

CHAPTER 1

PURPOSE AND NEED

This chapter presents the background, purpose and need, decisions to be made, proposed action, and issues considered for Motorized Travel Management for the Okanogan-Wenatchee National Forest (Forest). Additional documentation may be found in the project record located at Okanogan-Wenatchee National Forest Headquarters in Wenatchee, Washington. Some of this documentation is located on the project website

<http://www.fs.usda.gov/project/?project=46467>.

BACKGROUND

The Okanogan-Wenatchee National Forest has a long history of motorized recreation. Out of approximately 4.3 million total acres on the forest, nearly 2.6 million acres are open to motorized travel, on roads, trails, and cross-country. There are approximately 8,000 miles of National Forest System roads and 1,000 miles of motorized system trails that have been constructed over the past 60 to 70 years. In addition, there are many miles of unauthorized roads and trails spread across the 2.6 million acres, nearly all located on approximately 675,000 acres of forest land that is relatively flat and where the vegetation is open enough to allow vehicles to pass. People have created approximately 1,855 dispersed campsites (individual, user-created campsites, not part of a developed campground) along many open roads. People typically drive motorized vehicles to these campsites. Two distinct rock crawl areas, Moon and Funny Rocks, both on the Naches Ranger District, have been popular authorized destinations for rock crawlers since some of that land was acquired in 1986.

In 2005, in an effort to address resource impacts resulting from unmanaged motorized recreation, the Forest Service published the Motorized Travel Management Rule (36 CFR 212). This Rule requires that all national forests and grasslands designate roads, trails, and areas that are open to motor vehicle use under subpart B¹. Designations are to be made by class of vehicle and, if appropriate, by time of year, and to be displayed on a Motor Vehicle Use Map (MVUM). Motor vehicle use off designated roads and trails and outside designated areas would then be prohibited by regulation (36 CFR 261.13). The rule also contains provisions for limited motor vehicle use within a specified distance of designated open roads in order to access

¹ This project does not consider subpart A, which is being done across the Forest under separate NEPA analyses, or subpart C, winter use.

dispersed camping and for parking. The MVUM is to be updated and republished as needed, since travel planning will be an ongoing process.

In 2006 the Okanogan-Wenatchee National Forest set forth with the goal of establishing a clearly defined system of roads, trails, and areas where motorized use could occur across the 4.3 million acre landscape. Toward that end, the Forest sent scoping letters, hosted meetings and provided comment opportunities, gathering input from groups and individuals. Resource specialists worked to analyze effects of several alternative motorized travel systems. Given the size of the forest, environmental issues, and extensive existing road and trail system, the analysis was too complex to be covered in a single document, and the analysis process was paused in 2013. The Okanogan-Wenatchee National Forest Supervisor decided to reconsider the approach, taking on the task in a smaller, more manageable, and ultimately more responsive way.

Washington State House Bill 1632 was signed into law in July 2013. It established Wheeled All Terrain Vehicles (WATVs) as a new class of licensed motorized vehicles, setting the stage for land management agencies to designate which roads, if any, would be open to fully licensed WATVs.

The interdisciplinary team was reconvened in 2014 to analyze components of the Travel Management Rule that can be applied consistently across the forest to minimize the effects of cross country use of motorized vehicles. The existing, official system road and motorized trail network, and the Moon and Funny Rocks areas are the existing designated system on the forest, and do not need to be reconsidered to allow the existing authorized motorized uses to continue (USDA Motor Vehicle Route and Area Designation Guide, v. 111705). The forest-wide components that can be applied consistently include:

- minimizing the environmental effects of motorized access to dispersed camping by providing limited motorized access within defined corridors,
- closing the Okanogan-Wenatchee National Forest to motorized cross-country travel, and
- allowing WATV use on some open system roads.

In subsequent years, the Forest will have the opportunity to consider changes to the motorized system on a smaller district or zone-level, in response to public and resource management needs. During these subsequent analyses, the Forest would identify ways to minimize the effects of operating motorized vehicles on trails (minimization analysis), and incorporate these into future proposed actions. Site-specific road access and management decisions will continue to be made at the district level, allowing for additional public involvement. The many comments already collected will be available to each ranger district so that information can be used in future travel management proposals. Any subsequent travel management decisions will be incorporated into future versions of the MVUM.

The two other subparts of the Travel Management Rule (Subpart A, the administration of the forest transportation system, and Subpart C, which address over-snow vehicles) are included under separate analysis processes. Subpart A was completed in 2015, and identified potential changes to the Forest Service road system to address resource concerns and budget shortfalls, while providing access for resource management, fire suppression, and recreation. The results will be considered when proposed actions for road management projects are developed in the future. The Forest will complete Subpart C at some point in the future, but has not started the process yet.

DOCUMENT ORGANIZATION

The Forest Service has prepared this Environmental Assessment (EA) for public comment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. It discloses the direct, indirect, and cumulative environmental effects that would result from implementing the proposed action and alternatives to the proposed action. The purpose of this EA is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact.

This document contains the following:

- **Chapter 1. Purpose and Need for Action:** Provides information on the background of the proposal, the planning framework that guides management of this portion of the National Forest, the purpose and need for the project, and the agency proposal (Proposed Action) for achieving that purpose and need. This chapter also details how the Forest Service informed the public of the proposal and how the public responded. Finally, this chapter lists issues developed in response to the proposed action.
- **Chapter 2. Alternatives, including the Proposed Action:** Provides a detailed description of the proposed action as well as alternative methods for achieving the purpose and need. Mitigation measures and monitoring are also detailed. Finally, this chapter provides a summary table which compares the components and environmental consequences associated with each alternative.
- **Chapter 3. Existing Condition and Environmental Consequences:** Describes the existing condition of area resources and the environmental effects of implementing the proposed action and alternatives described in Chapter 2. Relevant direction from National Forest Land and Resource Management Plans and applicable laws and regulations are also detailed.

- **Literature Cited:** Includes the citations included throughout the document.
- **Appendices:** Provide more detailed information to support the analysis presented in the EA.

ANALYSIS AREA

The analysis area is the entire Okanogan-Wenatchee National Forest, focusing on areas currently open to cross-country motorized travel, and the existing road and trail system. The map on the following page shows the project location.

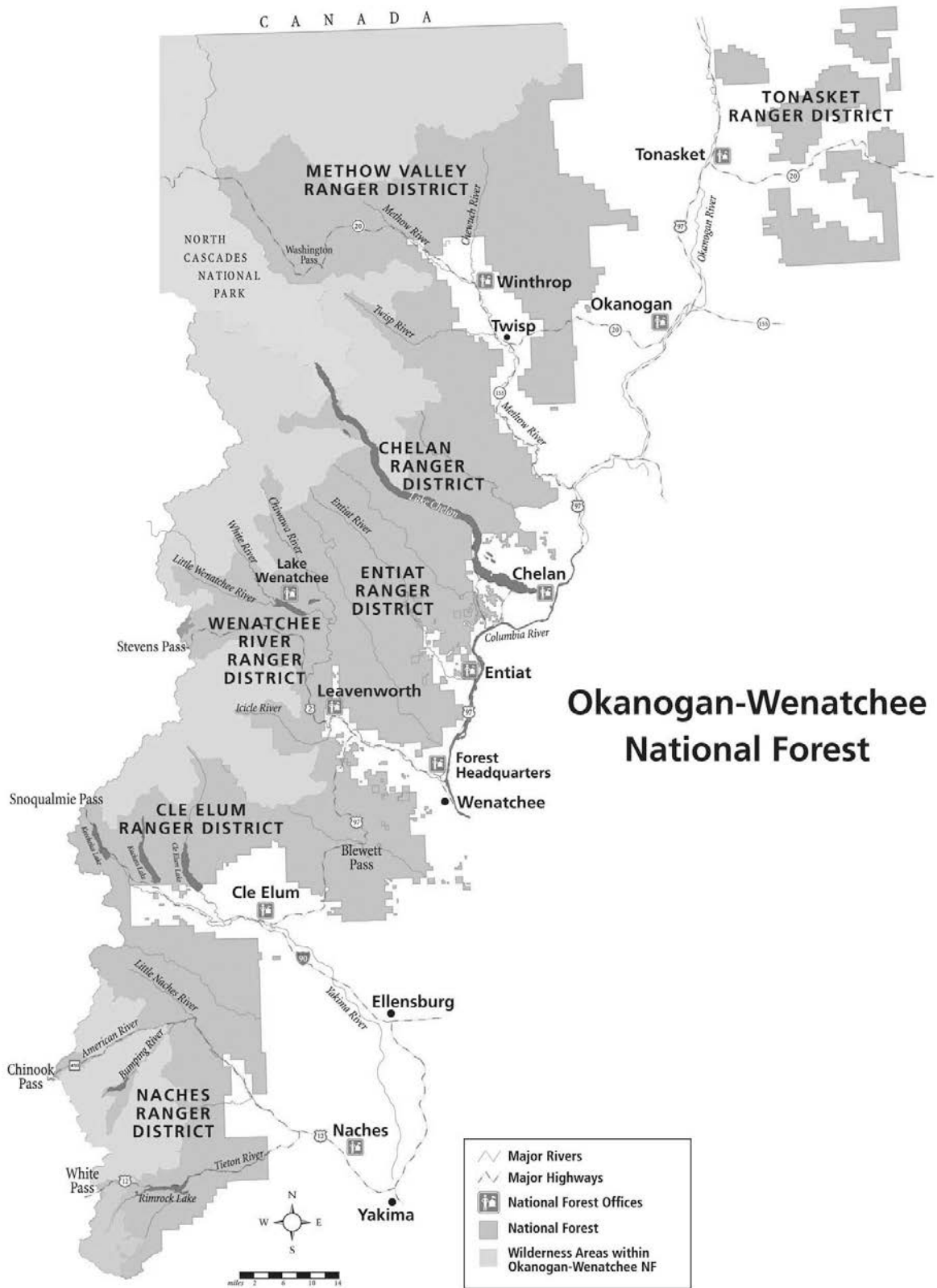


Figure 1. Analysis Area

REGULATORY FRAMEWORK

APPLICABLE LAWS AND REGULATIONS

A number of laws and executive orders, with implementing regulations as appropriate, are relevant to desired and existing conditions and purpose and need for this project. Many other laws, rules and regulations apply to this project and are covered in the resource analyses and findings in Chapter 3 of this document. Those specifically relevant to the Purpose of and Need for this project are detailed below:

Executive Orders

Two Executive Orders provide direction for ORV management on National Forest System lands- President Nixon's Executive Order 11644 – *Use of Off-Road Vehicles on the Public Lands* (February 8, 1972), and President Carter's Executive Order 11989 (*Off-road Vehicles on Public Lands*-May 24, 1977). These executive orders direct that the Forest Service "develop and issue regulations and administrative instructions... to provide for administrative designation of the specific areas and trails on public lands on which the use of off-road vehicles may be permitted, and areas in which the use of off-road vehicles may not be permitted." The 2005 Travel Management Rule implemented these Executive Orders. Thus, if this action meets the 2005 Travel Management Rule, then it meets the Executive Orders. The Executive Orders will not be discussed further.

Travel Management Rule

The Final Travel Management Rule was published in the Federal Register on November 9, 2005. This Rule requires that all national forests and grasslands designate roads, trails, and areas that are open to motor vehicle use on a Motor Vehicle Use Map (MVUM). Motor vehicle use off designated roads and trails and outside designated areas would then be prohibited by regulation (36 CFR 261.13). The rule also allows for designation of the limited use of motor vehicles within a specified distance of certain designated routes, referred to in this document as corridors, solely for dispersed camping. The MVUM is to be updated and republished as needed, since travel planning will be an ongoing process.

Criteria for Designation (36 CFR 212.55 (a) & (b))

The Travel Management Rule requires that, in designating roads, trails and areas open to motorized vehicles, the responsible official shall consider the effects of motor vehicles on a number of factors described in the regulation, including minimization criteria.

- Roads
The Forest completed the minimum roads analysis to meet the requirements of Subpart A. This is being further studied and incorporated into transportation management and restoration projects across the forest, on a project-by-project basis.

The purpose and need and proposed action for this EA does not include any changes to the National Forest system roads, in terms of maintenance level, seasonal closures, or mixed use designation, so additional minimization analysis on roads was not conducted for this EA.

- **Trails and Areas**

Since the purpose and need and proposed action does not include making any changes to the existing, designated National Forest system motorized trails, the trail minimization analysis was not conducted as part of this project. Rather, it would be done if changes to the motorized trail system were proposed in the future.

The proposed action was developed to specifically address resource concerns with cross country motorized travel. The resource analysis included in Chapter 3, and the corresponding reports in the analysis file demonstrate how closing cross country travel forest-wide, with the exception of the Moon and Funny Rocks areas, would minimize impacts to soil, water, aquatic resources, wildlife, vegetation, and heritage resources. It would also minimize conflicts between recreationists.

- **WATV Routes**

Again, the purpose and need and proposed action does not include making any changes to the designated National Forest System of roads, except where the proposal includes adding designation for WATV use on specific roads. The forest did complete a minimization analysis for every route considered for WATV travel. As described in the Public Involvement section, later in this chapter, several roads were proposed for WATV use with input from WATV riders, ATV clubs and conservation group representatives. Each proposed road was reviewed by ranger district resource specialists to determine potential effects on soil, hydrology, aquatic biology, wildlife habitat, vegetation, heritage resources, and other recreationists or forest visitors. Those roads where WATVs would create unacceptable impacts or resource concerns were eliminated from further consideration in order to minimize effects. Detailed information about this process is in the analysis file. The environmental effects of the proposed WATV roads are included in the resource sections of Chapter 3.

MANAGEMENT DIRECTION

Land and Resource Management Plans, as Amended

Management direction for the analysis area has been established by the Okanogan and Wenatchee National Forest Land and Resource Management Plans. Both Plans have been amended by both Regional and Multi-Regional amendments.

This analysis and document are tiered to the *Okanogan National Forest Land and Resource Management Plan Final Environmental Impact Statement* (USDA Forest Service 1989) and its accompanying *Land and Resource Management Plan* (Okanogan Forest Plan, USDA Forest

Service 1989), and the *Wenatchee National Forest Land and Resource Management Plan Final Environmental Impact Statement* (USDA Forest Service 1990) and its accompanying *Land and Resource Management Plan* (Wenatchee Forest Plan, USDA Forest Service 1990). Forest Plan standards and guidelines provide general direction for the administration of National Forest System land. Relevant standards and guidelines established by both Forest Plans for the purpose and need for this project are listed below.

Forest-wide and Management Area Specific Standards and Guidelines

Under the Wenatchee Forest Plan (USDA, 1990b), the Forest is managed as open to motor vehicles year round unless closed by Forest order. Motorized vehicle restrictions from the Okanogan Forest Plan (USDA, 1989) are displayed on the Travel Plan Map (USFS, 2005), which also displays temporary exceptions or restrictions under 36 CFR section 261.50, and identifies specific areas where seasonal and other restrictions for motorized use are in place for resource protection. As identified on the Travel Plan Map, cross-country motor vehicle travel is seasonally prohibited in some areas and many roads and trails are subject to travel restrictions for wildlife protection. Otherwise the travel plan shows areas as open for motorized use. Temporary exceptions to motorized vehicle closures and restrictions are posted at the appropriate Ranger District office and at the restricted area, road or trail.

The relevant Forest-wide Okanogan Forest Plan standards and guideline for travel management in relation to this project is (USDA, 1989b, p 4-50):

17-3: Areas, roads, and trails shall be designated open, closed, or restricted to motorized use to conform to management goals. These designations shall be displayed in the Forest Travel Plan (p. 4-38).

Relevant Wenatchee Forest Plan standard for travel management in relation to this project is (USDA 1990):

- Road Closures – The decision to close any Forest road will be made on a case by case basis. Unless there is a resource need documented in the project analysis, currently open roads will remain open and newly constructed roads will be closed to public access by vehicle (p. IV-102).

Both Forest Plans have Management Area specific management direction to maintain some management areas as semi-primitive motorized or semi-primitive non-motorized which resulted in the designation of trails as either motorized or non-motorized.

In 2005, both Forest Plans were amended by the R6 PNW Invasive Plant Management Record of Decision (USDA 2005). Standard 10 of the ROD requires the establishment of a system of roads, trails, and areas designated for motor vehicle use; and prohibition of use of motor vehicles off the designated system that is not consistent with the classes of motor vehicles and if applicable, the time of year designated for use.

PURPOSE AND NEED FOR THE PROPOSED ACTION²

The purpose and need of this project is to implement the requirements, under subpart B, of the 2005 Motorized Travel Management Rule and amend the Forest Plans to be consistent with the Rule. The Okanogan-Wenatchee National Forest Supervisor also intends to include a decision concerning the authorization WATVs on some National Forest System roads. In order to accomplish these and publish an MVUM, there is a need to:

- Prohibit motor vehicle travel off of the designated system of motorized roads, trails and outside of designated areas³, to minimize the effects of motor vehicles on resources.
- Standardize the approach to managing motorized vehicle use on maintenance level 1 roads, and comply with the Forest Service Handbook definition, which specifies that these roads are closed to vehicular (motorized) traffic, unless part of a Forest Service system motorized trail.
- Minimize impacts from motorized access to dispersed campsites while providing for limited motorized access along select designated system roads,
- Amend the Okanogan and Wenatchee National Forest Land and Resource Management Plans to clarify that, except for over-snow vehicle use, areas, roads, and trails shall be closed to motor vehicles unless specifically designated as open on an MVUM, and
- Allow WATVs on some currently open, National Forest System roads.

The Okanogan-Wenatchee National Forest currently manages the designated system of Forest Service roads and trails open to motorized travel as listed in the Forest Travel Management Atlas, and two rock crawl areas. Each road is assigned a maintenance level⁴, and each trail is designated as motorized or non-motorized. Motorized trails are designated for a specific

² The purpose and need was revised after public comment from the one that appeared in the December 2014 newsletter.

³ The Travel Management Rule defines limited exceptions to the cross-country travel prohibition.

⁴ Definitions of road maintenance levels, from FSH 7709.58, 10, 12.3:

Maintenance Level 1: assigned to intermittent service roads during the time they are closed to vehicular traffic.

Maintenance Level 2: roads open for use by high-clearance vehicles.

Maintenance Level 3: roads open and maintained for travel by prudent drivers in a standard passenger car. User comfort and convenience are low priorities.

Maintenance Level 4: roads that provide a moderate degree of user comfort and convenience at moderate travel speeds.

Maintenance Level 5: roads that provide a high degree of user comfort and convenience.

vehicle class⁵. Drivers are allowed to pull vehicles off open roads to park or let other vehicles pass, as long as no resource damage occurs.

There are existing seasonal closures on some roads and trails on the Forest. The Okanogan National Forest Travel Plan (April 2005) designates area closures, specific road and trail restrictions, and open routes through area closures on the Methow Valley and Tonasket Ranger Districts. Additional closure orders are used to limit or prohibit motorized vehicles on some roads and trails on these districts. The Chelan, Entiat, Wenatchee River, Cle Elum, and Naches Ranger Districts also use closure orders to limit or prohibit motorized vehicles on some roads and trails, and in some areas, but these orders are not shown on one consolidated map. Some roads on the Forest are identified as open for motorized mixed use, meaning unlicensed ATVs are authorized to operate on roads open to highway legal vehicles.

The Moon and Funny Rocks rock crawl areas have been used for the past 50-60 years, and the Forest Service has permitted events at these areas under special use permit subsequent to the acquisition of portions of these areas by the Forest Service in 1986.

Cross-country motorized use is currently allowed on approximately 2.6 million acres of National Forest System land, as long the regulation prohibiting operation of vehicles in a manner that damages or unreasonably disturbs the land, wildlife, or vegetation is met (36 CFR 261.15(h)). Use consistent with this regulation may include motorized use on maintenance level 1, decommissioned, and unauthorized roads not covered by seasonal or individual closures. In fact, the Okanogan Travel Plan specifically states that OHVs may be driven on roads that are blocked with rocks, trees or earthen barriers, and not open for passenger cars or trucks. Under this existing Travel Plan, once a road is blocked, it is considered part of the cross-country landscape, and therefore open unless designated closed. Approximately 2,557 miles of maintenance level 1 roads are present on the Forest, although many are overgrown with vegetation and some are difficult to access or have no attraction for vehicle operators.

The Okanogan and Wenatchee National Forests, have managed use on maintenance level 1 roads somewhat differently from each other as discussed below, and there is a need to standardize the approach, and comply with the Forest Service Handbook definition, which specifies that these roads are closed to vehicular (motorized) traffic.

The Okanogan Forest Plan states that “Areas, roads, and trails shall be designated open, closed, or restricted to motorized use to conform with management goals” and that “These designations shall be displayed in the Forest Travel Plan” (Standards and Guidelines, 17-3, pp. 4-50). The Okanogan National Forest Travel Plan (2005) states that:

If your OHV is not licensed, it may be used only on roads that are blocked with rocks,

⁵ Vehicles are divided into 3 classes: greater than 50 inches wide, such as a 4x4; less than 50 inches wide, such as an ATV; and motorcycles.

trees or earthen barriers and not open for passenger cars or trucks.

Because of this direction, all maintenance level 1 roads on the Methow Valley and Tonasket Ranger Districts are currently considered open for OHVs, unless specifically closed with a Code of Federal Regulations (CFR) legal order (36 CFR 261.54), or if they fall within an area closed to motorized vehicles.

The Wenatchee Forest Plan does not specifically address motorized use on closed roads. Management of these roads assumes they are closed to vehicular traffic. However, cross country travel is not prohibited or enforceable because it is not prohibited by CFR, so some closed roads receive vehicular use to the extent that they are physically accessible. In order to prohibit traffic use on a road, a CFR legal order must be approved and enforced. Only a limited number of maintenance level 1 roads on the Chelan, Entiat, Wenatchee River, Cle Elum, and Naches Ranger Districts are officially closed with a CFR.

Despite regulations against creating resource damage, such damage has occurred in some areas from cross-country motorized use. Many unauthorized motorized trails and roads have been created by motorized recreational use on the Forest.

The Travel Management Rule allows for limited corridors to be designated for motorized access to dispersed camping. The Okanogan Forest Plan requires provision for a variety of recreational experiences (p. 4-38), of which motorized dispersed camping is an important part. The Wenatchee Forest Plan does not include a similar standard and guideline, but requires that dispersed recreation sites be evaluated to determine if they meet present and future public expectations, needs, and desires, and if they have the resource capability of sustaining present or future levels of visitor use (p. IV-65). Open roads currently provide motorized access for dispersed camping across the Forest. A network of unauthorized or user-created access routes to dispersed campsites has developed over the years as people have driven off system roads to popular areas. Although some areas are currently closed to cross-country travel by orders or the Okanogan Travel Plan, most areas adjacent to open roads are currently open to cross-country travel since off-road use is not expressly prohibited.

PROPOSED ACTION

The proposed action below was sent to the public and agencies in December 2014. As a result of both public comment and mistakes found in the original proposed action map and described below, a revised proposed action was developed and is discussed in detail in Chapter 2. No changes are proposed for the existing Forest Service system of roads or trails. The reasons for the modifications to the original proposed action are detailed in the Chapter 2, under the description of Alternative B.

The Forest Supervisor for the Okanogan-Wenatchee National Forest proposes to close the Forest to cross-country motorized travel off the existing open National Forest System roads

(maintenance levels 2-5) and existing open system motorized trails. All system roads currently open for motorized use (maintenance levels 2-5) would remain open to highway legal vehicles during the existing seasons of use, with existing designations for vehicle types. All motorized system trails would remain open to current vehicle designations (greater than 50 inches, less than 50 inches, or motorcycle) during the existing seasons of use.

The Travel Management Rule does not require reconsideration of past management decisions, and the Forest is not proposing changes to existing road maintenance levels, or to the use designation of trails.

The proposed action would make the following changes:

- Prohibit cross-country motor vehicle use off the existing Forest Service system of roads and trails.
- All maintenance level 1 roads would be closed to motorized vehicles, unless currently part of a motorized system trail, in accordance with Forest Service Handbook direction (FSH 7709.58, 10, 12.3).
- Allow motor vehicle use up to 30 feet from the edge of all open system roads for parking, as long as resource damage does not occur.
- Allow WATVs to operate on approximately 350 miles of currently open National Forest System roads.
- Allow managed motor vehicle use off approximately 1,640 miles, or approximately 31% of currently open road for the purpose of accessing dispersed camp sites (as shown on the Proposed Action Map). The corridors would be 300 feet wide from the road centerline, on both sides of these roads. Within corridors, motorized vehicles would be restricted to existing routes, and vehicles would not be permitted within 100 feet of water. Some routes within these corridors have been improved to reduce environmental impacts (called Improved Sites in this document). Fences, boulders or other barricades, and/or signs define the acceptable travel routes. At these sites, vehicles would be allowed on the defined route, regardless of the proximity to water.
- Amend the Okanogan and Wenatchee National Forest Plans to make them consistent with the Travel Management Rule as follows:

The Okanogan Forest Plan currently contains the following forest-wide standard and guideline:

17-3 Areas, roads, and trails shall be designated open, closed, or restricted to motorized use to conform to management goals. These designations shall be displayed in the Forest travel plan (USDA 1989 page 4-50).

This would be amended as follows:

17-3 Except for over-snow vehicle use; areas, roads, and trails shall be closed to motor vehicles unless specifically designated as open on the motor vehicle use map. Open, closed, and restricted areas, roads, and trails shall conform to the goals of the

management area. Project-specific NEPA decisions may be made on a case-by-case basis to open, close, or restrict roads, trails, and areas based on the goals of the management areas; these changes would be displayed on future motor vehicle use maps. Over-snow vehicle use areas, roads, and trails shall be open, closed, or restricted consistent with the goals of the management area and designated on a map depicting authorized use.

The Wenatchee Forest Plan currently contains the following forest-wide standard and guidelines:

Road Operation

1. Road closures – The decision to close any Forest Road will be made on a case by case basis. Unless there is a resource need documented in the project analysis, currently open roads will remain open and newly constructed roads will be closed to public access by vehicle (USDA 1990, page IV-102).

Trail System Maintenance and Operation

1. The Forest trail system will provide for use by all specified modes of transportation as contained in the management prescriptions (USDA 1990 page IV-69).

These would be amended as follows:

Road Operation

1. Except for over-snow vehicle use, roads shall be closed to motor vehicle use unless specifically designated as open on the motor vehicle use map. Open, closed, and restricted roads shall conform to the goals of the management area. Project-specific NEPA decisions may be made on a case-by-case basis to open, close, or restrict roads, trails, and areas based on the goals of the management area with changes displayed on the subsequent motor vehicle use map. Over-snow vehicle use on National Forest System roads may be allowed, restricted, or prohibited consistent with the management area prescription.

Trail System Maintenance and Operation

1. The Forest trail system will provide for use by all specified modes of transportation as contained in the management prescriptions. Except for over-snow vehicle use, trails shall be closed to motor vehicle use unless specifically designated as open on the motor vehicle use map. Open, closed, and restricted trails shall conform to the goals of the management area. Project-specific NEPA decisions may be made to open, close, or restrict trails based on the goals of the management area with changes displayed on the subsequent motor vehicle use map. Over-snow vehicle use on National Forest System trails may be allowed, restricted, or prohibited consistent with the management area prescription.

The Wenatchee Forest Plan would additionally be amended to add the following standard and guideline (IV-69):

Motorized Areas

1. Except for over-snow vehicle use, areas shall be closed to motorized vehicles except where specifically designated open on the motor vehicle use map. Open, closed, and restricted areas shall conform to the goals of the management area. Project-specific NEPA decisions may be made to open, close, or restrict areas based on the goals of the management area with changes displayed on the subsequent motor vehicle use map. Over-snow vehicle use on National Forest System areas may be allowed, restricted, or prohibited consistent with the management area prescription.

DECISION FRAMEWORK

The Forest Supervisor of the Okanogan-Wenatchee National Forest is the Responsible Official, and will seek to provide the best compromise between all the Forest needs. The travel management rule, the Forest Plans as described earlier, and project purpose and need provide direction on decision criteria to use.

The Forest Supervisor of the Okanogan-Wenatchee National Forest will decide:

- Will the Forest be closed to cross country motorized vehicles off the existing National Forest System roads and motorized trails?
- Will there be corridors where limited motorized access for dispersed camping is allowed, and if so, where will the corridors be located?
- Will motorized vehicles be allowed on maintenance level 1 roads?
- Will WATVs be allowed to operate on Forest Service roads, and if so, which ones?
- How will the Forest Plan be amended to comply with the travel management rule?

PUBLIC INVOLVEMENT, TRIBAL CONSULTATION AND GOVERNMENT AGENCY INVOLVEMENT

TRIBAL CONSULTATION AND GOVERNMENT AGENCY INVOLVEMENT

The Forest Supervisor sent government-to-government letters to the Yakama Nation and the Confederated Tribes of the Colville Reservation on December 12, 2014 updating the tribes on the revised approach to Travel Management, describing the purpose and need, and proposed action, and inviting comments. The Confederated Tribes of the Colville Reservation responded in a letter dated January 28, 2015, stating that the Tribal Historic Preservation Officer concurred with the monitoring plan, and looked forward to reviewing the monitoring results.

The proposed action was also sent to the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Environmental Protection Agency, and the county commissioners for the affected counties.

The U.S. Fish and Wildlife Service and National Marine Fisheries Service expressed support for the proposal to prohibit cross-country motorized travel, and for closing maintenance level 1 roads to motorized use. They expressed concern over the potential impacts to threatened and endangered fish from motorized access to dispersed campsites within identified corridors, and about concentrating dispersed camping activities within the limited designated corridors. They also included comments that were outside the scope of the purpose and need, and suggested alternatives to the proposed action. Alternatives C and D were developed based on their suggested alternatives, and to address the concerns raised. Refer to the comment database in the project record on the Okanogan-Wenatchee National Forest website for more details.

The Environmental Protection Agency also expressed support for the proposed closure of cross-country motorized travel, but also had concerns about the corridors, and potential impacts to water quality and riparian areas from the motorized access. Some of their comments were outside the scope of the purpose and need. They suggested alternatives to the proposed action. Alternative C partially addresses their concerns. Refer to the Alternatives Considered but Eliminated section in Chapter 2 for an explanation of why some of EPAs suggested alternatives were not considered in detail. Also, refer to the comment database in the project record for more details about EPAs concerns and issues, and how these were used in the analysis.

The Okanogan County Commissioners responded by stating that the proposed action does not comply with the Travel Management Rule because it does not allow all types of motorized vehicles on all roads, specifically ATVs in compliance with Washington State Law #1632

(WATVs). They also felt the Forest Service was required to involve the commissioners in the development of the proposed action, and since this did not occur, the proposed action is invalid. The Travel Management Rule does not require designation of all types of motorized vehicles on all roads, but rather requires designation of roads, trail, and areas. Use of motorized vehicles off designated roads and trails and outside designated areas is then prohibited by regulation (36 CFR 261.13). The Forest Service has discussed the Travel Management process with the Okanogan County Commissioners at regularly scheduled meetings, and considered their input in the development of the proposed action and alternatives. Opening some National Forest System roads to WATVs was added to the proposed action to address some of the Commissioners' concerns. Refer to the comment database in the project record for more details about their concerns and issues, and how these were used in the analysis.

The Chelan County Commissioners commented, stating concern that the proposed action would limit public access to National Forest System Land, supporting additional opportunities for access. Refer to the comment database in the project record for more details about their concerns and issues, and how these were used in the analysis.

PUBLIC INVOLVEMENT

As described in the earlier Background section of this document, the Forest conducted public involvement and scoping between 2006 and 2010 on the original proposed action and analysis process. All comments received were recorded and analyzed for later use.

A newsletter describing the current Travel Management analysis process, including the purpose and need, and proposed action was sent on December 22, 2014 initiating scoping on a new proposal to all agencies, organizations, and individuals on the Travel Management mailing list. The newsletter, proposed action and purpose and need, and maps showing the proposed action were posted on the Forest's internet site. The site also included a link to submit comments online. Some mailing list members received hard-copy mail of the newsletter, which included the internet site address. Paper copies of the maps were provided on request. The newsletter requested comments be submitted by January 20, 2015. Some requests were submitted for an extension of the comment deadline, so the period was extended until January 30, 2015. The agency invited the submission of comments through a variety of other ways:

- Use of the Web site comment form (PDF that could be downloaded from the site)
- On-line comments
- Comments sent by postal service, delivery service, fax, or hand-delivered to any of the ranger district offices or the Forest Supervisor's Office

The Forest received 484 unique letters during the scoping period. Many commenters expressed support for portions of the proposed action, including the ban on cross-country

motorized travel, not adopting unauthorized roads and trails, and closure of all maintenance level 1 roads to motorized vehicles. Commenters felt these actions would be beneficial to the environment and would reduce user conflicts between motorized and non-motorized recreationists.

Many other people opposed the proposed action, feeling that it would substantially reduce motorized recreation opportunities, and that the assumed environmental effects from motorized vehicles were overstated or inaccurate. Many felt this would reduce public access to public land, and would interfere with the type of recreation they had been enjoying for many years.

Using these comments, and comments from other Federal, state, and local agencies, organizations and American Indian Tribal governments, the planning team developed a list of issues for the project. The following section includes all the issues raised during scoping, and Chapter 2 includes descriptions of all alternatives suggested. Refer to the comment database in the project record for information on all letters and comments received, and how each was used in the analysis process.

In a separate, focused process, the forest identified routes to open to WATVs by requesting input and ideas from WATV riders and ATV club members, and from conservation group representatives. District Rangers and resources specialists reviewed the suggested routes and input from the conservation groups, and recommended routes where no additional environmental impacts would be anticipated from allowing this new class of licensed motorized vehicles on roads currently open to other licensed motorized vehicles. The 350 miles of road were added to the proposed action for this Travel Management analysis.

ISSUES

Issues are unresolved conflicts concerning environmental effects that may occur as a result of implementing the proposed action. Issues provide focus for the analysis of environmental effects and influence alternative development, including development of mitigation measures.

Key Issues are used to formulate alternatives to the proposed action, prescribe mitigation measures, and analyze environmental effects. They are used to compare the alternatives in the Comparison of Alternatives Table in Chapter 2. One Key Issue was identified by the Interdisciplinary (ID) Team and approved by the Responsible Official.

In addition to the Key Issue, other concerns were raised. These concerns shaped the environmental and social analysis of each alternative, and are addressed in resource sections of Chapter 3.

Finally some issues were not considered further because each was; 1) outside the scope of the proposed action, 2) already decided by law or regulation, Forest Plan, or other higher level

decision, 3) irrelevant to the decision to be made, or 4) conjectural and not supported by scientific or factual evidence. The Council on Environmental Quality NEPA regulations require identification and elimination from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3).

Corrections or Clarification of the Proposed Action

Some concerns raised during scoping pointed out errors in the proposed action, or identified where additional clarification was needed. These concerns, and the changes made to the original proposed action are listed below.

Correction Issue #1. Proposed action would prohibit motorized vehicles in the Moon and Funny Rock areas on the Naches Ranger District. *This issue was used to correct the proposed action.*

Some commenters pointed out that the Moon and Funny Rock areas were not shown as open on the proposed action maps, nor described in the proposed action distributed on December 22, 2014. These long-established rock climb areas are existing, authorized motorized rock crawl areas that were inadvertently left out of the proposed action. The purpose and need and proposed action were corrected to include the areas.

Correction Issue #2: Several mapping errors were reported, where open system motorized trails or roads were not showing on the proposed action map, and some corridors were showing on non-National Forest System land. *This issue was used to correct the proposed action maps.*

Several comments were received pointing out trails or roads that were not showing on the proposed action maps, that the commenters felt were part of the existing road or trail system. Each road and trail was checked, and those that currently show in the forest's roads database (INFRA) as maintenance level 2, 3, 4, or 5 (system roads), or in the forest's trail database (INFRA) as a motorized system trail were added to the transportation system displayed on the proposed action map. The proposed action map also showed some corridors along National Forest System roads crossing non-National Forest System land. These corridors were removed from the map, and the miles of proposed corridor reduced to reflect the corrections.

Correction Issue #3: The proposed action must include provisions for access covered by Tribal treaty rights, the General Mining Act of 1872, permitted special use activities, disabled hunting areas managed by Washington State Department of Fish and Wildlife, and emergency response. *The proposed action was clarified to explain the exceptions to the prohibitions, covering these areas.*

Comments were received concerning currently authorized or permitted motorized use, wanting to ensure the proposed action would not change this use. The Travel Management Rule does not take away any statutory or treaty rights, and designations must recognize valid existing rights. Several exceptions to the limitation on motorized use are included in the Travel Management Rule, including aircraft, watercraft, limited administrative use, emergency purposes, national defense, law enforcement response, and use specifically

authorized under a written authorization. Refer to Alternative B description in Chapter 2 for more details.

Correction Issue #4: The proposed action should include monitoring to ensure compliance with the MVUM, and to minimize environmental effects. *A monitoring plan was added to all action alternatives.*

Comments were received stating that a monitoring plan would be needed to recognize violations to the MVUM, and to ensure the effects displayed in the EA accurately reflect the conditions on the ground. A mitigation measure and monitoring plan were developed and added to Alternatives B, C, and D. Refer to the Mitigation and Monitoring section in Chapter 2 for the detailed measures and plan.

Key Issues

Key Issue #1: The corridors for motorized access to dispersed camping included in the proposed action should be modified. *This issue was used to develop Alternatives C and D.*

A variety of comments were received concerning the corridors. Some expressed concern about the impact of motorized access within the corridors to threatened and endangered fish species. Alternative C was developed to address this side of the issue, by eliminating corridors within 300 feet of designated critical habitat.

Other comments included specific areas where the commenters felt corridors should be added, and other comments that were less specific, but stated that more corridors were needed so no motorized access to established campsites was lost. Other comments expressed concern that the limited amount of corridors would concentrate campers into the designated corridors, potentially increasing violations of the requirement to stay on existing routes, and changing the distribution of human-caused ignitions of forest fires. Alternative D was developed to address this side of the issue, placing corridors along on all maintenance level 2 through 5 roads. The potential effects to social, economic, and environmental issues, and the indicators used to analyze the alternatives, are specified below.

Key Issue #2: Allowing WATVs on road could cause resource damage, and create safety issues for other drivers. *This issue was used to develop Alternative C.*

Several comments were received expressing concerns about allowing WATVs to operate on National Forest System roads. Some people were concerned that the additional traffic would cause resource damage. Others were concerned that the WATVs would increase the risk of vehicle accidents, including collisions.

Concerns

The following concerns were identified by the public, tribes, planning team, and others. They were used to display the effects of the alternatives in Chapter 3.

1. **Proposed action would substantially reduce motorized recreation opportunities by limiting motor vehicle use to open system roads and trails, and closing the forest to cross-country motorized vehicles.**

Multiple comments were received expressing this concern. Several comments stated that unauthorized trails and roads are an important part of the current recreation experience. Others felt that maintenance level 1 roads provide important routes and links for motorized vehicles. Concern was also expressed over closing the forest to cross-country travel, stating that it would substantially reduce motorized recreation opportunities, and concentrate people onto designated open roads and trails, causing overcrowding and a decrease in the quality of the recreation experience on the open trails. Commenters expressed concern about the loss of family based recreation opportunities. Concern was also expressed about user conflicts between motorized and non-motorized recreationists on trails and in cross-country areas.

This issue is analyzed in the Recreation section in Chapter 3 using the following key indicators:

- Number of acres open for cross-country motorized use, and qualitative discussion of the loss of cross-country motorized recreation opportunities
- Miles of road open to motorized vehicles
- Number of miles of motorized system trails
- Qualitative discussion of the loss of access to unauthorized roads and trails
- Qualitative discussion of the effects of increased crowding on open roads and trails
- Qualitative discussion of changes in potential user conflicts between motorized and non-motorized recreationists.

2. **The proposed action would prohibit motorized access to some established dispersed campsites that are not within designated motorized access corridors, leaving some campsites difficult to access and potentially concentrating campers into designated corridors, therefore increasing the possibility of new access routes being created.**

Several comments were received. Some commenters were concerned they would lose motorized access to their favorite campsites. Others were concerned that displacing people who want to use established campsites not in designated corridors could increase the potential of new access routes being established within designated corridors as people look for places to drive to dispersed campsites.

The effects will be analyzed and included in the Recreation section of Chapter 3, using the following key indicators:

- Number of miles of designated corridors
- Approximate percentage of established dispersed campsites within designated corridors, and more than 100 feet from water, allowing motorized access directly to campsite
- Approximate percentage of existing campsites located along roads without corridors
- Qualitative discussion of potential changes in use patterns as a result of changes to motorized access for dispersed camping.

3. The proposed action could affect water quality, fish habitat, and riparian areas by prohibiting cross-country travel, closing maintenance level 1 roads, and by permitting motorized access for dispersed camping in designated corridors.

Many commenters supported the ban on cross-country travel because of the potential benefit to water quality, fish habitat, and riparian areas. Others supported closing maintenance level 1 roads to motorized vehicles to reduce potential impacts to these resources. Concerns were expressed over the impact of allowing motorized access for dispersed camping, especially near critical threatened and endangered fish habitat. Concern was also expressed that the project must comply with the Clean Water Act.

The effects will be analyzed in the Hydrology and Aquatic Habitat section of Chapter 3, using the following key indicators:

- Overall open road density
- Number of 5th Level HUs with open road density , 1 mi/mi²
- Number of 5th Level HUs with open road density between 1 mi/mi² and 2.4 mi/mi²
- Number of 5th Level HUs with open road density >2.4 mi/mi²
- Miles of open Forest Service roads in riparian reserves or RHCAs
- Miles of open Forest Service roads within 300 feet of Critical Fish Habitat
- Acres of Riparian Reserves or RHCAs with designated corridors
- Acres of corridors within 300 feet of Critical Fish Habitat

4. The proposed action could affect wildlife by prohibiting cross-country travel, closing maintenance level 1 roads to motorized use, and by allowing motorized access for dispersed camping in designated corridors.

Many commenters supported the ban on cross-country travel because of potential benefits to wildlife habitat, specifically with the reduction in noise disturbance. Concerns were expressed over the impact of allowing motorized access for dispersed camping, especially in critical threatened and endangered wildlife habitat. These

concerns were expressed for threatened, endangered, and candidate wildlife species, in addition to management indicator species, sensitive species; and land birds.

The effects will be analyzed in the Wildlife section of Chapter 3, using the following indicators:

- Determination of effects on threatened, endangered, proposed, sensitive, management indicator, and survey and manage species
- Acres and percent of habitat types within area open to cross country motorized travel
- Miles of road open to motorized vehicles and effect on security habitat for wildlife species
- Acres of habitat types within corridors, and qualitative discussion on effects to species

5. The proposed action could affect threatened, endangered, sensitive, and proposed plants, and change the establishment or spread of invasive species by prohibiting cross-country motorized travel, closing maintenance level 1 roads, and allowing motorized access for dispersed camping within corridors.

Comments were received expressing concern about vehicles spreading noxious weeds, and how motorized recreation can result in this spread. Concerns were also expressed about the potential effects to threatened, endangered, sensitive, and proposed plants from motorized access within designated corridors.

The effects will be analyzed in the Botany and Invasive Species sections of Chapter 3, using the following indicators:

- Acres open to motorized cross country travel
- Acres of riparian habitat open to motorized cross country travel.
- Acres of late successional habitat/old growth habitat open to cross country motorized travel
- Miles of road open to motorized use
- Acres of corridors in riparian habitat
- Acres of corridors in late successional/old growth habitat
- Number of endangered, sensitive, and survey and manage species within corridors
- Number of known endangered, sensitive and survey and manage sites within corridors
- Determination of effects to *S. oregano* var. *calva* and its Critical Habitat.

- Determination of effects to sensitive species

6. The proposed action could change potential impacts to heritage resources by closing cross-country travel, closing maintenance level 1 roads, and allowing motorized access for dispersed recreation within designated corridors.

This concern was raised by a commenter wanting to ensure that the Okanogan-Wenatchee National Forest meets the requirements for involving local Tribes in the planning and analysis of Travel Management to identify the impacts, and provide assurance that the Tribes' treaty rights and privileges have been addressed appropriately. Concern was also expressed about potential damage to heritage resources by motorized vehicle use within designated corridors.

The effects will be addressed in the Heritage Resource section of Chapter 3, using the following the following indicators:

- Number of known heritage resources potentially impacted by motorized cross country travel
- Miles of road open to motorized vehicles, potentially impacting unknown heritage resources
- Number of known heritage resources within corridors
- Acres of high, moderate, and low probability areas within corridors

7. The proposed action would have an effect on local economies by changing the number of people visiting local communities for recreation, and potentially impacting minority and low-income populations

Some commenters expressed concern that the reduction in motorized recreation opportunities would reduce recreation-based income, hurting the economies of the local towns. Others felt that reducing motorized recreation would increase recreation-based income because more non-motorized recreationists would visit the forest, spending more money on average than motorized recreationists. Concern was also expressed that limiting motorized recreation opportunities could disproportionately impact minority and low-income populations.

The effects will be analyzed in the Economics section of Chapter 3, using the following indicators:

- Estimated employment and labor income from motorized recreation.
- Role of Forest Service recreation visitor spending to local economy
- Qualitative discussion of effects to communities of interest

8. The proposed action could affect air quality by prohibiting cross-country motorized use and closing maintenance level 1 roads.

Several comments were received expressing concern about dust and exhaust from motorized vehicles, and the required compliance with the Clean Air Act.

The effects will be analyzed in the Air Quality section of Chapter 3, using the following indicators:

- Qualitative discussion concerning air quality and the Clean Air Act.

Issues Not Considered Further

The following issues were not considered further because they were; 1) outside the scope of the proposed action, 2) already decided by law or regulation, Forest Plan, or other higher level decision, 3) irrelevant to the decision to be made, or 4) conjectural and not supported by scientific or factual evidence. Each issue is underlined, with the reason for no further consideration following.

1. Proposed action should open all roads to WATVs or ATVs.

Multiple comments were received concerning support for, or disagreement with House Bill 1632. Many felt that it automatically opened all Forest Service roads to WATVs. House Bill 1632 has already been decided by law and is outside the scope of this analysis. The Travel Rule directs designating roads, trails and areas by type of use. It does not require opening all roads or trails to all types of vehicles, therefore this is outside the scope of this analysis.

2. Proposed action would limit public access to public lands by eliminating cross country travel, blocking use of non-system roads and trails.

Multiple comments were received on this topic. The purpose and need is to prohibit motorized use off of the designated system and outside of designated corridors, not to provide for new system road and trail opportunities. Changes to public access as a result of the prohibition on cross-country use are covered in the effects analyses in Chapter 3.

3. The proposed action would not close, decommission or add any system roads or system trails, nor would it change any existing seasons of use; existing impacts would continue.

Several comments were received expressing concern about the existing road and trail system – such as road and trail density, erosion, completing and implementing a minimum roads analysis. Commenters also said that motorized vehicles should (or should not) be allowed on unauthorized, or non-system roads and trails or they requested modifications to the existing system. Changes to the open National Forest system road and trail network, maintenance levels, seasons of use and status of trails are outside the scope of this analysis since the purpose and need is to prohibit motorized use off of the designated system and outside of designated corridors.

Adding unauthorized roads or trails to the system may be considered in future projects, as may changes to the existing road and trail system.

4. **Allowing vehicles to be parked up off roads would lead to resource damage.**

The use of designated roads and trails includes the ability to park a motor vehicle on the side of the road when it is safe to do without causing damage to National Forest System resources or facilities, unless prohibited by state law, a traffic sign or an order (36 CFR 261.54). The road designation must identify that vehicles can park within one vehicle length, or within a specified distance of up to 30 feet from the edge of the road surface (FSM 7716.1). Alternative distances were considered (refer to Alternatives Considered But Eliminated #6 in Chapter 2). Since the purpose and need does not include making any changes to the National Forest System roads (which currently include roadside parking), prohibiting roadside parking would be outside the scope of this analysis.

5. **Comments were received stating that the safety analysis the Forest Service conducted as part of the previous Travel Management analysis process to determine roads where new mixed use could be considered was flawed.**

The purpose and need does not include making changes to mixed use designations on roads, but a new safety analysis was conducted on the roads considered for opening to WATVs. The results of this safety analysis are included in the Recreation section in Chapter 3. The safety analysis conducted for the previous Travel Management planning process is outside the scope of the current analysis.

6. **Trail and road maintenance is needed on many routes.**

Some comments were received concerning the condition of open roads or trails, lack of maintenance, needed trail bridges, etc. Road and trail maintenance is outside the scope of the purpose and need to implement the requirements of the 2005 Motorized Travel Management Rule and amend the Forest Plans to be consistent with the Rule.

7. **The proposed action would violate the Americans with Disabilities Act, and discriminate against elderly people and people with disabilities.**

The purpose and need is to prohibit motorized use off of the designated system and outside of designated corridors, and would not discriminate against the elderly and people with disabilities. The comment and response to the 2005 Travel Management Rule states, "Under section 504 of the Rehabilitation Act of 1973, no person with a disability can be denied participation in a Federal program that is available to all other people solely because of his or her disability". In conformance with section 504, wheelchairs are welcome on all National Forest System lands that are open to foot travel and are specifically exempted from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery-powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service's motorized travel management program (7 CFR 15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory."

8. The proposed action may affect wilderness; either by adding wilderness or by reducing the quality of wilderness.

Some comments were received expressing concern that this action would lead to creation of more wilderness. Others expressed concern that allowing motorized vehicles in or near wilderness would decrease the quality of the wilderness. Wilderness designation is outside the scope of this analysis. The purpose and need is to prohibit motorized use off of the designated system and outside of designated corridors. Motorized vehicles are prohibited in Wilderness areas by law.

9. The Okanogan-Wenatchee's approach to Travel Management is (or is not) flawed.

Several comments were received concerning the current approach to this analysis. Some expressed frustration with how long the forest has been working on the analysis, and that their input (concerning which roads and trails to add to the system) up to this time is being ignored. Others expressed concern about having the ranger districts analyze changes to the Forest System roads and trails at a later date, believing that districts lack the ability to consider trails connecting to other districts and to fully analyze cumulative effects, and that adequate public involvement would not occur. The opposing opinion was also expressed. These concerns do not pertain to potential environmental or social effects of the proposed action, but rather to the process being followed. As stated in the Background section earlier in this chapter, the current approach will allow more focused public involvement concerning any potential changes to the National Forest System roads or trails, and site specific analysis of the environmental and social effects. Any future analysis will be conducted on entire trails, even if they cross district boundaries, would include public involvement, and would fully analyze cumulative effects.

10. Concerns were expressed about the methods and environmental impacts of constructing, maintaining, closing or decommissioning roads; including maintenance level 1 and unauthorized roads.

Constructing, maintaining, physically closing and decommissioning roads is outside the scope of the purpose and need to prohibit motorized use off of the designated system and outside of designated corridors. The annual motor vehicle use map (MVUM), published as a result of this decision, would make it illegal to use motorized vehicles on maintenance level 1 or unauthorized roads. The minimum roads analyses may result in proposals to close roads on the ground, and would be addressed in the appropriate level of NEPA analysis, documentation and decision.

11. Concerns were expressed that restrictions on motorized vehicles within corridors for motorized access to dispersed camping would close trails that cross rivers or creeks.

No changes to the existing National Forest System motorized trail network are proposed. Any system motorized trail passing through corridors would remain open to the current authorized use.

12. The proposed action should include a framework to provide for a continued working relationship between the Forest Service and the motorized recreation community.

Working relationships are important, and the Forest Service will continue to work with members of the motorized recreation community to continue providing motorized recreation opportunities on National Forest System land.

13. The proposed action is not consistent with the 68264 Final Rule which required a firm commitment to motorized recreation.

The Travel Management Rule (68264 Final Rule) requires forest to designate routes and areas, if warranted, open for motorized vehicles, and publish a map showing those routes. Under the rule, once the map is published, all cross-country motorized travel is prohibited in areas not shown as open on the MVUM. The proposed action and purpose and need will allow the Okanogan-Wenatchee National Forest to comply with the rule.

14. The proposed action does not include winter recreation.

Winter motorized recreation is outside the scope of the purpose and need, which addresses Subpart B of the Travel Management Rule. Subpart C, which addresses winter motorized recreation will be completed by the forest at a later date, under a separate analysis.

15. The proposed action should implement a minimum roads plan.

Minimum roads analysis is outside the scope of the purpose and need to prohibit motorized use off of the designated system and outside of designated corridors. Minimum roads analysis was completed in 2015. Subsequent project level NEPA would analyze recommendations from minimum roads analysis and any decisions would be reflected on subsequent MVUMs.

16. Travel analysis for the purpose of determining a minimum road system is separate from motorized travel management.

For the purpose of informing motorized travel management decisions, the responsible official (Forest Supervisor) had the ability to determine the appropriate scale and detail of travel analysis needed. Travel management decisions do not need to be completed at the same scale as travel analysis. Previous administrative decisions may be incorporated. Thus, the Forest has complied with agency direction.

17. Roadless Areas should be designated as non-motorized.

Motorized status of roadless areas is outside the scope of the purpose and need to prohibit motorized use off of the designated system and outside of designated corridors.

18. Concerns were expressed about the effect of motorized vehicles on trails.

Some commenters had concerns that motorized vehicles cause excessive damage to trails, while others felt that motorized recreationists invest more time volunteering to accomplish trail maintenance, leading to better maintained trails. The condition of National Forest System motorized trails is outside the scope of this analysis, which is focused on cross-country travel off existing designated roads, trails, and areas.

19. The proposed action could result in increased response times during fire suppression, leading to larger, more destructive fires.

There is no factual evidence that the proposed action would increase response times since this project would not close any roads on the ground. Although ML1 roads would be closed to motorized use, exemptions to this are permitted for emergencies, including fires [36 CFR 212.51(a)]. NEPA documents prepared to implement minimum roads analysis are being conducted across the forest, and are the appropriate analysis to address this issue.

20. The proposed action would not allow people to hide motorized vehicles well off roads when hunting, or picking mushrooms or berries, creating a safety hazard.

Roadside parking is part of the designated road network, and therefore not proposed to change. Motorized vehicle travel beyond this 30 feet, outside designated corridors or areas, is considered cross-country travel, and prohibited by the Travel Management Rule.

21. The proposed action should include a ban of cross-country travel by any user group.

A ban on all cross-country travel by any method is outside the scope of the purpose and need, which specifically addresses where motorized vehicles are permitted. Any changes or limitation on non-motorized methods of travel or recreation are outside the scope of the analysis.

22. The trail system should be designed to protect the solitude of Roadless Areas, undeveloped areas and Wilderness.

Changes to the current trail system are outside the scope of the purpose and need since it does not include making any changes to the current motorized trail system on the forest.

23. Some people submitted comments on the 2009 proposed action, in response to comments based on that action, or responses to other commenters on this proposed action.

Comments received in response to the 2009 proposed action are outside the scope of this analysis. The 2009 proposed action is different than the current proposed action, and included proposed changes to the National Forest System motorized trail system. These comments are on file and will be considered in subsequent Subpart B analyses, and when developing the upcoming site-specific proposals regarding changes to roads and motorized trails. Responses to other commenters were noted, but did not alter the original comment.

24. Successful implementation of a Travel Management Plan would rely on adequate enforcement and education.

Education and enforcement are important aspects to the implementation of Travel Management. Once a decision has been made and the MVUM has been published, education and enforcement plans will be developed.

25. Concern was expressed that the Nature Conservancy may prohibit motorized vehicles on trails crossing their newly acquired land adjacent to the Cle Elum Ranger District.

This issue is beyond the scope of this analysis since it does not pertain to National Forest System land.

26. Commenters provided advice and guidance on proper development of an EIS.

An EA is prepared to determine if there are significant effects. A subsequent EIS would be prepared if the analysis showed that there would be significant effects associated with the proposed action or alternatives. It is the intent that the analysis and documents comply with applicable laws, policies and regulations.

27. Commenters expressed concern about their ability to understand the maps and about not being able to find non-system routes.

The maps were posted on the Okanogan-Wenatchee Forest website, and covered the entire forest. The format allowed the viewer to shift the location and increase the scale of any areas of interest. Larger-scale, or more geographically focused paper maps were provided to everyone requesting them. Non-system roads and trails were not displayed as part of the proposed action since they are not part of the National Forest transportation system. The proposal is to close the forest to cross country travel which would include prohibiting travel on non-system routes. When a decision is made, the designated motorized system will be displayed on the national standardized Motor Vehicle Use Map.

28. Gating or physically blocking trails leading to Wilderness would be cost prohibitive.

Making any changes to existing system trails, including installing gates or blocking trails, is outside the scope of the purpose and need.

29. Concern was expressed about how motorized vehicles contribute to climate change.

This issue is outside the scope of the analysis. The proposed action would not change the use of carbon emitting vehicles.

30. Several issues and concerns were raised that are outside the scope of the analysis because they do not pertain to the purpose and need, or Travel Management. These include the following:

- fallout from chemical trails from jets
- clearcutting
- opening the Twisp and Chewuch River drainages for firewood cutting

- support for the North Summit Horsecamp
- opposition to the National Recreation Area on the Okanogan-Wenatchee National Forest proposed by the Yakima Working group
- concern over the Umpqua National Forest Travel Management process.