



United States
Department of
Agriculture

Forest
Service

Southwestern
Region

September 2011



Response to Comments

Coconino National Forest Travel Management Final Environmental Impact Statement

Volume II



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Printed on recycled paper – September 2011

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Response to Comments

Public responses on the Coconino National Forest Travel Management Plan Draft Environmental Impact Statement were analyzed and categorized using a process called content analysis. This document provides responses to all of the issues brought up in comments received during the comment period on the Draft Environmental Impact Statement by providing specific responses to actual comments that represent specific issues.

The content analysis process consists of sorting responses, analyzing them, entering the analysis into a database, and using database reports to write a Summary of Public Comment that summarizes the concerns raised in the public comments. This document then provides specific responses to the Summary of Public Comment. The goals of the analysis process are to:

- Ensure that every response is considered,
- Identify the concerns raised by all respondents,
- Represent the breadth and depth of the public's viewpoints and concerns as fairly as possible, and
- Present those concerns in such a way as to facilitate the Forest Service's consideration of comments.
- Provide thoughtful and detailed responses to all of the issues and concerns submitted in public comment.

A public comment is a single, whole submission that may take the form of a letter, email, fax, presentation at a public meeting, etc. These submissions are sorted to identify all unique public comments. Some letters are signed by different individuals but have identical content; these are called "form letters," and only one example of each form letter type is analyzed as a unique public comment. Some individuals have submitted form letters but have added information to them; these are called "form plus letters," and only the added information that is not redundant to the content of the form is analyzed as a unique public comment.

The final analysis of public comments focuses on submitted main areas of concern, and a formal list of public concern statements. Each public concern statement is accompanied by one or more sample excerpts from original public comment. Public concern statements were not written for comments that were route- or district-specific. These comments were identified and responded to separately to more clearly address the site-specific nature and issue in the comments.

This process and resulting documentation do not replace comments in their original form. Rather, they provide a map to the comments and provide a method to respond to public comment in a clear manner. It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that provide the basis for modifications to planning documents and decisions. Further, because those who submitted comments are self-selected, they do not constitute a random or representative

public sample. The Forest Service encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Public comment may therefore include State, local, and tribal governments; organizations (or public interest groups); businesses; people from other countries; children; and people who submit multiple comments. All unique input is read and evaluated, and the analysis team attempts to capture all relevant public concern in the content analysis process.

Chapter 1. Decision Making Process, Public Involvement, and Coordination

Category	Public Concern	Comment	Response
Management Priorities	1-1 The Forest Service should include recent guidance from the Secretary of Agriculture	<p>REGARDING RESTORATION FOR THE BENEFIT OF WATER RESOURCES AND THE CLIMATE IN THE TRAVEL MANAGEMENT PROCESS</p> <p>Significant development occurred on December 17, 2009, when Agriculture Secretary Tom Vilsack announced, “Our shared vision begins with restoration. Restoration, according to the Forest Service, means managing forest lands first and foremost to protect our water resources, while making our forests more resilient to climate change.” Forest Service 2009b. Resiliency is the capacity to recover and return from a disturbance (whether natural or anthropogenic) to its pre-disturbance state and sustain ecosystem function. Forest Service 2008a:24; Herrick et al. 1999. Biological integrity, a key prerequisite for resilient landscapes, is the capacity of an ecosystem to support and maintain a biota that is comparable to that found in natural conditions. Forest Service 2008a:23; Frey 1977; Karr et al. 1986. Secretary Vilsack subsequently stated, “Developing a new [Forest Plan Revision] planning rule provides the opportunity to manage national forests and grasslands for the benefit of water resources, the climate and local communities.” Forest Service 2009a. The Forest Service (2009a) presented “Potential Principles” that could guide development of a new planning rule which include an emphasis on:</p> <ul style="list-style-type: none"> -Restoration -Conservation -Improved resilience of ecosystems 	#175.142.11000.160: The Coconino National Forest is implementing the Travel Management Rule by designating a system of roads, trails, and areas for motorized use. This is expected to reduce ongoing impacts from unmanaged motorized use and is fully consistent with objectives to restore Forest resources by increasing the resiliency of our landscapes.

Category	Public Concern	Comment	Response
		<ul style="list-style-type: none"> -Watershed Health -Climate Change Response -Species Diversity -Wildlife Habitat -Sustainable National Forest Lands -Proactive collaboration -Working Across Landscapes <p>This general guidance should be incorporated into all USFS planning and management, including the TMP [Travel Management Process]. (Preservation/Conservation, Santa Fe, NM - #175.142.11000.160)</p>	
<p>Management Priorities</p>	<p>1-2 The Forest Service should plan for a managed road and trail system that accommodates all user groups.</p>	<p>TO COMPLY WITH THE AGENCY’S DIRECTIVES AND THE TRAVEL MANAGEMENT RULE</p> <p>Our [Motorcycle Industry Council, Specialty Vehicle Institute of America, BlueRibbon Coalition, and Coconino Trail Riders] concern with the DEIS begins immediately from the overly-defensive and incorrect assertion that “the intent of the TMR” and related authorities is “to address unacceptable resource damage created by increased recreational motorized use across the forest.” DEIS at 4. In reality, the 2005 Travel Management Rule (“TMR”)(70 Fed. Reg. 68264 et seq., Nov. 9, 2005; 36 CFR Parts 212, 251, 261, and 295) is not a “closure” directive as portrayed by some preservationist special interests. The then-Chief Dale Bosworth stated upon release of the TMR that “[I]and managers will use the new rule to continue to work with motorized sports enthusiasts, conservationists, state and local officials and others to provide responsible motorized recreational experiences in national forests and grasslands for the long run”. USDA Forest Service, News Releases, “USDA Releases Final rule for Motorized Recreation in National Forests and Grasslands,” dated November 2, 2005. “A managed system of roads, trails, and area designated for motor vehicle use will better protect natural and</p>	<p>#202.1-2.12220.162:</p> <p>The Coconino Travel Management EIS includes several alternatives designed to designate a system of motorized use across the Forest. The designation of motorized use is expected to reduce impacts from motorized use currently occurring as a result of unmanaged motorized use, not only as a result of recreational motorized use. The EIS is an attempt to move from the current system where motorized use is occurring in sensitive areas and causing user conflict. The Travel Management EIS is an effort to manage motorized use by working with all groups, including OHV enthusiasts, to comply with not only the agency’s own directives but also the Travel Management Rule. The Coconino National Forest Travel Management EIS doesn’t include all user-created routes currently being used; however the large majority of</p>

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		<p>cultural resources, address use conflicts, and secure sustainable opportunities for public enjoyment of national forests and grasslands.” Travel Management Rule Final Communication Plan, November 2, 2005, p.5.</p> <p>In fact, “it is Forest Service Policy to provide diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability.” Forest Service Manual 2353.03(2); see also, 70 Fed. Reg. 68264 (“motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests in the right places and with the proper management.”). The Forest Service should be planning for a managed system, and working with all groups, including OHV enthusiasts, to comply with not only the agency’s own directives and the Travel Management Rule, but the policies behind the Rule. (Motorized Recreation, Boise, ID - #202.1-2.12220.162)</p>	<p>routes designated in all alternatives are available for use by all vehicle types (including ATVs and motorcycles). Unauthorized routes were considered and included in some circumstances; however, a preponderance of unauthorized routes are not appropriate for designation because they result in impacts to one or more Forest resources such as soil and water, recreational use, vegetation, wildlife habitat, and archeology. The Coconino National Forest recognizes that the Motor Vehicle Use Map resulting from the Travel Management is the initial comprehensive effort toward designating motorized use. As use continues to evolve and change, the Coconino National Forest hopes to continue working with all groups to improve the design and implementation of motorized use on the Forest.</p>
Management Priorities	1-3 The Forest Service should choose to implement those items that are easily understood and can be effectively enforced.	<p>THE FOREST SERVICE SHOULD CHOOSE TO IMPLEMENT THOSE ITEMS THAT ARE EASILY UNDERSTOOD AND CAN BE EFFECTIVELY ENFORCED</p> <p>These forests are large; the management of them is costly. Pick your battles and choose to implement the issues that can be clearly understood by the masses and enforced in a cost-effective manner. Get the greatest value from the simplest restrictive actions. Yet, overall...remember the purpose of forest management. Keep our public lands as public as possible. Please. (Individual - #218.2.14000.125)</p>	#218.2.14000.125: Thank you for your comments. The Coconino National Forest Travel Management EIS is not expected to resolve all Forest management issues. While the EIS will include increased management of motorized use across the Forest, it is not meant to make the National Forest less accessible to the public. The Travel Management planning effort is meant to increase the effectiveness of managing motorized uses to reduce Forest impacts while still allowing multiple uses across the Forest. The designation of a system for

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			<p>motorized use has been implemented in other National Forests throughout the nation and has been studied showing an improvement in public lands management (Divine and Foti 2004).</p>
<p>Management Priorities</p>	<p>1-4 The Forest Service should resist moving toward the model of forest and trail management used by the Forest Service in the Sedona area.</p>	<p>BECAUSE THE SEDONA FOREST SERVICE MISUSES FUNDS AND DOES NOT SUPPORT HIKING IN THE FOREST</p> <p>The U.S. Forest Service in the Sedona area has for years charged for use of the trails. They have the backing of multiple volunteer agencies to do their work for them. Volunteers do the rescue work for hikers in distress.</p> <p>Volunteers do the trail maintenance. Volunteers man the ranger station and the list goes on and on. They have chosen to use the monies available to them for a multimillion-dollar ranger station at the southern border of Sedona. In all the years we've hiked on the Sedona trails, we have encountered Forest Service personnel once and that person made it clear that people were not welcome to hike the trails of Sedona and that the Forest Service was definitely trying to make it much more difficult to do so.</p> <p>(Individual, Sedona, AZ - #16.5.14000.125)</p>	<p>#16.5.14000.125: The Coconino National Forest depends heavily on volunteers to manage the National Forests for public use and sustainable resources. The Travel Management DEIS will result in no management changes affecting non-motorized uses such as hiking. The Travel Management DEIS doesn't include any proposals to charge for access.</p>

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Management Priorities	1-5 The Forest Service should support organization of a trail maintenance and monitoring program staffed by volunteer users of the trail system.	<p>TO HELP POLICE TRAIL USE</p> <p>If the concern is abuse, I believe we (users of the trails) could organize a self-policing, department-trained group of individuals dedicated to preserving the wonderful experience these trails provide. (Individual - #50.3.14220.165)</p>	<p>#50.3.14220.165: Although abuse of public lands does unfortunately exist, the Coconino Travel Management Plan is designed to reduce impacts to Forest resources from unmanaged motorized use. Unmanaged motorized use means that there are many roads and trails located in areas where appropriate or inappropriate motorized use may cause unnecessary resource impacts. For example, even the responsible use of motorized vehicles in endangered species habitat may result in noise disturbance or reduced vegetation, which can harm one or more individuals. There are also many areas where routes go through archeological sites, and regular use increases erosion and negatively impacts these sites. The Coconino National Forest Travel Management EIS is expected to designate a system for motorized use while maintaining and improving Forest resources so that motorized and non-motorized Forest visitors can continue to experience and enjoy the Forest.</p>

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		<p>TO PROVIDE OVERSIGHT AND TRAIL MAINTENANCE It seems to me that if area management is an issue, then a program including administrators and volunteers could provide oversight and trail maintenance rather than close riding areas. My vote would be for alternative/option 1 with volunteer help from responsible groups and clubs. (Individual - #9.2.14220.500)</p>	<p>#9.2.14220.500: Increased help from volunteers would no doubt be valuable in helping to manage Forest resources, but this alone is not a solution. The Coconino Travel Management Plan is designed to reduce impacts to Forest resources from unmanaged motorized use. Unmanaged motorized use means that there are many roads and trails located in areas where appropriate or inappropriate motorized use may cause unnecessary resource impacts. For example, even the responsible use of motorized vehicles in endangered species habitat may result noise or reduced vegetation, which can harm one or more individuals. There are also many areas where routes go through archeological sites or in riparian areas, and regular use increases erosion and negatively impacts these sites. The Coconino National Forest Travel Management EIS is expected to designate a system for motorized use while maintaining and improving Forest resources so that motorized and non-motorized Forest visitors can continue to experience and enjoy the Forest. The designation of a system for motorized use has been implemented in other National Forests throughout the nation and has been studied showing an improvement in public lands management (Divine and Foti 2004).</p>

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Management Priorities	1-5 The Forest Service should support organization of a trail maintenance and monitoring program staffed by volunteer users of the trail system.	<p>TO ALLOW FOR MORE TRAILS TO REMAIN OPEN FOR MOTORIZED USE</p> <p>Perhaps I have not seen a representative sample, but the trails I am aware of near Flagstaff are often cared for by motorcyclists. My impression is that the Coconino Trail Riders have been responsible stewards and partners for years. It would seem that all those volunteer hours were invested in vain. Closing trails with the idea that some of them may one day be reopened is not only unreasonable and inefficient; it sets everyone up for an antagonistic future that will do nothing to protect the natural resource, as users who previously felt invested in forest protection become marginalized.</p> <p>Trails that are open to OHV use today, and have been for years without unreasonable degradation, should remain open. If you need to rehabilitate certain areas or limit travel, you should partner with OHV clubs not only for the volunteer hours required for the work, but also to create buy in from the community on your goals.</p> <p>Responsible OHV use is a legitimate use of the forest. Your plan makes a mockery of fair public process. (Individual, Colorado Springs, CO - #76.2.14220.530)</p> <p>If you take the time to realize that clubs such as Coconino Trail Riders, Arizona Trail Riders, FASTR motorcycle club would be willing to donate time to maintain said trails. If you are understaffed, we understand, but do not close trails just because of it. That is wrong! (Individual - #77.4.14220.530)</p>	<p>#76.2.14220.530: We agree that responsible OHV recreation is a legitimate use of Coconino National Forest lands. The Coconino Travel Management Plan is designed to reduce impacts to Forest resources from unmanaged motorized use. Unmanaged motorized use means that there are many roads and trails located in areas where appropriate or inappropriate motorized use may cause unnecessary resource impacts. For example, even the responsible use of motorized vehicles in endangered species habitat may result noise or reduced vegetation, which can harm one or more individuals. There are also many areas where routes go through archeological sites or in riparian areas and regular use increases erosion and negatively impacts these sites. The Coconino National Forest Travel Management EIS is expected to designate a system for motorized use while maintaining and improving Forest resources so that motorized and non-motorized Forest visitors can continue to experience and enjoy the Forest.</p> <p>#77.4.14220.530: The Coconino National Forest Travel Management EIS does not include trail closures solely because they might not be adequately maintained to standard based on current resources. The Coconino Travel Management Plan is</p>

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			<p>designed to reduce impacts to Forest resources from unmanaged motorized use. Unmanaged motorized use means that there are many roads and trails located in areas where appropriate or inappropriate motorized use may cause unnecessary resource impacts. For example, even the responsible use of motorized vehicles in endangered species habitat may result noise or reduced vegetation, which can harm one or more individuals. There are also many areas where routes go through archeological sites or in riparian areas and regular use increases erosion and negatively impacts these sites. The large majority of routes to be designated in any alternative are open to all vehicle types. The Coconino National Forest Travel Management EIS is expected to designate a system for motorized use while maintaining and improving Forest resources so that motorized and non-motorized Forest visitors can continue to experience and enjoy the Forest.</p>
Public Involvement	1-6 The Forest Service should improve efforts to communicate with the public	<p>THE FOREST SERVICE SHOULD IMPROVE EFFORTS TO COMMUNICATE WITH THE PUBLIC.</p> <p>The Forest Service personnel should go out into the community to understand the needs of the people instead of always asking the people to come to their meetings. Many never find out about the meetings or simply cannot get to them at these times or locations. Sometimes a simple postcard with information mailed to all the people in the county would be a good way to reach many. (Individual, Flagstaff, AZ - #129.4.12100.060)</p>	<p>#129.4.12100.060: The Coconino National Forest staff understands how important public participation and involvement are in large-scale planning efforts such as the Travel Management DEIS. The Travel Management DEIS will affect all Forest users and visitors by how they access and experience the National Forest. The Coconino National Forest made great efforts to share information with the public</p>

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			<p>on the Travel Management planning process. The Forest received and reviewed several thousand letters and comments on the proposed plan and Draft EIS. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning.</p>
Public Involvement	1-6 The Forest Service should improve efforts to communicate with the public	<p>TO AVOID THE APPEARANCE OF BIAS</p> <p>I have attended numerous meetings regarding the Travel Management Process, and at those meeting filled out requests for either a printed or CD version of the Draft EIS. I am dismayed, but not necessarily surprised, that I have received neither of these versions of the Draft, nor even a postcard or e-mail regarding the fact that the DEIS was available. I am also not necessarily surprised that the cover of the DEIS features pictures of roost-throwing ATVs and irresponsible four wheel bozos in axle-deep mud crossing apparently otherwise pristine meadows. There is no better way to showcase the inherent bias regarding off road recreation in this document. (Individual, Flagstaff, AZ - #189.1.12100.162)</p>	<p>#189.1.12100.162: We apologize for the oversight in not mailing you the DEIS as you requested. The cover of the DEIS features one user stuck in the mud, but also shows responsible use of the road and motorized trail system.</p>
Public Involvement	1-7 The Forest Service should coordinate with local residence and communities.	<p>TO PROVIDE SUFFICIENT ACCESS TO THE FOREST</p> <p>The Forest Service needs to work hand in hand with the people to secure the idea of keeping our forests open and accessible for all needs throughout the long-term future. We need to have solid partnerships to implement this idea.</p> <p>I ask that you become intertwined with the societies that you are stationed in and work together with the residents to make our forest experience the best for all the years to come. (Individual, Flagstaff, AZ - #129.5.12000.023)</p>	<p>#129.5.12000.023: The Coconino National Forest staff understands how important public participation and involvement is in large-scale planning efforts such as the Travel Management DEIS. We applaud your efforts and involvement in the Travel Management Process. It is clear that the designation of a system for motorized use across 1.8 million acres of public lands is challenging and very complex. The Forest received and reviewed several thousand</p>

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			<p>letters and comments on the proposed action and Draft EIS. Substantial changes were made to the proposed action based on these comments and a modified proposed action (Alternative 3) was developed along with another alternative to consider a range of reasonable alternatives to address the issues received from Forest users. Additional comments received on the DEIS were also considered and additional changes were made to address errors and unresolved issues. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning.</p>
<p>Public Involvement</p>	<p>1-8 The Forest Service should collaborate with the public, government agencies, and recreation groups.</p>	<p>TO IMPROVE THE TRAVEL MANAGEMENT PLAN Failure to truly collaborate with anyone: The Travel Planning web page for the Coconino National Forest (CNF) states that, "Collaboration is Key". http://www.fs.fed.us/r3/coconino/tmr.shtml. I am aware of the comments submitted by the US Fish and Wildlife Service both in response to the PA [Proposed Action] and in response to this DEIS. I am aware of input submitted by the Arizona Department of Game and Fish. I am aware of input submitted by hundreds of OHV users. I am aware of input submitted by the BlueRibbon Coalition, a nationally recognized OHV advocacy organization. I am aware that even national preservationist groups admonish government agencies to develop and implement designated trails systems for OHVs. I attended several public scoping meetings on travel planning hosted by the CNF. I participated in several meetings with Nora Rasure, Forest Supervisor at the time, Joseph Stringer, acting and Deputy Forest Supervisor at the time, Jim</p>	<p>#203.5-6.12220.050: The Coconino National Forest staff understands how important public participation and involvement is in large-scale planning efforts such as the Travel Management DEIS. We applaud your efforts and involvement in the Travel Management Process. It is clear that the designation of a system for motorized use across 1.8 million acres of public lands is challenging and very complex. The Forest received and reviewed several thousand letters and comments on the proposed action and Draft EIS. Substantial changes were made to the proposed action based on these comments and a modified proposed action (Alternative 3) was developed along with another</p>

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		<p>Beard, landscape architect and project lead for travel planning, Mark Sensebaugh, Public Services Staff Officer at the time, Gene Waldrip, District Ranger at the time, various specialists and others both in the office and on the ground. I helped to coordinate, and participated in, a meeting between the Coconino Trail Rider’s representatives and representative of the US Fish and Wildlife Service Shaula Hedwall, the Peaks and Mormon Lake District Ranger Gene Waldrip, representatives of the Sierra Club, Grand Canyon Wildlands Council and Center for Biological Diversity. The Coconino Trail Riders submitted suggestions for trail system adoption and creation early in the pre-scoping for this effort. I was instrumental in preparing the Coconino Trail Rider’s response to the Proposed Action for Travel Management released in July of 2007 as well as the preparation of the maps and suggested alternative submitted to the Coconino NF at the same time. I submitted my own comments in response to the Proposed Action for Travel Management.</p> <p>All of the information gleaned through these various meetings and comments was essentially ignored by the DEIS. Although I am aware that there are “resource issues” with some of the routes suggested by the Coconino Trail Riders, all parties listed above expressed interest in attempting to work together to seek solutions to these issues. The DEIS makes no attempt to incorporate any of this input into its content, with the exception of the brutally short statement:</p> <p>“Following the implementation of TMR, the forest will be undertaking a forest wide motorized trail planning effort to evaluate additional opportunities for designation of trails for motorized travel. Further analysis of such trails will include public involvement under NEPA, thereby allowing further input and a more focused proposal for motorized trails on the CNF.” (Individual, Flagstaff, AZ - #203.5-6.12220.050)</p>	<p>alternative to consider a range of reasonable alternatives to address the issues received from Forest users. Additional comments received on the DEIS were also considered and additional changes were made to address errors and unresolved issues. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning.</p>

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Public Involvement	1-9 The Forest Service should make use of the information provided by stakeholders.	<p>TO AVOID THE APPEARANCE OF A PRO FORMA PROCESS</p> <p>You also called for public input from users of the Coconino to help identify roads for consideration in the development process of the proposed action maps. We [Verde Valley 4 Wheelers] did this, and submitted a disc with all the roads we would like to see kept open, but most of these roads were not displayed on the maps in the proposed action. It appears that you asked for input merely to make us think you would look at our suggestions as opposed to actually considering them. (Motorized Recreation, Cottonwood, AZ - #111.5.12220.720)</p>	<p>#111.5.12220.720: The Coconino National Forest staff understands how important public participation and involvement is in large-scale planning efforts such as the Travel Management DEIS. We applaud your efforts and involvement in the Travel Management Process. It is clear that the designation of a system for motorized use across 1.8 million acres of public lands is challenging and very complex. The Forest received and reviewed several thousand letters and comments on the proposed action and Draft EIS. The Verde Valley 4 Wheeler's comments were specifically considered and resulted in site-specific consideration and designation of routes including lower Smasher Canyon and Red Tank Draw in Alternative 3 and Alternative 4. Other routes were also considered but not designated because these routes resulted in direct or indirect impacts one or more Forest resources.</p>
Public Involvement	1-10 The Forest Service should include users of National Forests in the travel management planning process	<p>TO ENSURE THAT OUTDOOR OPPORTUNITIES ARE NOT OVERLY LIMITED</p> <p>I continue to be amazed at the lack of respect for the action of cooperation and compromise. Can it be too much to ask that users of our National Forests be included in the process of trail planning? I believe the National Forest Service is creating a huge problem for the American public. While more and more people are attempting to “get outdoors”, the National Forest service is closing the door on our outdoor options. (Individual, Jonesboro, AR - #84.2.12000.500)</p>	<p>#84.2.12000.500:</p> <p>It is unfortunate that you are clearly unsatisfied with the Coconino National Forest Travel Management planning process. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning. The Travel Management planning effort is meant to increase the effectiveness of</p>

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		<p>Please reconsider your two “poorly constructed” options (i.e., Alternative 3 and Alternative 4). It’s obvious that there was no real respect for public input or comment previously... and that the USFS intention is simply to push forward with their own agenda (without any consideration for those who respect, improve and are true stewards of the land). Instead, I fear that you will punish everyone (as Alternatives 3 and 4 outline)—as a result of the lack or your own enforcement of current rules/regulations and laws. If this is falling on deaf-ears... at the very least Alternative 4 is at best a “poor choice,” but certainly better than Alternative 3. (Individual, Camp Verde, AZ - #32.6.12100.720)</p>	<p>managing motorized uses to reduce Forest impacts while still allowing multiple uses across the Forest. While the EIS will include increased management of motorized use across the Forest, it is not meant to make the National Forest less accessible to the public.</p> <p>#32.6.12100.720: It is unfortunate that you are clearly unsatisfied with the Coconino National Forest Travel Management planning process. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning. The Travel Management planning effort is meant to increase the effectiveness of managing motorized uses to reduce Forest impacts while still allowing multiple uses across the Forest. While the EIS will include increased management of motorized use across the Forest, it is not meant to make the National Forest less accessible to the public. The Forest received and reviewed several thousand letters and comments on the proposed action and Draft EIS. Substantial changes were made to the proposed action based on these comments and a modified proposed action (Alternative 3) was developed along with another alternative to consider a range of reasonable alternatives to address the issues received</p>

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		<p>Some specific concerns and issues I found as I reviewed the maps are indicative of what may be a far broader problem with this planning initiative: the planners tasked with this project are not connected enough with realities on the ground to be making informed decisions about how to manage recreational and travel uses of the landscape. This once again points to the need for the planning team to have better engaged the recreating public and those within the Agency or outside agencies who are in the field more frequently for feedback and information, and then to have used that feedback and information to prepare a better plan. (Individual, Flagstaff, AZ - #203.11.12220.410)</p>	<p>from Forest users. Additional comments received on the DEIS were also considered and additional changes were made to address errors and unresolved issues.</p> <p>#203.11.12220.410: It is unfortunate that you are clearly unsatisfied with the Coconino National Forest Travel Management planning process. We understand that public involvement efforts can always be improved and the Forest will continue to make great efforts to inform and involve the public in TMR implementation and future planning. The Travel Management EIS was not put together by a small number of staff, but involved Forest Service employees across the Forest; broad involvement by local, State and Federal partners; and public input and involvement.</p>
		<p>THE FOREST SERVICE SHOULD WORK WITH MOTORIZED RECREATION GROUPS</p> <p>I have been a member of the Rockstars MC club for the last 5 years. Our club has participated in several cleanups on the Tonto National Forest. As a member of the motorcycle and off road community that is working with the Forest Service, it is deeply disturbing that the CNF [Coconino National Forest] has been unwilling to work with us. (Individual, Chandler, AZ - #94.4.14220.530)</p>	<p>#94.4.14220.530: The Coconino National Forest depends heavily on volunteers to manage the National Forests for public use and sustainable resources. Please accept our apology if you feel that the Coconino National Forest has not made adequate efforts toward working with you in the past. It is our hope to work with the Rockstars MC club and others toward maintaining a safer, more fun, and ecologically sustainable motorized system on the Forest.</p>
		<p>TO DEVELOP A PLAN THAT MEETS THE NEEDS OF THESE GROUPS AND PROVIDES FOR MAINTENANCE</p>	<p>#152.2.12220.530: The Coconino National Forest depends</p>

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		<p>AND ENFORCEMENT</p> <p>By involving groups of trail riders and OHV enthusiasts in the decisions as to how public lands are used, we can work together to make both parties happy. Please take the time to understand how many people are affected by making hasty decisions on closing trails.</p> <p>If we work together, we can come up with a solution for maintaining and patrolling areas and keeping our National Forests and public lands beautiful, as well as usable. (Individual, Flagstaff, AZ - #152.2.12220.530)</p>	<p>heavily on volunteers to manage the National Forests for public use and sustainable resources. The designation of a motorized system of roads, trails, and areas on the Coconino National Forest included a very rigorous process considering a broad variety of resources including recreational opportunities, recreation quality, scenery, wildlife, water quality, soil, local economic impacts, and cultural resources. Though many routes on the Forest that are currently available may not be designated for public use, it is to protect and maintain those resources and opportunities that make the Coconino National Forest a special place for current and future generations. We understand your concern and hope to continue working with you and a broad array of stakeholders toward maintaining these opportunities on the Forest.</p>
Public Involvement	1-11 The Forest Service should work with motorized recreation groups.	<p>BECAUSE THESE GROUPS ALREADY ARE ACTIVELY MAINTAINING MOTORIZED ROUTES IN THE FOREST</p> <p>It is my understanding that there are currently 124 miles of motorized trail (not roads) within the CNF and only 25 miles have been adopted into the travel management plan. These trails are currently legal for use today and many of them have been identified by the Coconino Trail Riders, a key stakeholder group, as highly valued by Forest visitors. Many of these trails would make logical additions to the classified trail system. It is this same group, the Coconino Trail Riders, which currently maintains the trail system with and without the help of the National Forest employees. Every spring, they have crews clearing the trails of fallen trees, so riders remain on the trail</p>	<p>#154.1.14220.410: The Coconino National Forest depends heavily on volunteers to manage the National Forests for public use and sustainable resources. We appreciate the efforts of the AZ Trail Riders and other volunteer groups that spend their time and effort to keep the Forest a special place. Based on your comments and those of many others, the Challenger Trail (Peaks loop) was added to Alternative 4 for detailed study and consideration. All motorized trails were considered for designation, but many of these trails were not included in an</p>

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		<p>instead of creating bypass routes. The club also holds a number of “trail days” throughout the summer months. Some of these trail days even involve working on non-motorized trail.</p> <p>I have participated in some of these trails days, as have many members of the Phoenix based club I belong to, the Arizona Trail Riders. If so many miles of trail that have been carefully maintain by concerned users are closed, it would come across as a real “slap in the face” to those of us who have dedicated so much time to responsible use. (Individual - #154.1.14220.410)</p>	<p>alternative due to their impacts on Forest resources. For example, some trails are located in areas with sensitive wildlife habitat or in areas resulting in impacts to cultural resources. The Challenger Trail was added to Alternative 4 because it includes a 52-mile loop of single track motorized trail in forested vegetation. This is a unique recreational experience not otherwise available on the Forest.</p>
<p>Public Involvement</p>	<p>1-12 The Forest Service should consider using volunteers.</p>	<p>TO ASSIST IN MONITORING AND DECOMMISSIONING EFFORTS</p> <p>We [EPA] recommend the CNF consider using volunteers to assist in monitoring and decommissioning efforts. One possible resource for identifying appropriate volunteer programs is the National Directory of Volunteer Environmental Monitoring Programs, http://www.epa.gov/owow/monitoring/dir.html. (U.S. Environmental Protection Agency, San Francisco, CA - #205.7.14220.023)</p>	<p>#205.7.14220.023: The Coconino National Forest depends heavily on volunteers to manage the National Forests for public use and sustainable resources. We appreciate the information on the National Directory of Volunteer Environmental Monitoring Programs.</p>
<p>Public Involvement</p>	<p>1-13 The Forest Service should initiate a collaborative planning effort.</p>	<p>THAT INCLUDES THE DIABLO TRUST AS THE ORGANIZING GROUP IN THE DIABLO CANYON RURAL PLANNING AREA</p> <p>The Diablo Trust is a land management collaborative team of national standing and considerable durability. The Diablo Canyon Rural Planning Area includes popular and intensely used lands of the CNF. As such, the</p> <p>Diablo Trust is well situated to serve as a laboratory for active recreation management, which in all of its variety inevitably involves motorized access. While recreation management is not the stated mission of the</p> <p>TMR, the effects of TMR will preclude or hinder a range of creative options which active management might develop or take</p>	<p>#165.12.12220.201: The Coconino National Forest understands your concern regarding potential impacts to recreational uses on the Forest from the implementation of the Travel Management Rule. We agree that a collaborative effort to optimize resource protection would be a worthwhile endeavor in addition to the ongoing Travel Management planning effort. Implementation of the Travel Management Rule will in no way preclude working in an open, collaborative manner to optimize resource protection while maintaining</p>

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		<p>advantage of. TMR is also poised to cause a disturbing array of impacts to recreation and management which might better be avoided. Therefore, if a collaborative effort to optimize resource protection and enjoyment is to be undertaken, it must be realized before TMR is implemented. The Diablo Trust formally requests that such an effort be initiated, that it be expressly acknowledged in the TMR process, and that the Diablo Trust be the organizing group for such an effort within the Diablo Canyon Rural Planning Area. (Place-based group, Flagstaff, AZ - #165.12.12220.201)</p>	<p>public lands for the public.</p>
<p>Public Involvement</p>	<p>1-14 The Forest Service should use usage patterns as the basis for making route designation decisions.</p>	<p>RATHER THAN BASING DECISIONS ON THE NUMBER OF PUBLIC COMMENTS RECEIVED</p> <p>It would be a huge step backward for society if we had to comment on every foot of road, water line, sewer pipe, sidewalk, and motorized trail that the public needs. Gauging public need by the number of comments is not the norm in our society and should not be used in this process. We have been keeping observations of the types of visitors in multiple-use areas since 1999 and have found that 97% of the visitors are motorized recreationists. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit. (Motorized Recreation, Helena, MT - #109.32.12000.530)</p>	<p>#109.32.12000.530: We understand your frustration with the process, but it is not necessary to comment on every route that you would like designated. It is important, however, to provide information on those key routes that are the most important for maintaining a quality recreational experience so that we may include this information in consideration with other resource issues to design one or more alternatives for a system of motorized use. Your statement that you have data suggesting that 97% of Forest visitors are motorized recreationists varies drastically from the data we currently have available. Please send this data to comments-southwestern-coconino@fs.fed.us so we may consider this data in future planning efforts.</p>
<p>Coordination with Other Agencies</p>	<p>1-15 The Forest Service should ensure that the U.S. Fish and Wildlife Service is</p>	<p>BECAUSE THEY HAVE BEEN OMITTED ON SOME COMMUNICATIONS</p> <p>Chapter 4. Consultation and Coordination, List of Agencies,</p>	<p>#105.16.10200.001: The staff of the Coconino National Forest apologize for this oversight and have worked hard to correct this by working more closely with the Fish</p>

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	<p>included on project distribution lists.</p>	<p>Organizations and Person to Whom Copies of the DEIS Were Sent (pages 117–118): This section lists the entities (Federal agencies, federally recognized Tribes, State and local governments, organizations, and public) to whom the DEIS was sent. The Fish and Wildlife Service is not included on the list and we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] did not even hear that the DEIS was out until almost two weeks following the publication of the notice in the Federal Register. It then took a few days for the CNF [Coconino National Forest] to provide us with a copy after we requested it at our annual coordination meeting on March 30. We provided comments on the July 2007 Proposed Action, have attended TMR meetings, and responded affirmatively to electronic email requests regarding whether we wanted to be kept informed of the process. We would appreciate being added to the distribution list for further information regarding this project. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.16.10200.001)</p>	<p>and Wildlife Service since the release of the DEIS.</p>
<p>Coordination with Other Agencies</p>	<p>1-16 The Forest Service should consult with the U.S. Fish and Wildlife Service</p>	<p>REGARDING ALL FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES AFFECTED BY THE PROJECT</p> <p>Given the finding of “may effect” for all species analyzed in the DEIS, the Coconino National Forest must consult with Fish and Wildlife Service for all federally listed threatened and endangered species impacted by this project as required by section 7 of the Endangered Species Act. We [Center for Biological Diversity et al.] note that the Wildlife Specialist’s Report (at page 4) makes clear that when the Forest Service is required to consult with the Fish and Wildlife Service whenever it makes a finding of “may effect.”</p> <p>We can find no evidence of consultation. The CNF [Coconino National Forest] must correct this oversight or provide evidence</p>	<p>#175.16.10200.135: Consultation with FWS occurs once the Forest selects a preferred alternative. At the time your comment was received, the Forest had yet to make this selection as it is of paramount importance that public comments received on the DEIS are first reviewed and considered before a preferred alternative is selected. The Forest Service incorporated many public comments into the alternatives and prepared a Biological Assessment for the preferred alternative and submitted it to the U.S. Fish and Wildlife Service on November 22, 2010. The Fish and Wildlife Service provided a concurrence to the Forest on</p>

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		of consultation in the supplemental DEIS or FEIS. (Preservation/Conservation, Prescott, AZ - #175.16.10200.135)	December 22, 2010. The Forest Service later sent an amended BA and again received concurrence from the Fish and Wildlife Service. These documents will be available as part of the project record once the Record of Decision is signed.
Coordination with Other Agencies	1-17 The Forest Service should coordinate with the Kaibab, Apache-Sitgreaves, and Tonto National Forests	<p>TO ENSURE CONSISTENCY ACROSS ALL THE FORESTS</p> <p>As mentioned in the DEIS, Game Management Units cross National Forest boundaries. The Department [Arizona Game and Fish Department] encourages [Coconino National Forest] CNF to coordinate with the Kaibab, Apache-Sitgreaves and Tonto National Forests to ensure consistency across all the forests. Having different regulations with adjacent forests will make regulations confusing and difficult for the forest users to understand. (Arizona Game and Fish Department, Phoenix, AZ - #160.3.10200.160)</p>	#160.3.10200.160: The Coconino National Forest has endeavored to follow your suggestion of coordinating motorized big game retrieval with surrounding Forests (the Kaibab National Forest is the only Forest where hunting units are shared between the two Forests where there is no topographical divide) to ensure consistency with the public. In addition to the game retrieval policy in Alternative 3 and 4, the Forest studied an alternative that would allow motorized big game retrieval in Game Management Units 7W, 8 and 7E, which it shares with the Kaibab National Forest.
Coordination with Other Agencies	1-18 The Forest Service should describe the consultation between the BLM and each of the tribal governments in the project area.	<p>TO ENSURE COMPLIANCE WITH EXECUTIVE ORDER 13175</p> <p>Coordination with Tribal Governments: Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes. The DEIS states that CNF [Coconino National Forest] “routinely consults 13 tribes”; however, only two Tribes are listed as having received copies of the DEIS (p. 117). EPA recommends the FEIS describe the</p>	#205.15.10300.100: The Coconino National Forest has worked closely with Tribal Governments throughout the planning process. On September 8, 2006 the Coconino National Forest sent information to 25 different tribal entities informing them of the start of the travel management planning effort and asking for feedback. In addition, the DEIS was made available to all tribes and multiple meetings occurred to discuss the project. All consultation meetings and correspondence have been documented and will be available as part of

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		<p>process and outcome of government-to-government consultation between the BLM and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative. (U.S. Environmental Protection Agency, San Francisco, CA - #205.15.10300.100)</p>	<p>the project record once the Record of Decision is signed.</p>
<p>Coordination with Other Agencies</p>	<p>1-19 The Forest Service should coordinate with Native American tribes and the Arizona Game and Fish Department</p>	<p>In keeping with our trust responsibilities to American Indian Tribes, by copy of this letter, we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] will notify the Hopi Tribe, Hualapai Tribe, Fort Mohave Indian Tribe, Navajo Nation, Salt River Pima-Maricopa Indian Community, Yavapai-Prescott Indian Tribe, Yavapai Apache Nation, and Pueblo of Zuni, which may be affected by this proposed action and encourage you to invite the Bureau of Indian Affairs to participate in the review of your proposed action. We also encourage you to coordinate the review of this project with the AGFD [Arizona Game and Fish Department]. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.17.10300.001)</p>	<p>#105.17.10300.001: The Coconino National Forest has worked closely with both Tribal Governments and the Arizona Department of Game and Fish throughout the Travel Management planning process. This is reflected in the comment above and documentation of communication and correspondence with tribal governments and the Arizona Game and Fish Department are in the project record.</p>
<p>Coordination with Other Agencies</p>	<p>1-20 The Forest Service should coordinate with the Arizona State Land Department</p>	<p>WITH REGARD TO ANY DECISION THAT AFFECTS STATE TRUST LANDS</p> <p>The Department [Arizona State Land Department] functions in a fiduciary capacity for the State Land Trust and is responsible for generating revenue for 13 site-specific beneficiaries, including the common schools (K-12 grade) and the universities. State Trust lands are not public lands; the Department’s mission is different that the Forest Service, and as a result the Department’s requirements for the use of roads on State Trust land are different.</p> <p>The process for planning State Trust lands is described in the Arizona Revised Statutes. Passage of the Growing Smarter Legislation in 1998 required conceptual plans to graphically portray the Department’s long-term land use goals. The</p>	<p>#201.1.10200.640: It is unfortunate that the Department does not feel they received documentation of the Travel Management planning process. The Arizona State Land Department is on the Travel Management EIS mailing list and we have met several times with Arizona State Land Department personnel on a number of issues. Since receiving your letter, we have met with you on October 14, 2010 and reviewed documentation of these previous meetings and mailings and discussed several site specific issues. We hope this meets your expectations of pro-active involvement on</p>

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		<p>Department must be included in all planning efforts involving State Trust land. Some of the State Trust lands included in your planning proposal are in the process of being sold: these unapproved routes are an encumbrance that complicates the sale. The department was not included in the mail distribution of printed material and did not receive the documentation until the end of April, leaving insufficient time to review the proposal. We hope future planning activities that include State Trust land will be handled in a more pro-active and cooperative manner. (Arizona State Lands Department, Phoenix, AZ - #201.1.10200.640)</p>	<p>travel management planning.</p>
<p>Coordination with Other Agencies</p>	<p>1-21 The Forest Service should coordinate with Arizona State Parks</p>	<p>TO CREATE A PROGRAM USING VOLUNTEERS TO PATROL MOTORIZED ROUTES</p> <p>On numerous occasions I have heard of your lack of resources to observe and maintain areas of the forest. Because of this, I would urge you to develop or team with the Arizona State Parks on a program such as the OHV Ambassadors. There are many OHV folks who want to assist in ensuring the responsible use of OHV's and legitimate and reasonable access to riding areas/opportunities. A program such as this could assist you by having extra "eyes" out in the forest able to report unethical behavior by riders or any other user group to the appropriate authorities. This program has been well received and is a model in cooperation between the State Parks and off-road stake holders. (Individual, Litchfield Park, AZ - #166.5.14220.165)</p>	<p>#166.5.14220.165: That is a great suggestion. The Coconino National Forest depends heavily on volunteers to manage the National Forests for public use and sustainable resources. Recently, the Coconino National Forest got involved in the OHV Ambassador program and is now actively looking for volunteers interested in being OHV Ambassadors.</p>
<p>Plan Development and Revision</p>	<p>1-22 The Forest Service should complete all the expected travel management planning before completing the current EIS process.</p>	<p>THE FOREST SERVICE SHOULD COMPLETE ALL THE EXPECTED TRAVEL MANAGEMENT PLANNING BEFORE COMPLETING THE CURRENT EIS PROCESS</p> <p>On page 3 of your DEIS, you appear to acknowledge this key flaw: "Following the implementation of TMR, the forest will be undertaking a forest wide motorized trail planning effort to evaluate additional opportunities for designation of trails for</p>	<p>#104.6.10000.530: The Coconino National Forest does not agree that acknowledgement of future planning needs is a fault in the Travel Management planning process. Rather, we feel that acknowledging that future planning will be part of the process fully meets the intent of the National</p>

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		<p>motorized travel. Further analysis of such trails will include public involvement under NEPA, thereby allowing further input and a more focused proposal for motorized trails on the CNF.” This needs to be initiated and completed prior to the implementation of any management plan. This is basic management planning 101, and it seems that we are not currently exercising what is required of our public servants and within the bounds of state and federal obligations. (Individual, Mesa, AZ - #104.6.10000.530)</p>	<p>Environmental Policy Act and adaptive management and monitoring guidance provided by the Council for Environmental Quality. Though the Travel Management Rule is a big change in the management of motorized use on the Coconino National Forest, it is not the end of the process. Rather, we see it as the beginning of the process of management of motorized use on the Forest. The Coconino National Forest did review unauthorized motorized trails as part of the Travel Management planning process, but found that these trails as they currently exist result in resource conflicts. The language on Page 3 of the DEIS is an acknowledgement that more site-specific planning work can be done after the Travel Management EIS to find solutions so motorized trails that result in less impact to Forest resources can be designated.</p>
<p>Plan Development and Revision</p>	<p>1-22 The Forest Service should complete all the expected travel management planning before completing the current EIS process.</p>	<p>TO ENSURE THAT THE EFFECTS ON LOCAL COMMUNITIES ARE CONSIDERED</p> <p>I request that the Final EIS and Record of Decision postpone the closure of any of the 124 miles of existing trails until future planning efforts bring new trails on to the system. Any closure of existing trails will have a significant negative impact on the local communities around the Coconino and this should be given serious consideration in the Forest Service’s planning. (Individual, Phoenix, AZ - #117.3.52000.814)</p>	<p>#117.3.52000.814: All existing motorized trails that were included in comments to the Coconino National Forest were considered for designation. If the motorized trails did not include resource conflicts, they were designated in one or more alternatives. A majority of the motorized trails submitted in public comment are actually coincident with roads and were designated as ‘all vehicle’ roads (see Record of Decision for more information). Those that included resource impacts that could not be feasibly avoided were not included in an alternative as they</p>

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			did not meet the purpose and need of the Travel Management Rule. As a result, all motorized trails were fully considered in the Travel Management EIS.
Plan Development and Revision	1-23 The Forest Service should clarify how the Travel Analysis Process Report was used in developing the Travel Management Plan	<p>THE FOREST SERVICE SHOULD CLARIFY HOW THE TRAVEL ANALYSIS PROCESS REPORT WAS USED IN DEVELOPING THE TRAVEL MANAGEMENT PLAN.</p> <p>We [Center for Biological Diversity et al.] appreciate the many years of difficult work that must have gone into the drafting of the Travel Analysis Process Report (TAP), the final version of which is dated January 2010 [Footnote 30: See email dated November 2007 indicating the TAP was unavailable and under review by the Regional Office (attached as Appendix U). We repeatedly inquired about the status of the TAP in the more than 2 years since the November 2007 request [Emails relevant to these requests are attached as Appendix V. However, after such a lengthy process, we expected the report to include more information than it contains. We had requested the TAP as early as November 2007, and were repeatedly told it was unavailable because the Regional Office was reviewing it. We are puzzled by the lengthy delay and question how the information in the TAP was utilized by the CNF [Coconino National Forest] during the TMP process, from Proposed Action through the development of the DEIS and which iterations of the TAP were utilized throughout the process. We note that the TAP itself states that Travel Analysis “is an iterative process.” Forest Service 2010b:2. (Preservation/Conservation, Tucson, AZ - #175.154.10000.160)</p>	#175.154.10000.160: We apologize that the results of the Travel Analysis Process (TAP) were not available to you immediately. The TAP was posted on the Coconino National Forest website with the publication of the Draft Environmental Impact Statement. As you indicate, the TAP is an iterative process. The initial TAP was used to inform the proposed action and will likely be modified based on additional roads analysis.
Plan Development and Revision	1-24 The Forest Service should clarify how the Travel Management Rule Process will be coordinated with the	<p>TO REDUCE CONFUSION</p> <p>The Proposed Action Does Not Explain How the TMR [Travel Management Rule] Process will Interface with the Forest Planning Process: The Forest Service is currently poised to engage in two very significant decision making processes across</p>	#175.311-312.10400.200: The purpose of the Coconino Travel Management EIS is to designate a system of roads, trails, and areas for motorized use as is required by the Travel Management Rule.

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	<p>forest planning process.</p>	<p>all Region 3 Forests: TMR planning and Forest Planning. The interplay between these two processes has created a considerable amount of confusion. As we [Center for Biological Diversity, et al.] understand the Forest Service’s position, revised Forest Plans will constitute ‘strategic’ decisions while TMR decisions constitute ‘tactical’ decisions. Our concern, therefore, should be obvious: ‘tactical’ decisions should not compromise or delimit the reach of ‘strategic’ decisions before such ‘strategic’ decisions are identified and defined. [Footnote 23: The Forest Service’s distinction between the two processes also serves as a basis for our position, set forth in section (2), that the TMR process must produce a plan, not simply a route map. In other words, ‘tactical’ decisions must be properly nested within a ‘tactical’ plan to ensure conformance with overarching goals and strategies.] See 40 C.F.R. [section] 1506.1.</p> <p>Many of us are in the process of developing protective management recommendations (e.g., special management area designation for sensitive species habitats) for the CNF [Coconino National Forest] that transcend single resource uses (i.e., motorized recreation) and focus on landscape-scale ecological protection and restoration.</p> <p>It is unclear, at this time, whether these recommendations are best submitted during the TMR process or the Forest Plan revision process. Route designations could, obviously, prejudice or compromise these recommendations if the Forest Service takes a narrow view of the TMR process and rejects these conservation-oriented management recommendations on the basis that they are more properly considered as part of the Forest Plan revision process. While the Forest Service may state that they retain the authority to revisit TMR designations during the Forest Plan revision process, it strikes us that the Forest Service will, generally speaking, resist revisiting route designations to make room for conservation-oriented management recommendations.</p>	<p>The Travel Management Rule includes re-publication of the MVUM map each year to incorporate changes made to the motorized system through the NEPA process. The TMR allows for changes in the system over time. A decision on the Coconino Travel Management EIS does not preclude any strategic planning decision made in the Coconino National Forest Plan Revision process. I think you will see from the Implementation section of the Record of Decision that the TMR process will result in a plan and not just a map.</p>

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		<p>This scenario is deeply troubling as it undermines the spirit and intent, if not the letter, of the TMR and Forest Planning processes. (Preservation/Conservation, Tucson, AZ - #175.311-312.10400.200)</p>	
<p>Plan Development and Revision</p>	<p>1-25 The Forest Service should allow for amendments to the plan.</p>	<p>TO CREATE NEW TRAIL, CREATE LOOP TRAILS, AND MAKE BOUNDARY ADJUSTMENTS</p> <p>To be responsive to the needs of motorized recreationists, the plan should specifically allow for amendments as required to create new trails, connect trails to create motorized loops, extend trails, make minor boundary adjustments to allow a motorized trail, etc. (Motorized Recreation, Helena, MT - #109.56.54000.160)</p>	<p>#109.56.54000.160: The Travel Management Rule specifically requires re-publication of the MVUM map each year to incorporate changes made through the NEPA planning process. This would allow for additional or removal of route designations, given there is site-specific analysis completed through the NEPA process. Thus, there is no need for the plan to specifically allow for amendments.</p>
<p>Plan Development and Revision</p>	<p>1-26 The Forest Service should include training protocol in the plan.</p>	<p>TO ENSURE THAT STAFF ARE EDUCATED IN HOW TO APPLY FOR GRANTS, USE CHALLENGE COST-SHARE PROGRAMS, AND EFFECTIVELY MANAGE VOLUNTEER PROGRAMS</p> <p>Our [BlueRibbon Coalition] suggestion is that you address any legitimate maintenance concerns by incorporating a training protocol into your travel plan that would train Agency staff on how to apply for grants, use the challenge cost share program, effectively manage volunteer programs, and learn about and apply for other funding sources. In addition, you might consider MOUs [Memorandums of Understanding] or other similar agreements with recreational groups. (Motorized Recreation, Pocatello, ID - #172.7.14000.410)</p>	<p>#172.7.14000.410: This is a great idea for implementation and one we are already working toward. Including a training program as part of the Travel Management EIS decision, however, is not necessary as it is administrative in nature and outside of the scope of the purpose and need for this project.</p>
<p>Compliance with Laws, Rules, and Policies</p>	<p>1-27 The Forest Service should revise the description of the genesis of the Travel Management Rule.</p>	<p>TO ACCURATELY REFLECT THAT THE PURPOSE IS TO PROVIDE FOR ALL TYPES OF RECREATIONAL ACTIVITIES</p> <p>Page 2, Background: The TMR [Travel Management Rule] is grossly mischaracterized as being “developed in response to the</p>	<p>#202.29.15000.162: Though the Travel Management Rule was developed in response to the Chief of the Forest Service's identified Threat of Unmanaged Recreation, we agree that a designated system of roads,</p>

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		<p>substantial increase in the use of OHVs on [NFS] lands and related resource damage to forest resources caused by unmanaged OHV use of the past 20 to 30 years.” Neither the summary nor background of the TMR speaks in these terms. See 70 Fed. Reg. 68264 (summary); at 68265 (“The agency must strike an appropriate balance in managing all types of recreational activities. To this end, a designated system of roads, trails, and areas for motor vehicle use, established with public involvement, will enhance public enjoyment of National Forests while maintaining other important values and uses on NFS lands.”) (Motorized Recreation, Boise, ID - #202.29.15000.162)</p>	<p>trails, and areas for motor vehicle use, established with public involvement, will enhance public enjoyment of National Forests while maintaining other important values and uses on NFS lands.</p>
<p>Compliance with Laws, Rules, and Policies</p>	<p>1-28 The Forest Service should accurately represent the provisions of the Travel Management Rule</p>	<p>AS THEY RELATE TO PUBLICATIONS OF INTERIM ORDERS, FOREST VISITOR MAPS, OR OTHER NON-NEPA DECISIONS</p> <p>Page 2, Background: The TMR [Travel Management Rule] is mischaracterized or misinterpreted, where the ID Team or author of this section states the TMR “does not require reconsideration of any previous administrative decisions that allow, restrict, or prohibit vehicle use...that were made under other authorities.”</p> <p>Several important qualifiers to this passage of 36 CFR § 212.52(a) are omitted, including that the applicable “previous administrative decisions” must have included public involvement, and addressed vehicle use over an entire Ranger District or Forest. To be specific, publication of an interim order, Forest Visitor Map, or other “decision” (without NEPA review and/or public involvement) is not addressed or legitimized by the TMR. (Motorized Recreation, Boise, ID - #202.30.15000.162)</p>	<p>#202.30.15000.162: The purpose of the Coconino Travel Management EIS is to designate a system of roads, trails, and areas for motorized use as is required by the Travel Management Rule. This purpose does not include re-visiting all previous decisions relating to motorized use to determine their validity. This is specifically discussed in the preamble to the Travel Management Rule where it states, “Nothing in this final rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails or in areas on NFS lands...” (Federal Register Vol. 70, No. 216; Wednesday, November 9, 2005; Rules and Regulations, p. 68268).</p>
<p>Compliance with Laws, Rules, and Policies</p>	<p>1-29 The Forest Service should ensure that the plan complies with federal laws.</p>	<p>INCLUDING NFMA, ESA, CLEAN WATER ACT, NATIONAL HISTORIC PRESERVATION ACT, AND EXECUTIVE ORDER 11644</p> <p>We [Center for Biological Diversity, et al.] agree with the Forest</p>	<p>#175.267.15000.530: We agree. Implementation of a Travel Management decision will be completed to the extent possible based on available resources.</p>

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		<p>Service’s overall goals to create an ecologically sustainable, fiscally responsible, manageable, and enforceable designated motorized vehicle route system.[Footnote 2: We use the generic term “routes” given the Forest Service’s allowance of motorized recreation use on both roads and trails and to emphasize the point that environmental impact analysis and protective management standards and guidelines should be predicated on the physical footprint of a particular route and the use of that route - not bureaucratic classifications.] The revised regulations in the Travel Management Rule (TMR) reflecting these goals, take positive steps by prohibiting widespread crosscountry travel and instituting a legal requirement that deems areas closed unless marked open on the motor vehicle use maps (MVUM), thereby placing the responsibility on motorized vehicle users to know which routes are legal.</p> <p>That said, the devil is in the details and, indeed, the TMR merely “provides a national framework under which designations are made at the local level.”[Footnote 3: 70 Fed. Reg. 68264, 68265 (Nov. 9, 2005)]</p> <p>Thus, promulgation of the TMR was but a first step in ensuring responsible, managed motorized recreational use on our National Forests. The Forest Service is now duty-bound to ensure that the TMR is faithfully implemented on the Coconino in accord with the Forest Service’s related legal responsibilities. These responsibilities—for example, the National Forest Management Act (“NFMA”), the National Environmental Policy Act (“NEPA”), the Endangered Species Act (“ESA”), the Clean Water Act (“CWA”), the National Historic Preservation Act (“NHPA”), and Executive Order 11644, as amended—establish important legal sideboards for the travel planning process and serve as guidelines to determine legally and ecologically acceptable limits and opportunities for motorized recreation use. (Preservation/Conservation, Tucson, AZ -</p>	

Category	Public Concern	Comment	Response
Compliance with Laws, Rules, and Policies	1-30 The Forest Service should ensure that the plan complies with the Multiple Use Sustained Yield Act	<p>#175.267.15000.530)</p> <p>THE FOREST SERVICE SHOULD ENSURE THAT THE PLAN COMPLIES WITH THE MULTIPLE USE SUSTAINED YIELD ACT</p> <p>These National Forest lands were set aside for the people for Multiple Use Sustained Yield. Access and usage should not be restricted but encouraged. There are some people who do abuse our forests and there should definitely be laws in place to prosecute these actions. (Individual, Flagstaff, AZ - #129.2.11100.165)</p>	#129.2.11100.165: The Coconino Travel Management EIS is an effort to move current management toward the requirements of multiple use in the Multiple Use Sustained Yield Act and is in full compliance with this law. The purpose of the Travel Management EIS is not to restrict access, but to manage motorized use across the Forest so that resource conflicts are minimized to facilitate multiple uses.
Enforcement Funding	1-31 The Forest Service should ensure sufficient fund for enforcement are available.	<p>THE FOREST SERVICE SHOULD ENSURE SUFFICIENT FUNDS FOR ENFORCEMENT ARE AVAILABLE.</p> <p>I favor Alternative 4 and hope that there will be sufficient funds to support enforcement of this plan. (Individual, Cornville, AZ - #52.3.22640.165)</p>	#52.3.22640.165: Thanks for your input. The Coconino National Forest has worked hard to prepare for implementation of the new travel management rules by securing grant funding for additional signage and working with a broad number of partners and other agencies to coordinate future planning and enforcement.
Enforcement Funding	1-31 The Forest Service should ensure sufficient fund for enforcement are available.	<p>BEFORE IMPLEMENTING THE PLAN</p> <p>On the Law Enforcement side we would like to see the funding come ahead of the Rule. Knowing that the USFS Law Enforcement is spread thinly across the whole Forest, it appears that the intent is for the Arizona Game and Fish Department to pick up the enforcement. They are also spread pretty thin and time enforcing camping laws will take them further away from wildlife management. (Domestic Livestock Industry, Flagstaff, AZ - #206.9.14100.165)</p>	#206.9.14100.165: Thanks for your input. We will continue to work closely with the Arizona Department of Game and Fish and other enforcement agencies to maximize our effectiveness at enforcement and education of State and Federal rules and regulations.

Category	Public Concern	Comment	Response
Enforcement Funding	1-32 The Forest Service should ensure that sufficient funds are allocated for maintenance and enforcement.	<p>BEFORE PLAN INITIATION</p> <p>To implement the TMR, funding is an integral concern. This PA [Preferred Alternative] will call for increased management and services, to include enforcement, road maintenance, and concessionaire services. Funds to support these actions must be delineated before action is taken. (Place-based group, Flagstaff, AZ - #165.8.14120.002)</p>	#165.8.14120.002: The purpose of the Coconino Travel Management EIS is to designate a system of roads and trails for motorized use as is required by the Travel Management Rule. Implementation of a Travel Management decision will be completed to the extent possible based on available resources. We disagree that the proposed action will require additional maintenance, enforcement, or concession services. By having a clearly designated system of motorized roads and trails, no additional concession services would be required and maintenance and enforcement funds will be more focused on those designated routes than all existing routes across the Forest.
Enforcement Funding	1-33 The Forest Service should use funds from fees to finance increased patrolling of the forest.	<p>TO REDUCE THE INCIDENCE OF ILLEGAL ACTIVITIES</p> <p>I do believe that some type of restrictions is necessary; therefore, Alternative 1 would not work. I have witnessed many illegal activities in the forest, from speeding, littering, traveling off-road, and plain old stupidity. I know that it is very expensive to patrol so many miles of forest, but I rarely see anyone patrolling the roadways. Especially on the big weekends of July 4th and Labor Day. If there were more experienced officials present in the forest, there would be less abuse of the forest. It is mandatory for children to take a Hunter Safety class in this state. It is mandatory for hunters to have a tag to shoot game. It is mandatory to have a permit to collect firewood. It is mandatory for ATV riders to have a decal on their machines. Why not make it mandatory for campers to have a permit to use the forest? The funds received could be used to pay for the much needed patrolling. I do agree</p>	#21.4.14000.165: Requiring campers to have a permit is outside the scope of the Travel Management planning process. The Coconino Travel Management EIS is expected to reduce the recreation conflicts (See Recreation specialist report) that you have experienced. Your suggestions to require a permit for camping and to use the funds to increase patrols are currently being done on the Red Rock District of the Coconino National Forest.

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		<p>that campers should be restricted to certain areas. When I see a motor home, or truck, cross a meadow to get to a pretty site, it makes my blood boil. I have confronted many people and I'm getting to the point that I am afraid there could be repercussions. Many people do not appreciate confrontations...especially when they know they are wrong. (Individual - #21.4.14000.165)</p>	
<p>Enforcement Funding</p>	<p>1-34 The Forest Service should prioritize conditional decisions that will be implemented based on availability of funding.</p>	<p>TO HELP IDENTIFY FUNDING NEEDS AND OPPORTUNITIES FOR OUTSIDE ORGANIZATIONS TO ASSIST THE FOREST SERVICE</p> <p>Without accounting for its limited resources, the Forest Service is setting up the TMR [Travel Management Rule] for failure in terms of its on-the-ground implementation. Understandably, the Forest Service may desire to plan for activities that, at present, it does not have the funds to implement. This, in our view, simply reinforces the need to produce not just a map, but also a travel management plan outlining priority management actions to be implemented given existing agency resources, and to prioritize conditional decisions that will be implemented if additional agency resources are obtained. As provided in the TMR: "In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration (36 C.F.R. [section] 212.55(a))."</p> <p>Accounting for Agency resources during the TMR process also provides stakeholder groups with a basis to work with local communities and our political leaders to advocate for increased funding or obtain grant funding necessary to implement conservation-oriented management actions. While we cannot assist the Forest Service in law enforcement activities, we may be</p>	<p>#175.315-316.14000.162:</p> <p>The purpose of the Coconino Travel Management EIS is to designate a system of roads and trails for motorized use as is required by the Travel Management Rule. Your request for the Forest to develop a plan outlining priority management actions cannot be completed until a decision is made on this process. We highly value the efforts of volunteers such as yourself and hope to continue working with you in the future toward mutual goals. We would be happy to work with you, where possible, to provide information to augment your capacity in working towards these goals.</p>

Category	Public Concern	Comment	Response
		<p>able to increase our ability to assist with implementation activities clearly linked to resource protection objectives—objectives that must be articulated in Agency TMR plans. For example, we could raise Clean Water Act § 319 funds to implement watershed restoration projects involving route closure and reclamation activities.</p> <p>We are committed to continuing our volunteer work and thereby providing the Forest Service with significant in-kind contributions. If we could point to agency documentation explaining the importance of this work, and conditionally giving that work a “green light” pending funding, we anticipate that we could continue, if not expand, these contributions. Underlying agency documentation provides us—and our supporters—with assurances that the Forest Service is operating in good faith as a partner with the public. (Preservation/Conservation, Grand Canyon, AZ - #175.315-316.14000.162)</p>	
Enforcement Funding	1-35 The Forest Service should ensure that the plan is enforceable.	<p>TO AVOID OVER-RELIANCE ON THE SHERIFF AND GAME AND FISH PERSONNEL</p> <p>Law Enforcement: An active enforcement plan will need to be implemented, especially if the public views the adopted plan as unreasonable. Relying on maps is unrealistic. Signage will be of paramount importance. Given the current level of law enforcement from the USFS in our area, and the economic situation, this does not seem feasible. We do not feel this responsibility should fall solely on the Sheriff and Game and Fish [Arizona Game and Fish Department] personnel. (Domestic Livestock Industry - #161.8.40300.002)</p>	#161.8.40300.002: The purpose of the Coconino Travel Management EIS is to designate a system of roads and trails for motorized use as is required by the Travel Management Rule. Implementation, including enforcement, of a Travel Management decision will be completed to the extent possible based on available resources. The Coconino National Forest is currently placing route signs throughout the Forest on all routes to help with implementation once a decision is made. The Coconino National Forest plans to work in coordination with other Federal, State, and county agencies for enforcement and implementation of this decision.

Category	Public Concern	Comment	Response
Enforcement Funding	1-35 The Forest Service should ensure that the plan is enforceable.	<p>TO REDUCE ILLEGAL USE OF THE FOREST</p> <p>As an active member of the “Stewards of Public Lands,” I am concerned that more limited access would stifle our efforts to work with the CNF [Coconino National Forest]. We clean up trash and litter on a regular basis. Additionally we monitor and patrol the public lands looking for trash and the illegal dumpers of the trash. Since some people already break the law by dumping illegally, these scofflaws will surely not pay attention to road closures. These closures will only serve to inhibit our progressive actions to assist the CNF in prevention and keeping the CNF clean. I suspect that you may say that these actions could be handled by administrative permit. The hassle and the bureaucracy needed to deal with these permits would be cumbersome and our efforts would likely have to be much more limited. Permits for impromptu patrol and monitoring would be very difficult to administer. Additionally, use of routes by “permitted volunteers” would likely send a mixed message to the other users of the CNF who would not know that those specific vehicles were permitted. The scofflaws who dump trash, camp illegally, etc., will have “clear sailing” because there will likely be no one else on the route to catch and report them. (Individual, Sedona, AZ - #112.12.14220.165)</p>	<p>#112.12.14220.165: Volunteers working under active volunteer agreements are considered Forest Service employees and their use of non-designated routes while doing approved activities under Forest Service supervision is considered an administrative activity, which is exempt from the Travel Management Rule. The implementation of the Travel Management Rule is expected to help improve enforcement efforts. Current efforts to enforce the 'open unless closed' status of the Forest has shown to have major problems and other Forests across the nation that have moved to a system of 'closed unless designated open' have been more successful at enforcement of those who choose to violate Forest regulations.</p>

Chapter 2. DEIS, Alternatives and Analysis

Category	Public Concern	Comment	Response
General	2-1 The Forest Service should revise the DEIS	<p>TO ADDRESS FUNDING ISSUES AND PROVIDE MORE DETAIL</p> <p>Draft Environmental Impact Statement for Travel Management on Coconino National Forest, Coconino, Yavapai Counties, Arizona (CEQ number 20100081): The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document [Draft Environmental Impact Statement for Travel Management on Coconino National Forest, Coconino, Yavapai Counties, Arizona (CEQ# 20100081)] pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality Act (CEQ) regulations (40 CFR Parts 1500–1508), and our NEPA review authority under Section 309 of the Clean Air Act.</p> <p>EPA provided scoping comments to the Coconino National Forest (CNF) on September 11, 2007. We commend the Forest Service for its efforts to address the many challenges inherent in developing a balanced Travel Management Plan that responds to both recreational and resource management demands. EPA applauds the CNF’s proposal to reduce roads via a determination of the minimum road system needed, pursuant to 36 CFR Subpart A 212.5 (b)(2). We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses.</p> <p>Based on our review, we have rated the DEIS as Environmental Concerns-Insufficient Information (EC-2) (see enclosed “Summary of Rating Definitions” due to our concerns that adverse impacts to the environment may result from the lack of funds for maintenance, monitoring, and enforcement. We are also concerned about the lack of detail provided in the DEIS. (U.S. Environmental Protection Agency, San Francisco, CA - #205.1.21000.002)</p>	<p>#205.1.21000.002: Since the road system available for public use would be decreased by over 30% for either action alternative, we believe that maintenance, monitoring, and enforcement would be improved by a decision on this Travel Management EIS. The EIS was written to be succinct and to the point. More information on the specifics of the effects analyses is available on the Forest website in the specialist reports for each resource.</p>

Category	Public Concern	Comment	Response
General	2-2 The Forest Service should revise the purpose and need for the project.	<p>TO ADDRESS IMPACTS FROM USER-CREATED ROUTES, IDENTIFY UNNEEDED ROUTES, PROVIDE FOR RECREATION WITHIN THE CAPACITY OF THE LAND, AND ACCOUNT FOR FUNDING LIMITATIONS</p> <p>The Purpose and Need for this project is addressed in two short paragraphs. We appreciate the fact that the Purpose and Need statement has been adjusted to reflect the need to address unacceptable resource damage created by recreational motorized use across the forest, specifically to address the impacts to soil and water quality as well as wildlife habitat and quiet forest users. Forest Service 2010:4. It is key to proper implementation of the TMR [Travel Management Rule] that the need to reduce the number of open road miles on the forest was identified as a purpose and need for this project. Forest Service 2010:4. However, we believe the purpose and need statement could be improved to more accurately reflect the intent of the Travel Management Rule and the purpose of travel planning. Specifically, we recommend the following statements of purpose and need be added:</p> <ul style="list-style-type: none"> -the need to address degradation of environmental, social, and cultural resources associated both with usercreated routes and currently designated roads, trails, and areas, as identified through Travel Analysis; -the need to—by way of a science-based analysis—“identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands” and identify roads that are “no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails”; -the need to provide opportunities for motorized and non-motorized recreation within the carrying capacity of the land (minimizing damage to soil, watershed, vegetation, cultural sites, and other resources of the public lands; and minimizing harassment of wildlife or significant disruption of wildlife habitats); and, -the need to adjust both the core transportation system and recreation travel network in light of funding limitations for maintenance, monitoring, and enforcement; and the need to address public safety concerns, user conflicts, private property rights, lost non-motorized recreational opportunities, and impact to natural soundscapes and air quality that have arisen or might be expected to arise given recent trends in motorized use. (Preservation/Conservation, Tucson, AZ - #175.17.18.20000.002) 	<p>#175.17-18.20000.002: Many of your suggestions to modify the purpose and need (such as 'identify the minimum road system needed for safe and efficient travel') can be completed through an administrative process and are not federal actions subject to the National Environmental Policy Act. The identification of the minimum road system was completed prior to the Coconino National Forest Travel Management EIS through the Travel Analysis Process. Many of the other suggested changes to the purpose and need are not based on the language from the Travel Management Rule or other valid management direction.</p> <p>#202.8.20000.530: The purpose and need for the project is based directly on the Travel Management Rule. The first sentence of the purpose and need clearly states, "The purpose of this project is to provide for a system of NFS roads, trails, and areas open to motor vehicle use on the CNF..." Impacts to recreational motorized use are fully analyzed in the DEIS.</p>

Category	Public Concern	Comment	Response
General	2-3 The Forest Service should provide a credible rationale for the proposed open route network.	<p>TO COMPLY WITH EXECUTIVE ORDER 11644, THE TRAVEL MANAGEMENT RULE, AND OTHER REGULATIONS</p> <p>The Proposed Action Does Not Justify a 3880-mile Open Road System: Conspicuously absent from the Proposed Action is credible rationale for the proposed open route network. See 40 C.F.R. [section] 1502.24 (requiring the Forest Service to “ensure the professional integrity, including scientific integrity, of the discussions and analysis in [EISs],” and providing that the Forest Service “shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon. [Footnote 4: Additionally, the Data Quality Act directs federal agencies in “ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by Federal agencies” P.L. 106554 [section] 515. Decisions made in minimizing damage to soil, watersheds, vegetation, wildlife, and habitats should incorporate and reference findings of relevant university, government, and other studies regarding the negative or positive impact of ORV use, automobiles, and roads. The Forest Service must describe what methodology and scientific information they used to determine how motorized routes could potentially impact natural resources on the Forest and how this information drove the project design criteria with respect to soils, watersheds, vegetation, threatened and endangered species, sensitive species, and management indicator species. The Agency should cite all science-based decisions and provide a list of references from peer-reviewed publications from universities, government agencies, and other researchers. The Forest Service must describe how they used the best available science (or if lacking, whether they employed the precautionary principle) to make their decisions. Specific methodology for determinations should be given.] The PA [Proposed Action] has not provided any legal or science-based methodologies or “sideboards” indicating how the proposed open routes were screened</p>	<p>#175.268-271.20000.162:</p> <p>The proposed action was clearly based on the purpose and need, which states, "A need exists to reduce the number of open road miles on the forest and to address resource impacts associated with unmanaged motorized use." Impacts from unmanaged motorized use were identified and considered through an iterative process in an inter-disciplinary setting. This included reviewing each route on the Forest for impacts to forest resources and for potential impacts to Forest values and resources. This process also incorporated information from the Travel Analysis Process to consider where the number of open miles could be reduced to protect Forest resources while allowing for continued motorized use on those routes with the highest utility. Much of this information and information on how the best available science was considered in analyzing the proposed action and alternatives was included in the DEIS. Even more information on what scientific resources were used, how they were used, and what assumptions and methods were used to analyze the potential impacts of each alternative are included in the specialist reports for each resource, which will be made available on the Forest website with the release of the Final EIS.</p>

Category	Public Concern	Comment	Response
		<p>and selected, or how these routes comport with legal protections afforded to watersheds, water quality, wildlife populations and habitat, and quiet use recreation interests. Thus it is not apparent how the Proposed Action comports with motorized recreation designation criteria set forth in Executive Order 11644, [section] 3, as amended, and the TMR, 36 C.F.R. [section] 212.55, or functions as part of the “minimum road system needed for provide safe and efficient travel and for administration, utilization, and protection of National Forest System lands” required by 36 C.F.R. [section] 212.5(b) (see also Forest Service 2007). Of course, the broad contours of these sideboards are provided by the designation criteria in Executive Order 11644, [section] 3, as amended, and the TMR [Travel Management Rule], 36 C.F.R. [sections] 212.5(b), 212.55 but should be refined to account for CNF [Coconino National Forest]-specific ecological conditions, and informed by the Forest Service and broader public’s collective on-the-ground experience and understanding of the CNF. Moreover, the Forest Service is subject to a variety of other legal obligations, pursuant to, for example, the ESA [federal Endangered Species Act], CWA [federal Clean Water Act], and NHPA [National Historic Preservation Act] that apply in varying and different degrees depending on the specific spatial and temporal scales at issue, and the specific natural and cultural resources implicated by route designations. Understanding the rationale behind the Proposed Action is essential given that the Forest Service has yet to prepare the requisite environmental analysis as required by NEPA. As you are aware, NEPA prescribes a process, not a result, and it is therefore essential to provide this rationale to:</p> <p>(1) ensure that the NEPA process is meaningful and “foster[s] excellent action” (40 C.F.R. [section] 1500.1);</p> <p>(2) ensure that the Forest Service’s ultimate decision is not “arbitrary or capricious” (5 U.S.C. [section] 706(2)(A)) and thereby comports with the Forest Service’s legal obligations to conserve and protect the</p>	

Category	Public Concern	Comment	Response
		<p>Coconino National Forest (e.g., NFMA [National Forest Management Act], ESA, CWA, NHPA, and Executive Order 11644, as amended); and (3) assist the public's involvement in the travel planning process.</p> <p>The failure to provide this rationale at this stage risks undermining the intent and purpose behind the NEPA process, not to mention adherence to the Forest Service's related legal responsibilities, and compromises the Forest Service's and broader public's ability to reach reasoned and informed conclusions concerning the validity and acceptability of route designation decisions. The PA [Proposed Action] simply states, "Applicable Forest Plan direction, best management practices, and Forest Service Manual and Handbook direction will be incorporated in project design and implementation." This is extremely nebulous, and does not provide a basis for justifying the Proposed Action as presently constructed.</p> <p>We [Center for Biological Diversity et al.] are aware, through verbal communication with the Project Leader and associated staff, that the CNF did prepare a Roads Analysis (RAP) that influenced the Proposed Action, although the report is still in the final editing stage. We also know that the RAP was not the exclusive basis for the Proposed Action, as the interdisciplinary Team reviewed the RAP report and made additional decisions for the route recommendations in the PA.</p> <p>We appreciate receiving a section of the RAP report (Step 4. Assessing Benefits) on August 28th and have a better understanding of the criteria used to evaluate each authorized route. However, we still have many questions, such as how the ranking system was developed and question the various weights assigned to certain criteria. Without that information, the complete RAP report and the objective screens used by the Interdisciplinary (ID) Team to refine the RAP decisions, we cannot adequately address the CNF's decisionmaking process in these comments. In addition, we are uncertain as to whether or not the RAP fulfilled all the components of</p>	

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		<p>the proposed FSM section on Travel Analysis since we have yet to review the final report. As such, we reserve the right to submit additional comments once the final RAP report and ID Team's process have been made available.</p> <p>These sideboards can then be reviewed by the public to ensure that they account for the public's expertise, interests, values, and on-the-ground knowledge. (Preservation/Conservation, Tucson, AZ - #175.268-271.20000.162)</p>	

Category	Public Concern	Comment	Response
General	2-4 The Forest Service should ensure the DEIS includes site-specific detail, cites relevant scientific or technical resources, and provides sufficiently detailed information.	<p>TO COMPLY WITH NEPA</p> <p>The DEIS is primarily focused on reducing “unacceptable resource damage” but fails to document the existence of that damage or its reduction by the alternatives with the necessary site-specific detail. When federal agencies evaluate technical issues or apply specialized expertise, NEPA requires them to rely on valid sources and to disclose methodology, present hard data, cite by footnote or other specific method to technical references, and otherwise disclose and document any bases for expert opinion. 40 C.F.R. [section] 1502.24; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1150 (9th Cir. 1998). When applying NEPA, agencies must: utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man’s environment...</p> <p>42 U.S.C. [section] 4332(A); 40 C.F.R. [section] 1502.6. NEPA does not envision undocumented narrative exposition, instead requiring: Agencies shall insure the professional integrity, including the scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix. 40 C.F.R. [section] 1502.24. Where information is not provided in the NEPA document itself, but is only cross-referenced:</p> <p>“The propriety of such incorporation is dependent upon meeting three standards: 1) the material is reasonably available; 2) the statement is understandable without undue cross reference; and 3) the incorporation by reference meets a general standard of reasonableness.”</p> <p>... [T]here is no evidence in the record concerning the public availability of other incorporated materials. In addition, although it appears that the EA is dependent on these documents to support its finding of no significant impact, the EA does not appear to specifically cite to which documents or portions of these documents support which conclusions. This requires undue cross-referencing. It appears that the incorporation of these materials fails the general reasonableness test. Defendants have failed to point out where these materials are specifically cited to in the materials to support their conclusions.</p> <p>Siskiyou Regional Education Project v. Rose, 87 F.Supp.2d 1074</p>	#202.10-12.13100.131: We believe the DEIS, FEIS, and the NEPA process used for the Coconino National Forest is and will be in conformance with the procedural requirements of the National Environmental Policy Act. The DEIS did include summaries of the analysis for each resource to provide a succinct and readable document for all interested publics, in accordance with guidance from the Council on Environmental Quality. The Coconino National Forest has made great efforts to make available all specialist reports on the Forest website. The specialist reports include all of the detailed information on how best available science was considered and what assumptions and methodologies were used for each resource analysis. Specialist reports will be made available on the Coconino National Forest website with the publication of the Final EIS. Where needed, references will be added in the FEIS for those instances where there is uncited information in the effects analysis.

Category	Public Concern	Comment	Response
General	2-5 The Forest Service should provide site-specific analysis and clarify the units of measure.	<p>TO AVOID UNSUPPORTED CONCLUSIONS REGARDING IMPACT REDUCTION</p> <p>Page 7, Issues: The framework of analysis is unclear, particularly the units of measure identified. If the DEIS is suggesting that some form of linear relationship between the units and goal constructs exists, this assumption would seem deeply flawed. For example, adverse impacts associated with cross-country travel require site-specific analysis, and one cannot assert that reduction of cross-country travel on 95% of the CNF will cause a 95% reduction of alleged adverse impacts. (Motorized Recreation, Boise, ID - #202.35.30100.530)</p>	<p>#202.35.30100.530: The DEIS makes no assertion that a reduction of 95% of cross-country travel on the CNF will result in a 95% reduction of adverse impacts. Rather, each resource includes methodologies to analyze the effects of the proposed changes in each alternative and these methodologies change according to the resource. Methodologies for assessing impacts are discussed in each specialist report.</p>

Category	Public Concern	Comment	Response
General	2-6 The Forest Service should identify the minimum road system and unneeded roads that should be decommissioned.	<p>TO COMPLY WITH THE TRAVEL MANAGEMENT RULE</p> <p>We [Center for Biological Diversity et al.] have concerns regarding the TAP [Travel Analysis Process]. Our first concern is the statement in the TAP that the “purpose of this report is to document the planning concerning motorized travel on the Coconino National Forest (CNF) to inform. This planning is required before beginning the environmental analysis process to designate routes according to the Travel Management Rule.” Forest Service 2010b:2. This statement only partially describes the purpose of a TAP. The TMR requires the responsible official to incorporate a science-based roads analysis to “identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.” 36 C.F.R. 212.5(b)(1).</p> <p>However, the CNF TAP also states that: “In identifying the recommended minimum road, trail and area system, we considered risk- and value-related issues for resource protection and use,” considering the following: provision for recreational opportunities; access needs for adjacent property owners; conflicts among uses of National Forest System lands; natural and cultural resources; road maintenance needs; and administrative access needs. Forest Service 2010b:2. Conspicuously absent from this list of considerations is the legal requirement in the TMR to identify the minimum road system to meet applicable statutory and regulatory requirements, to reflect long-term funding expectations, and to ensure the minimization of adverse environmental impacts. 36 C.F.R.212.5(b)(1). Also missing from the list of considerations is the identification of unneeded roads that should have been identified for decommissioning. 36 C.F.R. 212(b)(2). We have attached a section from the TAP for the Kiowa-Rita Blanca Ranger District, Cibola National Forest as an excellent example of the information we are seeking from the CNF. See Appendix S, Cibola National Forest TAP for KRB Grasslands. (Preservation/Conservation, Grand Canyon, AZ - 175.155.22100.002)</p>	<p>#175.155.22100.002:</p> <p>The Travel Analysis Process (TAP) was an administrative process to provide information to inform the analysis for implementation of the Travel Management Rule. The TAP did include identification of the Minimum Road System. Much of the information from the TAP was considered for an analysis, such as Alternative 6 in the DEIS. Identifying roads for decommissioning is outside the scope of this project.</p>

Category	Public Concern	Comment	Response
General	2-7 The Forest Service should more clearly state the need for additional trails, provide more detail on future planning efforts, and postpone road closures.	<p>THE FOREST SERVICE SHOULD MORE CLEARLY STATE THE NEED FOR ADDITIONAL TRAILS, PROVIDE MORE DETAIL ON FUTURE PLANNING EFFORTS, AND POSTPONE ROAD CLOSURES.</p> <p>Your Final EIS and your Record of Decision need to more clearly state the need for additional trails and provide clear direction for timely planning efforts that will meet that need in the foreseeable future. (Do your homework. Now!) Planning does not need to be undertaken at a “forest wide” level, (you don’t need all your buddies over to play music and “study”), and your Final EIS and Record of Decision should allow more efficient and focused District-level planning to occur. Finally, the Final EIS and Record of Decision should postpone the closure of any of the 124 miles of existing trails until future planning efforts to bring new trails on to the system are completed. (Individual, Flagstaff, AZ - #189.4.20000.410)</p>	<p>#189.4.20000.410:</p> <p>The purpose of the Coconino Travel Management EIS is to designate a system of roads, trails, and areas for motorized use as is required by the Travel Management Rule. All motorized trails were considered for designation, but a majority of these trails were not included in an alternative due to their impact on Forest resources. For example, some trails are located in areas with sensitive wildlife habitat. Other are located in areas with cultural resource values or in areas with impaired soils or impacts to water quality. The Final EIS and Record of Decision will reflect the conclusions of the effects analyses from all resources and updates based on responses to comments on the DEIS. Lastly, a decision on the Travel Management EIS does not preclude future planning efforts to designate motorized trails or un-designate routes that are observed to cause unacceptable resource impacts.</p>

Category	Public Concern	Comment	Response
General	2-8 The Forest Service should acknowledge that concerns were raised earlier in the process regarding resource impacts.	<p>The only significant issues identified from comments are issues related to allowing additional motorized use of the forest, despite our [Center for Biodiversity, et al.] comments identifying significant concerns regarding resource impacts from the existing system and any proposed additions or cross-country motorized uses. The three significant issues identified by the Forest Service include only (Forest Service 2010:7):</p> <ol style="list-style-type: none"> 1. Motorized dispersed camping opportunities may be reduced; 2. Motorized recreational opportunities may be reduced; and 3. Motorized big game retrieval opportunities may be reduced. <p>(Preservation/Conservation, Tucson, AZ - #175.3.22210.530)</p>	#175.3.22210.530: This is incorrect; the issues mentioned in your comment are those issues identified as significant issues. Other issues were identified but are fully addressed by the modified Proposed Action (Alternative 3) and Alternative 4. Though you identify the issues as those that "are issues related to allowing additional motorized use of the forest," it should be noted that both of the action alternatives decrease cross-country use by 95% across the Forest and decrease available routes for motorized use by over one third.
Alternatives	2-9 The Forest Service should fully describe the alternatives ranking process.	<p>BECAUSE THE PUBLIC IS ENTITLED TO THIS INFORMATION</p> <p>Page 9, Development of Alternatives: The "travel analysis process" ("TAP") is cryptically and insufficiently referenced or discussed in the DEIS. This is of particular concern given the apparent importance of the TAP rankings "according to their benefits and risks by resource." It is precisely this ranking process (and the "finer filter" applied by the ID Team) that the public is entitled to understand and participate in as part of the NEPA analysis. (Motorized Recreation, Boise, ID - #202.36.22200.131)</p>	#202.36.22200.131: The Travel Analysis Process (TAP) was an administrative process to provide information to inform the development of the initial proposed action. The proposed action was made available to the public during the scoping process and then modified based on comments submitted by the public. Issues identified during the scoping period were used to develop yet another alternative for full analysis in the DEIS. Comments received on the DEIS were then used to make modifications to both alternatives 3 and 4 in addition to updates to the environmental analysis. Lastly, the results of the Travel Analysis Process have been made available on the website and was clearly used as the precursor to the NEPA process.

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Alternatives	2-10 The Forest Service should improve the explanation for eliminating alternative that would have included more non-system routes.	Page 12, Alternatives Considered but Eliminated: No sufficient detail is provided here, and thus no sufficient explanation, for eliminating alternatives that would have meaningfully considered designation of additional non-system routes, trails, or even areas for continuing vehicle access. (Motorized Recreation, Boise, ID - #202.37.40200.530)	#202.37.40200.530: Explanations of the alternatives considered but eliminated are included in the FEIS. The FEIS also includes reasons for why the alternatives were eliminated. Additional information on why specific routes are or are not included as designated in one or more alternatives is included in the response to comments.
Alternatives	2-11 The Forest Service should develop an action alternative that would provide for larger areas of land located farther from roads.	<p>TO PROVIDE FOR ADEQUATE RECREATIONAL ACCESS WHILE STILL MEETING RESOURCE PROTECTION OBJECTIVES</p> <p>Chapter 1. Purpose and Need for Action, Issues (page 7): The DEIS states that only three significant issues were raised by the public and other agencies in response to the July 2007 Proposed Action and subsequent open houses. However, none of the issues you identify include the issue we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] raised in our August 30, 2007 comment letter on the Propose Action, in which we requested that the Forest Service consider an environmental alternative that would concentrate the road network in a smaller portion of the landscape and leave some larger blocks with fewer or no roads to better meet environmental objectives (Forman et al. 2003). Currently, neither action alternative addresses this issue as both alternatives result in an even distribution of the road network over the entire landscape. In Alternative 3, the Modified Proposed Action, 79.5% of the forest is 0.0 to 0.5 mile from an open road, 16.5% of the forest is 0.5 to 1.0 mile from an open road, 3.4% is 1.0 to 2.0 miles from an open road, and 0.6% is 2.0 to 4.0 miles from an open road. In Alternative 4, 81.4% of the forest is 0.0 to 0.5 mile from an open road, 14.8% of the forest is 0.5 to 1.0 mile from an open road, 3.2% of the forest is 1.0 to 2.0 miles from an open road, and 0.6% of the forest is 2.0 to 4.0 miles</p>	<p>#105.1-2.22500.002: Your request that the agency concentrate use into one or more parts of the Forest to allow for larger blocks of non-motorized areas was and issue considered but eliminated from detailed study. The reason for this is that it is outside of the scope of the project as defined by the purpose and need, which is to identify a system of motorized routes and areas that provide recreational opportunity and access while minimizing impacts to other Forest resources. The issue you bring up of establishing ‘landscape level wildlife movement corridors’ is being considered (through ‘wildlife habitat management areas’) right now under the Forest Plan Revision Process. Furthermore, the FEIS analyzes the potential impacts of each alternative to these potential ‘wildlife habitat management areas’.</p> <p>We do believe that the alternatives analyzed will provide for varied recreation</p>

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		<p>from an open road.</p> <p>In summary, both action alternatives maintain a road system where 96% of the motorized-vehicle accessible forest (approximately 1,618,560 acres out of a total of 1,686,000 acres) is less than 1.0 mile from a road. As stated in the Purpose and Need for Action, the road system is supposed to meet social, economic, and environmental goals. However, it is unclear that the proposed action alternatives would optimize any of these goals in any given area.</p> <p>We believe that it would be appropriate for the Forest Service to develop an action alternative that provides for larger areas of land located farther from roads as well as specific areas that are managed for increased user access (e.g., motorized trails)—particularly in light of the 72% increase in recreation visits from 2000 to 2005 documented in the DEIS and that increased recreational demand is likely to continue in the future. The current proposed action alternatives will not provide for varied recreation experiences in concert with resource protection, particularly landscape-level wildlife movement corridors, that the DEIS describes as desirable outcomes. We believe this should be identified as a significant issue and handled accordingly. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.1-2.22500.002)</p>	<p>experiences in concert with resource protection, which the DEIS describes as desirable outcomes.</p>
Alternatives	2-12 The Forest Service should develop an action alternative that offers the same level of motorized access as the No-Action Alternative	<p>THE FOREST SERVICE SHOULD DEVELOP AN ACTION ALTERNATIVE THAT OFFERS THE SAME LEVEL OF MOTORIZED ACCESS AS THE NO-ACTION ALTERNATIVE.</p> <p>The existing level of motorized access and recreation cannot be dismissed because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is a reasonable alternative and an alternative other than No Action must be built around it. (Motorized Recreation, Helena, MT - #109.60.22500.530)</p>	<p>#109.60.22500.530:</p> <p>Alternative 1 (no change) is included in the DEIS. However, the existing level of motorized access and recreation is not consistent with the Travel Management Rule as the existing system clearly results in substantial impacts to wildlife, water quality, soil, and cultural resources. In summary, this alternative was studied in detail in the FEIS and does not meet the purpose and need of the project.</p>

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Alternatives	2-13 The Forest Service should include an alternative that keeps all existing routes open.	<p>WHILE PROHIBITING THE ESTABLISHMENT OF ANY NEW ROUTES</p> <p>The alternatives presented in this draft EIS are inadequate as they do not present and analyze alternatives that are somewhere in the middle between Alternative 1 and Alternative 3 or 4. A reasonable alternative would be to close the CNF [Coconino National Forest] to new cross-country travel and establishment of new routes.</p> <p>All existing routes should be kept open until such time that site-specific examination defines impacts that cannot be mitigated. This alternative would allow for the use of the routes until such time that issues or resource concerns would dictate their closure. It would be an ongoing process and updates would be provided in the annual republishing of the TMR [Travel Management Rule] maps.</p> <p>Prior to roads being proposed for closure an analysis should address the opportunity for incorporating mitigating measures which would allow roads to be kept open. (Individual, Sedona, AZ - #112.4.52000.200)</p>	<p>#112.4.52000.200: We disagree. The Coconino Travel Management EIS did include a site specific review of all motorized routes and considered designation of these routes in one or more alternative based on their impacts to wildlife, water quality, soil, cultural resources, and recreational experience. Alternative 3 and 4 are based on the purpose and need to reduce the number of open road miles on the forest and to address resource impacts associated with unmanaged motorized use.</p>

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Alternatives	2-14 The Forest Service should develop an alternative that addresses user needs in particular areas rather than across the forest.	<p>TO ENSURE THAT SUFFICIENT RECREATIONAL OPPORTUNITIES ARE PROVIDED</p> <p>Related to, but legally distinct from, the purpose and need issue, is the improperly narrow range of alternatives. There are minimal trail mileages considered in the alternatives, and even Alternative 4, which considers increased trail mileage (29 vs. 25 miles), cannot be rationally defended as providing for appropriate recreational opportunities for those seeking trail-based recreation. We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] wish to echo and incorporate by reference the comments at p. 2 of the letter from the U.S. Fish and Wildlife Service dated April 21, 2010, in support of the concept that an alternative should be analyzed that is attuned to user/resource needs in particular areas, rather than the current “average across the Forest” approach that will likely satisfy no one. We cannot recall the Service previously offering comment on a travel planning document which questions the Forest’s decision to provide too little recreational opportunity. (Motorized Recreation, Boise, ID - #202.9.51000.530)</p>	#202.9.51000.530: Based on your comments and those of others, additional motorized trail opportunities were added to Alternative 4. Specifically, the 52-mile Challenger Trail was added to Alternative 4 because this single track trail appears to represent a long-distance, single-track, motorized trail loop in Forest vegetation that is desirable to user groups and not represented in the modified proposed action.
Alternatives	2-15 The Forest Service should develop a Pro-Recreation Alternative	<p>TO COMPLY WITH NEPA AND MEET THE NEEDS OF MOTORIZED RECREATIONISTS</p> <p>As documented in our [Capital Trail Vehicle Association] comments, every Forest Service travel planning action has resulted in less motorized access and motorized trails. Motorized recreationists have become extremely frustrated with this disconnect between their needs and Forest Service actions. We often hear others say that the Forest Service is going to close our trails regardless of what we say or do. This is a sad statement for a federal agency with a stated commitment to equal program delivery. We are extremely concerned because the Forest Service is not providing equal program delivery to motorized recreationists. We urge Forest Service leadership to address this problem by developing a preferred alternative based on a Pro-Recreation alternative. The current set of alternatives does not include</p>	#109.15.52000.530: The purpose and need for action states, "A need exists to reduce the number of open road miles on the forest and to address resource impacts associated with unmanaged motorized use." The Forest Service sees a need to address unacceptable resource damage created by unrestricted and increased recreational motorized use across the forest. It is not the intent of the Forest Service to shut down motorized recreation, or to close motorized trails needlessly. It is the intent of the Forest Service to protect forest resources while allowing for

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		<p>a Pro-Recreation alternative. NEPA requires analysis of all viable alternatives and all significant issues. A Pro-Recreation alternative is viable and needed by the public. The reasons and issues presented by motorized recreationists, including these comments, are adequate justification to develop and support a Pro-Recreation alternative. Other motorized recreationists are available to develop and support a Pro-Recreation alternative if the agency would engage them. Again, we urge the Forest Service to address this situation and restore public confidence in the agency by developing and selecting a Pro-Recreation alternative that provides equal program delivery by allocating at least 50% of the trails to motorized use. (Motorized Recreation, Helena, MT - #109.15.52000.530)</p>	<p>continued motorized use on those routes with the highest utility. However, the Forest Service sees a need to reduce some open road miles in an effort to achieve a balance between these two actions.</p>
<p>Alternatives</p>	<p>2-15 The Forest Service should develop a Pro-Recreation Alternative</p>	<p>TO ADDRESS THE SHORTAGE OF ATV AND MOTORCYCLE TRAILS IN THE FOREST</p> <p>There is a great shortage of ATV and motorcycle trails in the Coconino National Forest. As shown graphically on the National OHV tables, there are no motorized trails. Clearly there is an imbalance of opportunity that justifies more (not less) motorized recreational opportunities. For this reason, we strongly recommend and support the development of a Pro-Recreation Alternative. The proposal by the Coconino National Forest does not meet this definition of a Pro-Recreation Alternative. (Motorized Recreation, Helena, MT - #109.9.22210.530)</p>	<p>#109.9.22210.530:</p> <p>There are currently approximately 7,484 miles of known roads that are currently used for motorized travel on the CNF. However, as the purpose and need for action states, "A need exists to reduce the number of open road miles on the forest and to address resource impacts associated with unmanaged motorized use." The Forest Service sees a need to address unacceptable resource damage created by unrestricted and increased recreational motorized use across the forest. It is not the intent of the Forest Service to shut down motorized recreation, or to close motorized trails needlessly. It is the intent of the Forest Service to protect forest resources while allowing for continued motorized use on those routes with the highest utility. In all alternatives</p>

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			over 2,500 miles of road would be designated for 'all vehicles', which includes a majority of the user-submitted ATV trails and other low-traffic roads and two-tracks used as ATV trails.
Alternatives	2-16 The Forest Service should include an alternative that would prohibit motorized game retrieval and dispersed camping.	<p>THE FOREST SERVICE SHOULD INCLUDE AN ALTERNATIVE THAT WOULD PROHIBIT MOTORIZED GAME RETRIEVAL AND DISPERSED CAMPING</p> <p>An alternative must be evaluated that does not provide an exception for motorized cross-country travel for game retrieval or dispersed camping. (Preservation/Conservation, Tucson, AZ - #175.7.55000.530)</p>	#175.7.55000.530: Your scoping response dated September 7, 2007 seems to contradict your comment here, which argues that an alternative is needed that considers no camping corridors. On September 7, 2007 your letter states, "We agree that the Forest's dispersed camping strategy outlined in the Proposed Action provides a practical approach to accommodate this recreational activity." The initial proposed action was modified from allowing 100-foot dispersed camping corridors on every designated route to 300-foot corridors on approximately 20% of designated routes. This is a decrease in approximately 1/3 of acres proposed as dispersed camping corridors. It is unclear that an additional alternative without any camping corridors is a feasible alternative. The Coconino National Forest considered including an additional alternative without dispersed camping corridors but this was eliminated from detailed study. Please refer to the FEIS for more information on why this alternative was not studied in detail.
Alternatives	2-17 The Forest Service should develop an alternative	<p>THE FOREST SERVICE SHOULD INCLUDE AN ALTERNATIVE THAT WOULD PROHIBIT MOTORIZED GAME RETRIEVAL AND DISPERSED CAMPING</p>	AZ - #175.10-11.32300.410: The purpose and need of the Coconino Travel Management Project is to reduce

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	<p>that would limit impacts on special-status species.</p>	<p>Both action alternatives would result in a “may affect” finding for all species analyzed. Forest Service 2010:81. Species listed as threatened or endangered include the black-footed ferret, southwestern willow flycatcher, Yuma clapper rail (all endangered), the Chiricahua leopard frog, Sonoran desert population of the bald eagle, and Mexican spotted owl (all threatened). Forest Service 2010:81-88. At least one alternative should be developed that would result in a “no effect” finding for some, if not all species. To that end, we [Center for Biological Diversity et al.] recommend the development and analysis of an alternative that:</p> <ul style="list-style-type: none"> -Removes the 10.4 miles of road in potential prairie dog habitat from the designated system; -Removes the 1.5 miles of camping corridor in prairie dog colonies from the designated system; -Removes the 0.5 mile of camping corridor within 0.25 miles of nests and critical habitat for southwestern willow flycatcher from the designated system; -Removes 8.2 miles of camping corridor within 1 mile of Chiricahua leopard frog current and historic sites from the designated system; -Removes 0.3 miles of user-created routes within 1 mile of Chiricahua leopard frog current and historic sites from the designated system; -Removes 0.4 miles of camping corridor from Sonoran Desert Bald Eagle nest sites from the designated system; -Removes 429 miles of road in the ponderosa pine natural vegetation type to protect wintering bald eagles from the designated system; -Removes the up to 17.3 miles of unauthorized routes in that would impact wintering bald eagles the from the designated system; -Removes the 16 miles of camping corridor within Mexican spotted owl PACs [Protected Activity Centers] from the designated system; -Removes the 0.6 miles of camping corridor within 0.25 miles of Mexican spotted owl nest sites from the designated system; 	<p>(not completely remove) impacts to wildlife and other resources in consideration of meeting multiple resource goals. The action alternatives in the FEIS are expected to decrease impacts to wildlife by greatly decreasing the extent of motorized use within wildlife species habitat. Each route going through the habitat of listed threatened and endangered species was specifically considered for designation (or not) through the travel management process.</p>

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		<p>-Removes the 0.5 miles of unauthorized road within Mexican spotted owl PACs from the designated system;</p> <p>-Removes the 12.6 miles of camping corridor within Mexican spotted owl critical habitat from the designated system;</p> <p>-Removes the 10 miles of camping corridor within 0.25 miles of yellow-billed cuckoo habitat from the designated system;</p> <p>-Removes the 1.5 miles of unauthorized route that would result in disturbance of yellow-billed cuckoo habitat from the designated system; -Removes the 0.6 miles of camping corridor within potential narrow-headed garter snake habitat from the designated system;</p> <p>-Removes the 0.7 miles of user-created route within potential narrow-headed garter snake habitat from the designated system.</p> <p>(Preservation/Conservation, Grand Canyon, AZ - #175.10-11.32300.410)</p>	

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Alternatives	2-18 The Forest Service should either include an alternative designed to protect special-status species or explain why it was rejected.	<p>THE FOREST SERVICE SHOULD EITHER INCLUDE AN ALTERNATIVE DESIGNED TO PROTECT SPECIAL-STATUS SPECIES OR EXPLAIN WHY IT WAS REJECTED</p> <p>We [Center for Biological Diversity et al.] provided the Forest Service with GIS shapefiles displaying route closures and an Excel spreadsheet with specific route recommendations and rationale that have apparently been ignored by the Forest Service. We submitted these specific recommendations as a complete alternative during scoping as well as during a pre-scoping process. We based our recommendations upon a route density of 1.0 mile/square mile route density, protection of threatened and endangered species (Mexican spotted owl, northern goshawk, Gunnison’s prairie dog colony sites), pronghorn core habitat, mule deer summer habitat, black bear core habitat, mountain lion core habitat, soil erosion hazards, proposed wilderness areas, and proposed wildlife habitat areas among other concerns. We do not find any alternative that reflects these recommendations nor do we see any explanation for why our recommendations were rejected. (Preservation/Conservation, Tucson, AZ - #175.9.30100.410)</p>	<p>#175.9.30100.410:</p> <p>An alternative to analyze a route system that would result in a route density of no more than 1.0 miles/square mile was considered but eliminated from detailed study. This alternative would not meet the purpose and need, which includes designation of a system of routes and areas for motorized use that would allow for access and recreational opportunities while minimizing impacts to Forest resources. An alternative that includes a road density of less than one mile/square mile would not even support the minimum road system identified by the Coconino National Forest in the Travel Analysis Process Report and thus would not provide adequate motorized access or recreational opportunities. In addition to considering this alternative, the Forest responded to all route closure or designation suggestions submitted during the public comment period after the release of the Draft Environmental Impact Statement. Please see Chapter 7 of this document for site-specific responses.</p>

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Alternatives	2-19 The Forest Service should analyze an alternative that would result in a route density of no more than 1 mile per square mile	<p>TO COMPLY WITH NEPA</p> <p>Our [Center for Biological Diversity et al.] proposed alternative, one that would have closed routes that had serious negative impacts to threatened and endangered species, management indicator species, and riparian areas, was not adequately considered by the Forest Service in violation of the requirements of the National Environmental Policy Act to rigorously explore and objectively evaluate all reasonable alternatives and discuss the reasons for eliminating any alternatives that were not developed in detail.40 C.F.R. 1502.14.</p> <p>Specifically, we recommended the Forest Service analyze a route system that would result in a route density of no more than 1.0 mile/square mile, a standard supported by a large and influential number of scientists. Concerned Scientists 2004. The failure to develop and analyze an alternative that would result in our recommended route density requires the withdrawal of the DEIS and the preparation of an additional DEIS that analyzes such an alternative. (Preservation/Conservation, Tucson, AZ - #175.6.40210.130)</p>	#175.6.40210.130: An alternative to analyze a route system that would result in a route density of no more than 1.0 miles/square mile was considered but eliminated from detailed study. This alternative would not meet the purpose and need, which includes designation of a system of routes and areas for motorized use that would allow for access and recreational opportunities while minimizing impacts to Forest resources. An alternative that includes a road density of less than one mile/square mile would not even support the minimum road system identified by the Coconino National Forest in the Travel Analysis Process Report and thus would not provide adequate motorized access or recreational opportunities.

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Alternatives	2-20 The Forest Service should develop an alternative that would limit road densities in the 5 th -level hydrologic unit code watershed to 1 mile per square mile.	<p>THE FOREST SERVICE SHOULD DEVELOP AN ALTERNATIVE THAT WOULD LIMIT ROAD DENSITIES IN THE 5TH-LEVEL HYDROLOGIC UNIT CODE WATERSHEDS TO 1 MILE PER SQUARE MILE.</p> <p>Under both action alternatives, 5 of the 7 5th HUC [5th Level Hydrologic Unit Code] watersheds in the CNF [Coconino National Forest] would continue to have road densities above the 1 mile/square mile standard we recommend. Forest Service 2010:78. An alternative must be developed and analyzed that would bring all 5th HUC watersheds within our recommended standard. (Preservation/Conservation, Tucson, AZ - #175.27.31100.410)</p>	#175.27.31100.410: Based on your comments, several additional routes were removed from designation in Alternative 3. Specifically, those routes or designated camping corridors that were identified as resulting in watershed impacts were removed from designation. Although these removals modified road densities for Alternative 3, not all road densities in each watershed were reduced to below 1 mi/mi ² . It was determined that reducing road densities to less than 1 mi/mi ² for every watershed would result in a road system that lacked adequate access for recreation, Forest use, and private land access. Please see the discussion on Alternatives considered but eliminated from detailed study in the Environmental Impact Statement.
Alternative 1	2-21 The Forest Service should select Alternative 1.	<p>BECAUSE IT BEST REFLECTS THE WILL OF THE PUBLIC</p> <p>I am frustrated, angry, just fed up with all these new rules. We gave our input at every single meeting and you have chosen to not listen to anything the people have voiced! I personally am not going to fly my plane into a Forest Service building like the man did the IRS building, but I understand how frustrating government bureaucracy is! Alternative 1 is our only choice! (Individual, Dupont, CO - #180.5.12000.740)</p> <p>We have attended every single meeting in our area regarding these changes. We have given our input and every single item we wanted has been ignored! American people are getting sick of being ignored. Please adopt Alternative 1 so we can maintain freedom in our forests.</p>	#181.5.12000.740: The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads, trails, and areas for motorized use. The Coconino National Forest worked closely with the public and users like you to collect information on routes used for camping and other activities. This information was used to establish a designated system of roads and trails to maintain access to the Forest while protecting those values and resources that are important to Forest users. Alternative 1 (no change) is included in the EIS and

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		<p>This is supposed to be a government of, for and by the people! (Individual, Happy Jack, AZ - #181.5.12000.740)</p>	<p>analyzed in full.</p> <p>#181.5.12000.740: The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads, trails, and areas for motorized use. The Coconino National Forest worked closely with the public and users like you to collect information on routes used for camping and other activities. This information was used to establish a designated system of roads and trails to maintain access to the Forest while protecting those values and resources that are important to Forest users. Alternative 1 (no change) is included in the EIS and analyzed in full.</p>
Alternative 1	2-21 The Forest Service should select Alternative 1.	<p>TO AVOID THE APPEARANCE OF BIAS</p> <p>My vote is for Alternative 1 because both 3 and 4 go way too far. Why would you not give us an alternative that is at least somewhere in the middle of the road? I have to admit that I'm pretty sure the Forest Service had its mind made up from the beginning what they would allow and number 1 is not what you wanted.</p> <p>Looks like typical politics, stacked from the beginning against what the majority of American citizens would want. Environmentalists have no common sense and it really shows. (Individual, Dupont, CO - #180.1.22610.720)</p>	<p>#180.1.22610.720:</p> <p>The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads, trails, and areas for motorized use. The Coconino National Forest worked closely with the public and users like you to collect information on routes used for camping and other activities. This information was used to establish a designated system of roads and trails to maintain access to the Forest while protecting those values and resources that are important to Forest users. Alternative 1 (no change) is included in the EIS and</p>

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Alternative 3	2-22 The Forest Service should modify Alternative 3.	<p>TO FURTHER REDUCE IMPACTS TO CRITICAL HABITAT AND RIPARIAN RESOURCES</p> <p>Range of Alternatives: While we [EPA] agree Modified Alternative 3 is environmentally superior to the other remaining alternatives, we recommend the Coconino National Forest (CNF) amend that proposed alternative to further reduce adverse impacts to critical habitat and riparian resources. EPA suggests the CNF include in the Final Environmental Impact Statement (FEIS) a specific plan for prioritizing deferred maintenance to minimize any potential adverse effects to the environment. (U.S. Environmental Protection Agency, San Francisco, CA - #205.3.41200.201)</p>	<p>analyzed in full.</p> <p>#205.3.41200.201:</p> <p>The Coconino National Forest agrees that Alternative 3 can be modified to further reduce impacts to critical habitat and riparian resources while minimally impacting recreational opportunities and Forest access. The Forest has followed your suggestion by re-considering the designation of routes in canyon bottoms and reconsidering the designation of dispersed camping corridors in meadows, riparian areas, and areas adjacent to Arizona Game and Fish critical waters (done by working in conjunction with the agency). Your comment about prioritizing deferred maintenance is outside of the scope of the project, albeit by designating a system of routes open for public use this does have the effect of prioritizing those routes open for public use for maintenance over other non-designated system routes.</p>

Category	Public Concern	Comment	Response
Alternatives 3 & 4	2-23 The Forest Service should not select Alternatives 3 or 4.	<p>BECAUSE THEY PROVIDE TOO FEW TRAILS</p> <p>I've read portions of the report and proposals for alternative plans 3 and 4. May I submit that the length and size of the trails in these proposals are too restrictive and would not meet the needs of the volume of folks who recreate in these areas. (Individual - #9.1.40000.500)</p>	<p>#9.1.40000.500:</p> <p>Based on your input and the comments of others, additional miles of motorized trails were added for designation to Alternative 3 and Alternative 4. Approximately 1.8 miles of motorized trail (Lower Smasher Canyon) was added to Alternative 3 based on site-specific review of this trail. Additionally, approximately 51.8 miles of single track motorized trail (Challenger Trail) was added to Alternative 4 because this route provides a unique recreational opportunity for consideration and detailed study in the FEIS.</p>

Category	Public Concern	Comment	Response
<p>Alternatives 3 & 4</p>	<p>2-24 The Forest Service should acknowledge that there are few meaningful differences between Alternative 3 and Alternative 4.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THERE ARE FEW MEANINGFUL DIFFERENCES BETWEEN ALTERNATIVE 3 AND ALTERNATIVE 4</p> <p>The DEIS presents three alternatives for public review, including the “no action” alternative. Alternative 1 is the no action alternative, Alternative 3 is the modified proposed action and Alternative 4 proposes crosscountry motorized uses in addition to the route system proposed and analyzed in Alternative 3. As noted in the summary of the DEIS, both action alternatives would designate more than 3,000 miles of roads and trails for motorized uses, including 64 miles of user created routes. Forest Service 2010: iii. In fact, there is very little difference between the two action alternatives, as both Alternative 3 and 4 would:</p> <ul style="list-style-type: none"> -Designate over 3,000 miles of motorized routes (3,280 for Alternative 3 and 3,507 for Alternative 4, a difference of just over 6%); -Add 64 miles of unauthorized routes; -Designate over 600 miles of corridor for motorized dispersed camping; -Include at least 25 miles of motorized trail (25 miles for Alternative 3 and 29 miles for Alternative 4, a difference of less than 10%); -Include a provision for MBGR [motorized big game retrieval] dependent on the decision made in the Kaibab National Forest’s Travel Management Plan; and -Include a provision for cross-country motorized use of the Cinder Pit OHV area (13,700 acres). (Preservation/Conservation, Phoenix, AZ - #175.2.22210.530) 	<p>#175.2.22210.530:</p> <p>Based on your comments and the comments of others, both Alternative 3 and Alternative 4 were modified to include analysis on a broader range of alternatives. Modifications made to each alternative were specifically based on comments received from the public. Information on what was changed in each alternative is available in the Final EIS.</p>

Category	Public Concern	Comment	Response
Alternative 4	2-25 The Forest Service should select Alternative 4.	<p>THE FOREST SERVICE SHOULD SELECT ALTERNATIVE 4</p> <p>I am in favor of Alternative Plan #4. (Individual, Camp Verde, AZ - #38.1.22610.001)</p> <p>Of the alternatives presented in this document, and if they were to stand alone without modification, Alternative 4 is the most suitable. (Individual, Sedona, AZ - #112.13.22640.001)</p>	<p>#38.1.22610.001: We thank you for your input.</p> <p>#112.13.22640.001: We thank you for your input.</p>
Alternative 4	2-25 The Forest Service should select Alternative 4.	<p>TO SUPPORT THE LOCAL COMMUNITY</p> <p>We have had a home in Munds Park at 1370 Antelope Trail for over fifteen years. We enjoy the forest and all the things we can do out there and think that Alternative 4 would be the best for our needs. We hope you will vote for the interest of all in the community and think of our needs and wants, too. (Individual - #51.1.22640.711)</p>	<p>#51.1.22640.711: We thank you for your input. We believe all of the alternatives would allow for community needs for motorized access and would provide some motorized recreation opportunities as well.</p>
Alternative 5	2-26 The Forest Service should provide more information regarding the elimination of Alternative 5.	<p>THE FOREST SERVICE SHOULD PROVIDE MORE INFORMATION REGARDING THE ELIMINATION OF ALTERNATIVE 5</p> <p>The elimination of Alternative 5 on page 13 because “it does not meet the TMR for resource protection” is inadequate. More detailed explanation and analyses of individual road issues is needed. (Individual, Sedona, AZ - #112.8.22650.410)</p>	<p>#112.8.22650.410: Alternative 5 was eliminated from further analysis because it would result in continued impacts to valuable resources, including endangered, threatened and sensitive species habitat, riparian areas, and cultural resources; which directly conflicts with the requirements of the Travel Management Rule. Additional information on why one or more routes were not included in alternatives 3 or 4 will be provided in the Record of Decision document or in response to the site-specific comments, below.</p>

Category	Public Concern	Comment	Response
Alternative 6	2-27 The Forest Service should include Alternative 6 among the analyzed alternatives.	<p>TO PROVIDE A REASONABLE COMPARISON TO THE OTHER ALTERNATIVES</p> <p>The alternatives considered but eliminated from detailed study include Alternative 6, which would have analyzed the impacts of the road system the Forest Service can reasonably afford to maintain. While it might not be realistic to implement this alternative which would have designated just 602 miles of road forest-wide, it should not have been excluded from detailed analysis. Forest Service 2010:13. Analyzing an alternative that presents a realistic picture of a road system that is bounded by fiscal realities would have offered a valuable comparison with which other alternatives could have been compared. It is our [Center for Biological diversity et al.] view that analyzing alternatives that fly in the face of fiscal realities in a vacuum, without comparing the impacts of a manageable, maintainable route system, leads to an unrealistic view of the impacts of adopting an unaffordable route system. (Preservation/Conservation, Grand Canyon, AZ - #175.5.22660.835)</p>	#175.5.22660.835: We disagree. Alternative 6 was eliminated from detailed study because it did not present a feasible option for providing basic forest-wide access to or any motorized-based recreational opportunities. Since this alternative is not considered feasible, it does not meet the purpose and need and thus eliminated from detailed study in the FEIS.
Impact Analysis	2-28 The Forest Service should quantify all impacts that are not negligible.	<p>THE FOREST SERVICE SHOULD QUANTIFY ALL IMPACTS THAT ARE NOT NEGLIGIBLE.</p> <p>Throughout the analyses of impacts, many of the impacts are unquantified. There are extensive uses of terms such as “may”, “could”, “likely”, “poses risk”, etc. when referring to impact descriptions. If the impacts cannot be better quantified, the result should be negligible impacts between alternatives. (Individual, Sedona, AZ - #112.9.13100.200)</p>	#112.9.13100.200: Though it is valuable to quantify impacts for each resource where feasible, in many circumstances it is neither realistic nor desirable to identify a number to describe the effect of an alternative to a resource. In many instances, such as when considering impacts to recreational experience, the EIS focuses on qualitative analysis rather than quantitative analyses based on the best available science and to ensure that potential effects of each alternative are disclosed in a meaningful way without being misleading.
Impact Analysis	2-29 The Forest Service should apply	<p>TO COMPLY WITH THE EXECUTIVE ORDER</p> <p>Need to Comply with Executive Orders Applies to All Designated</p>	#175.172-175.20000.130: The designation of a system of routes and

Category	Public Concern	Comment	Response
	<p>all criteria listed in Executive Order 11644 to all routes proposed for motorized use.</p>	<p>Routes:</p> <p>We [Center for Biological Diversity et al.] note that a Specialist Report for this DEIS makes reference to 36 CFR 219, 261, and 295 and states that ORV uses can be restricted or prohibited to minimize damage to natural resources (at page 7 of the Soil and Water Specialist’s Report). We point out that the Executive Orders use the term “shall” rather than “can” and we recommend the CNF [Coconino National Forest] ensure the minimization of the impacts of ORV use in the CNF in accordance with the Executive Orders.</p> <p>The preamble to the Executive Orders makes clear that it is the use of ORVs on public lands that are causing harm to public lands:</p> <p>An estimated 5 million off-road recreational vehicles—motorcycles, minibikes, trial bikes, snowmobiles, dune-buggies, all-terrain vehicles, and others—are in use in the United States today, and their popularity continues to increase rapidly. The widespread use of such vehicles on the public lands—often for legitimate purposes but also in frequent conflict with wise land and resource management practices, environmental values, and other types of recreational activity—has demonstrated the need for a unified Federal policy toward the use of such vehicles on the public lands.</p> <p>It is not the bureaucratic name of the route the ORV is used upon, but rather the use of the ORV itself that lead Presidents Nixon and Carter to order federal agencies to rein in unmanaged motorized recreation.</p> <p>The Executive Orders are intended to be broadly applicable to all federal land management agencies and all of the land they manage. The minimization requirements of the Executive Orders must apply to all lands and routes under the jurisdiction of the Forest Service, whether classified as routes, roads, or trails. Section 1. Purpose. It is the purpose of this order to establish policies and provide for procedures that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. Sec. 3.</p>	<p>areas for motorized use in conformance with the Travel Management Rule is considered to be in full compliance with previous Executive Orders issued on the subject of off-road use. Considering that either action alternative would prohibit off-road use on over 1.5 million acres (except for areas designated for motorized big game retrieval and designated dispersed camping), it is clear that the Coconino National Forest’s plans to implement the Travel Management Rule are going to largely reduce impacts to other Forest resources. Lastly, each route discussed in your comments and others were specifically considered for designation or not in one or more alternatives. As a result, only those routes that provided access or recreational opportunities while minimizing impacts to Forest resources were included for designation in one or more alternatives.</p>

Category	Public Concern	Comment	Response
		<p>Zones of Use. (a) Each respective agency head shall develop and issue regulations and administrative instructions, within six months of the date of this order, 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, and set a date by which such designation of all public lands shall be completed. Those regulations shall direct that the designation of such areas and trails will be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands. The regulations shall further require that the designation of such areas and trails shall be in accordance with the following:</p> <p>(1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.</p> <p>(2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.</p> <p>(3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.</p> <p>(4) Areas and trails shall not be located in officially designated Wilderness Areas or Primitive Areas. Areas and trails [start bold text] shall [end bold text] be located in areas of the National Park system, Natural Areas, or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values.</p> <p>(b) The respective agency head shall ensure adequate opportunity for public participation in the promulgation of such regulations and in the designation of areas and trails under this section.</p> <p>(c) The limitations on off-road vehicle use imposed under this section</p>	

Category	Public Concern	Comment	Response
		<p>shall not apply to official use. Sec. 9. Special Protection of the Public Lands. (a) Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.(b) Each respective agency head is authorized to adopt the policy that portions of the public lands within his jurisdiction shall be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use pursuant to Section 3 of this Order.</p> <p>As stated in the TAP [Travel Analysis Process]: “By state law, ML [Maintenance Level] 2 or High Clearance roads are available for use by nonhighway legal vehicles.” Forest Service 2010b:8. While ML 3, 4 and 5 roads are open to “highway legal vehicles,” in Arizona, ATVs, dirtbikes, and other ORVs can be licensed and made street legal. Therefore, all roads in the CNF are available for ORV uses and must comport with the Executive Orders and the requirement to minimize the impacts of ORVs to wildlife and wildlife habitat, soils, watersheds, vegetation, other natural resources, and other users. Executive Order 11644 as amended, [sections] I, 3(a), 9. In addition, all designated routes (ML 2-5) must be evaluated and monitored for adverse effects of off-road vehicle use to soils, vegetation, wildlife, and other natural resources and when considerable adverse impacts are discovered, the Forest Service shall immediately close the area or routes to ORV use. Executive Order 11644 as amended [sections] 8 and 9. All of these criteria should have been applied to all routes proposed for motorized uses: damage to soil, watershed, vegetation and other forest resources; harassment of wildlife and significant disruption of wildlife habitats; conflicts between motorized vehicle</p>	

Category	Public Concern	Comment	Response
		<p>use and existing or proposed recreational use of National Forest Service lands or neighboring Federal lands; and compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.</p> <p>It appears that considerations for routes classified as roads included only: speed; volume; composition; distribution of traffic on roads; and compatibility of vehicle class with road geometry and surfacing. Forest Service 2010b: 12. (Preservation/Conservation, Grand Canyon, AZ - #175.172-175.20000.130)</p>	
Impact Analysis	2-30 The Forest Service should analyze the impacts resulting from the existence of roads.	<p>NOT JUST IMPACTS FROM USE OF ROADS</p> <p>Page 5, Proposed Action: The lead-in paragraph indicates that nothing in the proposed action will affect nonmotorized recreation. We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] interpret this statement as recognizing that existing but undesignated routes will remain on the landscape following implementation of this project. Put differently, the CNF [Coconino National Forest] will not attempt road/trail decommissioning as part of this project. Assuming we are correct, an important corollary follows—the DEIS fails to analyze alleged adverse impacts associated with the mere existence of a road/trail, as opposed to impacts attributable to travel upon the same. As such, the “benefits” of route closure are greatly overstated in the DEIS, as many route impacts stem largely from route existence, and are minimally related to traffic. (Motorized Recreation, Boise, ID - #202.34.30000.410)</p>	#202.34.30000.410: Though it is true that the designation of a system of routes and areas for motorized use will not result in the removal of non-designated routes from the landscape it does remove or substantially reduce motorized use on these routes. Motorized use in and of itself can have negative impacts to wildlife, watershed, and culturally significant resources. Motorized use can also result in conflict. We feel that the Environmental Impacts Statement specifically focuses on how the designation of a system of routes and areas for motorized use would result in effects to Forest resources due to changes in motorized use and not in the removal of roads or trails.

Category	Public Concern	Comment	Response
Impact Analysis	2-31 The Forest Service should disclose impacts in a fair and unbiased manner with a relative sense of magnitude.	<p>AND SHOULD PROVIDE SUFFICIENT DETAIL TO SUPPORT THE DECISIONMAKING PROCESS</p> <p>Without going into unnecessary detail, BRC [BlueRibbon Coalition] is very concerned about the approach some land management agencies are taking when analyzing and disclosing effects to the human environment of OHV use.</p> <p>An approach we encounter far too often is one that is plagued by a preoccupation with documenting what impacts vehicle use can have or may have to various resources, at various points in time, while ignoring the relevant environmental analysis.</p> <p>Environmental impact analysis documents often include statement after statement regarding various negative impacts of roads and vehicle use; i.e., trampled vegetation, compressed soils, increased sediment loading, disturbed wildlife, etc., while including little or no information about what the existing condition is, or how the existing motorized and non-motorized uses are actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives.</p> <p>Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to baseline data to establish a threshold on which the significance of the impacts of each alternative can be determined.</p> <p>Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer. When federal agencies evaluate technical issues or apply specialized expertise, NEPA requires them to rely on valid sources and to disclose the methodology, present hard data, cite by footnote or other specific method to technical references, and otherwise disclose and document any bases for expert opinion. 40 C.F.R. [section] 1502.24; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1150 (9th Cir. 1998).</p> <p>When applying NEPA, agencies must: utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment...</p> <p>42 U.S.C. [section] 4332(A); 40 C.F.R. [section] 1502.6. NEPA does not envision undocumented narrative exposition, instead requiring:</p>	<p>#172.11- 12.30100.530:</p> <p>We believe the DEIS, FEIS, and the NEPA process used for the Coconino National Forest is and will be in conformance with the procedural requirements of the National Environmental Policy Act. An interdisciplinary approach was used in conformance with the National Environmental Policy Act and implementing regulations. The DEIS did include summaries of the analysis for each resource to provide a succinct and readable document for all interested publics in accordance with guidance from the Council on Environmental Quality. The Coconino National Forest has made great efforts to make available all specialist reports on the web. The specialist reports include all of the detailed information on how best available science was considered and what assumptions and methodologies were used for each resource analysis. Specialist reports will be made available on the Coconino National Forest website with the publication of the Final EIS. Where needed, references will be added in the FEIS for those instances where there is un-cited information in the effects analysis.</p>

Category	Public Concern	Comment	Response
Impact Analysis	2-32 The Forest Service should evaluate strategies to increase funding.	<p>TO SUPPORT THE VIABILITY OF ALTERNATIVE 3</p> <p>The FEIS should evaluate strategies to increase funding to support the viability of Modified Alternative 3. (U.S. Environmental Protection Agency, San Francisco, CA - #205.4.22630.835)</p>	<p>#205.4.22630.835:</p> <p>Evaluating strategies to increase funding is outside the scope of the project. The Forest Service will continue to use every feasible method available to augment resources to maintain and improve management of the road, trail, and motorized-use areas on the Coconino National Forest.</p>
Technical and Editorial	2-33 The Forest Service should modify Table 7.	<p>TO BETTER SHOW THE DIFFERENCES BETWEEN ALTERNATIVES</p> <p>Table 7, Summary of effects for the Travel Management Rule on the Coconino National Forest by resource area (pages 14-15): This table is provided to summarize the effects of the No Action Alternative and the two action alternatives. The table shows that there is no difference in effects from implementation of either action alternative, and effects to identified resources (recreation, socio-economics, heritage, contemporary Indian uses, soil and water, aquatic resources, wildlife, and plants) are exactly the same. Though the proposed alternatives do seem to be very similar, there are a few differences that should be reflected in the summary table. For example, Alternative 3 results in closure of approximately 288 more miles of road than Alternative 4, and we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend showing this difference in the table. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.5.22600.200)</p>	<p>#105.5.22600.200:</p> <p>Thank you for your input. The table you refer to is a summary of all effects for each alternative in the proposed action. As a result, it includes generalized information and does not fully capture all the detailed analysis included in the DEIS. The FEIS contains updated comparison tables to better reflect the differences between alternatives. In addition, rationale for why one alternative was selected over another is included in the Record of Decision.</p>
Technical and Editorial	2-34 The Forest Service should ensure that the Desired Conditions and Purpose and Need sections are corrected.	<p>TO BE COMPLETE AND ACCURATE</p> <p>Page 4, Desired Condition; Purpose and Need—both reiterate incomplete or incorrect statements in the Summary and Background sections. (Motorized Recreation, Boise, ID - #202.33.21000.002)</p>	<p>#202.33.21000.002:</p> <p>Thank you for your comment. The FEIS has been updated with those correction</p>

Category	Public Concern	Comment	Response
Technical and Editorial	2-35 The Forest Service should correct references to Table 9 or provide the table.	There is a reference to Table 9 on page 26 of the DEIS, referring readers to a table that “details the extent of roads, trails and areas available for travel with high-clearance vehicles.” This table is either mis-identified or does not exist. (Preservation/Conservation, Grand Canyon, AZ - #175.82.21000.530)	#175.82.21000.530: Thanks for that information. This error has been corrected in the FEIS.
Technical and Editorial	2-36 The Forest Service should consistently refer to the miles of roads that will be closed in Alternatives 3 and 4.	THE FOREST SERVICE SHOULD CONSISTENTLY REFER TO THE MILES OF ROADS THAT WILL BE CLOSED IN ALTERNATIVES 3 AND 4 The length of road to be closed in both Alternatives 3 and 4 is referred to as either the actual number (1,937 miles and 1,709 miles respectively) or “approximately 2,000 miles.” When both are referred to as “approximately 2,000 miles” it dilutes the 228 miles difference between the miles of roads closed in the two alternatives. We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that in the Final DEIS, the document consistently reference one specific number for each category. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.4.40210.410)	#105.4.40210.410: Thank you for your comments. The FEIS has been corrected to include more precise information on the number of roads where feasible.
Technical and Editorial	2-37 The Forest Service should ensure that language and dates related to motorized big game retrieval are consistent throughout the document.	TO REDUCE CONFUSION AND INCREASE COMPLIANCE Motorized Big Game Retrieval - Date Consistency: We [Arizona Wildlife Federation] noticed varying language and dates throughout the document [DEIS] regarding the date for MBGR [motorized big game retrieval] for Alternative 4 including: Page 11, “legally harvested cow and bull elk for all hunts that end prior to November 1” ; and Page 14, “legal elk harvested before Oct 31”. Clear language will be essential for hunter understanding and compliance. (Preservation/Conservation, , -#204.8.21100.160)	#204.8.21100.160: Thank you for your input. These inconsistencies have been addressed in the FEIS as the date for restricting motorized big game retrieval was removed from both alternatives based on public and agency input.

Category	Public Concern	Comment	Response
Technical and Editorial	2-38 The Forest Service should provide the citation for Arizona Game and Fish Department 2009a.	<p>THE FOREST SERVICE SHOULD PROVIDE THE CITATION FOR ARIZONA GAME AND FISH DEPARTMENT 2009A</p> <p>Hunting and Game Retrieval (pages 29-30): This section cites AGFD [Arizona Game and Fish Department] 2009a throughout, but it is not included in the literature cited. We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] would appreciate receiving a copy of this document. In addition, this section references the wet weather road policy, which should be included in the final EIS. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.7.55300.530)</p>	<p>#105.7.55300.530:</p> <p>The 2009a reference we believe was meant to reference Arizona Game and Fish Hunt Data. This information has been replaced with the 2010 hunt data and shall be correctly referenced in the FEIS. The Forests wet weather travel policy has been added to the FEIS and will be included in the Record of Decision.</p>
Technical and Editorial	2-39 The Forest Service should make available the dispersed camping document cited on page 5.	<p>THE FOREST SERVICE SHOULD MAKE AVAILABLE THE DISPERSED CAMPING DOCUMENT CITED ON PAGE 5</p> <p>There is a reference to a 2008 document entitled “Patterns of Disturbance from Dispersed Camping and Motorized Use, Feb. 2008. From Dispersed Camping Science Quorum of 1-10-2008” in the Recreation Specialist Report attached to the DEIS at page 5. However, this document is not available for review. We ask that this document be made publicly available as soon as possible and that we be notified when it is available. (Preservation/Conservation, Pinetop, AZ - #175.64.21000.060)</p>	<p>#175.64.21000.060: Thanks for you’re your request. This document was e-mailed to you by Mike Dechter on September 1, 2011.</p>

Category	Public Concern	Comment	Response
Technical and Editorial	2-40 The Forest Service should use the same number for the acres of the Cinder Hills OHV area throughout the document.	<p>THE FOREST SERVICE SHOULD USE THE SAME NUMBER FOR THE ACRES OF THE CINDER HILLS OHV AREA THROUGHOUT THE DOCUMENT</p> <p>2. Alternatives, Including the Proposed Action, Actions Common to Alternatives 3 and 4 (page 10):</p> <p>We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that throughout the document, the DEIS use the same precision for acreages and/or road miles rather than rounding the number off in some cases and using a different number in other situations to describe the same area or length of road. This occurs with several commonly stated numbers in the DEIS. One example is the acres used to refer to the Cinder Hills OHV Area. In some cases the Cinder Hills OHV Area is shown as having 13,711 acres and in others it is 13,000. We realize that this is not a significant difference in acres, but for consistency's sake, using the same number throughout the document would be helpful. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.3.40210.530)</p>	<p>#105.3.40210.530:</p> <p>We agree and the FEIS has been updated to provide more precise information with respect to acreage and mileage. In some circumstances, the number of acres or miles is approximated or rounded to provide readers with more easily understandable (readable) information. Approximations of data were generally limited to the extent practicable.</p>

Chapter 3. Natural Resources Management

Category	Public Concern	Comment	Response
		<p>TO PROTECT THE UNIQUE QUALITIES OF THE FOREST</p> <p>In 1990, I made my first trip to Arizona with my high school Archbishop Molloy to the Grand Canyon. We camped in the Coconino Forest and being a New York City boy, I was amazed by the beauty of the ponderosa pines, the diversity of wildlife and the quiet peacefulness the forest offered all who nestled into her belly. I am writing you to ask you to protect the serenity and the wildlife that make the forest such a special place. (Individual, Scottsdale, AZ - #42.9.30000.200)</p> <p>This is an outrage. Motorized mobility is taking over all over the county, thrashing and trampling through otherwise quiet, beautiful landscape that belongs to us all to enjoy and, most of all, to wildlife, birds and all animals and native plants that are a primordial part of the ecological balance. (Individual, Williams, AZ - #3.9.30000.530)</p>	<p>#42.9.30000.200: The purpose of the Coconino Travel Management planning process is to designate a system of routes and areas for motorized use. Currently unmanaged motorized use on the Coconino National Forest is resulting in impacts to a number of resources. The designation of a system for motorized use is expected to improve management for conservation of Forest resources for current and future generations.</p> <p>#3.9.30000.530: The purpose of the Coconino Travel Management planning process is to designate a system of routes and areas for motorized use. Currently unmanaged motorized use on the Coconino National Forest is resulting in impacts to a number of resources. The Coconino Travel Management EIS is expected to result in a decision that reduces the amount of routes and areas available for motorized use. The designation of a system for motorized use is expected to improve management for conservation of Forest resources for current and future generations.</p>
General Management	3-1 The Forest Service should protect the	<p>TO ALLOW FOR QUIET RECREATION</p> <p>Hey, there are many of us who know what forests are for—I am 65</p>	<p>#93.9.30000.710: The purpose of the Coconino Travel Management planning process is to designate a system of routes</p>

Category	Public Concern	Comment	Response
and Analysis	serenity and wildlife of the Coconino National Forest.	and have been camping with my families since I was a little girl. I was taught to value the forests for their beauty and quiet. Confine those loud crosscountry motorized vehicles. When guns were allowed, I thought, now I've seen it all! Where is the true spirit of camping and enjoying natures as it is?! I speak for humans who need nature renewal to continue our hectic lives—but the animals who live there have no voice or power against us, and it's up to humans to be good stewards of the land. What we do, or do not do, impacts how our very country will look and feel in the future. (Individual, Dripping Springs, TX - #93.9.30000.710)	and areas for motorized use. Currently unmanaged motorized use on the Coconino National Forest is resulting in impacts to a number of resources. The Coconino Travel Management EIS is expected to result in a decision that reduces the amount of routes and areas available for motorized use. The designation of a system for motorized use is expected to decrease the amount of the Forest open to motorized use and increase the predictability of where OHVs and other motorized vehicles can be heard, and thus improve opportunities for quiet recreation.
General Management and Analysis	3-2 The Forest Service should move forward with travel management planning	TO PRESERVE QUIET, VIEWSHEDS, AND ARCHAEOLOGICAL SITES WITHIN THE ADJACENT NATIONAL MONUMENTS Alternatives 3 and 4 would improve the ability of the NPS [National Park Service] to provide for long-term preservation and public enjoyment of the nationally significant resources within the National Monuments [Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments]. Both Alternatives would enhance NPS visitor experience by preserving scenic viewsheds on surrounding CNF [Coconino National Forest] lands and maintaining natural quiet at the primary visitor use areas within the Monuments. They would reduce the chance of inappropriate off-road travel within Wupatki and Walnut Canyon, whether intentional or accidental, and the potential for damage to archeological sites. Terminating CNF roads farther from the monument boundaries would have the effect of increasing access time and deterring vandalism to archeological resources within the Monuments. (U.S. National Park Service, Flagstaff, AZ - #174.5.30000.630)	#174.5.30000.630: In support of both action alternatives. No response needed.
General Management	3-3 The Forest Service should	THE FOREST SERVICE SHOULD DESCRIBE THE UNIQUE VALUES AND USES OF THE COCONINO NATIONAL	#175.300.30000.530: The FEIS clearly addresses how designation of motorized use

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and Analysis	describe the unique values and uses of the Coconino National Forest and potential impacts on those values and uses.	<p>FOREST AND POTENTIAL IMPACTS ON THOSE VALUES AND USES</p> <p>How will impacts affect the Forest Service’s responsibility to manage for other forest values and uses? Does the CNF [Coconino National Forest] provide values and uses that cannot be replicated outside of the CNF? Similarly, are their alternative opportunities, outside of the CNF, for motorized recreation, that are perhaps more appropriate than opportunities on the CNF? (Preservation/Conservation, Santa Fe, NM - #175.300.30000.530)</p>	in each alternative will affect the Forest's ability to manage for other Forest resources such as wildlife, water quality, rare plants, invasive species, and cultural resources. The recreation specialist report specifically discusses nearby motorized recreational opportunities and how those relate to the motorized opportunities available on the Coconino National Forest.
General Management and Analysis	3-4 The Forest Service should protect the forest from motorized use.	<p>THE FOREST SERVICE SHOULD PROTECT THE FOREST FROM MOTORIZED USE</p> <p>As a local resident and lover of the Coconino National Forest, I want to see its fragile lands protected. I also am bothered by the noise and destruction caused by ATVs. (Individual, Sedona, AZ - #2.9.30000.530)</p> <p>This forest is beautiful; please don't open it more to motorized vehicles! (Individual, Goodyear, AZ - #43.9.30000.530)</p>	#2.9.30000.530 and #43.9.30000.530: The purpose of the Coconino Travel Management planning process is to designate a system of routes and areas for motorized use. Currently unmanaged motorized use on the Coconino National Forest is resulting in impacts to a number of resources. The designation of a system for motorized use is expected to improve management for conservation of Forest resources for current and future generations.
General Management and Analysis	3-5 The Forest Service should reduce cross-country motorized travel.	<p>TO REDUCE NOISE, DUST, TRASH, AND DAMAGE TO HABITAT</p> <p>Because so many feel compelled to ride roughshod over the land wherever they find no fence in Arizona, we must begin to see some sort of curb to this behavior which ruins just about everything around where it occurs. Noise, habitat degradation, dust, and trash are a few of the impacts we and all the life forms in those areas experience. (Individual, Flagstaff, AZ - #4.9.30000.530)</p>	#4.9.30000.530: The purpose of the Coconino Travel Management planning process is to designate a system of routes and areas for motorized use. Currently unmanaged motorized use on the Coconino National Forest is resulting in impacts to a number of resources. The designation of a system for motorized use is expected to improve management for conservation of Forest resources for current and future generations.
General	3-6 The Forest	TO PROTECT WILDLIFE AND HABITAT	#46.9.30000.410: Both Alternative 3 and, to

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Management and Analysis	Service should include an alternative that reduces road density and prohibits cross-country motorized travel.	The Coconino has thousands of miles of roads on the ground that are compromising wildlife and degrading habitat. All of the action alternatives presented in this plan will continue to cause unnecessary harm. I am asking you to take a step back and analyze an alternative that would make significant reductions in road density and prohibit cross-country motorized travel for car camping and game retrieval. Any road or track eventually becomes if not a road, at least an ATV trail. (Individual, Sierra Vista, AZ - #46.9.30000.410)	a lesser extent, Alternative 4 make substantial reductions in road density and substantially restrict off-road vehicle use by not designating over 50% of the inventoried roads and trails on the Coconino National Forest. The analysis in the EIS clearly supports the fact that both alternatives 3 and 4 would substantially decrease impacts to wildlife habitat and the EIS references studies that show limited off-road use does not result in the proliferation of roads. Additionally, it is the intent of the Travel Management Rule, "...that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands." (Federal Register Vol. 70, No. 216; Wednesday, November 9, 2005; Rules and Regulations, p. 68281).
General Management and Analysis: Impact Analysis	3-7 The Forest Service should provide more detailed analysis of the environmental impacts.	TO FACILITATE PUBLIC AND DECISION MAKER REVIEW Records and Data on file: EPA [U.S. Environmental Protection Agency] encourages the CNF to include more detailed analyses of the project's environmental impacts in the FEIS. The DEIS references supporting data and studies used to identify the affected environment and project alternatives, and states that more information may be found in the project record located at the Coconino National Forest Supervisor's Office. To facilitate public and decision maker review, summaries of such data and studies should be included in the FEIS.	#205.18.30100.060: The Draft Environmental Impact Statement includes approximately 100 pages of analysis to facilitate public and decision-maker review. In addition all of the more detailed specialist reports were also published online for members of the public that wanted more detail. This EIS was developed in accordance with Council of Environmental

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		(U.S. Environmental Protection Agency, San Francisco, CA - #205.18.30100.060)	Quality guidance under 40 CFR 1500.4, which urges agencies to reduce excessive paperwork by limiting the number of pages of EIS documents. The Coconino National Forest summarized much more detailed analyses for each resource (specialist reports) to include the most relevant summarized information in the FEIS. This was done to meet CEQ guidance and to make the document more readable. All specialist reports for the FEIS will be made available on the website (as they were for the DEIS) and referenced studies are available upon request.
General Management and Analysis: Impact Analysis	3-8 The Forest Service should analyze impacts against the current conditions and in greater detail.	<p>TO ENSURE AN UNBIASED EVALUATION AND COMPLY WITH NEPA</p> <p>Without going into unnecessary detail, BRC [BlueRibbon Coalition] is very concerned about the approach some land management agencies are taking when analyzing and disclosing effects to the human environment of OHV use. An approach we encounter far too often is one that is plagued by a preoccupation with documenting what impacts vehicle use can have or may have to various resources, at various points in time, while ignoring the relevant environmental analysis. Environmental impact analysis documents often include statement after statement regarding various negative impacts of roads and vehicle use; i.e., trampled vegetation, compressed soils, increased sediment loading, disturbed wildlife etc. while including little or no information about what the existing condition is, or how the existing motorized and non-motorized uses are actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives.</p> <p>Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle</p>	#172.9- 10.30100.530: We believe the DEIS, FEIS, and the NEPA process used for the Coconino National Forest is and will be in conformance with the procedural requirements of the National Environmental Policy Act. The DEIS did include summaries of the analysis for each resource to provide a succinct and readable document for all interested publics in accordance with guidance from the Council on Environmental Quality. The Coconino National Forest has made great efforts to make available all specialist reports on the web. The specialist reports include all of the detailed information on how best available science was considered and what assumptions and methodologies were used for each resource analysis. Specialist reports will be made available on the Coconino

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		<p>use should be compared and contrasted to baseline data to establish a threshold on which the significance of the impacts of each alternative can be determined.</p> <p>Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer.</p> <p>When federal agencies evaluate technical issues or apply specialized expertise, NEPA requires them to rely on valid sources and to disclose the methodology, present hard data, cite by footnote or other specific method to technical references, and otherwise disclose and document any bases for expert opinion. 40 C.F.R. § 1502.24; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1150 (9th Cir. 1998).</p> <p>When applying NEPA, agencies must: utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment...</p> <p>42 U.S.C. § 4332(A); 40 C.F.R. § 1502.6. NEPA does not envision undocumented narrative exposition, instead requiring:</p> <p>Agencies shall insure the professional integrity, including the scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix.</p> <p>40 C.F.R. § 1502.24. Where information is not provided in the NEPA document itself, but is only cross referenced:</p> <p>“The propriety of such incorporation is dependent upon meeting three standards: 1) the material is reasonably available; 2) the statement is understandable without undue cross reference; and 3) the incorporation by reference meets a general standard of reasonableness.” (Motorized Recreation, Pocatello, ID - #172.9-</p>	<p>National Forest website with the publication of the Final EIS. Where needed, references will be added in the FEIS for those instances where there is un-cited information in the effects analysis.</p>

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<p>General Management and Analysis: Impact Analysis</p>	<p>3-9 The Forest Service should provide supplemental analysis and public review of the DEIS.</p>	<p>10.30100.530)</p> <p>TO ENSURE THAT AN ADEQUATE ANALYSIS OF IMPACTS RESULTING FROM CLOSED BUT NOTDECOMMISSIONED ROADS</p> <p>The DEIS contains a cursory and often undocumented discussion of impacts allegedly associated with motorized routes on various resources. Assuming that any of these causal relationships are accurate, the DEIS still fails to address the necessary inquiry of whether impacts are attributable to travel on the route, at any particular type, timing or intensity, or whether the impacts are primarily associated with the mere existence of the route. For example, for sedimentation, there arguably exist circumstances where the alteration of the landscape by the roadbed overrides actual use, and “whether a road is open or closed has no effect” on water quality. Davies Testimony (Dec. 8, 2004) at 50-51; see also, Letter from U.S. Fish and Wildlife Service dated April 21, 2010 at 4. Similarly, road density may indeed be a legitimate topic in analyzing wildlife impacts, but must be considered with the above-referenced factors and others such as the nature of use occurring along roads. Roads which are closed to vehicle travel but associated with frequent hunting may not provide secure habitat as is implied in the DEIS. In short, there are logical steps in the analytical process that are omitted for many resource issues.</p> <p>In conclusion, the DEIS is deeply flawed. We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] recommend that the Agency perform supplemental analysis, either by releasing a supplemental DEIS, or by releasing an FEIS reflecting changes as noted above, and allowing further public review/comment as is consistent with Agency practice when changes are necessary to a DEIS. Given the magnitude of the changes we believe are necessary here, we would recommend the former approach. (Motorized Recreation, Boise, ID - #202.26.30100.410)</p>	<p>#202.26.30100.410: The Coconino Travel Management EIS includes analysis of anticipated effects to a wide variety of Forest resources and values. The analysis is based on available scientific information. The argument that, "alteration of the landscape by the roadbed overrides actual use..." may be true, but studies clearly show that both the existence of roads and regular use on them result in impacts and that these impacts can be additive (Foltz 2006). Roads on the Forest do result in impacts to both sedimentation and wildlife habitat even with no or minimal traffic, but regular traffic on an existing road results in additional impacts by increasing erosion rates, reducing soils to fine sediments that can diminish fish habitat, and reducing vegetative cover. Motorized use may also result in undesirable noise and can have an asymmetrical impact on recreational use, especially in areas that are managed for primitive uses (Snyder et al. 2008).</p>

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General Management and Analysis: Impact Analysis	3-10 The Forest Service should provide a landscape-level analysis of impacts on natural resources.	<p>TO PROVIDE A BASIS FOR MINIMIZING IMPACTS AND CONFLICTS</p> <p>Landscape-scale environmental analysis enables the Forest Service to best understand the impacts of the entire travel network on watersheds, noise sheds, wildlife populations and habitat, other natural and cultural resources, and quiet use recreation opportunities, thereby providing an informed basis to minimize resource impacts and conflicts (Executive Order 11644, [section] 3, as amended; 36 C.F.R. [section] 212.55). Importantly, a proper analysis of these impacts and conflicts must address all routes, whether existing or reasonably foreseeable, and regardless of whether they are authorized or unauthorized. [Footnote 14: It would be naïve to assume that the promulgation of the TMR [Travel Management Rule] and CNF’s [Coconino National Forest] implementation of the TMR through travel planning and publication of the MVUM [Motor Vehicle Use Map] will prevent the proliferation of unauthorized and illegal user-created routes. At best, given current realities in terms of actual motorized recreation use, and Forest Service management, enforcement, and budget constraints, we anticipate that the proliferation of such routes will only be slowed.] (Preservation/Conservation, Santa Fe, NM - #175.284.30100.002)</p>	#175.284.30100.002: The Coconino National Forest Travel Management EIS includes designation or not of all routes within the 1.8 million acre Coconino National Forest. All routes the Forest received comments on were specifically reviewed. We disagree with your statement that all reasonably foreseeable routes need to be considered since the Forest currently contains thousands more miles of routes than are needed for access or recreational use. The designation of routes and areas under the Travel Management Rule is not expected to immediately stop all unauthorized or illegal activities, but it is expected to have a positive effect toward establishing a route and area system to decrease impacts to Forest resources for use and enjoyment by current and future generations.
General Management and Analysis: Impact Analysis	3-10 The Forest Service should provide a landscape-level analysis of impacts on natural resources.	<p>TO ESTABLISH DEFINED THRESHOLDS AND AID IN COMPLIANCE WITH FEDERAL REGULATIONS</p> <p>The landscape-scale environmental analysis prepared for the Travel Management Plan would establish defined thresholds, based on the NEPA process itself as well as the various consultation and certification processes required by federal law (ESA [section] 7 consultation process with the Forest Service, the [section] 106 consultation process required by the NHPA [National Historic Preservation Act], or the [section] 401 water quality certification process that may be required by the CWA [Clean Water Act]) that trigger “conditional decisions”. (Forest Service, 2005(b): p.32) (Preservation/Conservation, Grand Canyon, AZ -</p>	#175.304.30100.130: The Coconino National Forest Travel Management EIS includes analysis of impacts within multiple landscapes included in the 1.8 million acres included in the Coconino National Forest. The EIS is in conformance with all procedural requirements in NEPA as well as the procedural consultation requirements of the Endangered Species Act and the National Historic Preservation Act.

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<p>General Management and Analysis: Impact Analysis</p>	<p>3-10 The Forest Service should provide a landscape-level analysis of impacts on natural resources.</p>	<p>#175.304.30100.130)</p> <p>TO ACCOUNT FOR SHORT- AND LONG-TERM TEMPORAL SCALES</p> <p>Landscape-scale environmental analysis should account for short- and long-term temporal scales implicated by management actions and impacts. Accounting for both spatial and temporal scales underscores the importance of developing and implementing a travel management plan, not just an MVUM [Motor Vehicle Use Map], which includes time frames for implementation of specific actions and the achievement of specific management Standards and Guidelines. (Preservation/Conservation, Santa Fe, NM - #175.282.30100.160)</p>	<p>#175.282.30100.160: The Coconino National Forest Travel Management EIS includes analysis of impacts at multiple spatial and temporal scales as is appropriate based on the potential impacts of the proposed activities.</p>
<p>General Management and Analysis: Impact Analysis</p>	<p>3-10 The Forest Service should provide a landscape-level analysis of impacts on natural resources.</p>	<p>INCLUDING MONITORING PROTOCOLS FOR MANAGEMENT INDICATOR SPECIES</p> <p>As a general proposition, the Forest Service should adopt a landscape-scale approach to travel planning and NEPA environmental analysis that accounts for both public and private lands. Relatedly, landscape-scale environmental analysis should also account for short- and long-term temporal scales implicated by management actions and impacts. The plan should retain monitoring protocols established for Management Indicator Species (MIS) and overlay these monitoring protocols with a requirement that the Forest Service divide the CNF [Coconino National Forest] into ecological subunits (preferably watersheds) wherein the Forest Service would prepare an annual monitoring report for each subunit that compiles and details: (1) illegal intrusions into areas closed to motorized use; (2) conflicts with quiet use and non-motorized recreationists; (3) relevant summaries of monitoring data obtained via Forest Plan-level monitoring protocols (e.g., for MIS); and (4) any considerable adverse impacts suffered by these subunits. (Preservation/Conservation, Tucson, AZ - #175.28.30100.530)</p>	<p>#175.28.30100.530: The Coconino National Forest Travel Management EIS includes analysis of multiple landscapes within the approximately 1.8 million acres included in the Coconino National Forest. Analysis in the EIS includes disclosure of impacts at multiple spatial and temporal scales as is appropriate based on the potential impacts of the proposed activities. Your request for specific monitoring protocols will be taken into consideration, but are not a requirement for inclusion in this EIS.</p>

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General Management and Analysis: Impact Analysis	3-10 The Forest Service should provide a landscape-level analysis of impacts on natural resources.	<p>TO INCLUDE BOTH PRIVATE AND PUBLIC LANDS AND CUMULATIVE IMPACTS</p> <p>As a general proposition, the Forest Service should adopt a landscape-scale approach to travel planning and NEPA environmental analysis that accounts for both public and private lands. [Footnote 12: The Wilderness Society’s Ecology and Economics Research Department has prepared analyses suggesting the type of analysis we are recommending. See Fleming, et al., Ecological and Financial Implications of Roads in the Monongahela National Forest (2004) www.wilderness.org/Library/Documents/MonongahelaRoadsReport.cfm), and Hartley, et al., Ecological Effects of a Transportation Network on Wildlife (2003) (www.wilderness.org/Library/Documents/MissouriBreaksTransportationEffects.cfm).]</p> <p>Landscape-scale environmental analysis (in the words of Aldo Leopold, “think like a mountain”) enables the Forest Service to recognize and understand the interplay of relevant spatial scales implicated by motorized recreation management of the CNF [Coconino National Forest]. Impacts may be felt at a broad landscape scale that encompasses a region much larger than the land contained within the specific boundaries of the CNF. Impacts may also be specific to certain areas or resources within specific portions of the CNF, but cumulatively may cause landscape-scale impacts. At a minimum, identifying and assessing impact at different spatial scales is critical to an integrated landscape analysis and a proper determination of what management alternatives--or components thereof--are appropriate and necessary. (Preservation/Conservation, Prescott, AZ - #175.281.30100.600)</p>	#175.281.30100.600: The Coconino National Forest Travel Management EIS includes analysis of multiple landscapes within the approximately 1.8 million acres included in the Coconino National Forest. Analysis in the EIS includes activities of both private and public activities in cumulative effects analysis for each resource. However, the Forest Service does not have authority to authorize or prohibit motorized use on non-National Forest System lands. The Coconino National Forest is working with adjacent landowners, state land management and wildlife agencies, and other Federal land management agencies and National Forests to coordinate efforts to create a more sustainable system of motorized roads, trails, and areas. Effects analysis for each resource, including cumulative effects analysis includes analysis at multiple spatial and temporal scales.
General Management and Analysis: Impact	3-11 The Forest Service should identify resources affected by the	<p>INCLUDING AN ASSESSMENT OF THE PRE-DISTURBANCE CONDITION OF THE COCONINO NATIONAL FOREST</p> <p>To properly move forward with preparation of the requisite NEPA</p>	#175.305.30100.201: The Coconino National Forest EIS includes a substantial amount of information used to establish the existing condition on the Forest, and where

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Analysis	plan and provide baseline data for these resources.	analysis, the Forest Service must first identify the actual resources and values implicated by the travel planning process and collect relevant baseline data for these resources and values. Such baseline data include not simply point-in-time data, but, also, trend data. In other words, the Forest Service must identify and assess current conditions and also assess whether or not current conditions are static, improving, or degrading, providing as much quantifiable analysis as possible. See 40 C.F.R. [section] 1502.22 (providing mandatory guidance on managing uncertainty and information gaps in the NEPA process). Critical to the obtainment of such baseline data is an assessment of the CNF's [Coconino National Forest] pre-disturbance condition to provide a benchmark for restoration objectives. While we do not necessarily expect the Forest Service to actually return the CNF to these conditions, such conditions can be used to identify potential restoration projects. (Preservation/Conservation, Grand Canyon, AZ - #175.305.30100.201)	feasible, to describe trends in resource viability. The Coconino National Forest considered the best available information and science to describe existing conditions and trends. Where possible this information was discussed quantitatively. All analysis for each alternative is based on the change caused by each alternative to the existing condition. The Coconino National Forest Travel Management EIS purpose and need is not to fully restore the Forest resources and processes, but to decrease impacts from motorized use.
General Management and Analysis: Impact Analysis	3-12 The Forest Service should describe the needed strategies and tactics to reduce impacts to acceptable levels.	THE FOREST SERVICE SHOULD DESCRIBE THE NEEDED STRATEGIES AND TACTICS TO REDUCE IMPACTS TO ACCEPTABLE LEVELS What strategies and tactics are necessary, in both the short and long terms, to reduce impacts to acceptable levels and best ensure compliance with legal and science-based sideboards? (Preservation/Conservation, Denver, CO - #175.299.30100.200)	#175.299.30100.200: The activities included in Alternative 3 and 4 (including prohibiting cross-country travel except in designated areas and designating a system of motorized routes) are expected to reduce impacts in both the short and long-term. The designation of routes and areas as included in Alternative 3 and 4 is in conformance with the Travel Management Rule. The term 'acceptable levels' can be a subjective term or vary drastically depending on what resources or values are considered. Each alternative will reduce impacts to different levels of acceptability; the time they may take to reduce impacts varies.
General Management	3-13 The Forest Service should	THE FOREST SERVICE SHOULD CONSIDER THE DIRECT, INDIRECT, AND CUMULATIVE IMPACTS OF THE	#175.48.30130.530: The Travel Management Rule specifically

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<p>and Analysis: Cumulative Impacts</p>	<p>consider the direct, indirect, and cumulative impacts of the exception for motorized big game retrieval.</p>	<p>EXCEPTION FOR MOTORIZED BIG GAME RETRIEVAL Fundamentally, NEPA decisionmaking requires the CNF [Coconino National Forest] to consider the direct, indirect and cumulative impacts of their actions. 42 USC 4332(C). The CNF cannot simply allow an exception for MBGR [motorized big game retrieval], but rather, must provide reasoned and informed justification for that decision. In this justification, the CNF must address the direct, indirect, and, in particular, the “cumulative impacts” of the exception. A cumulative impact is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 40 CFR [section] 1508.7. Comparatively, direct impacts are “caused by the action at the same time and place,” and indirect impacts are “caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.” 40 C.F.R. [section] 1508.8.</p> <p>Only after the CNF considers the cumulative impacts of allowing cross-country MBGR, and considers action alternatives which would affirmatively prohibit MBGR, can the CNF properly determine whether MBGR should or should not be allowed. In any event, because MBGR appears unnecessary, except in the case of disabled hunters, we request that the CNF prohibit MBGR. (Preservation/Conservation, Grand Canyon, AZ - #175.48.30130.530)</p>	<p>allows for designation of off-road vehicle use for dispersed camping and motorized big game retrieval in 36 CFR 212.51(b).</p> <p>The complete and total prohibition of motorized big game retrieval (MBGR) was considered, but not included for detailed study (see the FEIS, Alternatives Considered but Eliminated from Detailed Study for more detail).</p> <p>The Forest has provided analysis of the change included in each alternative for motorized big game retrieval in the FEIS. This analysis includes direct, indirect, and cumulative effects. See each of the specialist reports and the FEIS, which includes the large majority of the analysis completed. Currently, almost 1.5 million acres is open to off-road travel for any purpose. Both Alternative 3 and 4 (though allowing some level of motorized big game retrieval) would substantially reduce the amount of off-road vehicle use for game retrieval. This is because both alternatives would limit game retrieval to elk and both alternatives would restrict off-road travel for other purposes. Furthermore, each alternative includes a number of terms and conditions under which off-road motorized big game retrieval can occur such as taking a direct route to retrieve game, not crossing streams or riparian areas, and not causing</p>

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Soil Management and Erosion	3-14 The Forest Service should provide site-specific analysis of erosion effects.	<p>TO PROVIDE A COMPLETE IMPACT ANALYSIS OF THE OPEN ROAD SYSTEM</p> <p>There is no site-specific analysis for erosion offered. Site-specific analysis needs to be conducted to determine the amount of sediment that results from the proposed open-road system as well as the 1,900 miles of road that are closed to public use but remain on the ground. The negative impacts of these roads will continue whether they are used by the public or not. (Individual, Cottonwood, AZ - #1.5.31220.410)</p> <p>Before any site-specific analysis for erosion can be offered, the USFS needs to first conduct an accurate survey of every existing road/trail and dry wash that currently exists on USFS public lands. Any site-specific analysis to be conducted to determine the amount of sediment that results from the proposed open-road system, as well as the 1,900 miles of road that are closed to public use but remain on the ground, would be a waste of taxpayer money unless all roads/trail/dry washes are documented and shown on maps. There is no accurate method to determine negative or positive impacts of road/trails/dry washes unless every route is documented. (Individual, Las Vegas, NV - #33.6.31200.410)</p>	<p>damage to natural or cultural resources.</p> <p>#1.5.31220.410: The EIS includes an analysis of the expected effects of each alternative on soil and related watershed impacts. The analysis includes several different methods including field-based data gathering, spatial GIS analysis, and modeling to provide information on the likely magnitude of change resulting from designating motorized use across the Forest. The argument that, "...negative impacts of these roads will continue whether they are used by the public or not" may be true, but studies clearly show that both the existence of roads and regular use on them result in impacts, and that these impacts can be additive (Foltz 2006). Roads on the Forest do result in impacts to both sedimentation and wildlife habitat even with no or minimal traffic, but regular traffic disturbance on an existing road results in additional impacts by increasing erosion rates, reducing soils to fine sediments that can diminish fish habitat, and reducing vegetative cover. Motorized use may also result in unwanted noise and can have an asymmetrical impact on recreational use, especially in areas that are managed for primitive uses (Snyder et al. 2008).</p> <p>#33.6.31200.410: Though ground-based surveys of every route on the Forest would</p>

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			provide valuable information, the staff of the Coconino National Forest completed the Travel Management EIS using a wide variety of field-based data, GIS spatial analysis, modeling, and professional input from a wide variety of local, State, and Federal agencies. The Forest also considered each comment received from the public providing site-specific route information to help inform the design of the alternatives and the analysis of effects in the EIS.
Soil Management and Erosion	3-15 The Forest Service should provide more detailed analysis of potential erosion and related water quality effects and commitments to reduce effects.	<p>TO ENSURE THAT PLANS WILL BE EFFECTIVE</p> <p>Direct, Indirect, and Cumulative Effects: NEPA requires evaluation of direct, indirect, and cumulative effects that are caused by the action (40 CFR 1508.8(b) and 1508.7). Of specific interest are potential cumulative effects of the proposed project and livestock grazing, forest thinning, private land development, and miscellaneous recreational uses that may negatively affect water and soil resources in the area if left unmitigated. To avoid impacts from erosion, the Forest Service should provide commitments in the FEIS/ROD which include provisions for water management plans and erosion plans that will be implemented and enforced. (U.S. Environmental Protection Agency, San Francisco, CA - #205.9.31000.002)</p>	<p>#205.9.31000.002:</p> <p>The FEIS was updated to include the past, present and reasonably foreseeable actions such as livestock grazing, forest thinning, private land development, and recreational use where it was relevant in the cumulative effects analysis for soil and water resources. In many situations these activities are not relevant because the impacts from each alternative would generally be decreasing soil and water impacts as a result of restricting motorized use. As the action alternatives would have beneficial effects to soil and water resources compared to the No Action Alternative, and as no decommissioning activities are proposed as part of this project, provisions for water and erosion management plans are not required.</p>
Soil Management	3-16 The Forest Service should	<p>THE FOREST SERVICE SHOULD PROVIDE SUPPORT FOR THE SEDIMENT EFFECT CONCLUSIONS AND EXPLAIN</p>	<p>#202.50.31000.330: Yes, the WEPP model is not 100% correct but estimates are based</p>

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and Erosion	provide support for the sediment effect conclusions and explain how specific species would be affected.	<p>HOW SPECIFIC SPECIES WOULD BE AFFECTED</p> <p>Page 67, Soil/Water Environmental Consequences: The conclusion that existing roads deliver 4,300 to 24,100 tons of sediment per year “across buffers” is highly questionable. Regardless of what the proper figure is for any route, nowhere does the DEIS attempt to connect any of these figures to specific habitat needs for specific species. (Motorized Recreation, Boise, ID - #202.50.31000.330)</p>	<p>on best available science. It is important to realize that although the output numbers may not be highly accurate, the model outputs are used to compare magnitude of erosion and sedimentation by road type, traffic use, road density and stream crossings and offers the best available science. The range 4300 to 24,100 is wide ranging because it includes all road type designs, road surface and traffic use. Assumptions include an average cross drain spacing of 200 feet and vegetative buffer width of 50 feet. These values vary forest-wide but on-site observations made concluded these values represent the overall average spacing and width and are used Forest-wide in the modeling. The Effects analysis models differences in erosion and sedimentation between the No Action Alternative and Action Alternatives and does not attempt to analyze specific habitat needs or effects to specific species in the soil and water specialist report. The fisheries and aquatic specialist report analyzes and ties in sedimentation outputs effects to aquatic species.</p>
Soil Management and Erosion	3-16 The Forest Service should provide support for the sediment effect conclusions	<p>BECAUSE THERE ARE FEW PERENNIAL STREAM COURSES IN THE FOREST</p> <p>The CNF [Coconino National Forest] is largely “high desert” with relatively few perennial streamcourses. It seems questionable to imply delivery of sediment leaving any “buffer” (to an implied</p>	<p>#202.22.31000.410: The Coconino National Forest is ecologically diverse, ranging from deserts (less than 12 inches of precipitation/yr) to alpine tundra (receiving more than 35</p>

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	and explain how specific species would be affected.	streamcourse) for the bulk of roads/trails on the CNF. (Motorized Recreation, Boise, ID - #202.22.31000.410)	inches/yr) with more than 224 miles of perennial streams. There are currently approximately 7,484 miles of known National Forest System roads on the Forest and the WEPP model results of 4,300 to 24,100 tons/year reflect the amount of sediment that is delivered across the 50 foot buffer Forest-wide and does not model the amount that actually is delivered into a perennial stream. It is important to realize that although the output numbers may not be highly accurate, the model outputs are used to compare magnitude of erosion and sedimentation by road type, traffic use, road density and stream crossings and offers the best available science. The range 4,300 to 24,100 is wide ranging because it includes all road type designs, road surface and traffic use. Assumptions include an average cross drain spacing of 200 feet and vegetative buffer width of 50 feet. These values vary forest-wide but on-site observations made concluded these values represent the overall average spacing and width and are used Forest-wide in the modeling.
Soil Management and Erosion	3-17 The Forest Service should discuss erosion and sedimentation effects from closed but still extant roads.	<p>THE FOREST SERVICE SHOULD DISCUSS EROSION AND SEDIMENTATION EFFECTS FROM CLOSED BUT STILL EXTANT ROADS</p> <p>Page 69: There is little of no discussion of the impacts associated with existence of a road/trail versus impacts attributable to continuing traffic on the same. It is critical to conduct this analysis, at some reasonable level of site-specific detail. See, Davies Testimony (Dec.</p>	<p>#202.52.31100.410:</p> <p>The analysis uses WEPP for roads and one of the variables analyzes 4 traffic level effects on erosion and sedimentation. Assumptions of traffic level use include the following; high traffic are roads that receive considerable traffic during much of the year</p>

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		<p>8, 2004) at 50-51 (sedimentation can actually increase on closed roads, due to lack of regular travel/maintenance; existence of road, road/stream crossings and culvert condition are primary factors, “whether a road is open or closed has no effect” on water quality). (Motorized Recreation, Boise, ID - #202.52.31100.410)</p>	<p>and include all forest, improved roads. Low traffic roads are roads with light recreational use during dry weather and include unimproved or user-created roads. No traffic are roads with no access or restricted and also include closed roads or roads that would not be designated open under selection of an action alternative. Modeling, most research and personal observations indicate roads with no traffic have reduced erosion and sedimentation over the long-term as vegetation begins to heal the road footprint providing protective cover to reduce accelerated erosion and sedimentation. It is possible and recognized that non designated roads may require some level of maintenance to reduce accelerated erosion from that could occur as a result of natural disturbances such as wildfire. Very few culverts, if any are located on roads that would not be designated to be open but may also require cleanout.</p>
<p>Soil Management and Erosion</p>	<p>3-18 The Forest Service should analyze the impacts of dispersed camping on soil and water quality.</p>	<p>THE FOREST SERVICE SHOULD ANALYZE THE IMPACTS OF DISPERSED CAMPING ON SOIL AND WATER QUALITY Approximately 38% of the Coconino National Forest has soils that are impaired, unsatisfactory or inherently unstable, and while the remaining 62% has soils that are in satisfactory condition, these soils are at risk of a loss of soil productivity if repeated motorized use causes loss of vegetation. Soil and Water Specialist’s Report:8. Both action alternatives would provide for a 300-foot corridor in which motorized cross-country travel is permitted for dispersed camping, leaving more than 45,000 acres of forest at risk for repeated ORV uses. As noted in the recreation section of the DEIS, motorized</p>	<p>#175.101.31000.530: The soil and water analysis is based on change from the existing condition which allows cross-country travel across the Forest and compares it to action alternatives including major reduction in areas where camping and MBGR would be allowed. Both action alternatives would substantially decrease cross-country travel, resulting in primarily beneficial effects. Camping corridors were designed in previously</p>

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		<p>dispersed camping has resulted in several areas being repeatedly used and traveled upon, completely denuding the area of all vegetation. Forest Service 2010:18 et seq. In addition, ORV impacted soils are believed to be widespread in the ponderosa pine, montane meadows, riparian areas, wetlands, and pinyon-juniper vegetation types. Soil and Water Specialist's Report:8. These areas are included in the dispersed camping corridor proposal and these areas must specifically be evaluated for soil loss potential prior to corridor designation. (Preservation/Conservation, Denver, CO - #175.101.31000.530)</p>	<p>disturbed areas outside of montane meadows, wetlands and riparian areas where soils are most susceptible to degradation and water quality impacts. The effects of designating camping and MBGR are discussed in the specialist report.</p>
<p>Soil Management and Erosion</p>	<p>3-18 The Forest Service should analyze the impacts of dispersed camping on soil and water quality.</p>	<p>INCLUDING USING A MORE GENEROUS ESTIMATE OF THE ACRES AFFECTED</p> <p>With road densities of at least 1.87 miles/square mile, and reaching a maximum of 5.04 miles/square mile, it is clear that an excessive number of roads are negatively impacting soil and water quality on the Coconino National Forest. Soil and Water Specialist's Report:22. There are four approved TMDLs [total maximum daily load] designed by ADEQ [Arizona Department of Environmental Quality] in response to past water quality impairments, including the Verde River which is impaired for turbidity. To improve water quality, appropriate management activities by the Forest include limiting or restricting OHV travel and decommissioning or obliteration of roads to reduce sediment delivery into connected streams. See Soil and Water Specialist's Report.</p> <p>We [Center for Biological Diversity et al.] disagree that motorized dispersed camping would impact just 500–700 acres under either Alternative 3 or 4. Soil and Water Specialist's Report:38. As explained above, we have calculated the area available from cross-country motorized travel for dispersed camping to be 45,673 acres. Our calculation is 60 to 90 times greater in size than the area analyzed in the DEIS. The impacts on all acres available for motorized use</p>	<p>#175.104.31100.530: The soil and water analysis is based on change from the existing condition, which allows cross-country travel across the Forest, and compares it to action alternatives including major reduction in areas where camping and MBGR would be allowed. Both action alternatives would substantially decrease x-country travel, resulting in primarily beneficial effects. Camping corridors were designed in previously disturbed areas outside of montane meadows, wetlands and riparian areas where soils are most susceptible to degradation and water quality impacts. The effects of designating camping and MBGR are discussed in the specialist report. Actual dispersed camping corridor acres will be corrected in the FEIS. New number of acres of dispersed camping corridor for Alt 3. Alt 4 will have the same amount of acres of dispersed camping corridor, which equals around 45,000 acres.</p>

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		<p>must be evaluated. This is especially critical in light of the fact that the more than 12,000 identified motorized camping sites will be bottlenecked into 2,000–3,000 sites in the designated corridors. Soil and Water Specialist’s Report:38. (Preservation/Conservation, Santa Fe, NM - #175.104.31100.530)</p>	
<p>Soil Management and Erosion</p>	<p>3-19 The Forest Service should acknowledge that the National Forest Management Act prohibits management activities that cause permanent impairment of soils.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THE NATIONAL FOREST MANAGEMENT ACT PROHIBITS MANAGEMENT ACTIVITIES THAT CAUSE PERMANENT IMPAIRMENT OF SOILS</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Soils: NFMA (National Forest Management Act) prohibits management activities that cause permanent impairment of soils—the foundation upon which all life in the forest grows (16 U.S.C. [sections] 472a, 512b, 1600, 1611-1614; FSM 2500, 2510, 2520, 2530, 2540, and 2550 (providing watershed, water resource, and soil management policies, protections, and guidance); and FSH 2509.18 Soil Management Handbook).</p> <p>(Preservation/Conservation, Phoenix, AZ - #175.287.31200.133)</p>	<p>#175.287.31200.133:</p> <p>The short- and long-term effects of each alternative to soils and other resources are discussed in the Travel Management EIS. Analysis on impacts to soils are discussed in the FEIS and in the water and soil specialist report. For more specific information of impacts for a particular resource, please review the individual specialist reports, which contain more information on expected impacts. The impacts from each alternative to soils were closely analyzed and this information is included in the FEIS. Since the action alternatives are both expected to substantially decrease motorized use throughout the Forest, and on sensitive soils, the analysis does not conclude that either of the action alternatives would cause permanent impairment of soil resources.</p>
<p>Soil Management and Erosion</p>	<p>3-20 The Forest Service should acknowledge the effect of roads on arroyo cutting and revegetation.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE EFFECT OF ROADS ON ARROYO CUTTING AND REVEGETATION</p> <p>Soil Impacts: In the Southwest, roads and associated activities are the primary cause of extensive arroyo cutting during this century. Bahre 1991. Vehicular traffic directly destroys biological resources by crushing vegetation and microbiotic crusts. The resulting soil</p>	<p>#175.144.31200.410:</p> <p>The short- and long-term effects of each alternative are discussed in the Travel Management EIS. The impacts from each alternative to soils were closely analyzed and this information is included in the EIS. Since the action alternatives are both</p>

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		<p>compaction retards revegetation. In addition, inadequate maintenance of primitive roads in remote locations imposes significant ecological as well as monetary costs, since poorly located or unmaintained roads often result in serious erosional problems. Moll 1996; Ketcheson and Megahan 1996. Since severe gully formation negatively impacts soils, vegetation, and archaeological resources, the most practical and economical long-term mitigation of these problems lies with road closure and revegetation. Moll 1996.</p> <p>In any event, NFMA [National Forest Management Act] prohibits management activities that cause permanent impairment of soils—the foundation upon which all life in the forest grows (16 U.S.C. [sections] 472a, 512b, 1600, 1611–1614; FSM 2500, 2510, 2520, 2530, 2540, and 2550 (providing watershed, water resource, and soil management policies, protections, and guidance); and FSH 2509.18 Soil Management Handbook).</p> <p>The CNF [Coconino National Forest] Forest Plan directs that soil productivity be maintained or enhanced and that all areas are in a satisfactory condition by 2020. Forest Service 1987:23, as amended. (Preservation/Conservation, Santa Fe, NM - #175.144.31200.410)</p>	<p>expected to substantially decrease the extent of motorized use throughout the Forest, and on sensitive soils, the analysis does not conclude that either of the action alternatives would cause permanent impairment of soil resources.</p>
Soil Management and Erosion	3-21 The Forest Service should acknowledge the effects ATVs have on soil and water resources.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE EFFECTS ATVS HAVE ON SOIL AND WATER RESOURCES</p> <p>There is no question that ATV and other off-highway vehicle use has increased exponentially since the time the present Forest Plan was developed more than 20 years ago. Even at that time it was recognized that unrestricted use was leading to resource damage in some sensitive areas and that there was the potential for conflicts with other users.</p> <p>The EIS and the supporting specialist's reports document the effect that the road system and the large mileage of unauthorized roads are having on a number of resources, including soil and water. There is also documentation of soil and water damage from indiscriminate and repeated ATV use in sensitive areas. (Individual, Cornville, AZ -</p>	<p>#190.1.31000.530:</p> <p>The Coconino Travel Management Plan is designed to reduce impacts to Forest resources from unmanaged motorized use. The Coconino National Forest Travel Management EIS is expected to designate a system for motorized use while maintaining and improving Forest resources so that motorized and non-motorized Forest visitors can continue to experience and enjoy the Forest. The FEIS summarizes the soil and water effects analysis completed for all alternatives; the complete Soil and Water Specialist Report is available on our website</p>

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		#190.1.31000.530)	or by request.
Soil Management and Erosion	3-22 The Forest Service should explain how they reached the determination regarding sediment delivery rates and why more routes were not considered for designation.	<p>THE FOREST SERVICE SHOULD EXPLAIN HOW THEY REACHED THE DETERMINATION REGARDING SEDIMENT DELIVERY RATES AND WHY MORE ROUTES WERE NOT CONSIDERED FOR DESIGNATION</p> <p>Page 68, Unauthorized Route Sedimentation Effects: We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] are unable to determine how the DEIS determined that the 64 miles of unauthorized routes identified for designation in the action alternatives would increase “sediment delivered from forest buffers by about 0.5 to 3 tons forestwide...” The discussion then concludes these effects would not adversely impact water quality. Assuming the methods and conclusions are accurate, the DEIS fails to explain why additional routes were not considered for designation. (Motorized Recreation, Boise, ID - #202.51.31200.410)</p>	<p>#202.51.31200.410:</p> <p>The DEIS used the WEPP model to quantify the level of sediment produced by roads to be designated for motorized use in each alternative. This model was set-up to factor in the type of road (managed for high-clearance or for passenger use) and the level of traffic expected on the road. Unauthorized roads were specifically considered so that the responsible official could consider the site-specific effects of designating unauthorized roads under each alternative. Both action alternatives (Alts 3 and 4) are expected to reduce the amount of sediment resulting from motorized use on the Forest because they would decrease motorized traffic on many unsurfaced, unmaintained roads, and focus maintenance on roads with more motorized traffic.</p>
Water Resources	3-23 The Forest Service should consult with the U.S. Army Corps of Engineers regarding potential jurisdictional waters on the forest.	<p>TO ENSURE THAT POTENTIAL IMPACTS FROM ROADS ARE FULLY ANALYZED AND TO COMPLY WITH THE CLEAN WATER ACT</p> <p>Clean Water Act Section 404: Discharge of material into waters of the U.S. (jurisdictional waters) requires a permit from the United States Army Corps of Engineers (USACE) pursuant to Section 404 of the Clean Water Act. EPA recommends the CNF [Coconino National Forest] consult with the USACE regarding the extent of jurisdictional waters on the project site and the potential impacts to such waters from roads. The FEIS should include a description of road improvements needed to bring previously unclassified roads into the NFSRs [National Forest System Roads], such as resurfacing, ditching,</p>	<p>#205.17.31100.170: The proposed action (Alternative 3) and Alternative 4 will substantially decrease the amount of roads available for public use. Both alternatives include a small number of roads (approx 63 miles) that are currently not in the Coconino National Forest Roads system, but are proposed to be added to the road system and designated for public use. Twenty-seven miles of these routes are unauthorized or user-created routes and the remaining routes are existing Forest roads previously not included in the road management system.</p>

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		<p>culverts, and vegetation removal. Descriptions should include the total length of each road and the number of stream crossings that might need improvements. If the improvements would result in a discharge of fill material into waters of the United States, the CNF should obtain all necessary Clean Water Act section 404 permits from the USACE and comply with EPA's 404(b)(1) guidelines. For more information regarding jurisdictional delineation and the permitting process, contact: Jess Laurie, Project Manager, USACE at 520-584-1677. (U.S. Environmental Protection Agency, San Francisco, CA - #205.17.31100.170)</p>	<p>These roads were closely scrutinized and are included solely to provide an alternative to existing system routes that are in Endangered and Threatened Species habitat, system routes that are in canyon bottoms and drainages, and routes that result in other management conflicts. The majority of 'unauthorized' routes that are proposed for designation in one or more alternative are for access to private property, which is required by law. These 'unauthorized' routes currently exist on-the-ground and regularly receive motorized use. Thus, the designation for public use of this small number of routes will not result in additional sedimentation that is not currently occurring, and the overall effect of designating motorized use across the Forest will be to substantially decrease sedimentation in every watershed across the Forest. Since the decision on any alternative will not result in any new uses or earth-disturbance resulting in new sedimentation a Section 404 permit from the US Army Corps of Engineers is not required.</p>
Water Resources	3-24 The Forest Service should analyze the impacts on watersheds and water quality.	<p>TO PROVIDE FOR ECOSYSTEM RESILIENCY Watershed health is directly dependent on ecosystem resiliency. Jones et al. 2000. Roads are key contributors to soil loss, watershed degradation and non-native plants invasion because of the abundance of exposed soil on roadsides and unpaved roads. Forman et al. 2003. We submit that all these issues are inextricably relevant to the CNF [Coconino National Forest] Travel Management Planning process and the reduction of route density through the reclamation of user-created</p>	<p>#175.143.31000.410: We agree that roads and use of roads are inextricably tied to water quality. The soil and watershed section of the EIS specifically discusses how the designation of motorized use across the Forest via the identification of a designated system of roads, trails, and areas will substantially reduce the impacts within</p>

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		<p>routes and the decommissioning and obliteration of unneeded roads must be a major element in restoring ecological resiliency. The Forest Service must analyze the effects of the travel management plan on watersheds and water quality. In particular, the NEPA analysis must explain effects:</p> <p>1) relative to the Clean Water Act’s anti-degradation policies (see 40 C.F.R. [sections] 131.12(1)-(3)) for individual stream segments; and</p> <p>2) relative to water quality impaired waters (see 33 U.S.C. [section] 1313(d)) See, generally, 33 U.S.C. [section] 1323 (subjecting and requiring the Forest Service to comply with the CWA); FSM 2500, 2510, 2520, 2530, 2540, and 2550 (providing watershed, water resource, and soil management policies, protections, and guidance). (Preservation/Conservation, Tucson, AZ - #175.143.31000.410)</p>	<p>all watersheds that are wholly or partially located on the Coconino National Forest. The purpose of this project is to designate motorized use across the Forest as is discussed above. The decommissioning of roads is outside the scope of this project, but may be included in future planning efforts.</p>
Water Resources	3-24 The Forest Service should analyze the impacts on watersheds and water quality.	<p>TO COMPLY WITH THE CLEAN WATER ACT AND OTHER FEDERAL RULES AND PERMITS</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Watersheds and water quality, especially: (1) relative to the Clean Water Act’s anti-degradation policies (see 40 C.F.R. [sections] 131.12(1)-(3)); and (2) water quality impaired waters (see 33 U.S.C. [section] 1313(d)). See, generally, 33 U.S.C. [section] 1323 (subjecting and requiring the Forest Service to comply with the CWA); FSM 2500, 2510, 2520. 2530. 2540, and 2550 (providing watershed, water resource, and soil management policies, protections, and guidance).</p> <p>Of note, depending on whether a particular activity is a point or non-point source of pollution, the Forest Service would have to obtain a discharge permit (33 U.S.C. [section] 1342), a dredge & fill permit</p>	<p>#175.285.31100.130: We agree that roads and use of roads are inextricably tied to water quality. The soil and watershed section of the EIS specifically discusses how the designation of motorized use across the Forest via the identification of a designated system of roads, trails, and areas will substantially reduce the impacts within all watersheds that are wholly or partially located on the Coconino National Forest. Both alternatives include a small number of roads (approx 63 miles) that are currently not in the Coconino National Forest roads system, but are proposed to be added to the road system and designated for public use. These roads were closely scrutinized and are included solely to provide an alternative to existing system routes that are in</p>

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		<p>(33 U.S.C. [section] 1344), implement best management practices (in particular for non-point source pollution), and obtain water quality certification from the State of Arizona for “any activity” wherein a “Federal license or permit” is required that “may result in any discharge into the navigable waters” (33 U.S.C. [section] 1341). (Preservation/Conservation, Grand Canyon, AZ - #175.285.31100.130)</p>	<p>Endangered and Threatened Species habitat, system routes that are in canyon bottoms and drainages, and routes that result in other management conflicts. The majority of 'unauthorized' routes that are proposed for designation in one or more alternative are for access to private property, which is required by law. These 'unauthorized' routes currently exist on-the-ground and regularly receive motorized use. Thus, the designation for public use of this small number of routes will not result in additional sedimentation that is not currently occurring, and the overall effect of designating motorized use across the Forest will be to substantially decrease sedimentation in every watershed across the Forest. Since the decision on any alternative will not result in any new uses or earth-disturbance resulting in new sedimentation a Section 404 permit from the US Army Corps of Engineers is not required.</p>
Water Resources	3-25 The Forest Service should provide the supporting data for the watershed analysis.	<p>TO ALLOW FOR EVALUATION OF THE TECHNICAL ANALYSIS</p> <p>Page 78, Table 20: There are numerous figures presented regarding various watersheds. However, we [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] are unable to determine how any of these figures were achieved. For example, neither the methodology, hard data, nor even map locations of stream crossings are discussed. There is no way to reasonably consider the DEIS technical analysis here. (Motorized Recreation, Boise, ID - #202.55.31100.131)</p>	<p>#202.55.31100.131:</p> <p>The DEIS and FEIS contain summaries of the effects analysis for each resource to present a more concise document for both the public and decision maker. The Soil and Water Specialist Report contains descriptions of methodologies, data used and more details on the analysis. The full report is available by request and will be available on the Forest website.</p>

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Water Resources	3-26 The Forest Service should calibrate the water Erosion Prediction Project erosion model to local conditions.	<p>TO ENSURE MORE ACCURATE RESULTS</p> <p>Despite limits to accuracy of +/-50% using the WEPP [Water Erosion Prediction Project] erosion model, reasonable estimates are key to analyzing impacts of action alternatives. The key context for travel management purposes is to compare sediment delivery from roads versus sediment delivery in the absence of roads. This comparison will provide a comparison of how roads and their use have increased sediment delivery to riparian ecosystems and waterbodies. We [Center for Biological Diversity et al.] note that the WEPP erosion model tends to underestimate erosion/sediment delivery from roads while overestimating it from the natural background. We recommend looking at model output per unit area and compare this with published measurements from a similar area to determine actual accuracy of the WEPP model for the Coconino National Forest. Locally calibrated models are usually more accurate than “off the shelf” use of WEPP. (Preservation/Conservation, Prescott, AZ - #175.105.31100.410)</p>	<p>#175.105.31100.410: We understand your concerns about the inherent lack of precision for estimating sedimentation using the WEPP model. Your statement that, "The key context for travel management purposes is to compare sediment delivery from roads versus sediment delivery in the absence of roads," however, is incorrect. The purpose of the Travel Management Rule is to designate motorized use across the Forest by identifying a system of designated roads, trails, and areas. This will primarily affect use of existing roads and not the presence or absence of roads on the landscape. The WEPP model is used as a best approximation of how each alternative will affect sediment delivery to nearby waterways. It is recognized that the WEPP model has its limitations and is not 100% accurate. Yet it is still useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect.</p>
		<p>TO ENSURE THAT THE TOOL IS USED PROPERLY</p> <p>The soil and water analysis may be deficient. This analysis relies heavily upon WEPP modeling. DEIS at 63. As background we [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] are submitting, as Exhibit “A” hereto, the testimony of Robert C. Davies (December 8 & 9, 2004) in The Lands Council v. Stringer; Case No. CV-03-344-N-MHW (D.Idaho). The setting of this testimony is relatively unique in our experience, as it was presented in what became a five-day</p>	<p>#202.16.31100.410: We understand your concerns about the inherent lack of precision for estimating sedimentation using the WEPP model. The WEPP model is used as a best approximation of how each alternative will affect sediment delivery to nearby waterways. It is recognized that the WEPP model has its limitations and is not 100%</p>

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		<p>evidentiary hearing on remedy in a case challenging a travel planning decision made by the Coeur d'Alene River Ranger District of the Panhandle National Forest in northern Idaho. Mr. Davies was, at the time, the District hydrologist. See, also, Exhibit "B" submitted herewith, Memorandum Decision and Order dated March 31, 2005 in <i>The Lands Council v. Stringer</i>.</p> <p>We recognize that WEPP is a regularly used tool on both public and private lands to analyze erosion and sedimentation issues. Acknowledging this use should not be interpreted as accepting its validity, as even the DEIS conspicuously notes that "the model has limitations of plus or minus 50 percent." Id. Assuming, arguendo, that WEPP is the right tool for this challenge, it appears it was not used correctly here. At the most basic level, the Specialist Report states that the WEPP FuME model was used. Specialist Report at 4. Among the available options, this is the "fuel management" interface, when the WEPP: Road interface would seem the more appropriate choice here. See http://forest.moscowfsl.wsu.edu/fswcpp/. (Motorized Recreation, Boise, ID - #202.16.31100.410)</p>	<p>accurate. Yet it is still useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect. The WEPP FUME model was used to model hillslope erosion forest-wide and No, Low and High access roads were selected as the source of sediment. The model did not run burned areas.</p>
Water Resources	3-27 The Forest Service should revisit the analysis done using the Water Erosion Prediction Project model.	<p>TO ENSURE THAT SUFFICIENTLY DETAILED DATA IS USED</p> <p>The DEIS WEPP analysis proceeds from deeply flawed assumptions. Rather than modeling individual routes, the analysis "averages" the various inputs by route type, models those "average" inputs, and then extrapolates the sediment yields across the Forest. This method is flawed on multiple levels. It is critical that WEPP inputs be determined with precision. In our experience, WEPP modeling of roads is conducted on a road-by-road basis. See, e.g., Davies Testimony, Dec. 8, 2004 at 32-36 (describing inputs to Roads 1550 and 794). As Mr. Davies describes, the WEPP inputs were made for each of these roads, based on actual road-specific data or measurement. For example, for Road 1550 the buffer (distance to stream) was 2,644 feet. Id. at 33. It does not appear individual buffer values were determined for any route on the CNF [Coconino National</p>	<p>#202.17-18.31100.410: We understand your concerns about the inherent lack of precision for estimating sedimentation using the WEPP model. The WEPP model is used as a best approximation of how each alternative will affect sediment delivery to nearby waterways. It is recognized that the WEPP model has its limitations and is not 100% accurate. Yet it is still useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect. Since the same assumptions are used for all alternatives, the precision of the model or lack thereof is not</p>

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		<p>Forest], at least in WEPP modeling. Instead, broad assumptions were made based primarily on “maintenance level” classifications. Specialist Report at 5.</p> <p>In fact, even road-by-road use of WEPP may depend on a high degree of precision inputting of relevant data, even to the point of breaking a road into discrete segments, to achieve defensible results. See Rhee, Fridley & Foltz. 2004. Modeling Erosion from Unpaved Forest Roads at Various Levels of Geometric Detail Using the WEPP Model. American Society of Agricultural Engineers 47(3): 961-968 (submitted herewith as Exhibit “C”). Rhee et al studied a small project area, and compared high-, intermediate-, and low-detail WEPP inputting. Id. at 963. They found little difference between the three approaches for predicting “road traveled-way sediment”, i.e., surface erosion along the road surface itself, but found significant differences for “input buffer geometry, i.e., the method we used to describe the topography between the stream and the road segments.” Id. at 967.</p> <p>These differences were sufficient to cause the authors to conclude “it might be more appropriate to divide the road network based on buffer geometry instead of on road traveled-way geometry.” Id. at 968. (Motorized Recreation, Boise, ID - #202.17-18.31100.410)</p>	<p>a factor in providing information on the relative impacts of each alternative on water quality impacts, which is the key information (along with consideration of other Forest resources) to be considered in a decision.</p>
Water Resources	3-28 The Forest Service should calculate the route density for all 5 th -level hydrologic unit code watersheds.	<p>TO PRIORITIZE FOR CLOSURE ANY UNNECESSARY HIGH-CLEARANCE ROUTES</p> <p>We [Center for Biological Diversity et al.] emphasize the importance of route density in terms of sedimentation and erosion. We recommend the route density of each 5th HUC [5th level hydrologic unit code] watershed be calculated using all known routes, whether user-created or system, unauthorized or authorized, open or closed, classified as route or trail, and be included in the route density calculations. Wilderness areas should be excluded from these calculations. Given that the Forest Service recognizes that high-clearance routes contribute a significant amount of sediment, the density of these routes should be identified separately so that any unnecessary high-clearance routes in areas with route densities above</p>	<p>#175.99.31100.410:</p> <p>Motorized trails are not included in road density calculations, based on Forest Plan guidance (USDA Forest Service 1987, p. 58). The Soil and Water Specialist report analyzed sedimentation and erosion effects based on road density calculations that included many unauthorized, or user-created roads, yet some unauthorized routes may not have been digitized into the Forest GIS data layer used (October 2010). The goal of Travel Management Planning is not to prioritize routes for closure,</p>

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		<p>1 mile/square mile can be prioritized for closure, decommissioning, and obliteration. (Preservation/Conservation, Tucson, AZ - #175.99.31100.410)</p>	<p>decommissioning and obliteration, but rather to identify a system of roads and trails for motorized use. Decommissioning and obliteration of roads not designated as open through this planning process may occur through additional analysis through the National Environmental Policy Act process.</p>
<p>Water Resources</p>	<p>3-29 The Forest Service should reduce route densities to 1 mile per square mile in watersheds.</p>	<p>TO PROTECT WILDLIFE, HABITAT, AND WATERSHED HEALTH</p> <p>Every watershed listed as important for aquatic resources, with the exception of Fossil Creek, have road densities above 2.0 miles/square mile, the most egregious road densities are for West Clear Creek (2.7 miles/square mile) and Upper Clear Creek (4.1 miles/square mile). Forest Service 2010:75. We [Center for Biological Diversity et al.] do not agree that the Coconino National Forest (CNF) should rely on a road density standard that indicates a watershed is no longer properly functioning (the 2.5 miles/square mile standard cited in the DEIS at page 75). Rather, we recommend the CNF should be working to reduce route densities to 1 mile/square mile to protect wildlife and habitat and watershed health. (Preservation/Conservation, Prescott, AZ - #175.116.31100.410)</p>	<p>#175.116.31100.410:</p> <p>Both action alternatives decrease road densities within important watersheds, including those listed in your comment. The FEIS and Soil and Water Specialist Report contain more information about effects on from each alternative. An alternative to analyze a route system that would result in a route density of no more than 1.0 miles/square mile was considered but eliminated from detailed study. This alternative would not meet the purpose and need, which includes designation of a system of routes and areas for motorized use that would allow for access and recreational opportunities while minimizing impacts to Forest resources. An alternative that includes a road density of less than one mile/square mile would not even support the minimum road system identified by the Coconino National Forest in the Travel Analysis Process Report and thus would not provide adequate motorized access or recreational opportunities.</p>

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		<p>TO PROTECT WETLANDS, WILDLIFE HABITAT, AND OLD-GROWTH MIXED-CONIFER AND PONDEROSA FORESTS</p> <p>Alternative 3 provides a reduction in road density in the East Clear Creek watershed from the current 4.1 mi/sq mi to 1.7 mi/sq mi. While we [Center for Biodiversity et al.] commend this action, and believe it should result a significant reduction in adverse impacts to the watershed, native aquatic and other wildlife, and recreational experience of most forest visitors, we strongly believe additional route closures, stabilization and decommissioning is necessary. East Clear Creek’s unique abundance of free flowing streams and wetlands provide tremendous ecological benefits to wildlife. The area contains significant wildlife habitat for Little Colorado River spinedace and other native fish; the listed Chiricahua and northern leopard frogs, beaver, Mexican spotted owl, northern goshawk and other raptors, black bear, and strongly interactive species including mountain lion, Abert’s squirrel, and beaver.</p> <p>The East Clear Creek watershed, especially the canyons, contains significant remnant old-growth mixed conifer and ponderosa forest. These values are significant, given that more than 200 years are required to develop old growth structure in southwestern ponderosa pine forests (Reynolds et al. 1992; 2006:308). Ecologists (Noss et al. 1995) have determined that old-growth ponderosa pine forests constitute one of America’s most endangered ecosystems. They report that old-growth ponderosa pine has suffered an estimated 85–98% area loss due to destruction, conversion to other uses, and significant degradation in structure, function, and composition. Logging is one of the principal causes of this decline.</p> <p>Based upon an analysis of the TAP [Travel Analysis Process] (Forest Service 2010a), augmented by extensive on-the-ground surveys over the past five years by Grand Canyon Wildlands Council, we strongly urge the Coconino National Forest to close the routes [we recommend] for watershed and resilient forest restoration, including</p>	<p>#175.178-179.31100.410:</p> <p>Stabilization and decommissioning activities are outside the scope of the Travel Management Plan; however future planning processes may consider these activities following a decision on this Plan. The Coconino National Forest recognizes the values associated with the East Clear Creek watershed; the Forest carefully reviewed the routes in the East Clear Creek area. Alternative 3 was further modified from the DEIS to the FEIS to not designate several routes in the East Clear Creek watershed (based on the previous East Clear Creek Watershed Health Decision) to protect watershed resources.</p>

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		protection and restoration of native species [in the East Clear Creek area]. (Preservation/Conservation, Grand Canyon, AZ - #175.178-179.31100.410)	
Water Resources	3-30 The Forest Service should further reduce route densities in the East Clear Creek watershed.	<p>TO CORRECT FOR THE INACCURATE BUFFER LENGTH</p> <p>A flawed assumption occurred in selecting buffer length. This value is essentially the distance of the route in question from the applicable water body. WEPP allows a maximum value of 1,000 feet. See Davies Testimony, Dec. 8, 2004 at 36–37. The DEIS is based on a buffer length of 50 feet for all WEPP runs for every route. Specialist Report at 5. In fact, the DEIS itself seemingly questions this value, for the discussion of riparian areas and water quality indicates “there are about 45 miles of road that are within 132 feet (2 chains) of a riparian stream course.” In other words, of particular concern for water quality and related aquatic impacts would be those routes relatively close to streams, and “close” on the CNF [Coconino National Forest] is 132 feet, which implicates 45 miles of roads. DEIS at 64. It is unclear, and questionable, why a buffer length of 50 feet is an appropriate input for every mile of road analyzed under WEPP when the DEIS identifies only 45 miles of routes of concern for riparian impacts, and selects, for whatever reason, 132 feet as the region of concern.</p> <p>We [Motorcycle Industry Council, Specialty Vehicle Institute of America, BlueRibbon Coalition, and Coconino Trail Riders] performed WEPP runs with variable buffer length inputs to compare the results to those published in the Specialist Report. For reference purposes, we selected Run 9 of Table 2b, which addresses unimproved (i.e., level 1 & 2) roads. We attempted to track the CNF inputs on all attributes, except buffer length. See Exhibit “D” submitted herewith, WEPP results. Our results are summarized in Table 1, reported as Appendix 1 hereto. In summary, at a buffer length of 100 feet, the sediment leaving buffer value is zero. Site-specific analysis might reveal concerns about road-related sedimentation or impacts related to motorized travel on discrete sites,</p>	<p>#202.20-21.31100.410:</p> <p>We understand your concerns about the inherent lack of precision for estimating sedimentation using the WEPP model. The WEPP model is used as a best approximation of how each alternative will affect sediment delivery to nearby waterways. It is recognized that the WEPP model has its limitations and is not 100% accurate. Yet it is still useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect. Since the same assumptions are used for all alternatives, the precision of the model or lack thereof is not a factor in providing information on the relative impacts of each alternative on water quality impacts, which is the key information (along with consideration of other Forest resources) to be considered in a decision. It is important to realize that although the output numbers may not be highly accurate, the model outputs are used to compare magnitude of erosion and sedimentation by road type, traffic use, road density and stream crossings and offers the best available science. Assumptions include an average buffer width of 50 feet.</p>

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		<p>but there is no legitimate basis to assert impacts based upon the methodology or conclusions of the DEIS. (Motorized Recreation, Boise, ID - #202.20-21.31100.410)</p>	<p>These values vary forest-wide but on-site observations concluded that on this forest, 50 feet represent the overall average width for all road types and is used Forest-wide in the modeling to compare No Action with the Action Alternatives equally. It is important to realize that WEPP modeling outputs sediment delivered across the 50 foot buffer but does not mean to imply all of the sediment makes its way to a perennial stream. The analysis includes model estimates for sediment delivered at road stream crossings in watershed with major perennial streams and probably is a more realistic representation of sediment delivered to perennial streams than the figures related to sediment leaving road buffers forest-wide. Roads within or adjacent to riparian areas are of particular concern for water quality and aquatic impacts. Therefore, roads within or adjacent to riparian areas were analyzed and the Forest Plan standard of 132 foot buffer was selected necessary to adequately filter sediment to avoid or reduce sedimentation into riparian areas and downstream perennial streams. The 132 foot analysis was used as a tool to identify riparian areas at risk due to road locations and a determination was made to either designate these roads or close them under the action alternatives.</p>

Category	Public Concern	Comment	Response
Water Resources	3-30 The Forest Service should further reduce route densities in the East Clear Creek watershed.	<p>TO CORRECT FOR THE INACCURATE BUFFER LENGTH</p> <p>A flawed assumption occurred in selecting buffer length. This value is essentially the distance of the route in question from the applicable water body. WEPP allows a maximum value of 1,000 feet. See Davies Testimony, Dec. 8, 2004 at 36–37. The DEIS is based on a buffer length of 50 feet for all WEPP runs for every route. Specialist Report at 5. In fact, the DEIS itself seemingly questions this value, for the discussion of riparian areas and water quality indicates “there are about 45 miles of road that are within 132 feet (2 chains) of a riparian stream course.” In other words, of particular concern for water quality and related aquatic impacts would be those routes relatively close to streams, and “close” on the CNF [Coconino National Forest] is 132 feet, which implicates 45 miles of roads. DEIS at 64. It is unclear, and questionable, why a buffer length of 50 feet is an appropriate input for every mile of road analyzed under WEPP when the DEIS identifies only 45 miles of routes of concern for riparian impacts, and selects, for whatever reason, 132 feet as the region of concern.</p> <p>We [Motorcycle Industry Council, Specialty Vehicle Institute of America, BlueRibbon Coalition, and Coconino Trail Riders] performed WEPP runs with variable buffer length inputs to compare the results to those published in the Specialist Report. For reference purposes, we selected Run 9 of Table 2b, which addresses unimproved (i.e., level 1 & 2) roads. We attempted to track the CNF inputs on all attributes, except buffer length. See Exhibit “D” submitted herewith, WEPP results. Our results are summarized in Table 1, reported as Appendix 1 hereto. In summary, at a buffer length of 100 feet, the sediment leaving buffer value is zero. Site-specific analysis might reveal concerns about road-related sedimentation or impacts related to motorized travel on discrete sites, but there is no legitimate basis to assert impacts based upon the methodology or conclusions of the DEIS. (Motorized Recreation, Boise, ID - #202.20-21.31100.410)</p>	<p>Using a 100-foot buffer that shows zero sedimentation would not provide for useful output for which to compare the water quality affects of each alternative. The WEPP model is useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect. Since the same assumptions are used for all alternatives, the precision of the model or lack thereof is not a factor in providing information on the relative impacts of each alternative on water quality impacts, which is the key information (along with consideration of other Forest resources) to be considered in a decision. It is important to realize that although the output numbers may not be highly accurate, the model outputs are used to compare magnitude of erosion and sedimentation by road type, traffic use, road density and stream crossings and offers the best available science. Assumptions include an average buffer width of 50 feet. These values vary forest-wide but on-site observations concluded that on this forest, 50 feet represent the overall average width for all road types and is used Forest-wide in the modeling to compare No Action with the Action Alternatives equally. It is important to realize that WEPP modeling outputs sediment delivered across the 50 foot buffer but does not mean to imply all of</p>

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			<p>the sediment makes its way to a perennial stream. The analysis includes model estimates for sediment delivered at road stream crossings in watershed with major perennial streams and probably is a more realistic representation of sediment delivered to perennial streams than the figures related to sediment leaving road buffers forest-wide. Roads within or adjacent to riparian areas are of particular concern for water quality and aquatic impacts. Therefore, roads within or adjacent to riparian areas were analyzed and the Forest Plan standard of 132 foot buffer was selected necessary to adequately filter sediment to avoid or reduce sedimentation into riparian areas and downstream perennial streams. The 132 foot analysis was used as a tool to identify riparian areas at risk due to road locations and a determination was made to either designate these roads or close them under the action alternatives.</p>
<p>Water Resources</p>	<p>3-30 The Forest Service should further reduce route densities in the East Clear Creek watershed.</p>	<p>TO REVISE ASSUMPTIONS REGARDING TRAFFIC LEVELS ON ROADS</p> <p>The inputs to the WEPP Model are flawed. For example, the DEIS assumed that certain types of routes receive “high” traffic in WEPP terms. Specialist Report at 5. (“It is assumed that traffic use on native level 1, 2, and user-created routes are low and traffic on improved level 3 roads is generally high.”) In WEPP, “[h]igh traffic is generally associated with a timber sale, hauling numerous loads of logs over the road, or roads that receive considerable traffic during much of the</p>	<p>#202.19.40210.240: The analysis uses WEPP for roads and one of the variables analyzes 4 traffic level effects on erosion and sedimentation. Assumptions of traffic level use include the following; high traffic are roads that receive considerable traffic during much of the year and include all forest, improved roads. Low traffic roads are roads with light recreational use during</p>

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		<p>year.” See http://forest.moscowfs1.wsu.edu/fswepp/wr/traflevl.html. It is highly questionable to select a “high” traffic setting for any road in most Forests, and certainly one cannot reasonably conclude that all level 3 roads receive “high” traffic as specifically defined by WEPP. (Motorized Recreation, Boise, ID - #202.19.40210.240)</p>	<p>dry weather and include unimproved or user-created roads. No traffic are roads with no access or restricted and also include closed roads or roads that would not be designated open under selection of an action alternative.</p>
Water Resources	<p>3-30 The Forest Service should further reduce route densities in the East Clear Creek watershed.</p>	<p>TO ALLOW FOR REASONABLE COMPARISON OF ALTERNATIVES</p> <p>Page 71, Comparison of Alternatives: These conclusions are unexplained and questionable. Apparently they are based on the rough arithmetic comparison of simple route mileage totals between various alternatives. The analysis, including WEPP modeling, has not even been attempted at anything other than a broad level of detail, based on assumptions about most of the WEPP inputs. As such, the conclusions are of questionable value. (Motorized Recreation, Boise, ID - #202.53.31100.410)</p>	<p>#202.53.31100.410: We understand your concerns about the inherent lack of precision for estimating sedimentation using the WEPP model. The WEPP model is used as a best approximation of how each alternative will affect sediment delivery to nearby waterways. It is recognized that the WEPP model has its limitations and is not 100% accurate. Yet it is still useful as a tool to understand how each management alternative may affect water quality and how the management alternatives compare to each other in this respect. Since the same assumptions are used for all alternatives, the precision of the model or lack thereof is not a factor in providing information on the relative impacts of each alternative on water quality impacts, which is the key information (along with consideration of other Forest resources) to be considered in a decision.</p>
Aquatic and Wetland Resources	<p>3-31 The Forest Service should provide site-specific analysis of aquatic</p>	<p>TO AVOID PROCEDURAL CONCERNS AND ENSURE THAT BEST AVAILABLE SCIENCE IS USED</p> <p>Page 72, Aquatic Resources: This discussion is subject to procedural concerns regarding documentation, cross-referencing, and availability. Also, the necessary level of site-specific analysis is</p>	<p>#202.54.30100.131: Your comments regarding more specificity and discussion of specific impacts are addressed in the aquatic resources analysis (fisheries report). Much of the effects</p>

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	resources.	lacking. There is no identification of specific sites, proximity to routes under review, documentation of impacts at any such sites, species-specific impacts (on either a general or site-specific basis), impact of other factors (e.g., predation, nonmotorized recreation, habitat change). Nor is there discussion of impacts associated with route existence vs. continued travel, and finally, no discussion of possible mitigation measures or active management strategies. In summary, the DEIS does not reflect best available science. (Motorized Recreation, Boise, ID - #202.54.30100.131)	analysis of the report is based on monitoring data for both water quality and sensitive aquatic species. The fisheries report includes information on specific drainages and how changes in motorized use could affect elements such as sedimentation, which is a key monitoring element. The report also acknowledges in several areas that the impacts of roads are based both on the existence of the road and from motorized traffic on the road and these impacts are differentiated in the effects analysis.
Aquatic and Wetland Resources	3-32 The Forest Service should prioritize protection of wetland areas.	<p>BECAUSE THERE ARE FEW OF THEM AND THEY REPRESENT A VERY SMALL PERCENTAGE OF THE FOREST</p> <p>Wetlands and riparian areas are particularly susceptible to degradation from ORVs. With just 74 wetlands covering less than 0.1% aerial extent on the Coconino National Forest and most of these wetlands having road access, these areas should be prioritized for protection. Soil and Water Specialist's Report: 11. Riparian areas make up less than 0.3% of the forest (though many riparian areas are unaccounted for in the specialist report) and approximately 45 miles of roads are within 2 chains of a riparian streamcourse. Soil and Water Specialist's Report: 12. Dispersed camping frequently occurs where forest roads intersect with riparian areas. Soil and Water Specialist's Report: 13. Unless routes through all riparian or wetland areas are high value, these routes should be closed, decommissioned and obliterated. We would recommend prioritizing the 31 wetlands that are currently classified as Functioning at Risk, and the Upper Clear Creek, Oak Creek, Walnut Creek and Beaver Creek watersheds for route closure/decommissioning/obliteration. (Preservation/Conservation, Santa Fe, NM - #175.103.31100.530)</p>	<p>#175.103.31100.530:</p> <p>Wetlands/riparian were one of the main factors considered in route designation, thus these areas were avoided in both action alternatives except for a few circumstances where main routes pass across a stream with a culvert or low water crossing. Based on comments on the DEIS additional changes were made to the dispersed camping corridors to further reduce their presence in wetlands and riparian areas in Alternatives 3 and 4. For example, several spur roads in the Fossil Creek area were truncated to removed dispersed camping in riparian habitat. Lastly, your request that routes in wetlands and riparian areas be decommissioned and obliterated is outside of the scope of this project.</p>

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Air Quality/Climate Control	3-33 The Forest Service should analyze the air quality impacts.	<p>TO COMPLY WITH NEPA</p> <p>Despite the fact that the DEIS acknowledges that the majority of roads on the Coconino National Forest are unpaved, high-clearance roads, the Forest Service failed to conduct a full-scale quantitative analysis of the air quality impacts in the planning area or model these impacts. In addition, as part of the “hard look” requirement, NEPA demands that the Forest Service determine and accurately describe baseline air quality conditions, so that it, as well as the public, can fully understand the implications of the existing and proposed travel system. Without preparing near-field, far-field, and cumulative air quality analyses, the Forest Service will not understand the level of the pollutants the road and trail network and its use will emit, thereby violating NEPA and its requirement that the Forest Service understand the environmental impacts of its plan. In addition, the Forest Service must model pollution concentrations and dispersion to understand if this plan will comply with federal and state air quality standards and protect air quality related values. (Preservation/Conservation, Tucson, AZ - #175.114.31500.410)</p>	<p>#175.114.31500.410:</p> <p>In response to your comment and those of others, an Air Quality Specialist Report was completed and incorporated into the FEIS. The air quality specialist report includes information relating to air quality standards and whether the alternatives would affect those standards, including the No Action, which would continue baseline, or current, conditions. Though off-road vehicles do create emissions that could affect air quality, designating a system of routes or areas for motorized use on the Coconino National Forest is not expected to result in a substantial decrease or increase of motorized use on the Forest or surrounding areas. Therefore, none of the alternatives are expected to have any measurable effect on air quality caused by dust from motorized vehicle use on either paved and unpaved roads, nor cause emission to exceed air quality standards.</p>
Air Quality/Climate Control	3-34 The Forest Service should provide a detailed analysis of ambient air conditions, criteria pollutant nonattainment	<p>TO COMPLY WITH STATE AND FEDERAL AIR QUALITY REGULATIONS</p> <p>Air Quality: The FEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). Such an evaluation is necessary to ensure compliance with State and Federal</p>	<p>#205.10.31500.100: The air quality specialist report includes information relating to air quality standards and whether the alternatives considered in the Travel Management planning process will affect those standards. Though it is true that off-road vehicles cause emissions that have a negative effect on air quality, none of the</p>

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	<p>areas, and potential air quality impacts.</p>	<p>air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality. (U.S. Environmental Protection Agency, CA - #205.10.31500.100)</p>	<p>action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.</p>
<p>Air Quality/Climate Control</p>	<p>3-35 The Forest Service should analyze air quality impacts of ORVs</p>	<p>THE FOREST SERVICE SHOULD ANALYZE THE AIR QUALITY IMPACTS OF ORVS</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Air Quality: Off-road vehicles negatively affect air quality, which is typically high quality in our National Forests. ORVs have significant negative air quality impacts, especially on routes and in areas with a high volume of motorized traffic. (Preservation/Conservation, Tucson, AZ - #175.289.31500.530)</p>	<p>#175.289.31500.530: The EIS contains information on the expected short and long-term impacts of each alternative for wildlife, cultural resources, recreation quality and opportunities, social and economic resources, water and soil quality and air quality as it pertains to dust caused from motor vehicles. Though it is true that off-road vehicles emit emissions that have a negative effect on air quality, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. The action alternatives would both reduce the amount of routes available for motorized</p>

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			use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest.
Air Quality/Climate Control	3-36 The Forest Service should quantify all emissions from ORVs	<p>TO FULLY UNDERSTAND THE POTENTIAL AIR QUALITY IMPACTS</p> <p>The use of ORVs on designated routes will also generate emissions from vehicle engines. Currently, many ORVs in use run on 2-stroke engines, including off-highway motorcycles and ATVs, which do not burn fuel completely and produce significant amounts of airborne contaminants, including nitrogen oxides, carbon monoxide, pollutants that contribute to the formation of ozone, aldehydes, and extremely persistent polycyclic aromatic hydrocarbons (PAH), including the suspected human carcinogen, methyl tert-butyl ether (MTBE).</p> <p>The Forest Service must quantify all emissions from ORVs to fully understand their likely impact on air quality in the planning area. The Forest Service must include a comprehensive inventory of emissions generated by the vehicles traveling these routes and conduct management activities so that air quality will be equal to or better than that required by applicable federal, State, and local standards or regulations. Finally, to the extent these calculations reveal ORV use is contributing or will degrade air quality in the Flagstaff area, the Forest Service must reduce the amount of ORV use allowed on the Forest and locate routes on which ORVs can travel in such a way as to minimize contributions to air quality problems.</p> <p>(Preservation/Conservation, Tucson, AZ - #175.112.31500.530)</p>	#175.112.31500.530: Though it is true that off-road vehicles emit emissions that have a negative effect on air quality, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.
Air Quality/Climate Control	3-37 The Forest Service should ensure that the plan complies	<p>THE FOREST SERVICE SHOULD ENSURE THAT THE PLAN COMPLIES WITH ALL APPLICABLE AIR QUALITY LAWS AND REGULATIONS</p> <p>The Forest Service must comply with all federal, state, and local</p>	#175.110.31500.100: Though it is true that off-road vehicles emit emissions that have a negative effect on air quality, none of the action alternatives are expected to

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	with all applicable air quality laws and regulations.	<p>environmental laws, including that it must maintain “air quality at a level that is adequate for the protection and use of National Forest System resources and that meets or exceeds applicable Federal, State and/or local standards or regulations.” 36 C.F.R. [section] 219.27(a)(12). This means, for example, that the Forest Service may not permit activities that will result in exceedances of national ambient air quality standards (NAAQS), prevention of significant deterioration (PSD) increment limits, air quality related values (AQRVs), and standards for hazardous air pollutants. For instance, the Coconino National Forest must protect the current status of air quality related values [AQRV’s] in Class I Airsheds. The Clean Air Act itself also requires that the Forest Service not license, permit, approve, engage in, or support in any way an activity that will not conform with a state implementation plan (SIP). 42 U.S.C. [section] 7506(c)(1). State implementation plans are developed to achieve NAAQS and to observe PSD increment limits. See id. [section] 7410. Conformity with a SIP includes eliminating violations of NAAQS and ensuring that activities the Forest Service approves will not violate air quality standards such as NAAQS and PSD increment limits. Finally, NEPA requires that the Forest Service understand the environmental impacts of its actions, including analysis of air pollution to understand if the plan will comply with federal and state air quality standards, as required by Forest Service regulations and the Clean Air Act. (Preservation/Conservation, Pinetop, AZ - #175.110.31500.100)</p>	<p>effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.</p>
Air Quality/Climate Control	3-38 The Forest Service should comply with the requirements of the LRMP as it relates to air quality.	<p>THE FOREST SERVICE SHOULD COMPLY WITH THE REQUIREMENTS OF THE LRMP AS IT RELATES TO AIR QUALITY</p> <p>The Coconino National Forest (CNF) LRMP [Land and Resource Management Plan] directs the CNF to upgrade RIM [Reference Informative Model] Condition Classes 4–8 to Class 1. Forest Service 1987:189, as amended. In addition, the air quality-related values of Sycamore Canyon Wilderness Class 1 airshed, and all wilderness area airsheds, must be protected. Forest Service 1987:111, as amended.</p>	#175.113.31500.131: Though it is true that off-road vehicles emit emissions that have a negative effect on air quality, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. The action alternatives would both reduce the amount of routes available for motorized

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		(Preservation/Conservation, Tucson, AZ - #175.113.31500.131)	use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.
		<p>ON VEGETATION AND ON WILDLIFE</p> <p>While dust is bad for the health of people, it can also affect plants and animals. The Coconino National Forest should address the impact of fugitive dust on vegetation, including the disruption of photosynthetic and respiration processes, leading to reduced plant growth, reproduction, and survivorship. It should also evaluate the impact on species such as Gila monster, four-spotted skipperling, nitocris, and Nokomis fritillaries. This information is also necessary for understanding the likely contributions to regional climate change caused by this plan. (Preservation/Conservation, Santa Fe, NM - #175.109.31500.300)</p>	<p>#175.109.31500.300:</p> <p>Though it is true that off-road vehicles emit emissions that have a negative effect on air quality as a result of dust, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional dust that could negatively impact people, plants, or wildlife. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and</p>

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			<p>thus this decision is expected to have no effect on current or future air quality.</p>
		<p>AND SHOULD USE THE INFORMATION PROVIDED BY RESPONDENTS</p> <p>As stated in the TAP [Travel Analysis Process], most of the roads in the Coconino National Forest (CNF) pose a threat to air quality in the form of dust as the “fine material” is blown off graveled road surfaces. Forest Service 2010b:15. However, there is little analysis of the impacts of fugitive dust in the DEIS or specialists’ reports. The only reference we can find is at page 67 of the DEIS. Therefore, we [Center for Biological Diversity et al.] provide the following information and ask the CNF to utilize this information in the FEIS and analysis of any additional alternatives.</p> <p>Fugitive dust (mainly composed of lightweight soil particles, including silt and clay) kicked up by motorized vehicles and emissions from vehicle engines are both concerns regarding air quality in the planning area.</p> <p>Fugitive dust suspended in the air has the potential to impact more total area than any other impact of roads (paved or unpaved) and it can have significant effects on ecosystems and wildlife habitat. [Footnote 8: Forman et al., 2003; Westec, 1979] Dust is created and raised into the air as motorized vehicles travel on unpaved roads and through proposed dispersed camping and big game retrieval areas and is then carried along traffic created wind currents and dispersed along roadsides. Once soil surfaces within dispersed camping areas and along Forest Service roads are disturbed, wind erosion may increase the amount of debris flow. [Footnote 9: Lovich and Bainbridge 1999] An example of fugitive dust plumes caused by OHV traffic is documented in 1973 satellite photos. These photos show six dust plumes in the Mojave Desert covering more than 1,700 km (656.2 sq mi). These plumes were attributed to destabilization of soil surfaces</p>	<p>#175.106-107.31500.530:</p> <p>Though it is true that off-road vehicles emit emissions that have a negative effect on air quality as a result of dust, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional dust that could negatively impact people, plants, or wildlife. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.</p>

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		<p>resulting from OHV activities. [Footnote 10: Nakata et al., 1976; Gill 1996] In a study prepared by Walker and Everett, along Alaskan roads heavily traveled by various types of vehicles, they found that dust had buried mosses and very low-statured vegetation in the 10-m-wide area adjacent to each side of the road; dust blankets measured up to 10 cm (3.9 in) deep. [Footnote 11: Walker and Everett 1987] Dr. Jane Belnap of the United States Geological Survey recently gave a presentation to the Colorado Water Conservancy District. [Footnote 12: PowerPoint presentation given September 18, 2009 at the Colorado River Water Conservancy District seminar, attached as Appendix I and available online at http://www.crwcd.org/page_305] Dr. Belnap's presentation addressed the connection between increased temperature, disturbance, invasive species and dust. This presentation focused much attention on the impacts from ORVs and noted the cycle of increasing temperatures, which increases dust, which is exacerbated by ORVs, which increases the effects of climate change (temperature increases) and the key indicator of these problems being earlier snowmelts. Dr. Belnap also cited dust concerns in her testimony at congressional hearings on June 5, 2008. Of particular concern is the amount of dust that results from motorized routes, which settles upon snow pack and alters the melt rate which, in turn, alters the availability of warm season infusion of water into streams and lakes, when such water is critical to wildlife. We have attached the Senate oversight hearing testimony as Appendix J and ask that the CNF specifically review pages 3-7, and also pages 14, 18, 19. (Preservation/Conservation, Tucson, AZ - #175.106-107.31500.530)</p>	
Air Quality/Climate Control	3-39 The Forest Service should analyze the effects of fugitive dust.	<p>USING MODELING AND SAMPLE ROUTES</p> <p>The Forest Service has made no attempt to calculate the amount of dust that will be generated by the proposed open road system or any alternative. The Forest Service should, at the very least, analyze the amount of dust that will be generated from the road system by using modeling and sample routes to inventory the particulate matter pollution for PM10 which will be generated by fugitive dust from</p>	<p>#175.111.31500.530:</p> <p>Though it is true that off-road vehicles emit emissions that have a negative effect on air quality as a result of dust, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the</p>

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		<p>ORVs on designated routes. This has been done for Bureau of Land Management projects (the West Tavaputs Plateau Natural Gas Full Field Development Plan, DEIS February 2008, and the Enduring Resources' Saddletree Draw Leasing and Rock House Development Proposal, FEA December 2007.) (Preservation/Conservation, Grand Canyon, AZ - #175.111.31500.530)</p>	<p>Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional dust that could negatively impact people, plants, or wildlife at the airshed level. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.</p>
<p>Air Quality/Climate Control</p>	<p>3-40 The Forest Service should analyze the potential impacts related to PM10.</p>	<p>TO ADDRESS POTENTIAL HUMAN HEALTH EFFECTS When course particulates (PM10) are inhaled, they can affect the heart and lungs and increase respiratory symptoms, irritation of the airways, coughing, breathing difficulty, and more. The elderly, children, and those with respiratory or other health issues are at greatest risk relative to particulate pollution. Recently, a group of doctors in Utah cited increased dust due to climate change, which, as noted above, is exacerbated as a result of ORV use on fragile soils, as a top public health concern in the arid West. See Appendix K, Public Health Climate Change. Recently, a study was released in California clearly demonstrating that ORV activity is a major contributor to high PM concentrations in nearby airsheds because of destruction of soil crusts and vegetation. Craig, Cahill, and Ono 2010. This study is attached as Appendix L. (Preservation/Conservation, Tucson, AZ - #175.108.31500.719)</p>	<p>#175.108.31500.719: Though it is true that off-road vehicles emit emissions that have a negative effect on air quality as a result of dust, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional dust that could negatively impact people, plants, or wildlife. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the</p>

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			Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality.
Air Quality/Climate Control	3-41 The Forest Service should describe and estimate air emissions from proposed road work and develop an Equipment Emissions Mitigation Plan.	<p>TO REDUCE DIESEL PARTICULATE MATTER, CARBON MONOXIDE, HYDROCARBONS, AND NOX EMISSIONS</p> <p>The FEIS should describe and estimate air emissions from the proposed road work, including potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. The FEIS should specify the emission sources, by pollutant, from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. The FEIS should identify the need for an Equipment Emissions Mitigation Plan (EEMP). An EEMP would identify actions to reduce diesel particulate matter, carbon monoxide, hydrocarbons, and NOx associated with construction activities. (U.S. Environmental Protection Agency, San Francisco, CA - #205.11.31500.410)</p>	<p>#205.11.31500.410:</p> <p>The analysis of effects focuses on the change from the existing management of roads. The Travel Management Plan focuses on the designation of an open motorized road system, and does not involve construction and maintenance effects. An air quality specialist report was completed, and included within the FEIS. The report showed that the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is expected to have no effect on current or future air quality. The purpose of the Coconino Travel Management Plan is to designate a system of motorized routes; the specification of emission sources to the extent commented on is outside the scope of this project, as is the identification of an Equipment Emissions Mitigation Plan.</p>
Air Quality/Climate	3-42 The Forest Service should	<p>THE FOREST SERVICE SHOULD INCLUDE AN ANALYSIS OF THE POTENTIAL CONSEQUENCES ASSOCIATED</p>	<p>#205.8.31600.200:</p> <p>Thank you for your comment. Specialists</p>

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Control	include an analysis of the potential consequences associated with climate change.	<p>WITH CLIMATE CHANGE</p> <p>Climate Change: We [EPA] recommend that the FEIS include a description of climate change and its implications for the National Forest System roads. For example, describe and evaluate projected climate change consequences, such as increased frequency of high intensity storms, amplified rain events, and their potential effects on culverts, bridges, and low water crossings. We recommend that the FEIS clearly describe the effects of the project on water quality, riparian habitat, fish passage and other sensitive species in the context of climate change. (U.S. Environmental Protection Agency, San Francisco, CA - #205.8.31600.200)</p>	incorporated climate change into their effects analysis for watersheds, aquatic species, and wildlife under each alternative. The FEIS includes a summary of each analysis; specialist reports are available upon request and online. In addition the air quality report discusses effects to climate change. In general, the action alternatives were found to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and the overall miles in the road system, and by designating fewer roads within watersheds.
Air Quality/Climate Control	3-42 The Forest Service should include an analysis of the potential consequences associated with climate change.	<p>TO AVOID UNDERESTIMATING CUMULATIVE IMPACTS</p> <p>Secretary Vilsack advocates protecting forest resources, such as air and water quality. Without acknowledging the threat of climate change and building this threat into the Agency’s analysis of impacts and consideration of alternatives, the Forest Service cannot make a reasoned and informed decision pertaining to these uses of forest land. In particular, the Forest Service may be grossly underestimating the cumulative impacts of these activities on watersheds, soils, and wildlife. (Preservation/Conservation, Denver, CO - #175.152.30130.250)</p>	<p>#175.152.30130.250:</p> <p>The Coconino National Forest does acknowledge the impacts of climate change on forest resources, particularly in regards to drought severity and vegetation change. Specialists incorporated climate change into their effects analysis for watersheds, aquatic species, and wildlife under each alternative, and focused on potential cumulative impacts of each in the context of climate change. The FEIS includes a summary of each analysis; specialist reports are available upon request and online. In general, the action alternatives were found to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within</p>

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Air Quality/Climate Control	3-42 The Forest Service should include an analysis of the potential consequences associated with climate change.	<p>TO COMPLY WITH AGENCY DIRECTIVES AND INTEGRATE AGENCY PLANNING EFFORTS</p> <p>In a November 20, 2009 directive, USFS Chief Tom Tidwell ordered Regional Offices to develop and implement landscape conservation plans with desired outcomes, strategies, and specific actions to address the impacts of climate change on National Forest resources, especially watersheds. As noted in the recent (February 18, 2010) “Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions” issued by the Council on Environmental Quality, “Federal actions may cause effects on the human environment that are not significant environmental effects, in isolation, but that are significant in the aggregate or that will lead to significant effects ... Agencies then should consider the affected environment by looking for effects of past, present, and [begin underline] reasonably foreseeable change in combination with the direct and indirect effects of the proposal [end underline] for agency action ... “ [[emphasis added]].</p> <p>In 2009 Secretary Vilsack called for “making our forests more resilient to climate change.” Forest Service 2009b. Recent studies provide important information about the impacts of climate disruption on lands like the Coconino National Forest, as well as emerging new best management practices to employ in the face of climate change. See, for example, CCSP. 2009; U. S. Climate Change Science Program Final Report. 2008. Attached as Appendix P. The 2008 Environmental Protection Agency’s “Final Report,” specifically “identifies strategies to address management challenges posed by climate change for a subset of federally protected lands and waters. These strategies can also be broadly applied to other lands and waters managed by governmental or nongovernmental entities.” We [Center for Biological Diversity et al.] urge the Forest Service to include this information in the analysis of the alternatives to better address climate change. See specifically, Chapter 3. [Footnote 29: Key recommended</p>	<p>watersheds.</p> <p>#175.137-138.31600.160:</p> <p>Specialists incorporated climate change into their effects analysis for watersheds, aquatic species, and wildlife under each alternative, and focused on potential cumulative impacts of each in the context of climate change. The FEIS includes a summary of each analysis; specialist reports are available upon request and online. In general, the action alternatives were found to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds.</p>

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		<p>strategies include: promote connected landscapes to facilitate species movements and gene flow, sustain ecosystem processes, and protect critical habitats; reduce impact of stressors such as fragmentation; increase ecosystem redundancy and buffers; adjust management goals based on updated baseline conditions for species and ecosystems that have been significantly/cumulatively disturbed; coordinate with other agencies to reduce anthropogenic stressors.] Integrating consideration of climate change across all agency planning levels is key to managing forests in light of climate change and Travel Management Planning is an ideal opportunity to begin to fully implement this planning regime. (Preservation/Conservation, Tucson, AZ - #175.137-138.31600.160)</p>	
<p>Air Quality/Climate Control</p>	<p>3-42 The Forest Service should include an analysis of the potential consequences associated with climate change.</p>	<p>BECAUSE EVIDENCE SUGGESTS THAT TEMPERATURES AT HIGHER ELEVATIONS IN THE REGION ARE RISING</p> <p>When compared to the 20th century average, the western United States has experienced an increase in average temperature during the last five years that is 70 percent greater than the world as a whole. [Footnote 23: Saunders, Stephen, C. Montgomery, T. Easley, and T. Spencer. 2008. Hotter and Drier, 2: The West’s Changed Climate. Arizona’s [and] New Mexico’s average temperatures were 2.2 [and] 1.3 degrees Fahrenheit warmer in 2003–2007 than for the previous 100 years. [Saunders et al., 2008:41–43 [Citation not provided]]. Of special concern is that the increase in temperatures occurs more at higher elevations than lower elevations, affecting snow resources which supply much of the western United States’ fresh water supply. [Footnote 24: Hotter and Drier, Saunders, et al., 2008:5 [Citation not provided].] The IPCC projects that warming of the western climate will continue, making it imperative the CNF [Coconino National Forest] consider the impacts of global warming on each proposed action, including travel management. (Preservation/Conservation, Tucson, AZ - #175.132.31600.162)</p>	<p>#175.132.31600.162:</p> <p>Impacts from climate change/global warming on each alternative were analyzed and included in the FEIS. Though vehicles do produce emissions which can add to global warming, the Travel Mangement Plan is not anticipated to significantly increase or decrease the number of vehicles on the Coconino National Forest. However, this designation of a road and trail system is anticipated to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds.</p>

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Air Quality/Climate Control	3-42 The Forest Service should include an analysis of the potential consequences associated with climate change.	<p>INCLUDING IMPACTS TO HABITATS DURING DROUGHT CONDITIONS</p> <p>The Coconino National Forest must analyze the impacts of global warming and climate change. For example, to what extent does the scientific literature describe the impacts to and appropriate use (including motorized recreation) of any and/or all of the habitat types on the forest during short- and long-term drought and under varied climate regimes? (Preservation/Conservation, Phoenix, AZ - #175.127.31600.500)</p>	<p>#175.127.31600.500:</p> <p>Impacts from climate change/global warming on each alternative were analyzed and included in the FEIS. Though vehicles do produce emissions which can add to global warming, the Travel Mangement Plan is not anticipated to significantly increase or decrease the number of vehicles on the Coconino National Forest. However, this designation of a road and trail system is anticipated to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds.</p> <p>The determination of appropriate use of an area during drought conditions or varied climate regimes is outside the scope of this project.</p>
Air Quality/Climate Control	3-42 The Forest Service should include an analysis of the potential consequences associated with climate change.	<p>INCLUDING EFFECTS ON SNOWPACK, SNOWMELT, AND RAINFALL</p> <p>The Forest Service must address the issues of smaller snowpack, earlier snowmelt, less rainfall, increased temperatures, and the impacts associated with these phenomena on ecosystems in connection with the Travel Management Plan to properly determine the impacts of the proposed route system on the Coconino National Forest. (Preservation/Conservation, Tucson, AZ - #175.135.32000.250)</p>	<p>#175.135.32000.250:</p> <p>The implementation of either action alternative is anticipated to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds.</p>
Air Quality/Climate	3-43 The Forest Service should	<p>TO PROTECT FOREST RESOURCES FROM EFFECTS OF CLIMATE CHANGE</p>	<p>#175.141.31600.300:</p> <p>The purpose of this project is not to stop</p>

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Control	acknowledge that aggressive actions may be required	<p>Observed and anticipated impacts caused by climate change may require more aggressive actions to protect, restore, and enhance ecological resiliency. Such actions could entail protecting migratory wildlife corridors by reducing route densities, physically decommissioning and eliminating routes in bottlenecks and other important habitats, and administratively designating protected areas, free from motorized use, to protect wildlife. Similar actions may be warranted to protect other forest resources, such as water quality. But without acknowledging the threat of climate change and building this threat into the Agency’s analysis of impacts and consideration of alternatives, the Forest Service cannot make a reasoned and informed decision pertaining to motorized recreation. In particular, the Forest Service may be grossly underestimating the cumulative impacts of permitting an extensive motorized route system and, regardless, is failing to consider an increasingly dominant consideration for public lands management.</p> <p>We believe that observed and anticipated impacts caused by climate change may require more aggressive actions to protect, restore, and enhance ecological resiliency, as emphasized by Department of Agriculture Secretary Tom Vilsack. Such actions could entail protecting wildlife migratory and movement corridors by significantly reducing grazing impacts, logging activities and route densities, and administratively designating additional protected areas, free from motorized use, to protect wildlife.</p> <p>(Preservation/Conservation, Phoenix, AZ - #175.141.31600.300)</p>	<p>climate change, but to comply with the terms of the Travel Management Rule. Under the Travel Management Plan, both action alternatives would drastically decrease the number of road miles and limit cross-country motorized travel, which is anticipated to protect, restore and enhance ecological resiliency. The Coconino National Forest specifically chose routes proposed for designation due to their relative low impacts to sensitive resources, including water quality, wildlife and cultural resources. Changes to grazing and logging activities, as well as the designation of wildlife areas, are outside the scope of the Travel Management Plan.</p>
Air Quality/Climate Control	3-44 The Forest Service should ensure that the plan includes efforts to address climate change.	<p>TO PROTECT NATURAL AND CULTURAL RESOURCES ON THE FOREST</p> <p>The International Panel on Climate Change (IPCC), made up of over 1,000 scientists from over 100 countries, recently concluded that it is “very likely” (90 percent probability) that human activities are the main cause of global warming. The potential environmental consequences that may be caused by global climate change are both enormous and alarming. There is no longer any reasonable doubt that</p>	<p>#175.128-129.31600.162:</p> <p>Though it is true that off-road vehicles emit emissions that have a negative effect on global warming, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result,</p>

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		<p>human-caused pollution is already resulting in substantial changes to the global environment. [Footnote 13: See, e.g., Intergovernmental Panel on Climate Change (“IPCC”) February, 2007, Summary for Policymakers, “Climate Change 2007: The Physical Science Basis,” available at http://ipcc-wg1d.ucar.edu/wg1/wg1-report.html.]</p> <p>The IPCC’s most recent assessment demonstrates that climate change—in particular as a result of anthropogenic drivers causing global warming—is a pressing issue that must be addressed by the world’s communities. IPCC 2007. The question now is how can we mitigate global warming by reducing greenhouse gas emissions, and, most relevant here, how can we adapt our communities and ecosystems to withstand climate change impacts. On this latter front, the IPCC assessed the “current scientific understanding of impacts of climate change on natural, managed and human systems, the capacity of these systems to adapt and their vulnerability.” IPCC 2007a.</p> <p>The IPCC Report thus serves as a useful starting point for the Forest Service to address climate change impacts to the Coconino National Forest (CNF) and consider appropriate conservation measures necessary to protect the CNF’s natural and cultural resources.[Footnote 14: Of note, the Global Climate Change Prevention Act of 1990 (7 U.S.C. [section] 6701 et seq.) establishes a program whereby the program’s director must “ensure that recognition of the potential for climate change is fully integrated into the research, planning, and decisionmaking processes of the Department [[of Agriculture]].”]</p> <p>Moreover, scientists, including Forest Service researchers, have already recognized global warming as a key threat to biodiversity. See Malcom, Jay R. et al., 2006; Matthews, Stephen N. et al., 2004; IPCC 2007a. In fact, the United States Government Accountability Office recently recommended that the Secretary of Agriculture develop guidance to advise managers on how to address climate change effects on the resources that they manage. [Footnote 15: August, 2007, U.S. GAO Report, “Climate Change: Agencies Should Develop</p>	<p>neither of the action alternatives is expected to result in additional emissions that could negatively impact people, plants, or wildlife. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is not expected to effect global warming. However, either action alternative would result in a reduction in the miles of open roads and authorized cross-country travel, which would decrease fragmentation and could improve wildlife habitats and watershed health.</p>

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		<p>Guidance for Addressing the Effects on Federal Land and Water Resources,” available at http://www.gao.gov/new.items/d07863.pdf.]</p> <p>The nation’s public lands, and especially the National Forests, play a critical role in providing habitat and protection for hundreds of fish and wildlife species. The vast majority of the public has repeatedly made clear that it places a high value on the use of National Forest System lands for fish and wildlife protection.</p> <p>With a growing and sprawling population, resulting in the continued fragmentation of private lands, along with the unprecedented uncertainty created by the current climate crisis, the Forest Service must address the issues of global warming in conjunction with travel management planning. (Preservation/Conservation, Tucson, AZ - #175.128-129.31600.162)</p>	
<p>Air Quality/Climate Control</p>	<p>3-45 The Forest Service should consider recent climate change studies produced by federal agencies.</p>	<p>THE FOREST SERVICE SHOULD CONSIDER RECENT CLIMATE CHANGE STUDIES PRODUCED BY FEDERAL AGENCIES</p> <p>Climate change most likely will intensify the risk of ecosystem change for terrestrial and aquatic systems, affecting ecosystem structure, function, and productivity. Forest Service 2008a:8. Climate scientists agree that human activities have led to elevated atmospheric concentrations of carbon dioxide (CO2) and other greenhouse gases that cause global warming, and observed concentrations are projected to increase. The potential ecological implication of climate change trends in the Southwest include:</p> <p>1) increasing temperatures; 2) more extreme disturbance events, including wildfires, intense rain and floods, wind events, and drought; 3) reduced precipitation; and 4) shifts in the timing of snowmelt. The consequences of climate change are uncertain but may affect forest resources, such as water, vegetation, and animals. Forest Service 2008a:8.</p> <p>Unfortunately, in this DEIS, climate change has not been addressed at all. Several federal entities have published studies on climate change</p>	<p>#175.139-140.31600.170:</p> <p>Thank you for your input. As a result of you comment and those of others, climate change was incorporated into the Travel Management Plan alternatives analysis. The FEIS and specialist reports reflect this additional analysis. The implementation of either action alternative is anticipated to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds.</p>

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		<p>that can easily have been utilized by the Forest Service to analyze the impacts of this project in the context of climate change. These recent studies include:</p> <p>1) U.S. Climate Change Science Program Final Report, Synthesis and Assessment Product 4.4, “Preliminary Review of Adaptation Options for Climate-Sensitive Ecosystems and Resources” (June 2008), available at http://www.climatescience.gov/Library/sap/sap44/final-report/ and attached as Appendix P ;</p> <p>2) Committee on Environment and Natural Resources, National Science and Technology Council, “Scientific Assessment of the Effects of Global Change on the United States” (May 2008), available at http://www.climatescience.gov/Library/scientific-assessment/ and attached as Appendix Q ; and</p> <p>3) U.S. Climate Change Science Program, Synthesis and Assessment Product 5.2, “Best Practice Approaches for Characterizing, Communicating and Incorporating Scientific Uncertainty in Climate Decision Making” (April 2008), available at http://www.climatescience.gov/Library/sap/sap5-2/public-review-draft/default.htm and attached as Appendix R.</p> <p>These studies provide important information about the impacts of climate change on lands like the CNF [Coconino National Forest], as well as emerging new best management practices to employ in the face of climate change. (Preservation/Conservation, Grand Canyon, AZ - #175.139-140.31600.170)</p>	
Air Quality/Climate Control	3-46 The Forest Service should consider the report by the Intergovernmental Panel on Climate Change.	<p>IN THE ANALYSIS OF CLIMATE CHANGE IMPACTS</p> <p>How are impacts to the CNF [Coconino National Forest] affected by global warming and climate change? For example, to what extent does the scientific literature describe the appropriate use (including motorized recreation) of any and/or all of the habitat types on the forest during short- and long-term drought and under varied climate regimes? The Intergovernmental Panel on Climate Change’s (IPCC) most recent assessment demonstrates that climate change—in</p>	<p>#175.297-298.31600.200:</p> <p>Cumulative impacts associated with climate change/global warming were incorporated into the alternatives analysis. The FEIS and specialist reports reflect this additional analysis. The implementation of either action alternative is anticipated to slightly counteract the effects of climate change by</p>

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		<p>particular as a result of anthropogenic drivers causing global warming—is a pressing issue that must be addressed by the world’s communities. [Footnote 18: IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, M. Tignor and H.L. Miller (Eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA (http://ipcc-wg1.ucar.edu/wg1/wg1-report.html).]</p> <p>The debate is now shifting to how we can mitigate global warming by reducing greenhouse gas emissions, and, most relevant here, how we can adapt our communities and ecosystems to withstand climate change impacts. On this latter front, the IPCC assessed the “current scientific understanding of impacts of climate change on natural, managed and human systems, the capacity of these systems to adapt and their vulnerability.” [Footnote 19: IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Groups III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, M. Tignor and H.L. Miller (Eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA (www.ipcc.ch/SPM13apr07.pdf) (“IPCC Report”).]</p> <p>The IPCC Report thus serves as a useful starting point for the Forest Service to address climate change impacts to the CNF and consider appropriate conservation measures necessary to protect the CNF’s natural and cultural resources. [Footnote 20: Of note, the Global Climate Change Prevention Act of 1990 (7 U.S.C. [section] 6701 et seq.) establishes a program whereby the program’s director must “ensure that recognition of the potential for climate change is fully integrated into the research, planning, and decisionmaking processes of the Department [of Agriculture].”] (Preservation/Conservation,</p>	<p>providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads, and by designating fewer roads within watersheds. Though it is true that off-road vehicles emit emissions that have a negative effect on global warming, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional emissions that could negatively impact people, plants, or wildlife. The action alternatives would both reduce the amount of routes available for motorized use; however, this does not mean that there would be fewer motorized vehicles in the Coconino National Forest or in the surrounding lands that share the same airshed as lands within the Coconino National Forest. In summary, the proposed changes in management as a result of either of the action alternatives would have no effect on emissions from motor vehicles and thus this decision is not expected to effect global warming. However, either action alternative would result in a reduction in the miles of open roads and authorized cross-country travel, which would decrease fragmentation and could improve wildlife habitats and watershed health.</p>

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		Tucson, AZ - #175.297-298.31600.200)	
Air Quality/Climate Control	3-47 The Forest Service should calculate the greenhouse gas emissions associated with the project.	<p>THE FOREST SERVICE SHOULD CALCULATE THE GREENHOUSE GAS EMISSIONS ASSOCIATED WITH THE PROJECT</p> <p>We [Center for Biological diversity et al.] believe the Forest Service can and should calculate the likely greenhouse gas (GHG) emissions from this project. We have found the EPA’s calculator very helpful when examining such projects, and we believe the Forest Service must employ this or some other methodology to calculate likely GHG emissions. See http://www.epa.gov/RDEE/energy-resources/calculator.html#results. In addition, we believe the Forest Service should examine the carbon sequestration potential lost by maintaining such a vast road network. The Wilderness Society has recently completed a fact sheet on the matter, which we refer to elsewhere in the document and is attached as Appendix O. (Preservation/Conservation, Grand Canyon, AZ - #175.153.31600.410)</p>	<p>#175.153.31600.410:</p> <p>Though it is true that off-road vehicles emit emissions that have a negative effect on global warming, none of the action alternatives are expected to effectively change the amount of motorized use from OHV or other motor vehicles across the Forest and in surrounding areas. As a result, neither of the action alternatives is expected to result in additional emissions that could negatively impact people, plants, or wildlife. Carbon sequestration is outside the scope of this project.</p>
Visual Resources	3-48 The Forest service should clearly identify those areas that are failing to meet LRMP objectives for scenic quality.	<p>THE FOREST SERVICE SHOULD CLEARLY IDENTIFY THOSE AREAS THAT ARE FAILING TO MEET LRMP OBJECTIVES FOR SCENIC QUALITY</p> <p>In the DEIS, scenic quality is clearly described as negatively impacted by cross-country travel because ORVs leave tracks on the ground or completely denude an area of vegetation, and these effects can last for years. Forest Service 2010:25. And while the DEIS states that ORV use has made it difficult to meet LRMP [Land and Resource Management Plan] objectives for scenic quality in “some areas,” these areas are not described in the DEIS or in the Recreation Specialist report. The description of such areas as “ponderosa pine forest north of the Mogollon Rim involves a significant amount of land”. Forest Service 2010:25. The public cannot determine which areas of the Forest are failing (or nearly failing) to meet LRMP objectives for scenic quality, nor which areas are being rehabilitated</p>	<p>#175.77.31300.530:</p> <p>Thank you for your input. The Recreation Specialist Report and FEIS have been updated with more specific analysis of impacts to Land and Resource Management Plan objectives for scenic quality. Please see the Scenery specialist report, posted on the Coconino National Forest Travel Management home page for access to the scenery specialist report.</p>

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		<p>through the TMP [Travel Management Planning] process and which areas are being further degraded. (Preservation/Conservation, Grand Canyon, AZ - #175.77.31300.530)</p>	
Noise	<p>3-49 The Forest Service should analyze the impacts of noise on wildlife.</p>	<p>FOR ALL ROUTES</p> <p>The impacts to sound on wildlife appear to be analyzed only for routes upon which there will be a change of use. Because nearly every route that will be designated is a route that was open to motorized uses under the management regime prior to the beginning of this project, the vast majority of routes are apparently not included in this analysis. We [Center for Biological Diversity et al.] recommend that the ongoing effects of the existing, designated system be analyzed in one alternative. The Specialist Report for Wildlife in the DEIS (at page 14) states:</p> <p>“Noise associated with planned travel management relevant to this assessment fall into several categories: (1) change in use within the designated road system; (2) noise related primarily to the construction and use of newly designated trails (4) noise associated with camping corridors and the change in use.”</p> <p>The specialist’s report details a litany of impacts to mammals from ORVs, including death, disturbance, and habitat degradation. Small mammals, bats, raptors, amphibians, game birds, waterfowl, and ungulates are all impacted by noise associated with ORVs. Wildlife Specialist’s Report:14. Despite the well known and widespread impacts of ORVs and associated noise to wildlife, the specialist report details only the positive impacts of reducing motorized routes. There is no site specific analysis of the impacts of the routes that will remain open to motorized uses to any species. (Preservation/Conservation, Phoenix, AZ - #175.119.31400.410)</p>	<p>#175.119.31400.410:</p> <p>The Environmental Impact Statement focuses on impacts to wildlife and other resources based on the activities included in the alternatives. Both action alternatives include reducing motorized access across over a third of the Forest. Since the proposed management changes are expected to reduce motorized access across the forest the analysis of each resource area focuses on this change to the system and not the elements that are expected to stay the same. Focusing the analysis on the expected changes resulting from each alternative help provide greater understanding to the Responsible Official for choosing an alternative through the NEPA process.</p>
Noise	<p>3-50 The Forest Service should analyze the effects of noise on quiet</p>	<p>AND MINIMIZE CONFLICTS BETWEEN MOTORIZED AND QUIET USERS</p> <p>There is no analysis of the impacts of noise for any alternative. Scientific evidence supports the importance of natural sounds for</p>	<p>#175.90-92.31400.510:</p> <p>The impacts of noise from each alternative are included in each specialist report, including recreation, wilderness special</p>

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	users.	<p>wildlife, ecosystems and people. National Park Service’s Natural Sounds Program Center developed two annotated bibliographies: one regarding the impact that sound has on wildlife and another on the impact sound has on park visitors. [Footnote 6: Impacts of Noise and Overflights on Wildlife Annotated Bibliography. National Park Service Natural Sounds Program Center. Available at http://www.nature.nps.gov/naturalsounds/publications/wildlifebiblio.pdf. And Visitor Experience and Soundscapes: Annotated Bibliography. National Park Service Natural Sounds Program Center and Colorado State University. Available at http://www.nature.nps.gov/naturalsounds/publications/Biblio_visitor_experience_soundscapes_2006.pdf] We [Center for Biological Diversity et al.] have attached these annotated bibliographies (as Appendix F) for inclusion as part of the administrative record. [Footnote 7: 742 U.S.C. [section] 4332(C)] The Coconino National Forest [CNF] should analyze the impacts of noise on quiet users and develop an alternative that would protect quiet recreation in the CNF. Executive Order 11644 (as amended by E.O. 11989) states that designation decisions shall locate trails open to ORV use “based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands.” The Forest Service is required to “minimize conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands.” 36 C.F.R. [section] 212.55.</p> <p>Unlike many of the other best management practices (BMPs) that relate to forest health, there is not necessarily much information available to guide the Forest in how to avoid use conflicts and to manage for quiet use. Wildland CPR’s BMPs provide an authoritative guide for you to reference. See [section] 5.2 (“Justification for Use Conflicts BMPs). We [Center for Biological Diversity et al.] have attached these BMPs as Appendix G. The Forest Service needs to employ a rational approach in meeting use conflict provisions, and the</p>	<p>areas, and wildlife. In addition, the recreation specialist report and FEIS analyze impacts from each alternative on user conflicts between motorized and non-motorized recreationists (i.e. quiet users). Both action alternatives are expected to reduce user conflicts by providing for more predictable motorized use and noise and decreased motorized use in areas to be managed for non-motorized experiences.</p> <p>The Wildlife specialist report discusses several studies that identify noise from motorized use as causing disturbance to wildlife, especially nesting birds. Disturbance from motorized use was identified as one of the direct impacts of motorized use in the wildlife effects analysis. Thus, disturbance from motorized noise to wildlife was one of the criteria considered in areas where sensitive wildlife habitat is present.</p> <p>The Forest reviewed and performed tests with the SPREAD GIS spatial model suggested by the Center for Biological Diversity. This model is still in the development phases, but does provide some basic information on how noise would propagate from a single point on the ground. This model was not used primarily because the model lacks one very important function, which is an indicator to identify</p>

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		<p>BMPs provide such an approach. If the Forest Service chooses not to adhere to these BMPs, please explain your rationale for not using the BMPs, as well as the alternative approach employed by the Agency and any scientific data supporting that approach.</p> <p>Many spatial models and software packages are available for analyzing potential noise propagation from transportation systems, including a GIS model that The Wilderness Society recently developed for the specific purpose of analyzing noise propagation from off-road vehicles in forest landscapes. This model is based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to “evaluate potential ... acoustic impacts when planning the multiple uses of an area.” We adapted the SPreAD model to a GIS environment, so that potential noise impacts could be integrated with other variables being considered in the travel management planning process. We have included the user’s guide for the SPreAD-GIS model as an appendix to this document (Appendix H), and we would be happy to provide an up-to-date version of the software at your request.</p> <p>The SPreAD-GIS model can be implemented in your existing ArcGIS software at no additional cost. The Final EIS should include maps with projected sound propagation from the proposed systems, and this model is a tool for meeting that reasonable expectation. Moreover, these sound propagation maps should be overlaid with maps related to wildlife habitat and areas known to be used by quiet recreationists, so that the Forest Service can truly analyze the effects of ORV noise on wildlife and quiet recreationists, who constitute the majority of Forest visitors. (Preservation/Conservation, Tucson, AZ - #175.90-92.31400.510)</p>	<p>where noise from motorized vehicles would be inappropriate and impact users versus areas where noise from motorized use would have little or no impact on Forest users. Instead the Forest used a much more practical approach, which is to model the change in road use in areas designated for a non-motorized experience. This analysis is completed in the Recreation specialist report in discussions about user conflict. For Wilderness and other congressionally designated areas, the Forest analyzed impacts from noise by analyzing the change in open roads a ¼ mile from these areas.</p>
Wildlife and Habitat	3-51 The Forest Service should provide site-specific, species-	<p>TO ENSURE A THE ANALYSIS IS SUFFICIENT AND NOT ARBITRARY</p> <p>Page 80, Wildlife Analysis: The lack of site-specific and species-specific analysis and findings renders this section deficient.</p>	<p>#202.56.33000.131: It is quite unrealistic for the Forest Service to know the presence, location, and activity of each species on the 1.8 million acres that</p>

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	specific wildlife analysis.	Additionally, the discussion apparently refers to several species that are considered based only on identified habitat, but which may not actually exist on the CNF [Coconino National Forest]. See, e.g., DEIS at 82 (SW willow flycatcher “no nesting willow flycatchers are known to occur on NFS lands” but males have allegedly “been detected” in some areas). It is arbitrary and capricious to propose management restrictions in such circumstances. (Motorized Recreation, Boise, ID - #202.56.33000.131)	make up the Coconino National Forest. The Ninth Circuit has repeatedly approved `the Forest Service's use of the amount of suitable habitat for a particular species as a proxy for the viability of that species,' and its use of ""habitat as a proxy to measure a species' population.' Furthermore, Federal laws such as the Endangered Species Act are designed to protect rare species through habitat conservation. The measurement and analysis of species' habitat to approximate the measurement and analysis of a species dependent on this habitat is a well accepted industry practice.
Wildlife and Habitat	3-51 The Forest Service should provide site-specific, species-specific wildlife analysis.	<p>TO PROVIDE SUFFICIENT DETAIL TO ASSESS IMPACTS</p> <p>The wildlife analysis does not have sufficient site-specific detail to be valid. For the vast majority, if not all, of the possible issues of concern, such detail is critical, i.e., are there roads/trails in the species' habitat, at the time used by the species, in a manner that causes the possible effects to the particular species documented for that species in the same or reasonably analogous circumstances as exist on the CNF [Coconino National Forest]? This information is entirely lacking. The only attempt appears to be through presentation of tables in the Wildlife Report, which cannot be independently corroborated and reflect no analysis of any particular site. See, generally, Wildlife Report at 163–175. Thus, for Mexican Spotted Owl, for example, the DEIS reflects only consideration of gross road/trail miles within PACs [Protected Activity Centers] and critical habitat, with no further analysis of field data, traffic/noise levels, or other relevant factors. See also http://www.ohvstudy.com/results.html (ongoing state-of-the-art analysis of OHV impacts on Northern Spotted Owl, which preliminarily show “no discernable effect of</p>	<p>#202.14.33000.410:</p> <p>The wildlife analysis does consider site-specific impacts of each alternative by considering how the proposed changes in each alternative will affect species' habitats throughout the Forest. The tables you refer to in the wildlife analysis include quantitative analysis of how Mexican spotted owl habitat may be impacted from each alternative. This information, combined with the best available science of how motorized use may effect owl populations, is exactly how the Travel Management DEIS attempts to quantify how impacts to the owl may differ under different management scenarios (i.e. alternative). We appreciate the study information you sent us regarding the Northern spotted owl and will consider this information and include this in the Wildlife</p>

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		<p>OHV exposure on behavior or reproductive success”). The DEIS does not attempt, and therefore cannot achieve, the necessary site-specific analysis to reach defensible conclusions about impacts. (Motorized Recreation, Boise, ID - #202.14.33000.410)</p>	<p>Specialist Report.</p>
<p>Wildlife and Habitat</p>	<p>3-52 The Forest Service should revisit the assumptions in the wildlife analysis.</p>	<p>BECAUSE THEY ARE FLAWED</p> <p>The wildlife analysis sadly proceeds from the premise that both the existence and use of motorized roads/trails/areas adversely impacts wildlife, and then implicitly adopts the even more flawed assumption that reduction of use will eliminate such adverse effects. In fact, the limitation of analysis to tabular comparison of mileages seemingly reflect the assumption that any effects are linear in nature, i.e., a 40% reduction of motorized routes in deer winter range are 40% “better” for deer across any of the numerous criteria of study. Such an approach is flawed on its face—for the deer example, numerous other factors are significant, including the actual use of specific sites, quality of range in question, timing on said range, other stressors (including predators, shed hunters, non-motorized bipedal recreation) and other factors. In sum, the wildlife analysis represents a substantial challenge that has not been sufficiently addressed by the DEIS. (Motorized Recreation, Boise, ID - #202.15.33000.530)</p>	<p>#202.15.33000.530:</p> <p>The wildlife analysis does include the premise that use of motorized vehicles may have adverse effects on wildlife. This premise is based on consideration of best available science (see Wildlife Specialist Report). The wildlife analysis does generally base effects analysis on the assumption that effects are linear. The reason for this is that it is not realistic to be able to clearly quantify all of the factors you mention such as habitat quality, timing of impact, and other stressors across a 1.8 million acre area for dozens of species. The assumption that the impacts of motorized use on wildlife are generally linear in nature when considered over a broad area is reasonable and is not unproven by any research studies or other scientific information. This assumption is crucial for identifying how management options (alternatives) may differ in their effects to wildlife.</p>
<p>Wildlife and Habitat</p>	<p>3-53 The Forest Service should approve a plan that reduces route density.</p>	<p>TO HELP PROTECT WILDLIFE HABITAT ON THE ADJACENT NATIONAL MONUMENTS</p> <p>In addition to enhancing preservation of the archeological and geological resources the Monuments [Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments] were specifically designated to protect, Alternatives 3 or 4 would enhance the ability of the NPS [National Park Service] to succeed with its broader mission</p>	<p>#174.7.32000.630:</p> <p>Thank you for your comment. The Coconino National Forest looks forward to working closely with the Park Service during this and future projects.</p>

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		to conserve the inherent biological diversity and natural ecosystem function within the National Park System. In particular, the Monuments do not encompass sufficient habitat to sustain wideranging wildlife species. The reduction of road density close to the monument boundaries will reduce wildlife disturbance from vehicle traffic, and enhance habitat connectivity for species which seasonally move between the Monuments and the CNF [Coconino National Forest]. (U.S. National Park Service, Flagstaff, AZ - #174.7.32000.630)	
Wildlife and Habitat	3-54 The Forest Service should include all routes to determine route designations, regardless of bureaucratic designations.	<p>BECAUSE HIGH ROUTE DENSITIES NEGATIVELY AFFECT ELK AND OTHER BIG GAME</p> <p>When calculating route densities to determine environmental impacts, all routes should be included, regardless of their bureaucratic designation. High road densities are not conducive to maintaining a healthy elk population, and other big game is negatively impacted as well. (Individual, Sierra Vista, AZ - #46.12.33100.410)</p>	<p>#46.12.33100.410:</p> <p>The Travel Management environmental analysis covers the entire 1.8 million acres within the Coconino National Forest. Both action alternatives include reducing motorized access across over a third of the Forest, which would decrease route density. This reduction is anticipated to improve wildlife habitat, among that, elk and other big game. Impacts to elk and other big game species from each alternative are analyzed in the wildlife specialist report and FEIS.</p>
Wildlife and Habitat	3-55 The Forest Service should avoid assuming that closing roads would improve or increase wildlife habitat.	<p>BECAUSE THE RESEARCH DOESN'T SUPPORT THAT CONCLUSION</p> <p>Re: Wildlife impact analysis: An assumption that was often proffered by other stakeholders is that closing roads and trails to motorized uses would dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and is often directly contradicted [by] the current condition on the ground today.</p> <p>The agencies must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness.</p>	<p>#172.13-14.33000.530:</p> <p>Impacts to wildlife from motorized vehicle use and each of the alternatives were included in the Wildlife Specialist Report, as well as the EIS. Both cite various studies which found that roads and trails can do affect species. For example, roads and trails indirectly affect terrestrial species through;</p> <ol style="list-style-type: none"> 1) loss of habitat due to conversion of native vegetation to a particular road/trail surface (paved, gravel, dirt); 2) fragmentation of

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		<p>The analysis must not improperly assume or over-estimate the beneficial affects to wildlife resulting from motorized route closures. Research done at the Starkey Experimental Forest and Range is the most recent and most detailed and complex research done on deer and elk in relation to human travel modes consisting of ATV/trail bike, bicycle, hiking, and horseback. Previous studies dating back to the 1970s indicate that these animals flee from all of these travel modes. Starkey research quantifies the different rates, times, and distances. However, they admit that the resultant impact on individuals has not been determined and no scientific conclusions are reached in the studies on how this disturbance affects individual health or survivability.</p> <p>Likewise, no relationship has been made between the four disturbance modes and herd health. All that is known is that deer and elk run from humans using any form of travel. Nothing in the Starkey research proves the existence of motorized trails actually results in a decrease in habitat effectiveness or in an individual animal’s poor health and survivability, nor is this evidence that current vehicle use is negatively impacting herd health factors.</p> <p>It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve “wildlife vulnerability” when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass, or kill wildlife are still allowed.</p> <p>Herd health data available from the Colorado Division of Wildlife (DOW) must be considered in the analysis. The analysis should disclose the hunting seasons and tag objectives as scheduled and determined by the CDW. Without current herd numbers and trends, it cannot be determined that motorized vehicle use on or off the forest is impacting wildlife populations and herd health to such a degree that it warrants further restrictions.</p> <p>Impacts to wildlife must be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of</p>	<p>habitats due to a road and trail system development; 3) interruption in migratory patterns of wildlife to reach breeding habitat or winter range habitat; and 4) lack of habitat use by wildlife due to disturbance caused by use of the road or trail system.</p> <p>There has been a great amount of research that directly shows the noise and presence of motor vehicle use disturbs big game species and this can lead to changes in fitness and survival. The analysis does not assume that motor vehicle use is the only disturbance source to wildlife, but the noise and dust from motor vehicle use is much greater than hikers, bikers, and equestrians and this likely has a greater impact.</p> <p>Herd and hunt data was based on 2010 published data from the Arizona Game and Fish Department, since they oversee the management og game species in Arizona, where the Coconino National Forest is located.</p>

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		vehicle use must be compared and contrasted to baseline data to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined. (Motorized Recreation, Pocatello, ID - #172.13-14.33000.530)	
Wildlife and Habitat	3-56 The Forest Service should analyze habitat fragmentation impacts from roads.	<p>IN LIGHT OF CLIMATE CHANGE</p> <p>The Coconino National Forest provides critical linkages for wildlife populations between the Grand Canyon National Park and Utah. Habitat fragmentation is the most serious threat to biological diversity and is the primary cause of the present extinction crisis. This conclusion is supported by several prominent conservation biologists. Wilcox and Murphy 1983; Meffe and Carroll 1997 [Citation not provided]. Roads, both paved and primitive, constitute a major cause of North American forest habitat fragmentation. [Footnote 27: Trombulak and Frissell 2000; Stritholt and Dellasala 2001] As global warming continues, wildlife connectivity will increase in importance to best ensure the persistence, even survival, for many species. In addition, roads significantly contribute to soil erosion, loss of vegetation and microbotic organisms, and the invasion of non-native species. These impacts further reduce the native biodiversity and resiliency of ecosystems. (Preservation/Conservation, Grand Canyon, AZ - #175.134.32000.250)</p>	<p>#175.134.32000.250:</p> <p>The Travel Management Plan is designed to provide a comprehensive road and trail system for motorized use, while improving forest resources and reducing user conflicts. The roads and trails chosen for designation under Alternative 3 and Alternative 4 considered such concerns as soil erosion, loss of vegetation, invasion of non-native species and wildlife connectivity. Either action alternative is expected to improve those functions by reducing the miles of open road and minimizing the extent of authorized off-road travel.</p>
Wildlife and Habitat	3-56 The Forest Service should analyze habitat fragmentation impacts from roads.	<p>IN LIGHT OF CLIMATE CHANGE AND INCREASING NEED FOR HABITAT CONNECTIVITY</p> <p>Wildlife. "Habitat fragmentation is the most serious threat to biological diversity and is the primary cause of the present extinction crisis," a conclusion supported by several prominent conservation biologists. Wilcox and Murphy 1983; Meffe and Carroll 1997 [Citations not provided]. Roads, both paved and primitive, constitute a major cause of North American forest habitat fragmentation. Trombulak and Frissell 2000; Stritholt and Dellasala 2001. As global warming continues, wildlife connectivity will increase in importance</p>	<p>#175.149.32000.250:</p> <p>Habitat fragmentation from roads was specifically considered in the Wildlife Specialist Report. Scientific research clearly shows roads are a major contributor to habitat fragmentation for many species. But the many studies on this issue also clearly show that not all roads are created equal, meaning the high-clearance roads usually result in much less of an impact on most</p>

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		<p>to best ensure the persistence, even survival, for many species. This is especially relevant for forest located along the dramatic elevational gradients along the Mogollon Rim. (Preservation/Conservation, Grand Canyon, AZ - #175.149.32000.250)</p>	<p>species as a paved and fenced paved highway. Thus, the citations included in the comment are considered in context of the actual types of roads managed on the Coconino National Forest.</p> <p>The implementation of either action alternative is anticipated to slightly counteract the effects of climate change by providing slightly larger areas of refuge for wildlife by decreasing cross-country travel and fragmentation by roads.</p>
<p>Wildlife and Habitat</p>	<p>3-57 The Forest Service should reduce route densities in zones of dispersal.</p>	<p>TO ENSURE WILDLIFE IS ABLE TO MORE SAFELY MIGRATE THROUGH THE FOREST</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Zones of dispersal. These are areas that represent the best passage for large mammals between the east and west sides of the forest along I-17. This interstate highway has been identified as a major fracture zone for dispersal and migration. The Arizona Department of Transportation, working with the Arizona Game & Fish Department, Northern Arizona University and other cooperators are attempting to decrease animal highway fatalities by focusing on means to make under highway passages a more effective means for animal movement between the east and west sides of the forest. A key component of such a plan is the availability of desirable habitat on both sides of the passage. Thus reducing motorized vehicle densities in those areas will decrease wildlife harassment, particularly of bears and mountain lions as they use the wilderness and roadless area complex on both sides of the highway. (Preservation/Conservation, Pinetop, AZ - #175.330.32100.331)</p>	<p>#175.330.32100.331:</p> <p>Addressing animal highway fatalities is outside the scope of this project. However, the Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p>

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			<p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
Wildlife and Habitat	3-58 The Forest Service should acknowledge that roads facilitate the illegal movement of nonnative fishes.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT ROADS FACILITATE THE ILLEGAL MOVEMENT OF NONNATIVE FISHES</p> <p>Aquatic Resource, Environmental Consequences, Effects of Roads on Aquatic Species and their Habitats (Common to All Action Alternatives) (page 75): This section discusses several of the potential effects of roads on watershed condition. However, it does not mention that roads also facilitate the illegal movement of nonnative fishes by people. The more access people have to perennial water via motorized vehicle, the more risk there is of people transporting species to these areas. Therefore, though CNF [Coconino National Forest] has little</p>	<p>#105.12.33200.410: Thanks for your input. The FEIS was updated to include information about the likelihood of introduction of non-native fish based on road access.</p>

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		control over illegal transport of nonnative species, the transport of species via motorized vehicle is an effect of having an extensive road system that provides access to many areas. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.12.33200.410)	
Wildlife and Habitat	3-59 The Forest Service should consider closing routes in areas previously proposed as wildlife habitat areas.	<p>BECAUSE THEY ARE CONCENTRATED CORE HABITAT FOR MANY SPECIES</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Proposed wildlife habitat areas (Proposed wildlife habitat areas submitted earlier by Grand Canyon Wildlands Council and Center for Biological Diversity to the Coconino NF [National Forest] Forest Plan revision staff). These are areas of concentrated core habitat for a number of species. (Preservation/Conservation, Phoenix, AZ - #175.328.32000.330)</p>	#175.328.32000.330: Comments submitted for wildlife habitat needs were considered; however the establishment of wildlife areas is outside the scope of this project. Those actions are for the Forest Plan Revision process.
Wildlife and Habitat	3-60 The Forest Service should include a discussion of proposed wildlife habitat areas.	<p>THE FOREST SERVICE SHOULD INCLUDE A DISCUSSION OF PROPOSED WILDLIFE HABITAT AREAS</p> <p>The following issue or species was not analyzed at all in the DEIS and must be evaluated for impacts:</p> <p>Proposed wildlife habitat area. (Preservation/Conservation, Tucson, AZ - #175.122.34300.001)</p>	#175.122.34300.001: Comments submitted for wildlife habitat needs were considered; however the establishment of wildlife areas is outside the scope of this project. Those actions are for the Forest Plan Revision process.
Wildlife and Habitat	3-61 The Forest Service should use current scientific research and current information on OHV design in the wildlife analysis.	<p>TO ACCURATELY ASSESS IMPACTS ON WILDLIFE FROM OHV USE</p> <p>The DEIS wildlife analysis is problematic. We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] appreciate both the latitude accorded the Agency on technical analyses, and the difficulty of presenting defensible analysis on a species-by-species basis across a landscape like the CNF [Coconino National Forest] under the excessive scrutiny now commonplace in projects of this nature. However, there are two basic flaws in the wildlife technical analysis. First, the impacts allegedly attributable to motorized route existence</p>	#202.13.32000.530: Though the Coconino National Forest does not include populations of desert tortoise, the Bury study is still relevant as it illustrates that one of the direct impacts of motorized use in desert ecosystems to wildlife is from direct collisions. On an individual basis Gila monsters, for example, may suffer similar impacts from motorized use as desert tortoises in this respect.

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		<p>and motorized recreation are complete generalizations, which are questionable for many reasons. For example, the wildlife specialist report repeatedly cites the work by Bury for many alleged impacts, such as the assertion that roads/trails result in “killing individuals crossing or basking”, that vehicle noise “harasses” desert animals, and creates susceptibility to “death or injury from collisions.” Wildlife Report at 13–14. The Bury research solely addresses desert tortoises in the California desert, none of which was published more recently than 1980. These citations are dated in today’s intense controversy over desert tortoise management in the CDCA [California Desert Conservation Area], and of even less relevance to most of the species on the CNF. For instance, regarding noise, the report fails to incorporate or even acknowledge the world of modern OHV management as it relates to the use of sound-compliant OHV exhaust systems, and other tools used by the agency to manage OHV recreation on federal lands. California has adopted stringent standards, including SAE J-1287 96dBA sound limit, which has resulted in substantial (if not universal) changes in OHV design/production to achieve compliance. See http://www.parks.ca.gov/?page_id=23037 (CA standard). (Motorized Recreation, Boise, ID - #202.13.32000.530)</p>	<p>The wildlife specialist report also considers noise appropriately as a source of disturbance to wildlife, especially wildlife such as nesting bald eagles or nesting Mexican spotted owls. Though you are correct that there are some OHVs built to decibel standards of 96 decibels or lower. Not all OHVs have been manufactured to lower decibel standards and even those that have still result in noise impacts to species sensitive to disturbance from the sounds.</p>
Wildlife and Habitat	3-62 The Forest Service should analyze impacts on mountain lion.	<p>THE FOREST SERVICE SHOULD ANALYZE IMPACTS ON MOUNTAIN LION</p> <p>The following issue or species was not analyzed at all in the DEIS and must be evaluated for impacts: Mountain lion. (Preservation/Conservation, Grand Canyon, AZ - #175.125.33100.001)</p>	<p>#175.125.33100.001: The Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types</p>

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			<p>used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p> <p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
Wildlife and Habitat	3-63 The Forest Service should analyze impacts on bear.	<p>THE FOREST SERVICE SHOULD ANALYZE IMPACTS ON BEAR</p> <p>The following issue or species was not analyzed at all in the DEIS and must be evaluated for impacts: Bear. (Preservation/Conservation, Grand Canyon, AZ - #175.124.33100.001)</p>	<p>#175.124.33100.001:</p> <p>The Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management</p>

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			<p>Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p> <p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS</p>

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Wildlife and Habitat	3-64 The Forest Service should close routes near black bear core habitat.	<p>BECAUSE BEARS NEED NON-MOTORIZED HABITAT</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Black bear core habitat: A large wide-ranging omnivore that has crucial den habitat along the Mogollon Rim and uses the forest for dispersal. Bears avoid humans and generally need non-motorized habitat. Also a focal species recognized by conservation biologists. (Preservation/Conservation, Grand Canyon, AZ - #175.325.33100.330)</p>	<p>lands."</p> <p>#175.325.33100.330:</p> <p>The Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p> <p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate</p>

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			<p>locations. An extreme interpretation of “minimize” would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
Wildlife and Habitat	3-65 The Forest Service should close routes near mountain lion core habitat.	<p>BECAUSE LIONS NEED UNROADED, NON-POPULATED AREAS</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Mountain lion core habitat: A large wide-ranging carnivore that requires unroaded and non-populated areas for survival and a focal species recognized by conservation biologists. (Preservation/Conservation, Grand Canyon, AZ - #175.326.33100.330)</p>	<p>#175.326.33100.330:</p> <p>The Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p> <p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly</p>

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			<p>the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
Wildlife and Habitat	3-66 The Forest Service should close routes near mule deer core summer habitat.	<p>BECAUSE THEY ARE A MANAGEMENT INDICATOR SPECIES WHOSE HABITAT AND POPULATION ARE DECLINING</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Mule deer core summer habitat: Mule deer are one of the forest's "Management Indicator Species" whose habitat and populations are declining on the CNF [Coconino National Forest]. (Preservation/Conservation, Santa Fe, NM - #175.324.33100.354)</p>	<p>#175.324.33100.354:</p> <p>The Wildlife Specialist Report includes analysis on a broad and diverse array of species for both alternatives 3 and 4. Among the species considered are Management Indicator Species (MIS), which include analysis of species that are indicators of different habitat types. For example, mule deer is included as an MIS species for aspen and pinyon-juniper habitat types. Bear and lion are not MIS species, but analysis of effects is included on all of the habitat types used by these species. The Wildlife Specialist Report clearly illustrates that both Alternatives 3 and 4 would substantially decrease impacts to all habitat types used by these species and would decrease direct disturbance to these species as a result of noise and access from motorized use.</p>

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			<p>Additionally, the alternatives are designed to minimize impacts to wildlife by not designating routes in the most sensitive areas of the Forest. Yet, none of the alternatives are designed to eliminate all potential impacts to all wildlife species. This is clearly the intent of the Travel Management Rule as the preamble of the Rule states, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
Special-Status Species	3-67 The Forest Service should provide an alternative that would protect special-status species.	<p>INCLUDING THE GILA CHUB AND SOUTHWESTERN WILLOW FLYCATCHER</p> <p>The Coconino [National Forest] has thousands of miles of roads on the ground that are causing significant harm to threatened and endangered species, such as the Gila chub and the southwestern willow flycatcher.</p> <p>All of the action alternatives presented in this plan will continue to cause harm to these species and others. I am asking you to take a step back and analyze an alternative that would make significant reductions in road density and prohibit cross-country motorized travel for car camping and game retrieval.</p>	<p>#1.1.32300.002:</p> <p>Action alternatives include reducing all cross-country travel and reducing miles of road open by over 35%. Impacts to chub/flycatcher were included in the EIS analysis.</p>

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		<p>While I appreciate the Forest Service moving forward with travel-management planning after more than two years of delays, this analysis is inadequate and the problems I have identified must be corrected. (Individual, Cottonwood, AZ - #1.1.32300.002)</p>	
Special-Status Species	<p>3-68 The Forest Service should improve the analysis of impacts to threatened and endangered species.</p>	<p>INCLUDING CONSULTATION WITH THE USFWS All alternatives result in negative impacts to threatened and endangered species, and there is insufficient analysis of these impacts; in addition, consultation with the Fish and Wildlife Service appears to be lacking.</p> <p>These oversights must be corrected. (Individual, Cottonwood, AZ - #1.7.32300.025)</p>	<p>#1.7.32300.025: Analysis of alternatives is based on changes to the existing condition. The action alternatives are expected to decrease impacts to many resources from current conditions (can quote CEQ CFRs). Where these management changes may increase impacts, it will be disclosed in the EIS. Consultation with FWS occurs after the DEIS is released based on the FS preferred alternative. Consultation will be completed at the appropriate point in time.</p>
Special-Status Species	<p>3-68 The Forest Service should improve the analysis of impacts to threatened and endangered species.</p>	<p>TO COMPLY WITH THE ENDANGERED SPECIES ACT What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular: Native wildlife populations and habitat: (in particular threatened, endangered and sensitive species afforded protection pursuant to the ESA, and protected species habitats, such as goshawk Protected Family Fledging Areas (PFAs) and Mexican spotted owl Protected Activity Areas (PACs) will be felt in the short term. See 16 U.S.C. [section] 1604(6)(g)(B) (requiring Forest Service to provide for species diversity); 16 U.S.C. [section] 1531(b) (establishing purpose of the ESA to “provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species</p>	<p>#175.286.32300.135: The action alternatives in the DEIS are expected to decrease impacts to wildlife by greatly decreasing the extent of motorized use within wildlife species habitat. The Forest Service will consult with the FWS as required under the ESA, based on the potential impacts from the preferred alternative.</p>

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		<p>and threatened species”), 1536(a)(2) (providing that the Forest Service, in accord with ESA [section] 7 consultations, must “insure that any action authorized, funded, or carried out by such ... is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species ...”). [Footnote 15: The ESA also prohibits the “take” of listed species (16 U.S.C. § 1538); “take” is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct” and includes “significant habitat modification or degradation that kills or injures wildlife by impairing essential behavioral patterns, including breeding, feeding, or sheltering” (16 U.S.C. [section] 1532).] (Preservation/Conservation, Phoenix, AZ - #175.286.32300.135)</p>	
Special-Status Species	3-69 The Forest Service should acknowledge that none of the action alternative would significantly affect special-status species.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT NONE OF THE ACTION ALTERNATIVES WOULD SIGNIFICANTLY AFFECT SPECIAL-STATUS SPECIES</p> <p>The Coconino has thousands of miles of roads on the ground that are not causing significant harm to threatened and endangered species, such as the Gila chub and the southwestern willow flycatcher. All of the action alternatives presented in this plan will not cause harm to these species and others. (Individual, Las Vegas, NV - #33.1.32300.001)</p>	#33.1.32300.001: The action alternatives in the EIS are expected to decrease overall impacts to wildlife species such as the Gila chub and willow flycatcher. Yet, the alternatives may result in ongoing impacts to one or more species, or may result in localized impacts similar to or above current conditions. Impacts to the Gila chub and willow flycatcher are fully considered for each alternative in the EIS.
Special-Status Species	3-70 The Forest Service should include a complete review of potentially affected species.	<p>INCLUDING CONSULTATION WITH U.S. FISH AND WILDLIFE SERVICE</p> <p>Species of Concern: EPA recommends that the FEIS include a complete review of species that would be affected by the project alternatives. The results of consultation with the United States Fish and Wildlife Service, if appropriate, regarding threatened or endangered species or critical habitat should be included in the FEIS. (U.S. Environmental Protection Agency, San Francisco, CA -</p>	#205.12.33000.354: The DEIS and specialist reports do include a complete review of all Endangered and Threatened Species, Sensitive species, MIS, migratory birds, and other species of concern that may be affected by the alternatives included in the EIS. Consultation with Fish and Wildlife Service will be completed on the Preferred Alternative at the appropriate time

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		#205.12.33000.354)	and included in the FEIS as appropriate. All terms and conditions resulting from FWS consultation will be fully complied with during implementation.
Special-Status Species	3-71 The Forest Service should acknowledge the lack of monitoring special-status species throughout Region 3.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE LACK OF MONITORING SPECIAL-STATUS SPECIES THROUGHOUT REGION 3</p> <p>There is no mention of the systematic failure to monitor threatened, endangered, and sensitive species throughout Region 3 and specifically on the Coconino National Forest. This oversight must be corrected and accounted for in the FEIS. (Preservation/Conservation, Santa Fe, NM - #175.118.30110.354)</p>	#175.118.30110.354: Monitoring all resource conditions, species, and activities that may result in impacts is a challenge. The Coconino National Forest and other agencies regularly monitor multiple resources across the Forest based on available funding, personnel, and agreements made for monitoring key resources. A decision based on the Travel management EIS process is expected to help target monitoring and improve resource management in this area in the future.
Special-Status Species	3-72 The Forest Service should revisit the analysis of impacts on wintering bald eagles.	<p>TO ACCOUNT FOR CLIMATE CHANGE</p> <p>For wintering bald eagles, we disagree with the statement that “[m]ost camping occurs outside the season when wintering bald eagles are present” and that “snow and wet conditions make much of the forest difficult to access during the months when wintering eagles are on the CNF”; therefore, there would be a minimal impact to wintering eagles. Forest Service 2010:86. This analysis fails to take into consideration the rapidly changing climate that will result not only in changes to how, when, and where humans camp and hunt, but also changes in the timing of bald eagle wintering migrations. (Preservation/Conservation, Phoenix, AZ - #175.117.31600.354)</p>	#175.117.31600.354: The DEIS does include analysis of expected impacts to wintering bald eagles. There is no evidence that wintering camping and hunting will substantially change as a result of climate change. Camping and hunting activities primarily occur outside of the season when wintering bald eagles are present as most recreational facilities on the Coconino National Forest are closed or inaccessible during this time frame. There is no clear evidence on how or if, or to what magnitude bald eagle wintering migrations will change. If there is clear evidence that migration patterns or other changes occur resulting in substantial impacts, management

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			adjustments may occur at that point.
Special-Status Species	3-73 The Forest Service should close routes in Mexican spotted owl Protected Activity Centers.	<p>BECAUSE THIS IS A THREATENED SPECIES WHOSE HABITAT IS IN DECLINE</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Mexican spotted owl Protected Activity Centers: This is a federally listed “threatened” species whose habitat on the forest is stable to declining and for whom population assessments are inconclusive. (Preservation/Conservation, Santa Fe, NM - #175.320.32300.330)</p>	#175.320.32300.330: The purpose and need of the Coconino Travel Management Project is to reduce (not completely remove) impacts to wildlife and other resources in consideration of meeting multiple resource goals. Each route going through MSO habitat was specifically considered for designation (or not) through the travel management process. According to the DEIS, Alternative 3 reduces roads within PACS by 76% and 93% for trails, Alternative 4 reduces roads within PACS by 65% for roads and 93% for trails.
Special-Status Species	3-74 The Forest Service should close routes near northern goshawk nests or post-fledging family areas.	<p>BECAUSE THIS IS A SENSITIVE SPECIES WHOSE HABITAT IS IN DECLINE</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Northern goshawk nests or Post-Fledging Family Areas: This is a forest-listed “sensitive” species, an Arizona Game & Fish second-tier “Species of Greatest Conservation Need,” and a species whose habitat is declining and for whom population assessments are inconclusive. (Preservation/Conservation, Grand Canyon, AZ - #175.321.32300.330)</p>	#175.321.32300.330: The purpose and need of the Coconino Travel Management Project is to reduce (not completely remove) impacts to wildlife and other resources in consideration of meeting multiple resource goals. Each route going through goshawk habitat was specifically considered for designation (or not) through the travel management process. According to the DEIS, Alternative 3 reduces roads within PFAs by 75% and 75% for trails, Alternative 4 reduces roads within PFAs by 65% for roads and 75% for trails.
Special-Status Species	3-75 The Forest Service should close routes near active and	<p>BECAUSE THIS IS A SPECIAL-STATUS SPECIES WHOSE HABITAT AND POPULATION ARE IN DECLINE</p> <p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p>	#175.322.33100.330: Gunnison's prairie dogs were specifically considered in the route analysis process. The action alternatives decrease impacts to

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	<p>abandoned Gunnison’s prairie dog colony sites.</p>	<p>Gunnison’s prairie dog active and abandoned colony sites: A petition-to-list the species under the Endangered Species Act was denied pending specific actions to increase habitat and populations, both of which are currently on the decline. The U.S. Fish and Wildlife Service recently initiated a public comment period regarding the status of Gunnison’s prairie dog. It is also a first-tier “Species of Greatest Conservation Need.” It should also be noted that a number of active colonies do not appear on the Arizona Game and Fish inventory. In the next year, as the CNF [Coconino National Forest] prepares its DEIS additional colony information should become available and incorporated into the DEIS alternatives. (Preservation/Conservation, Tucson, AZ - #175.322.33100.330)</p>	<p>known or potential prairie dog sites.</p>
<p>Special-Status Species</p>	<p>3-76 The Forest Service should close routes near drainages that provide habitat for the Little Colorado spinedace.</p>	<p>BECAUSE THIS IS AN ENDANGERED SPECIES Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are: Severe soil erosion hazard. Several drainages on the forest provide habitat for the federally listed endangered Little Colorado spinedace. Sediment loads into the few drainages that flow year-round threaten habitat not only for the spinedace, but other native aquatic species. (Preservation/Conservation, Tucson, AZ - #175.327.33200.245)</p>	<p>#175.327.33200.245: Severe soil conditions and aquatic species habitat were specifically looked at when considering designation of routes in each action alternative. Each action alternative is expected to reduce impacts, such as sedimentation, which impacts aquatic species such as the Little Colorado Spinedace.</p>
<p>Special-Status Species</p>	<p>3-77 The Forest Service should close routes in pronghorn core habitat.</p>	<p>BECAUSE THIS IS A SPECIAL-STATUS SPECIES Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are: Pronghorn core habitat: Pronghorn habitat is stable to declining; populations are declining. It is a third-tier species on the “Species of Greatest Conservation Need” list. (Preservation/Conservation, Tucson, AZ - #175.323.32300.330)</p>	<p>#175.323.32300.330: Pronghorn habitat was specifically considered in the route analysis process. The action alternatives decrease impacts to known or potential pronghorn habitat.</p>
<p>Special-Status Species</p>	<p>3-78 The Forest Service should close routes that contribute to</p>	<p>BECAUSE THE CREEK PROVIDES CRUCIAL HABITAT FOR SPECIAL-STATUS SPECIES The Forest considers West Clear Creek an important watershed because it contains stream habitat for federally listed and candidate</p>	<p>#175.203.33200.410: As stated in your comment, the action alternatives do reduce road density in the West Clear Creek vicinity. The improvement of habitat for</p>

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	sediment load in West Clear Creek.	fish species, Region 3 Sensitive Species and forest management indicator species (MIS) (Forest Service 2010:74). It is known that roads are the greatest contributors of sediment of all land management activities (Gibbons and Salo 1973, Meehan 1991 [Citations not provided]). Sediment impacts on TES [Threatened, Endangered, or Sensitive] fish species on the CNF [Coconino National Forest] include filling of backwaters that provide larval and juvenile fish rearing habitat, smothering of invertebrates (including MIS) which provide the food base for many TES fish species, interference with fish reproduction by smothering and suffocation of eggs, and direct mortality (Forest Service 2010:74). While Alternative 3 significantly reduces the road density of West Clear Creek vicinity from 2.7 to 1.4 mi/sq mi (Forest service 2010:78), we [Center for Biological Diversity et al.] strongly urge the closure, and in most cases decommissioning of the impacting, unnecessary routes we have recommended. (Preservation/Conservation, Santa Fe, NM - #175.203.33200.410)	special-status species was specifically considered in the designation of the action alternatives.
Special-Status Species	3-79 The Forest Service should analyze potential impacts of the spread of white nose syndrome in bats.	<p>BECAUSE HUMANS ARE A SUSPECTED VECTOR FOR THE DISEASE</p> <p>For impacts to bats, including the Western red, Allen’s lappet-browed, pale Townsend’s big-eared, greater western mastiff, and spotted, the Coconino National Forest (CNF) should analyze the potential impacts of the spread of “white nose syndrome,” a fungal infection decimating bat colonies across the eastern U.S. and recently discovered to have spread west of the Mississippi River.</p> <p>Humans are a suspected vector of this fungus. See Center for Biological Diversity 2010, press release attached at Appendix M [ATT 19]. Nationally, the Forest Service is beginning to develop a strategy for addressing the anthropogenic transmission of white nose syndrome. See Appendix M1. While the closure of mines and caves used as hibernacula may help prevent the spread of white nose syndrome, we are also asking the CNF to proactively ensure that the use of ORVs on designated routes and in dispersed camping corridors</p>	#175.120-121.32300.530: Thanks for your comments. The Coconino National Forest is very concerned with the spread of "white nose syndrome". The closure of mines and caves is outside of the scope of this project. The wildlife analysis in the FEIS includes information relevant to how motorized access may affect the spread of white nose syndrome.

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		<p>or MBGR [motorized big game retrieval] “corridors” will not negatively impact bats or inadvertently lead to the spread of white nose syndrome. ORV travel on designated routes and in corridors could lead to the discovery of caves or mines that serve as bat roots and hibernacula and the inadvertent spread of this disease.</p> <p>We [Center for Biological Diversity et al.] have included five references the CNF should consider in analyzing the impacts of routes and cross-country travel to bats and the potential for recreational access to caves. Appendix N. The following information is from a Forest Service (Southern Region) press release from May 21, 2009: “White Nose Syndrome, or WNS, is named for a white fungus that appears on the faces, ears, wings and feet of hibernating bats. Scientists are trying to determine how WNS affects bats. The disease causes bats to come out of hibernation severely underweight.”</p> <p>In a desperate attempt to avoid starving, the affected bats are often seen flying during the day. They are looking for food, but the insects they normally eat in the spring are not yet available. Once a colony is affected, the fungus spreads rapidly and may kill 90 percent of bats at the hibernation site in just two years.</p> <p>The CNF Forest Plan directs that caves should be managed to protect and preserve cave ecology and that caves may be gated to protect their unique contents. Forest Service 1987:51, as amended. (Preservation/Conservation, Phoenix, AZ - #175.120-121.32300.530)</p>	
Special-Status Species	3-80 The Forest Service should correct the DEIS to reflect that the narrow-headed garter snake is not a candidate species and that the Mexican	<p>THE FOREST SERVICE SHOULD CORRECT THE DEIS TO REFLECT THAT THE NARROW-HEADED GARTER SNAKE IS NOT A CANDIDATE SPECIES AND THAT THE MEXICAN GARTER SNAKE IS A CANDIDATE SPECIES.</p> <p>Wildlife, Federally Listed and Candidate Species (pages 81–89): This section lists the narrow-headed garter snake as a candidate species and the northern Mexican garter snake as a sensitive species. Though we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] are very concerned about the status of both species, currently</p>	#105.13.32300.354: Thanks for your comments. This has been corrected in the FEIS.

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	garter snake is a candidate species.	only the northern Mexican garter snake is a candidate species under the Endangered Species Act. The Wildlife Specialist's report also needs to correct this information in a few places (e.g., Table of Contents), but in other sections the status of these species is reflected correctly. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.13.32300.354)	
Special-Status Species	3-81 The Forest Service should identify the Mexican spotted owl protected activity centers that would have camping corridors and authorized roads within them.	<p>THE FOREST SERVICE SHOULD IDENTIFY THE MEXICAN SPOTTED OWL PROTECTED ACTIVITY CENTERS THAT WOULD HAVE CAMPING CORRIDORS AND AUTHORIZED ROADS WITHIN THEM</p> <p>Wildlife, Federally Listed and Candidate Species, Mexican spotted owl [MSO] (page 87): We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that in the biological assessment submitted to us, the Forest Service identify the specific MSO PACs [Protected Activity Centers] that would have camping corridors and authorized road designated within them. This information is currently not available in the DEIS or in the Wildlife Specialist's report. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.14.32300.530)</p>	#105.14.32300.530: The DEIS includes summarized data of MSO impacts. The FEIS, final wildlife specialist report, and/or the biological assessment submitted for consultation includes more specific information about specific MSO PACs that would be impacted by each alternative.
Invasive Plant Species	3-82 The Forest Service should acknowledge that roads contribute to the spread of invasive species.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT ROADS CONTRIBUTE TO THE SPREAD OF INVASIVE SPECIES</p> <p>In 2006, the Forest Service Chief identified invasive species as a primary cause of disruption in ecosystem function, reduction in native biodiversity, and degradation of ecosystem health across our forests and grasslands. Forest Service 2006. Exotic plants dominating huge expanses of western land compete with or displace native plants. Exotic plants provide poor habitat for native wildlife generally adapted to utilizing native flora. Regarding native biodiversity, the long-term implication of exotic plant invasion is ominous. For example, studies of Idaho shrub-steppe habitat shows that sites invaded by nonmycorrhizal exotic plants eliminated vesicular-</p>	#175.145-146.32000.530: The effects of motorized routes on the spread of invasive species was considered in the EIS analysis. A full analysis of the impacts of each alternative on the spread of invasive species is included in the Botany specialist report.

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		<p>arbuscular mycorrhizae up to ten years. Wicklow-Howard 1994. Without native mycorrhizal-dependent plants, the fungal propagules may not be able to survive, and as a result the reestablishment of native plants is expected to be difficult. Possibly the most significant affect on arid and semi-arid biological communities relate to exotic plant invasions along road corridors. Davidson et al. 1996: 111.</p> <p>Motorized recreation and motorized routes serve as corridors for exotic plant and disease invasions; invasions by exotic species constitute one of the four threats to the health of the National Forests. See also Exec. Order 13112, [section] 2 (Feb. 3, 1999), providing that all federal agencies will use relevant programs and authorities to prevent the introduction of invasive species, and “not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species ... unless ... the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm.”</p> <p>Disturbed surfaces provide ideal habitat and avenues for exotic plants pathogens and pests to spread, possibly resulting in drastic habitat changes. Trombulak and Frissell 2000. For example, exotic plant species invaded logging roads in Montana forests at all elevations, and ultimately invaded adjacent ponderosa pine and grassland. Forcella and Harvey 1983. In another example, exotic annual plants invaded a pipeline corridor within woodland, grassland and chaparral reserve in California and persisted as the dominant plants ten years after the disturbance. Zink et al. 1995. (Preservation/Conservation, Tucson, AZ - #175.145-146.32000.530)</p>	
Invasive Plant Species	3-83 The Forest Service should analyze the effects of roads on invasive plant species.	<p>TO COMPLY WITH EXECUTIVE ORDER 13112</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p>	#175.288.34000.530: The effects of motorized routes on the spread of invasive species was considered in the DEIS analysis. A full analysis of the impacts of each alternative on the spread of invasive species is included in the Botany specialist report. Executive Order 13112 was

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		<p>Native vegetation: Motorized recreation and motorized routes serve as corridors for exotic plant and disease invasions; invasions by exotic species constitute one of the four threats to the health of the National Forests. [Footnote 16: Parendes, L.A., and J.A. Jones. 2000. Role of light availability and dispersal mechanisms in invasion of exotic plants along roads and streams in the H.J. Andrews Experimental Forest, Oregon. In: Conservation Biology 14:64–75; Zobel, D.B., L.F. Roth, and G.M. Hawk. 1985. Ecology, pathology, and management of Port Orford cedar (<i>Chamaecyparis lawsoniana</i>). U.S.D.A. Forest Service, Portland, OR, General Technical report PNW-184.] See also Exec. Order 13112, [section] 2 (Feb. 3, 1999) (providing that all federal agencies will use relevant programs and authorities to prevent the introduction of invasive species, and “not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species ... unless ... the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm”). (Preservation/Conservation, Santa Fe, NM - #175.288.34000.530)</p>	<p>specifically considered in the Botany specialist report.</p>
<p>Invasive Plant Species</p>	<p>3-84 The Forest Service should analyze the effects of climate change on plants and the establishment of invasive species.</p>	<p>THE FOREST SERVICE SHOULD ANALYZE THE EFFECTS OF CLIMATE CHANGE ON PLANTS AND THE ESTABLISHMENT OF INVASIVE SPECIES</p> <p>Global climate change presents a significant threat to the current ecosystems of the southwest. [Footnote 25: Weltzin and McPherson, 1995. One indication of climate change in the Southwest is that with increasing average temperatures, especially in summer, both the diversity and composition of flowering plant taxa are changing, particularly at higher elevations. [Footnote 26: Breshears, et al., 2008; Crimmins, et al., 2008; Kelly and Goulden, 2008, Parmesan and Yohe, 2003] Rare and endemic species; species relatively “immobile” due to limited pollinators, seed dispersal, or reproduction; and species at higher elevations are particularly vulnerable to climate change. Wetlands and high-elevation communities such as spruce forest face particularly serious threats in southwestern forests.</p>	<p>#175.133.34000.250:</p> <p>Global climate change is incorporated into the cumulative effects analysis for noxious and invasive weeds within the FEIS and the Botany Specialist Report. The effects of global climate change on invasive species are expected to add to the effects of disturbance from motor vehicle use across the Forest in the No Action Alternative. Both Alternative 3 and 4 would reduce the risk of present and future noxious/invasive weed dispersal from motor vehicles by limiting cross-country motorized travel, and reducing the existing road network.</p>

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		<p>Betancourt (2007) suggested that “the abrupt warming beginning in the 1980’s” may be responsible for the “exponential spread of buffelgrass (<i>Pennisetum ciliare</i>) in the Sonoran Desert, which will continue to spread northward and upward with progressive warming.” It seems likely that warmer winter temperatures are a factor in the establishment of invasive species at higher elevations. Grasses are particularly susceptible to dispersal by motor vehicles as are tamarisk in riparian corridors. (Preservation/Conservation, Santa Fe, NM - #175.133.34000.250)</p>	
<p>Invasive Plant Species</p>	<p>3-85 The Forest Service should acknowledge that road improvements increase the spread of invasive species.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT ROAD IMPROVEMENTS INCREASE THE SPREAD OF INVASIVE SPECIES</p> <p>Clearing of vegetation and soils during road construction, addition of road fill, and grading of unpaved roads create areas of bare and deeper soil that allow exotic seeds to become established. Frenkle 1970; Trombulak and Frissell 2000; Gelbard and Belnap 2003:421. Road improvements can be considered a major agent of land-cover change converting natural habitat to roadside habitat that tends to be highly invaded and may act as a conduit for the invasion adjacent interior ecosystems. Tyser and Worley 1992; Forman 2000; see Gelbard and Belnap 2003:430. In addition, scientists suggest that exotic weed invasion might be prevented by restricting access on existing roads. Davidson et al. 1996: 112. (Preservation/Conservation, Tucson, AZ - #175.147.34000.410)</p>	<p>#175.147.34000.410: The Coconino Travel management project includes designating a road and trail system for public use. This does not include clearing of vegetation and soils for road construction. Only existing routes are being considered for designation. Road grading of designated unpaved roads and its effect on invasive species is not expected to change as a result of this decision.</p>
<p>Invasive Plant Species</p>	<p>3-86 The Forest Service should recognize that neither action alternative would reduce the dispersal of invasive plants.</p>	<p>BECAUSE BOTH ALTERNATIVES ALLOW FOR MOTORIZED GAME RETRIEVAL AND DISPERSED CAMPING</p> <p>We [Center for Biological Diversity et al.] disagree that the risk of dispersing noxious or invasive weeds into uninfested areas by motor vehicles would be reduced in either action alternative. Both action alternatives would allow the continued use of motorized vehicles throughout nearly the entire forest for big game retrieval. In addition,</p>	<p>#175.126.34000.530: We disagree. Alternative 3 does not include motorized big game retrieval and both action alternatives eliminate cross-country travel across the Forest and reduce routes available to the public by over 30%. This is expected to reduce opportunities across the Forest for the spread of invasive species.</p>

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		both alternatives would leave more than 45,000 acres of forest open to cross-country travel for motorized dispersed camping. This analysis is completely lacking in the DEIS. The same is true for Region 3 sensitive species of plants; there is no mention of the impacts MBGR [motorized big game retrieval] will have on any of these species. (Preservation/Conservation, Tucson, AZ - #175.126.34000.530)	
Invasive Plant Species	3-87 The Forest Service should protect large roadless areas.	<p>TO PREVENT THE SPREAD OF INTRODUCED GRASSES TO UNDISTURBED AREAS</p> <p>Large unroaded areas with low circumference-to-area ratios offer the best protection of arid and semi-arid ecosystems against wholesale conversion, and that maintaining and restoring their roadless character offers the most economical strategy for preventing the spread of introduced grasses to relatively undisturbed areas.</p> <p>See Davidson et al. 1996:112. This underscores the importance to manage roadless areas responsibly and restore them where necessary. Strittholt and Dellasala 2001; DellaSalla et al. 1995; Strittholt et al. 1999 [Citation not provided]. (Preservation/Conservation, Pinetop, AZ - #175.148.32000.621)</p>	#175.148.32000.621: Both action alternatives eliminate cross-country travel across the Forest and reduce routes open to the public across the Forest by over 30%, this in effect increases the area of those locations with unroaded areas.
Grazing	3-88 The Forest Service should avoid giving more access for grazing than for recreation.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE NEED TO CHECK FENCES USING MOTORIZE VEHICLES</p> <p>Liberal open grazing laws allow cows in many places. Don't people have more rights than cows to enjoy the forests—our public lands? (Individual, Sedona, AZ - #131.3.35000.125)</p>	#131.3.35000.125: Outside the scope of this project. Driving off-road to check fences with the use of a motor vehicle may be authorized under the terms of a special use or livestock grazing permit.
Grazing	3-89 The Forest Service should increase the amount charged for grazing allotments.	<p>RATHER THAN RESTRICTING MOTORIZED ACCESS</p> <p>What you really need to do is to look at the Cattlemen—why can they lease the land for pennies and keep the public off their own land...check the flakes south of Apache Junction and see what they pay 57 cow allotment—about \$2.57 per cow per month...to the tune of \$1254.00 per year for all those sections of land, and I can't ride on my own land...it is truly a crime—why don't you check and see how many cows are out there right now...but hell no you are worried that I</p>	#12.3.35000.125: This project focuses on establishing a designated system of roads and trails for public use of motorize vehicles.

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		<p>might ride my dirt bike out there and destroy the environment...you guys make me sick...you should be ashamed of what you are doing. (Individual - #12.3.35000.125)</p>	
Grazing	<p>3-90 The Forest Service should acknowledge the need to check fences using motorized vehicles.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE NEED TO CHECK FENCES USING MOTORIZED VEHICLES When I assist with fence checking for a local rancher, there are times I must go off-road with my ATV. There is no way I can possibly walk the fence lines on the ranch. (Individual - #21.2.35000.815)</p>	<p>#21.2.35000.815: Permitted uses on the Coconino National Forest may allow use on specific routes that aren't designated for motorized use under this project. This falls under exempted uses in 36 CFR 212.5(a).</p>
Grazing	<p>3-91 The Forest Service should make permanent the exemption for motorized grazing management.</p>	<p>TO SUPPORT CONTINUING GRAZING OPERATIONS We [Bart Bar Ranch, Inc.], as a Grazing Permit Holder, appreciate the designation of "Exempted Uses", (36 CFR212.5(a)). This, and only this, will allow us to continue to operate effectively and carry out the stewardship responsibilities required in our 2005 Allotment Management Plan and our Annual Operating Instructions. However, when I asked the question if we would be able to use ATVs (4-wheelers) to carry out our normal ranch operations (off road), I was told that it would be at the Ranger's discretion, on an annual basis. We ask to make this a permanent exemption. In today's world, we cannot be expected to maintain hundreds of miles of fence, keep gates closed, move cattle, keep cattle where they are supposed to be, and utilize a complex grazing system without the use of ATVs off road. (Domestic Livestock Industry - #161.1.35000.823)</p> <p>The Diablo Trust being home to two historic ranches, we appreciate the designation of "Exempted Uses", (36 CFR212.5(a)). This, and only this, will allow our Grazing Permit Holders to continue to operate effectively and carry out the stewardship responsibilities required in our 2005 Allotment Management Plan and our Annual Operating Instructions. However, when in a recent meeting with the Forest Service, we asked if we would be able to use ATVs (4-</p>	<p>#161.1.35000.823: This comment is outside the scope of the analysis. Issues that result from livestock grazing on the Coconino National Forest, such as the need for use of ATVs on non-designated routes, could be addressed in Annual Operating Instructions.</p> <p>#165.4.35000.823: This comment is outside the scope of the analysis. Issues that result from livestock grazing on the Coconino National Forest, such as the need for use of ATVs on non-designated routes, could be addressed in Annual Operating Instructions.</p>

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		<p>wheelers) to carry out our normal ranch operations (off road), we were told that it would be at the Ranger’s discretion, on an annual basis. Instead, we hereby request to make this a permanent exemption. In today’s world, we cannot be expected to maintain hundreds of miles of fence, keep gates closed, move cattle, keep cattle where they are supposed to be, and utilize a complex grazing system without the use of ATVs off road. Anything less than a clear and comprehensive exemption for Grazing Permit Holders puts us in an annual jeopardy situation that frankly threatens our very existence as day-to-day stewards of the land. (Place-based group, Flagstaff, AZ - #165.4.35000.823)</p> <p>As far as ATV use for our permit and business, it is not recreational and is a tool. We appreciate being an “Exempted Use” (36CFE21.25(a)) on this issue. We do use them in every aspect of our operation. They are less expensive to run than pickups so we use them to put out salt, run fence, move livestock and check gates. We probably have over 300,000 miles of ATV travel on the National Forest, 60% of that being cross country, since their introduction in the 1980s, and I doubt that anyone could find any of our tracks. We do not take this Exemption lightly and use ATVs in a manner not to cause resource damage or to encourage others to follow our tracks. We would encourage this to be a permanent exemption and not at the Ranger’s discretion for permittees. Any Forest concerns with permittees could be dealt with in the Annual Operations Instruction if problems arise or with a phone call to discuss the use. To lose this modern tool and ask us to maintain a 21st century business using only [an] 18th century tool, a horse, would be like asking you, the USFS, to prepare a Travel Management Draft using yellow pads of paper and number 2 pencils. We can do a better job of resource management using better tools. (Domestic Livestock Industry, Flagstaff, AZ - #206.8.54100.823)</p>	<p>#206.8.54100.823: This comment is outside the scope of the analysis. Issues that result from livestock grazing on the Coconino National Forest, such as the need for use of ATVs on non-designated routes, could be addressed in Annual Operating Instructions.</p>
Forest Products	3-92 The Forest	TO ENSURE THAT PEOPLE DEPENDENT ON THE	#21.3.37010.711, #168.6.37010.002,

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	<p>Service should allow for firewood retrieval.</p>	<p>FIREWOOD HAVE SUFFICIENT ACCESS</p> <p>I assist an older couple with firewood retrieval. Some firewood isn't even close to a roadway. How would people, who depend on wood for heat, get their supplies without having to pay exorbitant prices to people in the business? (Individual - #21.3.37010.711)</p> <p>I see no reference to cross-country traveling for wood cutting permits. This would have a limited effect as to the imprint on the forest in the Munds Park area. Wood cutting of down and dead wood helps in cleaning up of the forest for keeping down the forest fires. I burn about 4 to 5 cords of wood a year and the cost of propane would put a hardship on me. (Individual, Munds Park, AZ - #168.6.37010.002)</p> <p>We depend on wood for our heat, and being 65 and 70 years old it is absolutely necessary that we be allowed to drive to the wood that is dead and down to be able to cut and load. We have never one time driven on muddy roads or done any damage to the forest while gathering wood. To treat us like we are irresponsible and careless just isn't right or fair! We strongly reject any change that will prohibit us continuing as we have for years. We have owned this property for 40 years. (Individual, Happy Jack, AZ - #181.2.54100.711)</p>	<p>#181.2.54100.711, and #29.1.37010.711: Driving off-road to cut and load firewood would be authorized under a firewood permit, under the written terms of the permit.</p>
<p>Forest Products</p>	<p>3-92 The Forest Service should allow for firewood retrieval.</p>	<p>TO SUPPORT REMOVAL OF EXCESS FUELS FROM THE FOREST</p> <p>The Coconino National Forest should be open for all highway licensed vehicles for fuelwood and other permit holders to gain access to forest products.</p> <p>Fuelwood harvesting is important in removing excess fuels from the forest and the products are gathered mostly in the dryer parts of the year.</p> <p>It would pose a great hardship by not allowing vehicular off-road access to most parts of our forest. (Individual, Flagstaff, AZ - #29.1.37010.711)</p>	<p>#21.3.37010.711, #168.6.37010.002, #181.2.54100.711, and #29.1.37010.711: Driving off-road to cut and load firewood would be authorized under a firewood permit, under the written terms of the permit.</p>

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Forest Products	3-93 The Forest Service should permit off-road travel for firewood gathering.	<p>THE FOREST SERVICE SHOULD PERMIT OFF-ROAD TRAVEL FOR FIREWOOD GATHERING</p> <p>It is my understanding that a permit for gathering firewood provides for some off-road travel. If not, it would be beneficial to both the public and the forest to make that provision. (Individual, Cornville, AZ - #113.2.37010.127)</p>	<p>#113.2.37010.127:</p> <p>Permitted uses such as firewood collection, may be exempted from the requirement to stay on designated routes by allowing some use on non-designated routes or some off-road use in a specific area according to a written permit.</p>
Forest Products	3-94 The Forest Service should evaluate travel management for forest products and grazing together.	<p>RATHER THAN SEPARATELY</p> <p>The document does not discuss travel management for forest products, e.g., timber harvest and personal use fuelwood, nor for managing livestock grazing but says they will be covered separately. In the interests of equity and fair treatment of uses, I believe they should be discussed together. (Individual, Cornville, AZ - #190.8.30000.740)</p>	<p>#190.8.30000.740:</p> <p>The Travel Management Rule allows for exemptions for motorized travel under permitted uses. The Coconino National Forest does not have information on what permitted uses will be requested throughout the Forest for the next several years. The impacts of motorized use for permitted uses such as timber harvest, fuelwood, etc. will be considered on a site-specific basis when this information is available.</p>
Forest Products	3-95 The Forest Service should provide more information on the effects of antler gathering.	<p>TO CLARIFY THE DIFFERENCE BETWEEN BASELINE AND PROJECT CONDITIONS</p> <p>Chapter 3. Affected Environment and Environmental Consequences, Collection of Forest Products (page 29):</p> <p>The last paragraph in this section states that though antler or shed horn gathering is not managed by the CNF [Coconino National Forest] (antlers are not considered an official forest product), during wet springs this activity results in visible tracks across large areas of the more popular antler collection areas. However, though antlers are not a forest product, the CNF does have a wet roads policy (referenced on page 30) that could be used to reduce resource damage from antler gatherers. The more information the Forest Service can provide on such activities, which help to define the difference between baseline condition and conditions resulting from</p>	<p>#105.6.30000.530:</p> <p>All alternatives in the Coconino Travel Management EIS would include the existing wet roads travel policy used by the Coconino National Forest. Thus, the analysis of effects of antler gathering during periods of wet roads is included in the baseline condition (analysis for No Action Alternative) and is reflected in the analyses of the action alternatives. Since the action alternatives would also eliminate cross-country travel across the Forest, information about how this management change in addition to the wet roads policy would even further reduce impacts can be included in the FEIS.</p>

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		implementing Alternative 3 and 4, the better we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] will be able to assist in evaluating impacts to wildlife and their habitat. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.6.30000.530)	
Forest Health	3-96 The Forest Service should analyze the impacts of global warming on pest and disease outbreaks.	BECAUSE THESE EFFECTS ARE LIKELY TO INCREASE Impacts associated with pest and disease outbreaks in forests should be analyzed along with the TMP [Travel Management Plan] as these impacts are expected to increase with global warming. [Footnote 28: Hotter and Drier, 21 [Citation not provided]. The IPCC reports with “very high confidence” that insect outbreaks are increasing and are likely to intensify in a warmer future with drier soils ... ”] The analysis of the impacts of global warming in conjunction with the impacts of off-road vehicle use are especially important given the known ability of off-road vehicles to act as a dispersal agent for noxious species. (Preservation/Conservation, Prescott, AZ - #175.136.34000.250)	#175.136.34000.250: Given no alternative is expected to change the amount of greenhouse gasses resulting from motorized use on the Forest, there is no evidence that motorized use is directly or indirectly related to pest and disease outbreaks.
Fire and Fuel Management	3-97 The Forest Service should include natural and human-caused fires in the analysis.	THE FOREST SERVICE SHOULD INCLUDE NATURAL AND HUMAN-CAUSED FIRES IN THE ANALYSIS Apparently, the effects analysis of Alternative 1 takes into account past and present impacts to natural resources. However, other than fuels reduction projects planned for the future, we [Center for Biological Diversity et al.] cannot find any indication that natural or human-caused fires in the Coconino National Forest have been taken into account. This failing of the DEIS must be corrected. (Preservation/Conservation, Santa Fe, NM - #175.94.30130.270)	#175.94.30130.270: Natural or human-caused fires are taken into account in the effects analysis for the action alternatives because these fires have resulted in the existing condition considered in effects analysis, including analysis of cumulative effects.
Historical and Cultural Resources	3-98 The Forest Service should select the Modified Proposed action.	BECAUSE OF THE ALTERNATIVES ANALYZED IT BEST PROTECTS THE CULTURAL RESOURCES ASSOCIATED WITH THE HOPI TRIBE The Hopi Tribe claims ancestral and cultural affiliation to the prehistoric cultural groups in Coconino National Forest, and the history of the Hopi clans that associates us with this area extends back	#36.1.37100.760: Thanks for your input.

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		<p>thousands of years. The Hopi Cultural Preservation Office supports the identification and avoidance of the prehistoric archeological sites of our ancestors, and we consider these prehistoric sites to be Traditional Cultural Properties. Therefore, we appreciate the Forest's continuing solicitation of our input and your efforts to address our concerns.</p> <p>The Hopi Cultural Preservation Office understands unrestricted motorized travel is causing irreversible environmental impacts to National Forests across the country, including Coconino National Forest. In addition, in the southwest unrestricted access has resulted in the destruction of untold numbers of identified or unidentified prehistoric sites. Therefore, we consider any action better than no action.</p> <p>We have reviewed the Draft Environmental Impact Statement for Travel Management and we support the Modified Proposed Action that will be the most beneficial for resources, and will close 1,937 miles of system roads to all motorized use, and add 63 miles of unauthorized routes to the system as roads. We note that Alternative 3, the Modified Preferred Alternative, could continue to affect a predicted 831 archeological sites and up to 1,398 sites that have already been impacted by road use, while currently an estimated 1,962 to 3,274 sites are being impacted. (Hopi Cultural Preservation Office, Kykotsmovi Village, AZ - #36.1.37100.760)</p>	
Historical and Cultural Resources	3-99 The Forest Service should revise the heritage resources analysis.	<p>TO PROVIDE SITE-SPECIFIC ANALYSIS</p> <p>Page 53, Heritage Resources: This section inadequately incorporates by reference the specialist report and again is deficient through its failure to tie conclusions to any meaningful site-specific analysis. (Motorized Recreation, Boise, ID - #202.49.37100.131)</p>	<p>#202.49.37100.131:</p> <p>The DEIS does clearly reference the Heritage Resource Specialist Report, which was available to the public upon request. The Heritage Resource Specialist Report is now available on the web and will be republished when the FEIS is released. The Heritage Resource Specialist Report includes analysis on the extent of heritage resources that may be impacted from each</p>

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			<p>alternative. This information in the DEIS is derived from site-specific data and additional data collection is occurring on camping corridors, which will be included in the FEIS.</p>
<p>Historical and Cultural Resources</p>	<p>3-100 The Forest Service should survey cultural sites and assess the potential impacts from nearby routes.</p>	<p>BECAUSE CULTURAL SITES NEAR ROADS ARE SUSCEPTIBLE TO VANDALISM</p> <p>A recent report by Spangler et al. (2006) indicates that cultural resources near roads experience higher incidences of vandalism. This report’s conclusions are based on an analysis of 339 sites in Range Creek Canyon, Utah. The authors report that sites within 200 meters of a road are vandalized more often than more remote sites and the “vast majority of vandalized sites are located within 200 meters of the roadway ... but beyond 200 meters vandalism drops precipitously ... ” Spangler 2006. Vehicle restrictions could significantly protect cultural resources from indirect effects of vehicle accessibility.</p> <p>We [Center for Biological Diversity et al.] recommend the Coconino National Forest (CNF) assess some level of significance to archaeological sites in the CNF and utilize GIS to analyze the known impacts to sites in relationship to route proximity.</p> <p>For Alternative 3, the impacts analysis states that “[c]orridors in high site density areas for motorized dispersed camping would be surveyed to identify and evaluate sites to determine if potential conflicts exist between archaeological sites, traditional uses, and dispersed camping.” Forest Service 2010:56. We recommend that an alternative be developed that prohibits motorized dispersed camping within high site density areas.</p> <p>For both alternatives, less than half the roads proposed for designation as open to public use have been surveyed for archaeological resources. Forest Service 2010:56. These roads must be carefully screened for impacts to archaeological resources even in light of the travel management protocol agreed to by the State Historic</p>	<p>#175.97.37110.410:</p> <p>We agree that roads can result in vandalism to nearby cultural resources and this is considered in the analysis of effects to heritage resources. We also agree that GIS is a powerful tool to assess the impacts to known sites and this method was used in the heritage resource analysis report. High site density areas were specifically considered for avoidance in the design of the action alternatives. Additionally, since the elimination of cross-country travel is also included in both action alternatives, an alternative specifically designed to avoid archeological sites is not needed and wouldn't fully address the purpose and need. Additional ongoing arch survey in proposed camping corridors is providing information for more accurate analysis and may result in further modification to one or more alternatives in the FEIS to avoid newly discovered sites.</p>

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		<p>Preservation Office and the Forest Service. (Preservation/Conservation, Tucson, AZ - #175.97.37110.410)</p>	
<p>Historical and Cultural Resources</p>	<p>3-101 The Forest Service should acknowledge that there are documented instances of ORVs on the forest damaging cultural resources.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THERE ARE DOCUMENTED INSTANCES OF ORVS ON THE FOREST DAMAGING CULTURAL RESOURCES</p> <p>The statement that “[i]nformation on road related site damage is only summarized in forest data files to the extent that it is road related, and does not indicate if it is due to OHV or other vehicular related causes” is incorrect. In documents obtained through a Freedom of Information Act Request by The Wilderness Society in 2009, and reviewed by the Center for Biological Diversity, several incidents of archaeological damage on the Coconino National Forest (CNF) caused directly by off-road vehicle use are clearly documented. The Center was able to determine the impacts were directly caused by ORVs, despite the heavily redacted nature of the documents. We [Center for Biological Diversity et al.] suggest the CNF review incident reports for archaeological damage from at least 2000 to the present to determine the number and location of sites directly, seriously, and negatively impacted by ORVs in the CNF.</p> <p>Examples: Report No. 2004-48-B: On December 21, 2006 a four-wheel drive pickup ran into and over-turned a pot hunter’s hole. Report No. 2004-48: On October 4, 2004, recent ATV tracks were discovered at an illegal excavation site. Report No. 2005-44-A: “Over the years, the fence surrounding the site has been cut, allowing off-highway vehicles to drive over the site.” “Unauthorized off-highway vehicle use over the area could in time totally obliterate this important site.” We suspect there are many additional sources of information available to the CNF staff that would provide geographical information on damaged archaeological sites and their proximity to roads or motorized trails. Utilizing this information, the CNF could determine the impact road location and density is having on archaeological sites. (Preservation/Conservation, Denver, CO - #175.96.37110.530)</p>	<p>#175.96.37110.530:</p> <p>The Heritage Resource analysis assumes that OHV access to archeological sites would result in negative impacts to those sites over time. Thus, there is no utility that would result from study of specific OHV impacts at sites... this determination is already considered as an assumption in the analysis.</p>

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Historical and Cultural Resources	3-102 The Forest Service should analyze potential effects on cultural resources from motorized big game retrieval.	For Alternative 4, while MBGR [motorized big game retrieval] would occur only from September through October, it is undetermined how many hunters would utilize MBGR and therefore the impacts of this activity are quite uncertain. We disagree that this activity would have limited impacts to archaeological resources and therefore no additional cultural surveys are necessary. Rather, the Coconino National Forest must comply with the Executive Orders that minimize the impacts of ORV use to cultural and historic resources. (Preservation/Conservation, Tucson, AZ - #175.98.37110.530)	#175.98.37110.530: Eliminating cross-country travel across the Forest would undoubtedly decrease the potential for impacts from motorized use to archeological sites throughout the Forest. There is no documentation that motorized game retrieval would result in widespread impacts to archeological or other cultural sites. Since cross-country use from motorized access would be limited, it is reasonable to conclude that impacts to archeological sites from MBGR would also be limited.
Historical and Cultural Resources	3-103 The Forest Service should coordinate with local Native American Tribes.	TO COMPLY WITH THE NATIONAL HISTORIC PRESERVATION ACT AND EXECUTIVE ORDER 13007 National Historic Preservation Act and Executive Order 13007: The proposed Travel Management project plans to bring 25 previously unclassified roads into the NFSR [National Forest System Roads]. This could involve ground disturbance, including grading, filling, vegetation clearing, paving, and increased vehicle traffic. This disturbance could have significant impacts on cultural, particularly tribal, resources. Thirteen Indian tribes have cultural affinity to sites in the CNF [Coconino National Forest]. EPA encourages the CNF to refer to Indian Sacred Sites Executive Order No. 13007. Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under the NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate state Historic Preservation Officer/Tribal Historic Preservation Officer	#205.16.37100.130: The 25 previously unclassified roads discussed in this comment already exist on-the-ground. Thus, impacts associated with these routes to archeological sites, if they exist, have likely already occurred. These routes may receive occasional basic maintenance activities, such as grading, to prevent erosion. Yet, these activities would occur in already disturbed areas. The Coconino Travel Management decision will in no way change the Coconino National Forest policy of facilitating access of tribal members for religious purposes. The Forest Service has been working closely with tribal interests and has designed alternatives with relevant input to avoid all sites to the extent practicable.

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		(SHPO/THPO). Executive Order 13007, Indian Sacred sites (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. (U.S. Environmental Protection Agency, San Francisco, CA - #205.16.37100.130)	
Historical and Cultural Resources	3-104 The Forest Service should acknowledge that the agency must accommodate access to and ceremonial use of Indian sacred sites.	TO COMPLY WITH EXECUTIVE ORDER 13007 Executive Order 13007, Indian Sacred sites (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. (U.S. Environmental Protection Agency, San Francisco, CA - #205.18.37100.760)	#205.18.37100.760: See response to comment 205.16.37100.130
Historical and Cultural Resources	3-105 The Forest Service should ensure that the Hopi Tribe will retain their right to access the Forest for traditional uses.	AS PROVIDED FOR IN ALTERNATIVE 3 As we, the Hopi Cultural Preservation Office, have stated in previous consultations, we do not consider the Forest Service's Motorized Travel Management Proposed Actions to be directly related to the Hopi people's right to access the Forests for traditional uses, and therefore we appreciate the exemption as stated in the Contemporary Indian Uses section, Environmental Consequences, Alternative 3, on page 62. (Hopi Cultural Preservation Office, Kykotsmovi Village, AZ - #36.2.40000.040)	#36.2.40000.040: We continue to work with the Hopi Tribe to provide access to the National Forest and its resources.
Monitoring	3-106 The Forest Service should monitor resource	NOT JUST IN THE CINDER HILLS AREA Resource impacts are to be monitored only in the Cinder Hills OHV area. This is completely inappropriate as impacts from ORV uses	#175.95.30110.530: Resources will continue to be monitored throughout the Coconino National Forest

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	impacts throughout the Coconino National Forest.	must be monitored throughout the Coconino National Forest, especially if crosscountry travel continues to be permitted throughout nearly the entire forest. (Preservation/Conservation, Denver, CO - #175.95.30110.530)	based on available funding and personnel. Monitoring will not only be limited to the Cinder Hills OHV area.
Monitoring	3-107 The Forest Service should provide a more robust monitoring protocol.	<p>INCLUDING DEFINITIONS AND RESPONSIBLE PARTIES</p> <p>Resource Monitoring (page 48): The resource monitoring section states, “In order to ensure that excessive resource damage is not being caused by motorized recreation activities, it will be necessary to monitor the effects of motor vehicle use on designated roads and trails and in the Cinder Hills OHV Area. This can be conducted by forest personnel during their day-to-day travels on the CNF.” We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend developing a more robust monitoring protocol that defines “excessive resource damage”, identifies the type of data Forest Service employees will collect, who will be responsible for compiling this information, when specific areas will be visited, and how resource damage will be assessed and repaired. We also recommend that the Forest Service develop a means of communicating this information to other resource agencies (e.g. AGFD [Arizona Game and Fish Department], FWS [US Fish and Wildlife Service], etc.) and the public. (Federal Agency/Elected Official, Phoenix, AZ - #105.10.30110.530)</p>	<p>#105.10.30110.530:</p> <p>The Coconino National Forest plans to monitor impacts resulting from motorized use through a monitoring protocol designed and updated as needed. The monitoring protocol will depend on the decision made based on the Coconino Travel Management process and the Forest Plan Revision process. The protocol will consider how information from monitoring will be shared with the public and other agencies.</p>
Monitoring	3-107 The Forest Service should provide a more robust monitoring protocol.	<p>INCLUDING MONITORING FOR MANAGEMENT INDICATOR SPECIES BY ECOLOGICAL SUBUNIT</p> <p>The plan should retain monitoring protocols established for Management Indicator Species (MIS) and overlay these monitoring protocols with a requirement that the Forest Service divide the CNF [Coconino National Forest] into ecological subunits (preferably watersheds) wherein the Forest Service would prepare an annual monitoring report for each subunit that compiles and details: (1) illegal intrusions into areas closed to motorized use; (2) conflicts with</p>	<p>#175.303.32300.530:</p> <p>Thanks for your input. The Coconino National Forest will consider your comments on monitoring design.</p>

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		<p>quiet use and non-motorized recreationists; (3) relevant summaries of monitoring data obtained via Forest Plan-level monitoring protocols (e.g., for MIS); and (4) any considerable adverse impacts suffered by these subunits addressed through the baseline Travel Plan-level that would not require further site-specific analysis (Forest Service, 2005 (b)). (Preservation/Conservation, Santa Fe, NM - #175.303.32300.530)</p>	
Land Designations	3-108 The Forest Service should support providing state historic parks with the same protections as National Parks.	<p>THE FOREST SERVICE SHOULD SUPPORT PROVIDING STATE HISTORIC PARKS WITH THE SAME PROTECTIONS AS NATIONAL PARKS</p> <p>State Historic Parks and the natural areas that surround them need some of the same protections that National Parks have. (Individual, Cleveland, TN - #86.9.60000.640)</p>	<p>#86.9.60000.640: State historic parks were treated no differently than any other National Park or other managed property.</p>
Land Designations	3-109 The Forest Service should disclose the impacts on Inventoried Roadless Areas.	<p>BECAUSE ROADS ARE INCOMPATIBLE WITH THE ROADLESS DESIGNATION</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Agency-inventoried Roadless Areas: By definition, Roadless areas afford a type of quiet and primitive recreation that cannot be found near roads and serve as refuges for a host of natural and cultural resources, in particular native wildlife, vegetation, and clean water. Motorized recreation is thus generally incompatible with Roadless values and should be prohibited. Route designations and use can nonetheless have indirect or cumulative impact, and can also enable illegal motorized intrusions (e.g., Deadwood Trail FS 9201J).</p> <p>Citizen-inventoried Roadless Areas: For the same reasons as above, where the Forest Plan does not specifically prohibit the use of motorized vehicles in citizen-inventoried roadless areas, we contend</p>	<p>#175.291.62100.530: The action alternatives do not include any roads or trails in Inventoried Roadless Areas. In some instances, there are mapping errors where it appears that a road or trail is crossing a small corner of a roadless area.</p>

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		<p>that these areas, with rare exceptions, should not contain designated ORV routes. (Preservation/Conservation, Phoenix, AZ - #175.291.62100.530)</p>	
<p>Land Designations</p>	<p>3-110 The Forest Service should evaluate potential impacts on Wilderness Areas.</p>	<p>THE FOREST SERVICE SHOULD EVALUATE POTENTIAL IMPACTS ON WILDERNESS AREAS</p> <p>The following issue or species was not analyzed at all in the DEIS and must be evaluated for impacts:</p> <p>Proposed wilderness (please refer to Grand Canyons Wildlands Council and Arizona Wilderness Coalition Proposals). (Preservation/Conservation, Santa Fe, NM - #175.123.62200.001)</p>	<p>#175.123.62200.001:</p> <p>Due to your comments potential impacts of each alternative to proposed Wilderness have been considered in the Special Areas Report.</p>
<p>Land Designations</p>	<p>3-110 The Forest Service should evaluate potential impacts on Wilderness Areas.</p>	<p>BECAUSE ROADS CAN HAVE SIGNIFICANT EFFECTS ON WILDERNESS AREAS</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Wilderness Areas: Insofar as motorized use and routes are prohibited in designated Wilderness, route designations and use can have indirect or cumulative impacts to Wilderness and Wilderness resources, and can also enable illegal motorized intrusions into Wilderness. (Preservation/Conservation, Phoenix, AZ - #175.290.62200.530)</p>	<p>#175.290.62200.530:</p> <p>Thank you for your input. An evaluation of impacts on Wilderness, Inventoried Roadless Areas, and other Special Areas was completed and included in the FEIS.</p>
<p>Land Designations</p>	<p>3-111 The Forest Service should evaluate potential impacts on Research Natural Areas.</p>	<p>BECAUSE MOTORIZED ROUTES ARE INCOMPATIBLE WITH THESE AREAS</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p>	<p>#175.293.62400.201:</p> <p>Thank you for your input. Impacts to Research Natural Areas were evaluated in the Wilderness and Special Areas Specialist Report, which was also incorporated into the FEIS.</p>

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		<p>Research Natural Areas (RNA) are set aside in perpetuity to preserve representative examples of specific botanic, aquatic, and geologic features, primarily for non-manipulative scientific and educational purposes. These areas contribute to the preservation of examples of significant natural ecosystems, provide genetic diversity, and protect habitats of threatened, endangered, or sensitive plant and animal species.</p> <p>ORV route designation in these areas would conflict with and impact the resources protected by RNA management objectives, including: (1) protection against human-caused environmental disruptions, (2) service as reference areas for the study of natural ecological processes, and (3) service as a baseline for comparing results of manipulative research (FSM 4063.02). Furthermore, these areas are to be used “only for research and development, study, observation, monitoring, and those educational activities that do not modify the conditions for which the Research Natural Area was established” (FSM 4063.03).</p> <p>Motorized route designations and use are therefore incompatible with these areas. To reiterate a key point, route designations and use can nonetheless have indirect or cumulative impacts, and can also enable illegal motorized intrusions. (Preservation/Conservation, Grand Canyon, AZ - #175.293.62400.201)</p>	
Land Designations	3-112 The Forest Service should evaluate potential impacts on designated Wild and Scenic Rivers.	<p>TO ENSURE THE TRAVEL MANAGEMENT PLAN COMPLIES WITH THE WILD AND SCENIC RIVERS ACT</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Designated Wild and Scenic Rivers Motorized routes and use in “Wild” river corridors is inappropriate, as these corridors are, by law, deemed “generally inaccessible except by trail, with watersheds or</p>	<p>#175.294-295.62600.200:</p> <p>Thank you for your input. Impacts to designated Wild and Scenic River corridors were evaluated in the Wilderness and Special Areas Specialist Report, which was also incorporated into the FEIS.</p>

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		<p>shorelines essentially primitive and waters unpolluted” and “represent vestiges of primitive America” (16 U.S.C. [section] 1273(b)(1); see also FSM 2354.42g and FSM 2354.41). They are also similarly inappropriate in “Scenic” or “Recreational” river corridors.</p> <p>Whether “Wild,” “Scenic,” or “Recreational” designated rivers shall be “administered in such a manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values” (16 U.S.C. [section] 1281(a)). [Footnote 17: According to the Interagency Guidelines, the WSRA’s [Wild and Scenic Rivers Act] protect and enhance mandate is “interpreted as stating a nondegradation and enhancement policy for all designated rivers, regardless of classification.” 47 Fed. Reg. 39454,39458 (Sept. 7, 1982). Each “component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values.” Id.] In such administration, “primary emphasis shall be given to protecting [the river’s] esthetic, scenic, historic, archeological, and scenic values.” Id. The Forest Service must also “take such action respecting management policies, regulations, contracts, plans, affecting such lands...as may be necessary to protect such rivers in accordance with the purposes of [[the WSRA]].” 16 U.S.C. [section] 1283(a). In so doing, particular attention “shall be given to scheduled timber harvesting, road construction, and similar activities which might be contrary to the purposes of [[the WSRA]].” Id.</p> <p>Assuming designated motorized routes and use are prohibited in these river corridors, route designations and use outside of these corridors can nonetheless have indirect or cumulative impacts, and can also enable illegal motorized intrusions, in particular given that these areas serve as refuges for a host of natural and cultural resources, in particular native wildlife, vegetation, and clean water. (Preservation/Conservation, Denver, CO - #175.294-295.62600.200)</p>	

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Land Designations	3-113 The Forest Service should evaluate potential impacts on eligible Wild and Scenic Rivers.	<p>TO COMPLY WITH FOREST SERVICE GUIDELINES</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural and cultural resources, in particular:</p> <p>Eligible Wild and Scenic Rivers: The Forest Service is duty bound to “protect and enhance” eligible Wild and Scenic Rivers for their outstandingly remarkable values and to preserve their classifications in compliance with applicable statutory requirements, including but not limited to 16 U.S.C. [section] 1281 and Forest Service policy set forth in the Forest Service Handbook, Ch. 8, “Wild and Scenic River Evaluation,” [section] 8.12, “Interim Management of Study Rivers.” There are eight stream segments within the CNF [Coconino National Forest] classified as “eligible” for Wild and Scenic designation (Forest Service 1993). As interpreted by interagency guidelines, the Forest Service’s duty to “protect and enhance” these rivers imposes “nondegradation and enhancement” requirements on the Forest Service’s management of these rivers or activities that impact these rivers. 47 Fed. Reg. 39454, 39459 (Sept. 7, 1982). This suggests that motorized recreation is incompatible in river corridors eligible for Wild & Scenic River designation. Of note, route designations and use outside of these corridors can nonetheless have indirect or cumulative impacts, and can enable illegal motorized intrusions, in particular given that these areas serve as refuges for a host of natural and cultural resources, in particular native wildlife, vegetation, and clean water. (Preservation/Conservation, Grand Canyon, AZ - #175.296.62600.201)</p>	<p>#175.296.62600.201:</p> <p>Thank you for your input. Impacts to designated Wild and Scenic Rivers were evaluated in the Wilderness and Special Areas Specialist Report, which was also incorporated into the FEIS.</p>
Land Designations	3-114 The Forest Service should designate the Diablo Trust Land Area as a Special	<p>TO MEET THE GOALS OF THE TRAVEL MANAGEMENT RULE</p> <p>Diablo Trust appreciates the opportunity to contribute to the Coconino National Forest Travel Management Rule (TMR) Draft</p>	<p>#165.1-3.62000.002:</p> <p>The Travel Management Rule requires the Coconino National Forest to designate a forest-wide system of motorized roads and</p>

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	<p>Recreation Management Area.</p>	<p>Environmental Impact Statement. ... Our Recreation Planning Project Panel (RecP3) ...has delved extensively into the complexities detailed in the Draft Environmental Impact Statement for Travel Management on the Coconino National Forest.</p> <p>In fact, the RecP3 has worked parallel to your TMR process for the last few years in an effort to guide a comprehensive demonstration project for travel management and recreation use on the intermingled land ownership Diablo Trust area.</p> <p>As you know, the Diablo Trust, formed in 1993, is a non-profit collaborative management team land specific to 426,000 acres of intermingled federal, state and private lands. As such, our overriding mission is not so different from yours—we strive for improved watershed and resource health while accommodating thousands of visitors each year who are in the pursuit of enjoyment in our spectacular outdoors.</p> <p>As stated by your agency, the primary purpose and intent of the Travel Management Rule is to protect natural and cultural resources, enhance public enjoyment of the national forests, promote the safety of all users, and minimize conflicts among the various users of National Forest System lands.</p> <p>We do not disagree with the goals; however, Diablo Trust’s philosophy is bedrock in its commitment to consider entire watersheds in a holistic manner in order to find win/win solutions for the many challenges that occur on the Diablo Trust land area. Former USDA Forest Service Chief Bosworth said the four “threats” to the management of our National Forest System lands are 1) unmanaged recreation; 2) loss of open space; 3) fire and fuels; and, 4) invasive species. We believe that solutions for each of these “threats” are interrelated and cannot be adequately addressed independently.</p> <p>Proposed solutions to the “recreation threat” have elicited a wide range of impassioned responses that, if acted upon in isolation from other land management issues, will do little more than to incur expense and create conflict providing, at best, only a temporary fix</p>	<p>trails. The designation of routes on Coconino National Forest lands within the Diablo Trust Land area is not expected to preclude the development of a Special Recreation Management Area in the future and will allow for compliance with the Travel Management Rule.</p>

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		<p>that will need to be addressed repeatedly as user interest changes.</p> <p>The work of our RecP3, carried out over 18 months and completed in the fall of 2009, offers an alternative solution. Focused on creating a culture of “recreation stewardship,” it recommends incentives over regulation, and collaboration over enforcement, and can provide the Forest Service with a laboratory for recreation management strategies. Last but not least, it has the wide-ranging support of user groups, most or all of whom are strongly opposed the recommended actions in the EIS.</p> <p>Diablo Trust Proposal: In the interest of advancing TMR, we hereby request that the Diablo Trust Land area be designated a Special Recreation Management Area. By utilizing the expertise gathered in the RecP3— which has included federal and state agencies, county and local governments, user groups, environmentalists and land managers—Diablo Trust will develop, monitor and revise innovative, science-based, and practical management actions, to achieve the goals stated in the fourth paragraph of this letter on a large, complex landscape scale. This Special Recreation Management Area designation will demonstrate the Forest Service’s willingness to explore innovative and collaborative solutions. For Diablo Trust, it is also an opportunity to continue to fulfill the Forest Service’s confidence in our organization as expressed in your selecting us for the National Rangeland Management Award in 2006.</p> <p>Diablo Trust offers the “perfect storm” where willing landowners and a diverse and multi-talented collaborative organization come together on a tenure-fractured, multiple-use land base. As it has always been a Diablo Trust goal to serve as a land management model to others across the west, we believe that we can, with the partnership of the Forest Service, develop a credible, workable, and long-term recreation management model on the Diablo Trust land area. It is a complex undertaking, to be sure, but one offering substantial benefits to the Forest Service, to the Diablo Trust, and to the public. (Place-based group, Flagstaff, AZ - #165.1-3.62000.002)</p>	

Chapter 4. Transportation System Management and Planning

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General	4-1 The Forest Service should move forward with a travel management plan.	<p>TO ALLOW FOR SUSTAINABLE MAINTENANCE OF THE SYSTEM</p> <p>I have live in Flagstaff for more than 30 years, and have watched the roads in the surrounding National Forest become poorer and poorer due to lack of maintenance and unrestricted off-road vehicle use. This is an opportunity to create a sustainable forest road system while eliminating off-road vehicles from all areas except designated roads and areas. (Individual, Flagstaff, AZ - #27.9.40000.530)</p>	#27.9.40000.530: Yes we agree. This is the purpose of the travel management planning process.
General	4-1 The Forest Service should move forward with a travel management plan.	<p>INCLUDING PROVIDING FOR A PUBLIC PROCESS, CROSS-COUNTRY TRAVEL, AND A SUSTAINABLE TRAIL SYSTEM</p> <p>Many of our [BlueRibbon Coalition] members and supporters live in and/or recreate in Arizona and use motorized vehicles, including off-highway vehicles, to access Forest Service managed lands throughout the region, including the Coconino National Forest. BlueRibbon’s members and supporters have concrete, definite and immediate plans to continue such activities in the future. Our members and supporters are interested in and will be directly affected by the travel management planning process currently underway.</p> <p>Our organization, as well as the larger OHV community, generally supports limiting travel to designated roads, trails, and areas. We support a rational, public process to move from a situation where no or incomplete formal recreation planning occurred and where cross-country travel has been permitted to a managed, sustainable and enjoyable trail system. (Motorized</p>	#172.15.54000.410: The Travel Management Rule requires the Coconino National Forest to designate a forest-wide system of motorized roads and trails. This includes considering a number of resources that depend on and are impacted by a system of designated routes. The proposed action includes several miles of designated motorized trails, roads, and areas for use by recreating public. It also does not designate many routes that were suggested to reduce impacts to Forest resources and provide non-motorized recreational opportunities.

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		Recreation, Pocatello, ID - #172.15.54000.410)	
General	4-2 The Forest Service should develop a robust travel management plan.	<p>TO COMPLY WITH THE TRAVEL MANAGEMENT RULE AND EXECUTIVE ORDER 11644</p> <p>The Proposed Action Fails to Envision a Travel Management Plan to Ensure Effective Motorized Recreation Management & Enforcement:</p> <p>The National Environmental Policy Act [NEPA] prescribes a process, not a result, and the analysis conducted within the NEPA process is just that—an analysis, not a plan. We [Center for Biological Diversity] are concerned that the CNF [Coconino National Forest] may simply publish an MVUM [Motor Vehicle Use Map] and Environmental Impact Statement divorced from a meaningful Travel Management Plan setting forth how the Forest Service will actually implement and manage motorized recreation and routes over time, in particular given that motorized recreation use is a dynamic, ongoing use of the CNF.</p> <p>This understanding of the TMR [Travel Management Rule] process conforms to the Executive Orders’ mandate to minimize resource impacts and minimize conflicts with other National Forests and nearby communities (Executive Order 11644, [sections] 3(a)(1)-(4), as amended), as well as the Forest Service’s responsibilities pursuant to NFMA [National Forest Management Act] and NEPA.</p> <p>By developing and implementing a robust Travel Management Plan, not just an MVUM, line officers, law enforcement officers, forest protection officers, and resource specialists are provided with clearly defined management direction, can focus adaptive management strategies, and are empowered with the authority to protect Forest resources when motorized recreation causes unacceptable negative impacts.</p> <p>This best ensures effective travel management in harmony with the broader landscape, resource management objectives, limited</p>	<p>#175.274-278.40000.162:</p> <p>The Coconino National Forest is fully in compliance with the Travel Management Rule and the National Environmental Policy Act by issuing a DEIS with several alternatives to designate a system of roads and trails for motorized use. A request to establish a Resource Protection Strategy with robust monitoring protocols and adaptive management actions is not precluded by a decision on the Coconino Travel Management Project. Rather, the Travel Management Rule requires that the Motor Vehicle Use Map be re-published each year. This provides an opportunity for adaptive management over time.</p> <p>Monitoring protocols and plans will be developed once a decision is made on the Coconino Travel Management project. This will allow the Forest to tailor monitoring to the approved designated route system.</p> <p>Lastly, in response to your request that the Forest not modify or remove road density direction in the Forest Plan - the designation of a road and trail system removes the need for a specified road density limit in the Forest Plan because the Forest is no longer open unless designated closed. Additionally, road density impacts to watershed and wildlife were closely considered in the DEIS.</p>

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		<p>agency resources, other recreational uses, and enforcement strategies. Given how essential these actions are to effective, meaningful resource management, to the CNF's consideration of reasonable management alternatives (40 C.F.R. [section] 1502.14), and to understanding the environmental impacts of the route designations (40 C.F.R. [section] 1508.7, 1508.8), it would be improper to exclude these activities from the current travel planning process.</p> <p>Fundamentally, the threat posed by motorized recreation on the CNF cannot be solved by the mere publication of an MVUM. Significant degradation to the CNF's natural and cultural resources has already been caused by the proliferation of extensive networks of unauthorized and damaging user-created routes on the CNF. To properly comply with the spirit and intent of Executive Order 11644, as amended, the TMR, and the Forest Service's intertwined responsibilities pursuant to, for example, NFMA, NEPA, ESA [Endangered Species Act], CWA [Clean Water Act], and the NHPA [National Historic Preservation Act], the Forest Service must acknowledge and remedy this past degradation. Simply put, the MVUM is a map—not the actual land—and just because motorized use will be prohibited on these routes does not remedy this existing degradation.</p> <p>We therefore strongly recommend that the CNF develop a meaningful framework for a travel management plan in the DEIS that provides for the following components, a time frame for their implementation, and anticipated budget requests necessary to meet these goals and objectives for all alternatives:</p> <p>1. A Resource Protection Strategy [Footnote 7: Roughly, this is in-line with the Forest Service's support for adaptive management. See, e.g., FSM 1909.12, Ch. 20 (providing guidance for FS "adaptive planning process")] based on:</p> <p>-(a) resource restoration and protection standards and guidelines (e.g., Route Density Standards (RDS), landscape scale analysis)</p>	

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		<p>that establish clear, measurable, legal and science-based management thresholds [Footnote 8: These thresholds, in addition to traditional Forest Plan Standards and Guidelines, would be crafted as “Road” and “Trail” “Management Objectives” (RMOs and TMOs) as per Forest Service guidance. Motor Vehicle Route and Area Designation Guide at page 32 (Forest Service, 2005b). RMOs and TMOs “translate travel management decisions into direction for day-to-day management of an NFS road or NFS trail.” Id.];</p> <p>-(b) robust monitoring protocols implemented at specific, defined intervals [Footnote 9: The TMR provides that the Forest Service must “monitor the effects of motor vehicle use on designated roads and trails and in designated areas...” 36 C.F.R. [section] 212.57.] (especially for indicator and sensitive resources) to determine whether on-the-ground conditions have breached those thresholds;</p> <p>-(c) adaptive management actions (conditional decisions [Footnote 10: Forest Service guidance contemplates “conditional decisions” that “specify an action that will take place when a certain anticipated or potential condition is met.” Motor Vehicle Route and Area Designation Guide at 37 (Forest Service, 2005 b) (November 17, 2005).</p> <p>As the Motor Vehicle Route and Area Designation Guide explains: The advantage of a conditional decision is that when the triggering event occurs, the planned response may be implemented without further analysis or decisionmaking, as long as the administrative unit or ranger district analyzed, in the original decision, the environmental effects of the action that will occur when the condition is met. Use of this tool requires that that the initial action, the triggering event, and the planned response be enumerated and analyzed in the supporting environmental and decision documents, so that the complete decision and its environmental consequences are clear and well</p>	

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		<p>understood. If a specific situation is too complex or there are too many uncertainties, it is better to make the initial decision, wait to see if the situation changes, and make a new decision based on new analysis. (.Id. at 37–38.) required or triggered if those thresholds have been exceeded (and would provide notice of those actions, in particular route or area closures [Footnote 11: While the Forest Service retains the authority to impose closures where motorized recreation “will cause or is causing considerable adverse effects” (Executive Order 11644, [section] 9, as amended) this authority is reactive, not proactive, and further, if decoupled from the TMR planning process, is difficult to leverage in the face of a vociferous motorized recreation community. Line officers and resource specialists deserve and need meaningful Travel Management Plans to provide them with the clear authority and basis to protect the CNF’s resources.]); and,</p> <p>-(d) a baseline NEPA analysis to provide a comparative basis to measure change and identify appropriate resource protection thresholds, monitoring protocols, and adaptive actions. We specifically address each of these components below: -(a) Resource protection is afforded by thoughtful, front-end design of a travel management plan whereby protection flows automatically from prohibiting routes in designated, specially protected areas, and in ecologically, biologically, recreationally, and culturally sensitive land.</p> <p>Additionally, we would expressly retain existing Forest Plan standards and guidelines afforded to Management Indicator Species (“MIS”) as per the Forest Service’s 1982 NFMA planning rules. We strongly object to the Proposed Action’s unsubstantiated “need ... [to] remove the road density direction” in the Forest Plan (page 7). Density standards provide a clear, scientifically credible metric regarding habitat quality that is easily understood and prevents differing perceptions of what is or</p>	

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		<p>is not acceptable regardless of changing CNF staff. At present, the CNF has not provided a basis for the removal of density standards; eliminating the CNF’s road density standards is a very significant and unwise management change that may lead to unintended route proliferation or the designation of an otherwise unacceptable high-density route network. (Preservation/Conservation, Phoenix, AZ - #175.274-278.40000.162)</p>	
General	<p>4-3 The Forest Service should consider conducting the travel management process concurrently with the forest planning process.</p>	<p>TO ENSURE THAT THE FOREST PLAN REVISION PROCESS IS NOT COMPROMISED If the Forest Service is unwilling to broaden the TMR [Travel Management Rule] process to consider these recommendations, or to conduct the TMR process concurrently with the Forest Plan revision process, the Forest Service must provide assurances to the public that the TMR process will not prejudice or compromise conservation-oriented management recommendations. Where the TMR process precedes the Forest Plan revision process, this suggests that the TMR process should focus on reducing route densities by designating a limited, baseline travel system using a minimum of existing, authorized routes and refrain from designating new routes, in particular unauthorized, user-created routes. This should provide at least some assurance that the Forest Service has not prejudiced or compromised the Forest Plan revision process. (Preservation/Conservation, Pinetop, AZ - #175.313.40200.160)</p>	<p>#175.313.40200.160: The purpose of the Travel Management Rule is to reduce impacts to Forest resources from motorized use by establishing a designated system for sustainable motorized recreation over time. This will in no way preclude broad management direction and management guidelines, which are the result of Forest Plan Revision.</p>
General	<p>4-4 The Forest Service should ensure that all areas not designated as Wilderness or other special areas be managed as multiple use.</p>	<p>TO COMPLY WITH THE ROADLESS RULE AND AVOID FURTHER CONTRIBUTIONS TO THE REDUCTION OF MOTORIZED ACCESS Over 50% of the public land is managed as wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access</p>	<p>#109.41.52000.160: The Coconino Travel Management planning process reviewed each route for designation primarily based on potential impacts to Forest resources and potential recreational opportunity. The DEIS includes a range of alternatives that is in full compliance with</p>

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		<p>and motorized recreation. The Final Roadless Rule, published on January 5, 2001 http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf), specifically stated, “The proposed rule did not close any roads or off-highway vehicle (OHV) trails”. The Agency must honor this commitment.</p> <p>This commitment was recently upheld as part of appeal Number 07-05-10-0005, dated January 10, 2008, for the Smith River NRA [National Recreation Area] travel management plan in the Six Rivers National Forest, filed by the BlueRibbon Coalition (http://www.sharetrails.org/releases/media/?story=556 and www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf). Therefore, all (100%) of the remaining public lands, including roadless areas, must be managed for multiple uses to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use. Jim Angell, the Denver-based Earth Justice attorney, says that’s why it’s too simplistic to liken roadless protections to those of full-blown wilderness designations—which take an act of Congress. “And it didn’t bar things like oil and gas, which often takes place without the building of roads by angling the drilling from elsewhere; it didn’t apply to ORV use which can continue without any stop,” Angell says.</p> <p>http://www.publicbroadcasting.net/kunc/news.newsmain/article/1/0/1622248/Regional/Oral.Arguments.Heard.in.Roadless.Appeal. (Motorized Recreation, Helena, MT - #109.41.52000.160)</p>	<p>the 2001 Roadless Rule.</p>
General	4-5 The Forest Service should not use the availability of funding as designation criteria.	<p>BECAUSE FUNDING MAY BECOME AVAILABLE IN THE FUTURE</p> <p>It has been suggested by other stakeholder groups that the CNF’s [Coconino National Forest] “ability” to maintain routes and funding for implementation, maintenance and enforcement of motorized routes be used as a planning issue or a “design</p>	<p>#172.6.40000.830: The Coconino Travel Management planning process reviewed each route for designation primarily based on potential impacts to Forest resources and potential recreational opportunity. Funding was not a primary consideration in the designation of routes in</p>

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		<p>feature.”</p> <p>BRC [BlueRibbon Coalition] objects to using funding (or the ability) for implementation, monitoring and maintenance and enforcement as a “designation criteria.”</p> <p>This raises the concern that the planning team may attempt to rely on lack of funding as an excuse for lack of effort and creativity in the travel planning and travel management processes. It has been our experience that “if you plan for it, the dollars will come.” The current travel planning activities motivated largely by the 2005 Travel Management Rule create an unprecedented opportunity to apply available resources to long neglected travel management duties. Most, if not all, U.S.F.S. programs are under-funded. Indeed, the shortfall in the roads maintenance budget, and the trail maintenance backlog for trails in designated Wilderness, is well documented.</p> <p>Ironically, it is the motorized user community that voluntarily “taxed itself” to provide the Agency with the tools to address legitimate concerns about route maintenance. There are other grant and volunteer opportunities available. The recreating public will not accept budgetary constraints as an excuse for route closures.</p> <p>Our members and supporters understand that trail maintenance can be a legitimate concern. However, the trail-using public will not accept the Agency applying a strict maintenance budget criteria applied only to recreational trails and not to other programs. (Motorized Recreation, Pocatello, ID - #172.6.40000.830)</p>	<p>the alternatives studied in detail in the DEIS.</p>
General	4-6 The Forest Service should coordinate with the National Park Service.	<p>TO ALLOW FOR HIKING ACCESS FROM THE CNF ROAD SYSTEM TO REMOTE AREAS OF ADJACENT NATIONAL MONUMENTS</p> <p>Either Alternative 3 or Alternative 4 in the TMP DEIS would greatly improve the ability of the USDA Forest Service to</p>	<p>#174.4.30000.630: We agree.</p>

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		<p>manage the CNF [Coconino National Forest], by providing clear management direction that offroad travel is prohibited except where designated. Both Alternatives 3 and 4 would enhance current levels of protection for site-specific resources, such as archeological sites and rare plant populations, along with improving landscape-level processes, such as natural watershed function. The alternatives would improve conditions on the CNF lands adjacent to the National Monuments [Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments] compared to the current travel management strategy. We would like to coordinate our management activities to access remote areas of the Monuments by hiking from the official CNF road system. (U.S. National Park Service, Flagstaff, AZ - #174.4.30000.630)</p>	
Road and Trail System	4-7 The Forest Service should avoid closing more roads.	<p>BECAUSE THE LAND BELONGS TO THE PUBLIC Stop closing roads—is this the only thing you can do?—It is my land and I want to use it in a reasonable manner ... but all you can do is close roads—this is my land ... You are a bureaucracy that is not elected by the public ... I only wish I could vote to get rid of some of you guys ... I will never camp in a campground ... I cannot put into words how much I hate your policy. (Individual - #12.1.41000.720)</p>	<p>#12.1.41000.720: The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads and trails. The Coconino National Forest worked closely with the public and users like you to collect information on routes used for camping and other activities. This information was used to establish a designated system of roads and trails to maintain access to the Forest while protecting those values and resources that are important to our visitors such as you.</p>
		<p>TO AVOID OVER-CONCENTRATING USERS INTO SMALL AREAS I have reviewed the DEIS for Coconino National Forest and believe Alternative #1 should be followed, leaving the Coconino road system as it is. The Alternatives that provide for more road</p>	<p>#11.1.41000.002: Alternative 1 (no change) is included in the DEIS, but is not consistent with the Travel Management Rule and thus does not meet the purpose and need of the project. The</p>

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		<p>closures should not be implemented. It has been my experience that as roads and trails are closed, it concentrates people into fewer areas leading to even more traffic and damage to the roads and areas that are left. It is also more dangerous because there is a greater concentration of traffic on the remaining roads and trails. (Individual - #11.1.41000.002)</p>	<p>Coconino National Forest does think there may be a concentration of users on designated roads and trails as was analyzed in the DEIS, but this 'concentration effect' is not expected to result in a substantially degraded recreational experience.</p>
<p>Road and Trail System</p>	<p>4-8 The Forest Service should leave the road system as it currently exists.</p>	<p>BECAUSE THE TOTAL AREA OF ROADS IS A SMALL PERCENTAGE OF THE LANDS WITHIN THE COCONINO NATIONAL FOREST</p> <p>Under the existing conditions with a typical width of no more than 12 feet, the 5598 miles of roads in the Coconino National Forest would cover about 8142 acres (5598 x 5280 x 12 /43560). At a typical width of no more than 48 inches, the 0 miles of ATV trails cover about 0 acres. At a typical width of no more than 24 inches, the 0 miles of motorized single-track trails cover 0 acres. The total Coconino National Forest is covers 1,848,000 acres. The percentage of the total forest used by roads, ATV trails, and single-track motorcycle trails under existing conditions is respectively, 0.4406%, 0.00%, and 0.00%.</p> <p>The total area of roads and trails under Existing Conditions [is] far less than 1% of the project area. The total area used by motorized routes under Existing Conditions is 8142 acres or 0.4406% of the 1,848,000 acre area. Therefore, the area used Under Existing Conditions is relatively insignificant and is an entirely reasonable level of use on multiple-use lands. The reduction under the proposed action produces a significant impact on the public's ability to access and recreate and is not a reasonable level of use for lands designated for multiple-use by congress. Furthermore, a Pro-Recreation Alternative that increases motorized access and motorized recreational opportunities in the Coconino National Forest is an entirely reasonable alternative for these multiple-use lands. (Motorized</p>	<p>#109.49.41000.530:</p> <p>The impact of roads and trails on wildlife, water resources, cultural resources, recreational experience, and scenery goes far beyond the physical footprint they make-up on the landscape. The DEIS clearly shows that even the most restrictive alternative (Alt. 3) provides motorized access to within 1.2 mile of almost 80% of the Forest outside of Wilderness areas. Your suggestion of having an alternative with more motorized access is not currently possible considering the entire Forest is open to motorized travel unless specifically closed and an alternative of this nature would not be consistent with the Travel Management Rule.</p>

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Road and Trail System	4-9 The Forest Service should include the creation of new routes in the plan.	<p>Recreation, Helena, MT - #109.49.41000.530)</p> <p>TO ENSURE THAT SUFFICIENT MOTORIZED RECREATION IS PROVIDED FOR</p> <p>The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement.</p> <p>Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists. We are concerned that the process will not provide motorized recreationists with an equal opportunity (50/50 sharing of motorized to non-motorized trails) in the outcome and we are only destined to lose. We would appreciate an independent evaluation of this situation as soon as possible so that the proper scoping direction can be corrected early in the process.</p> <p>(Motorized Recreation, Helena, MT - #109.39.52000.530)</p>	<p>#109.39.52000.530:</p> <p>The purpose of the Travel Management Rule is to establish a designated system of roads and trails not to create equal recreation opportunities for motorized vs. non-motorized users. The Coconino National Forest included several unauthorized routes in both action alternatives. Furthermore, a decision on the Travel Management project in no way precludes either future designation of additional routes or non-designation of routes.</p>
Road and Trail System	4-10 The Forest Service should add more routes to the system.	<p>TO REDUCE THE IMPETUS FOR USER-CREATED ROADS</p> <p>Each time we go [riding in our jeep or ATVs in the CNF], we find additional unlawful "roads" created by uncaring people, but people that want to travel in an area that is closed. Opening additional roads would help prevent that. (Individual, Kingman, AZ - #73.3.40200.530)</p>	<p>#73.3.40200.530:</p> <p>Currently, the Forest is open to cross-country motorized travel leading to the proliferation of motorized routes. Under the Travel Management Rule, cross-country motorized travel is prohibited unless in designated areas. This will make it illegal to establish new motorized routes outside of</p>

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Road and Trail System	4-11 The Forest Service should consider the ecological importance of roadless areas in the decisions related to route closures.	<p>TO FACILITATE ECOLOGICAL RECOVERY OF IMPACTED AREAS</p> <p>Restoration, according to the Forest Service, means “managing forest lands first and foremost to protect our water resources, while making our forests more resilient to climate change.” Forest Service 2009b. The extensive literature on the importance of intact natural habitats makes a compelling case for the role of roadless areas as refugia for native biodiversity and as areas crucial to forest integrity and function. Strittholt and DellaSala 2001:1751. Equally impressive is the mounting body of evidence showing the ecological cost of roads. Strittholt and DellaSala 2001:1751; Havlick 2002:37–58.</p> <p>Vehicular traffic directly destroys biological resources by crushing vegetation and microbiotic crusts and retards revegetation through soil compaction. Studies demonstrate that higher occurrences of adverse ecological impacts increase with higher road densities. Concern over this ubiquitous encroachment produced a large body of scientific literature describing the negative biological effects of roads, including direct wildlife mortality, changed animal behavior, increased sedimentation of streams, degraded habitat, habitat fragmentation, and the spread of exotic species. Forman et al. 2003; Cooperrider and Wilcove 1995:53–54, 58.</p> <p>A review of the literature underscores the importance to conservation of not building new roads in roadless or sparsely roaded areas and of removal or restoration of existing roads to benefit native biota. Trombulak and Frissell 2000:18, 26. Sections of the biologically rich areas may also contain a network of rough jeep/ORV trails that impact natural resources, such as soils and vegetation, and probably adversely affect wildlife species, such as big horn sheep and mountain lion. This problem will certainly accelerate should such areas remain open</p>	<p>designated areas.</p> <p>#175.150-151.40000.200:</p> <p>We agree. The purpose of the Travel Management Rule is to establish a designated system of roads and trails to minimize impacts to Forest resources while providing for motorized recreation opportunities.</p>

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		to mechanized access. Closure and active restoration of impacted areas would greatly facilitate ecological recovery. See Strittholt and Dellasala 2001. (Preservation/Conservation, Tucson, AZ - #175.150-151.40000.200)	
Road and Trail System	4-12 The Forest Service should include all of the road recommendations provided by the Arizona Game and Fish Department.	<p>THE FOREST SERVICE SHOULD INCLUDE ALL OF THE ROAD RECOMMENDATIONS PROVIDED BY THE ARIZONA GAME AND FISH DEPARTMENT</p> <p>The Department [Arizona Game and Fish Department] previously provided several comments regarding the proposed open and closed roads during the Proposed Action phase of CNF [Coconino National Forest] Travel Management Planning (see the Department letters dated March 03, 2007 and August 29, 2007 and October 10, 2007). The Department made specific recommendations, by road number, as to which roads that were planned to be open should be closed and which roads that were planned to be closed should remain open. The CNF has evaluated and cataloged these comments in the DEIS. In the FS [Forest Service] Response to our comments in the DEIS, CNF indicated it will be considering some of our road recommendations prior to release of the Final EIS. The Department asks that all of our road recommendations be included in the Final EIS. (Arizona Game and Fish Department, Phoenix, AZ - #160.14.52100.001)</p>	<p>#160.14.52100.001:</p> <p>The Coconino National Forest has considered the site-specific route comments provided by the Arizona Department Game and Fish. We understand that you would like us to include all of your recommendations, but in some cases this may not be feasible or desirable due to the requirement to meet a multitude of management goals from resource protection to access for recreational use and private lands. We look forward to continuing to work with you on Travel Management planning and implementation and have greatly appreciate the large majority of the Department's input and detailed recommendations.</p>
Road and Trail System	4-13 The Forest Service should ensure that all road closures related to previous NEPA decisions be accounted for in the Final EIS.	<p>THE FOREST SERVICE SHOULD ENSURE THAT ALL ROAD CLOSURES RELATED TO PREVIOUS NEPA DECISIONS BE ACCOUNTED FOR IN THE FINAL EIS</p> <p>The Department [Arizona Game and Fish Department] requests the CNF [Coconino National Forest] ensure that road closures related to prior NEPA decisions and other projects that have been implemented be accounted for in the Final EIS. Additionally, any road closures related to projects that have decision notices, but have not been implemented, should equally be accounted for. (Arizona Game and Fish Department, Phoenix, AZ -</p>	<p>#160.15.52100.130:</p> <p>The Travel Management process allows the Coconino National Forest to designate a forest-wide motorized route system not dependent on previous road decisions. Previous NEPA decisions made to establish or close routes were considered during the process, but did not establish an un-changeable precedent for the designation or non-designation of a route in the Coconino</p>

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		#160.15.52100.130)	National Forest Travel Management process.
Road and Trail System	4-14 The Forest Service should clarify whether the “minimum road system” and the “recommended road system” are the same.	<p>BECAUSE THE AGENCY IS REQUIRED TO IDENTIFY THE MINIMUM ROAD SYSTEM</p> <p>The “recommended open system of roads” is identified as approximately 3,600 miles on page 19 of the TAP [Travel Analysis Process], and as 4,197 miles on page 18 of the TAP, in Table 9. The CNF [Coconino National Forest] TAP identifies a minimum road system of approximately 3,600 miles of road, leaving 78% of the CNF within 1 mile of an open road. However, the map of the recommended road system shows 96% of the CNF within 1 mile of an open road.</p> <p>We [Center for Biological diversity et al.] ask for clarification on whether the “recommended road system” is the same as the “minimum road system.” We note again that the purpose of the TAP is to identify the minimum road system needed for safe and efficient travel and for administration, utilization and protection of National Forest Service lands, not to propose or recommend a route system for the Proposed Action or Alternatives to be analyzed in the DEIS. 36. U.S.C. 212.5(b). Rather, the CNF should have utilized the minimum road system identified in the TAP to develop the Proposed Action and to guide the development of any action alternatives. There is no evidence this was done. (Preservation/Conservation, Phoenix, AZ - #175.159.40210.410)</p>	#175.159.40210.410: The minimum road system is clearly different than the recommended road system. The minimum road system is clearly identified in the TAP and was the basis of the proposed action. The minimum road system was not used to guide the development of alternatives, this was based on issues identified from public comment.
Road and Trail System: Route Densities	4-15 The Forest Service should retain the route density standards.	<p>TO AVOID UNINTENDED ROUTE PROLIFERATION</p> <p>We [Center for Biological Diversity et al.] expressly recommend retaining existing Forest Plan standards and guidelines afforded to Management Indicator Species (“MIS”) as per the Forest Service’s 1982 NFMA planning rules. We strongly object to the Proposed Action’s unsubstantiated “need... [to] remove the road density direction” in the Forest Plan (page 7). Density standards</p>	#175.29.40210.133: The Coconino Travel Management project in no way changes Forest Plan standards and guidelines related to MIS species. Road density standards in the Forest Plan are removed through amendment of the Forest Plan as they are no longer necessary since

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		<p>provide a clear, scientifically credible metric regarding habitat quality that is easily understood and prevents differing perceptions of what is or is not acceptable regardless of changing CNF [Coconino National Forest] staff. At present, the CNF has not provided a basis for the removal of density standards; eliminating the CNF's road density standards is a very significant and unwise management change that may lead to unintended route proliferation or the designation of otherwise an unacceptable high-density route network. Rather than eliminate or alter the existing road density standards, we recommend that the CNF work diligently towards meeting these road density standards or meet the recommended 1 mile/square mile standard we recommended. (Preservation/Conservation, Tucson, AZ - #175.29.40210.133)</p>	<p>the Travel Management DEIS changes the system from open unless designated closed, to closed unless designated as open. Additionally, road density numbers were calculated and used for impact analysis for watershed and wildlife in the DEIS to disclose the impacts of each alternative to the public and to inform the decision making process.</p>
Road and Trail System: Route Densities	4-16 The Forest Service should broaden the reach of the existing route density standards.	<p>TO ENSURE THEY ARE CLEARLY DEFINED, SCIENCE-BASED, AND AT ECOLOGICAL SCALES Instead of eliminating the CNF's [Coconino National Forest] density standards, we [Center for Biological Diversity et al.] strongly recommend that the Forest Service broaden the reach of its existing road density standards. Route Density Standards should be at clearly defined, science-based, ecological scales (e.g., watershed, or habitat levels, rather than just vegetative types). This is consistent with the Forest Service's duty to address impacts, in particular cumulative impacts, in the proper "context" to determine those impacts' significance (40 C.F.R. [section] 1508.27). In so doing, the Forest Service has an informed means of determining whether or not agency actions comport with substantive legal obligations (e.g., to "provide for diversity of plant and animal communities....") (16 U.S.C. [section] 1604(g)(3)(B)). (Preservation/Conservation, Santa Fe, NM - #175.30.40210.200)</p>	<p>#175.30.40210.200: The purpose of the Travel Management Rule is to designate a system of roads and trails for motorized use to minimize impacts to Forest resources while maintaining motorized recreational opportunities. The establishment of new road density standards at multiple scales is not necessary to establish a designated system of roads and trails for motorized use. Rather, the Coconino National Forest considered the density of motorized routes at several scales including watershed and vegetation types to help inform the design of the route system and improve the decision-making process.</p>

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Road and Trail System: Route Densities	4-17 The Forest Service should revise the action alternatives to reduce the route densities.	<p>TO COMPLY WITH AGENCY GOALS TO PROTECT AND RESTORE RESILIENT ECOSYSTEMS</p> <p>Implementation of Alternative 3 would result in 3,281 miles of designated motorized routes and trails; Alternative 4 would result in 3,507. Calculating a Forest-wide road density based on 2,523 square miles (excluding designated Wilderness and Inventoried Roadless areas) would result, once closures and obliterations are complete for Alternative 3 or Alternative 4, in a motorized impact of 1.30 and 1.39 miles per square miles, respectively. These densities are nearly identical and both are unacceptable. While we [Center for Biological Diversity et al.] applaud the proposed forest-wide road density reduction, we also urge further reductions to achieve the Secretary Vilsack’s goal of protecting and restoring resilient ecosystems, particularly watersheds. As discussed in our February 28th Travel Management Rule Preliminary Route Recommendations” letter and in our scoping comments of 2007, an average forest-wide route density of no more than 1.0mi/sq mi is a standard, supported by the preponderance of credible scientific literature as well as a large and influential number of scientists. Concerned Scientists 2004. We urge again that the Coconino adopt this standard, and stress that determination of this standard should be based on general forest lands and not include Wilderness or Inventoried Roadless Areas. (Preservation/Conservation, Santa Fe, NM - #175.69.40210.201)</p>	<p>#175.69.40210.201:</p> <p>The purpose of the Travel Management Rule is to designate a system of roads and trails for motorized use to minimize impacts to Forest resources while maintaining motorized recreational opportunities. The establishment of new road density standards at multiple scales is not necessary to establish a designated system of roads and trails for motorized use. Rather, the Coconino National Forest considered the density of motorized routes at several scales including watershed and vegetation types to help inform the design of the route system and improve the decision-making process.</p>
Road and Trail System: Route Densities	4-18 The Forest Service should exclude Wilderness and Inventoried Roadless Areas from route density calculations.	<p>TO AVOID DILUTING THE CALCULATION INAPPROPRIATELY</p> <p>Designated wilderness and inventoried roadless areas (IRAs) that restrict motorized use should be excluded from RDS [Route Density Standards] calculations. Including these designations in RDS calculations too easily leads to the illusion of low route densities when, in reality, the density of route networks outside</p>	<p>#175.32.40210.621:</p> <p>Route density calculations primarily occurred at the scale of watershed and vegetation types to help better communicate potential impacts from each alternative on resources such as wildlife, water quality, soils, and fisheries.</p>

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		<p>of these protective designations is quite high and likely causing unacceptable degradation. Excluding these protective designations from RDS also de-politicizes protective designations relative to motorized recreation. In other words, protective designations should not be used as a pretext for condoning high-density route networks outside of protective areas. Instead, route densities throughout the entire forest must ensure resource protection. (Preservation/Conservation, Phoenix, AZ - #175.32.40210.621)</p>	
<p>Road and Trail System: Route Densities</p>	<p>4-19 The Forest Service should include all routes when calculating route densities regardless of their bureaucratic designation.</p>	<p>THE FOREST SERVICE SHOULD INCLUDE ALL ROUTES WHEN CALCULATING ROUTE DENSITIES REGARDLESS OF THEIR BUREAUCRATIC DESIGNATION</p> <p>When calculating route densities to determine environmental impacts, all routes should be included, regardless of their bureaucratic designation. (Individual, Cottonwood, AZ - #1.6.40210.200)</p>	<p>#1.6.40210.200: Route density calculations were based on analysis of effects of each alternative. So all of the routes proposed to be designated in each alternative were the number of routes included in route density calculations. To include all of the routes in the Forest in route density calculations, would not provide any information on how alternatives differed from each other. The route density calculations were based on language from the Forest Plan, which specifically says not to include motorized trails in these calculations.</p>
<p>Road and Trail System: Route Densities</p>	<p>The Forest Service should provide an alternative with fewer miles of roads.</p>	<p>BECAUSE THEY DON'T HAVE SUFFICIENT FUNDS TO MAINTAIN THE PROPOSED ROADS</p> <p>The Forest Service can only afford to maintain 602 miles of road, yet all alternatives would leave nearly six times that many miles of road on the ground. While I don't expect the forest to designate just 600 miles of road as open to the public, I do expect that a reasonable range of alternatives would include a more fiscally responsible plan: something between 600 and 3,200 miles. (Individual, Cottonwood, AZ - #1.2.41200.835)</p>	<p>#1.2.41200.835: Both of the action alternatives reduce the amount of routes to be available to the public by over a third of the current road system. This would substantially increase the ability of the Forest to maintain its designated system routes. There is no requirement to limiting designated routes to those that can be maintained each and every</p>

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			year. Each route on the Forest does not include maintenance each year.
Road and Trail System: Route Densities	4-21 The Forest Service should reduce road and trail densities to no more than two miles per section.	<p>TO BE CONSISTENT WITH OTHER ARIZONA NATIONAL FORESTS AND TO PROTECT WILDLIFE HABITAT</p> <p>The current density of roads and trails open to motorized vehicle use within the Coconino NF [National Forest] is excessive and is impacting the quality of important wildlife habitats. The AWF [Arizona Wildlife Federation] strongly supports reducing open road and trail density used by motorized vehicles to no more than two miles of open roads and trails per section, which is in line with the with the standards and guidelines developed in many other NFs in Arizona. These road density guidelines were developed in response to research that has identified the adverse impacts of high open road densities and their use by motorized vehicle and human activity to wildlife and fish populations and habitats, and other natural resources. (Preservation/Conservation - #204.2.30000.410)</p>	<p>#204.2.30000.410:</p> <p>We agree. Both of the action alternatives result in road densities less than 2 miles per square mile. See comment: 175.69.40210.201.</p>
Road and Trail System: Route Densities	4-22 The Forest Service should acknowledge the different impacts of roads, single-track, and ATV trails.	<p>BECAUSE THESE DIFFERENCES SHOULD BE ACCOUNTED FOR IN THE IMPACT ANALYSIS</p> <p>Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails has far less impact than roads in all resource areas and motorcycle single-track trails have far less impact than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decisionmaking. (Motorized Recreation, Helena, MT - #109.20.40210.530)</p>	<p>#109.20.40210.530:</p> <p>The DEIS did not include motorized trails in road density calculations.</p>
Road and Trail System: Inventories	4-23 The Forest Service should avoid closing any roads or	<p>THE FOREST SERVICE SHOULD AVOID CLOSING ANY ROADS OR TRAILS UNTIL THEY ARE PROPERLY STUDIED</p>	<p>#33.7.40000.125:</p> <p>The Coconino National Forest is following all requirements under the National</p>

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	trails until they are properly studied.	This is the American citizens' land and we deserve to have an accurate accounting of our roads/trails/dry washes, and no existing road/trail/dry wash should be closed to use by the American public until it is properly studied. It appears that the USFS is just trying to fast-track travel management planning and that is doing the American public a disservice. (Individual, Las Vegas, NV - #33.7.40000.125)	Environmental Policy Act to meet the goals of designating a system of motorized roads and trails as required under the Travel Management Rule. This includes closely studying the routes on the Forest, their impacts on Forest resources and recreation, and considering information from public comments during the NEPA process.
Road and Trail System: Inventories	4-24 The Forest Service should reconsider the decision to only consider currently classified routes in the Travel Management Plan.	<p>THE FOREST SERVICE SHOULD RECONSIDER THE DECISION TO ONLY CONSIDER CURRENTLY CLASSIFIED ROUTES IN THE TRAVEL MANAGEMENT PLAN</p> <p>On page 4 of the DEIS, you admit that there are many other motorized routes being used by Forest visitors. "There are 124 miles of motorized trail on the CNF, only 25 of which are part of the system. The remaining 99 miles are unauthorized, and there are additional unauthorized trails of unknown total mileage that have not been inventoried." These trails are currently legal for use today and many of them have been identified by a key stakeholder group as highly valued by Forest visitors. Many of these trails would make logical additions to the classified trail system. But because they do not meet your bureaucratically constructed definition of the "existing transportation system," these trails cannot even be considered in your planning process. A true and complete study, as if you were studying a plant life, is warranted and by all means demanded by us who enjoy outdoor recreation and unfettered access to our National Forests! (Individual, Mesa, AZ - #104.5.40210.530)</p> <p>I respectfully submit this notification that the Coconino National Forest Service is not planning for all forest users and is failing to acknowledge over 200 miles of motorized trail system (that exists today) and request that additional mileage be placed into the inventory before the Travel Management Rule [TMR]</p>	<p>#104.5.40210.530: The Coconino National Forest designated motorized trails based on preliminary review of Forest resources. Those non-system motorized trails considered for designation under the Travel Management process were reviewed and many portions of these trails resulted in unacceptable impacts to wildlife, cultural resources, or water quality resources.</p> <p>#120.4.40210.530: The Coconino National Forest staff reviewed all of the user-submitted trails. A majority of the non-single track trails were shown to occur coincident with Forest</p>

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		<p>closure, not a suggestion to merely evaluate motorized needs after the TMR implementation. (Individual - #120.4.40210.530)</p>	<p>Service roads and were designated for ‘all vehicles’, which includes ATVs and motorbikes. In addition a route-by-route list of the user submitted motorized trails, their designated status, and potential impacts are included in the Record of Decision.</p>
<p>Road and Trail System: Inventories</p>	<p>4-24 The Forest Service should reconsider the decision to only consider currently classified routes in the Travel Management Plan.</p>	<p>BECAUSE THIS IS NOT CONSISTENT WITH THE TRAVEL MANAGEMENT RULE CRITERIA</p> <p>The key flaw in the planning effort was that the agency chose to “focus on changes to the existing transportation system” (DEIS page 5). This means you will only consider making changes to routes that are “classified,” or can otherwise be defined as part of the “existing transportation system.” These are not criteria that are being used to evaluate road and trail inventories for Travel Management Rule evaluation. (Motorized Recreation, Prescott, AZ - #90.3.40210.410)</p> <p>Specific references from the new National OHV Policy that must be adequately addressed include:</p> <p>Existing—The unit or district restricts motor vehicles to “existing” routes, including user-created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use.</p> <p>For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management.</p> <p>To create a comprehensive system of travel management, the</p>	<p>#90.3.40210.410</p> <p>The strategy to “focus on changes to the existing transportation system” is based on Council for Environmental Quality guidance for NEPA analysis. Also, this analysis strategy did not preclude the Forest from designating several miles of non-designated roads in each alternative.</p> <p>#109.54-55.52000.160:</p> <p>The Coconino National Forest implemented the Travel Management Rule by considering all known existing routes on the Forest. This means the Coconino National Forest looked at all known system and non-system, routes and considered their resource impacts and potential for recreational use, in addition to other factors. This information was then used to designate a system of roads and trails for motorized use with minimal impacts to other Forest resources.</p>

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		<p>final rule consolidates regulations governing motor vehicle use in one part, 212, entitled "Travel Management." Motor vehicles remain a legitimate recreational use of NFS lands.</p> <p>This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that are not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands, sustain natural resource values through more effective management of motor vehicle use, enhance opportunities for motorized recreation experiences on National Forest System lands, address needs for access to National Forest System lands, and preserve areas of opportunity on each National Forest for non-motorized travel and experiences.</p> <p>Clearly the rule is intended to identify existing routes being used for motorized access and recreation and preserve existing non-motorized routes by elimination of cross-country travel. Why is a process that was intended to eliminate cross-country travel and designate existing motorized routes been allowed to turn into a massive closure process?</p> <p>Additionally, the rule preserves existing non-motorized routes by not allowing them to be converted to motorized routes, and it does not state anywhere that non-motorized travel and experiences were to be significantly enhanced by a wholesale conversion of motorized routes to non-motorized routes. We request that the intention of the final OHV Route Designation rule be followed by the Coconino National Forest Travel Plan decision and that the rule not be used inappropriately as an action to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes. (Motorized</p>	

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		Recreation, Helena, MT - #109.54-55.52000.160)	
Road and Trail System: Inventories	4-24 The Forest Service should reconsider the decision to only consider currently classified routes in the Travel Management Plan.	<p>BECAUSE THE BUREAUCRATIC CLASSIFICATION IS IRRELEVANT TO ITS IMPACT ON THE FOREST</p> <p>Current route density calculations should include all motorized routes—whether classified as a “road” or “trail,” and whether “authorized” or “unauthorized”. This makes sense given that the bureaucratic classification of a route is irrelevant. What is relevant is the impact of that route—and that route’s use—to the forest. We [Center for Biological Diversity et al.] reject calculations focused solely on “roads” that exclude unauthorized routes, as it defies common sense, ignores ecological realities, and constitutes a bureaucratic rationalization of the Forest Service’s failure to curb the proliferation of user-created routes. [Footnote 1: The Mountainair Ranger District of the Cibola National Forest in New Mexico has adopted an appropriate route density standard that can be found at page 27 of the DEA, available here: http://www.fs.fed.us/r3/cibola/travelmanagement/tm_mt_air/index.shtml “For the purpose of the wildlife species and habitat analysis, route density is defined as all motorized routes, including roads (system, unauthorized, and decommissioned) and trails located outside of Manzano Mountain Wilderness.” We have attached the relevant section of the DEA as Appendix T. (Preservation/Conservation, Grand Canyon, AZ - #175.31.40200.200)</p>	#175.31.40200.200: Route density calculations were based on roads available to the public. The reason for this is because the road density standards in the Forest Plan are based on road density and not trail density. Additionally, the amount of open roads was the main element that differed between alternatives and thus made for an effective measure of effects.
Road and Trail System: Inventories	4-24 The Forest Service should reconsider the decision to only	<p>TO ENSURE THAT THE ANALYSIS IS SUFFICIENT TO COMPLY WITH NEPA</p> <p>It is apparent that the CNF [Coconino National Forest] is deficient in that it lacks an adequate inventory of existing</p>	#112.6.40210.131: The purpose of the Travel Management Rule is to designate a system of roads and trails for motorized use. The Forest

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	consider currently classified routes in the Travel Management Plan.	established routes and because of that chooses to ignore their existence and thereby fails to provide appropriate analysis. The NEPA analysis must also fully analyze the closure of all these non-system routes to provide for an informed decision. To do otherwise will be an arbitrary decision. (Individual, Sedona, AZ - #112.6.40210.131)	recognizes that there may be some roads or trails that are not known; however, the Coconino National Forest did extensive public outreach to identify those routes that are most important for designation or non-designation. Only those routes that are known to the Forest could be designated for motorized use. Those routes that may not be known to the Coconino National Forest were not considered for motorized use, however, these were considered in the analysis as the DEIS recognizes that both action alternatives will stop motorized use on these unknown routes.
Road and Trail System: Inventories	4-25 The Forest Service should revisit the proposed route networks.	<p>TO BETTER DISTINGUISH BETWEEN DIFFERENT TYPES OF ROUTES AND ASSOCIATED FORMS OF RECREATION</p> <p>We [Motorcycle Industry Council, Specialty Vehicle Institute of America, BlueRibbon Coalition, and Coconino Trail Riders] are concerned by the inadequacy of the analysis and possible route networks presented in the DEIS. Of particular concern is the failure to meaningfully distinguish between different types of routes and associated forms of recreation. The DEIS seems fixated on reducing overall route mileage, particularly road mileage, and limiting cross-country travel which has continued on the CNF [Coconino National Forest] far longer than many units of the National Forest System. We acknowledge that travel planning on the CNF is woefully in need of updating. Current travel management direction, which exists primarily in the 1987 LRMP [Land and Resource Management Plan], is outdated. We do not advocate (or even defend) unrestricted cross-country travel for significant portions of any Forest. However, the DEIS</p>	<p>#202.5.40000.530:</p> <p>The Coconino National Forest understands your concerns, but is required to implement the Travel Management Rule to identify a system of roads and trails for motorized use. We disagree that the process to designate routes used deficient technical assumptions. Rather, the Coconino National Forest looked at specific routes one at a time to identify potential impacts to Forest resources and for motorized recreation opportunity to establish a sustainable system of designated routed for motorized use and recreation.</p>

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		<p>misconstrues the nature of effective travel management, relies on deficient technical assumptions, and falls far short of any acceptable outcome for any interested entity/population. (Motorized Recreation, Boise, ID - #202.5.40000.530)</p>	
<p>Road and Trail System: Inventories</p>	<p>4-26 The Forest Service should not distinguish between “unauthorized roads and trails” and classified routes.</p>	<p>BECAUSE MANY OF THE UNAUTHORIZED ROUTES ARE HISTORICAL AND WERE CREATED LEGALLY</p> <p>The use of “unauthorized trails or roads” is not an appropriate term, as many of these routes were created during periods going back to the 1800s when the forest was managed without designated routes, crosscountry travel was allowed, and access and use of the forest was encouraged. The use of “unauthorized trails or roads” is an inaccurate representation of the management conditions and uses allowed in the past, and we [Capital Trail Vehicle Association] request that this term be dropped from the text. (Motorized Recreation, Helena, MT - #109.10.40200.160)</p> <p>Many references to “unauthorized” roads and trails are a mistake, since the current forest policy documented in the “existing situations” says that the forest is “open” and that means all of the existing routes are also open and authorized. (Individual, Sedona, AZ - #131.6.40200.001)</p> <p>Most of the “user created” routes were legal travelways at the time of their creation and many are highly valued by the recreating public today. Some may be suitable, if not superior, candidates for inclusion in a final, well-planned route network. The Travel Management Rule clearly states such user-created trails may be evaluated for inclusion in the transportation plan using objective criteria. We [BlueRibbon Coalition] hope you will consider modifying your decision.</p> <p>It is critical to understand that the Forest Service has never been proactive in providing the recreational routes needed by the public. This is not an indictment of present or former Agency employees or policies, but simply a reflection of historical reality</p>	<p>#109.10.40200.160: The term used to describe routes on the Forest, which are not part of the Coconino National Forest route system is irrelevant. The Coconino National Forest considered all known routes; whether system routes or non-system routes (unauthorized) for designation in the Travel Management planning process. Though it is true that the Forest is currently open to cross-country motorized use and that it is not unauthorized to travel off-road, the establishment of off-road routes from cross-country travel is not explicitly authorized.</p> <p>#131.6.40200.001: We disagree. Though it is true that the Forest is currently open to cross-country motorized use and that it is not unauthorized to travel off-road, the establishment of off-road routes from cross-country travel is not explicitly authorized. Many unauthorized routes never went through any review of resource impacts or design and are therefore more likely tend to produce an inordinate amount of resource damage compared to system routes. The Travel Management process considered all known routes</p>

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		<p>and allocation of limited Agency resources. In fact, very little of the Agency’s route inventory, motorized or non-motorized, was “planned.” The vast majority of routes used by recreationists were constructed for other purposes, such as logging, mining, or access to grazing allotments. Routes that were originally constructed for other purposes are now used for recreation and, in some cases, it makes sense to include them in the travel plan. (Motorized Recreation, Pocatello, ID - #172.19.40200.530)</p>	<p>(system and unauthorized) to establish a more sustainable system of designated roads and trails for motorized use.</p> <p>#172.19.40200.530: Though it is true that the Forest is currently open to cross-country motorized use and that it is not unauthorized to travel off-road, the establishment of off-road routes from cross-country travel is not explicitly authorized. Many unauthorized routes never went through any review of resource impacts or design and are therefore more likely tend to produce an inordinate amount of resource damage compared to system routes. The Travel Management process considered all known routes (system and unauthorized) to establish a more sustainable system of designated roads and trails for motorized use. This means that many unauthorized routes were included in one or more alternatives in the DEIS. Furthermore, a decision on the Coconino National Forest Travel Management Project does not preclude future planning or establishment of additional motorized routes.</p>
Road and Trail System: Inventories	4-27 The Forest Service should not include user-created routes in the inventory.	<p>BECAUSE THE UNAUTHORIZED ROADS CAN HAVE LARGE IMPACTS ON RESOURCES AND USER EXPERIENCE</p> <p>As stated in the DEIS, unauthorized routes are “not designed and constructed by the CNF [Coconino National Forest]. Such roads</p>	<p>#175.23.40200.835: The Travel Management Rule does not preclude the designation of unauthorized routes in the travel management planning process. The Coconino National Forest</p>

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		<p>cause resource damage and do not follow standards and guidelines as prescribed for the CNF in its land and resource management plan (LRMP), both for resource sustainability and recreation goals and objectives.” Forest Service 2010:17. Similarly, unauthorized roads can intrude upon the recreational experiences of those seeking a natural appearing landscape, which is desired by most visitors and prescribed in the CNF LRMP. Forest Service 2010:21. “[U]nauthorized roads lack design consideration to avoid resource damage and excessive visibility” and are “much more likely to result in increasingly visible impacts to the landscape.” Forest Service 2010:21. It is not enough to merely prohibit route designation in semi-primitive, non-motorized ROS [Recreation Opportunity Spectrum] (SPNM ROS) class areas; the CNF must also analyze the impacts of routes designated adjacent to these areas and take a hard look at the impacts of these routes on the recreational experiences of users within the SPNM ROS classes, as well as impacts to primitive and wilderness area experiences. (Preservation/Conservation, Grand Canyon, AZ - #175.23.40200.835)</p>	<p>looked at all known routes for potential resource impacts (including impacts affecting non-motorized use in wilderness and SPNM areas) and opportunities for recreation. The Coconino National Forest will add further analysis to the FEIS to disclose impacts of route designation adjacent to wilderness and SPNM areas.</p>
<p>Road and Trail System: Inventories</p>	<p>4-28 The Forest Service should define the baseline system as all routes that have been documented in relevant NEPA analysis.</p>	<p>TO ENSURE THAT ALL ROUTES ARE APPROPRIATELY ANALYZED FOR THEIR IMPACTS In our [Center for Biological Diversity et al.] view, the appropriate baseline of existing system routes consists of those routes which have been documented in relevant NEPA analysis. We believe that any routes lacking documentation (including routes which were constructed or came into being before NEPA was enacted) should be analyzed as new unauthorized routes, in recognition of the fact that there is no record of administrative decision or analysis addressing the environmental impacts of motor vehicle use on these routes. Although we recognize the challenges associated with locating adequate supportive documentation given a past history of poor recordkeeping, we</p>	<p>#175.12.40210.131: The Travel Management process is a NEPA process including extensive public participation and site specific analysis of impacts of route designation. The Travel Management Rule can be implemented to modify previous NEPA decisions, if appropriate and fully analyzed.</p>

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		<p>fundamentally reject the position that justification for a specific route can be established solely based on a route's inclusion in the Infra database. We understand that past travel management decisions should be respected—provided that conditions on the ground have not changed, thus requiring new NEPA analysis—but the Forest Service must be careful not to assume that certain decisions with respect to motorized use have been made and are still valid. (Preservation/Conservation, Phoenix, AZ - #175.12.40210.131)</p>	
<p>Road and Trail System: Inventories</p>	<p>4-29 The Forest Service should develop a spreadsheet that would summarize NEPA decisions by route.</p>	<p>TO SUPPORT THE INCLUSION OF EACH ROUTE IN THE SYSTEM</p> <p>We [Center for Biological Diversity et al.] strongly recommend that the Forest Service develop a “documentation” spreadsheet which would supplement the description of the No Action Alternative, and would eventually accompany the MVUM [Motor Vehicle Use Map]. This spreadsheet would summarize the NEPA decisions, together with other relevant documentation (e.g., formal adoption of road/trail objectives for the route; information establishing consistent maintenance expenditures over time, etc.) supporting the inclusion of each route on the authorized system. We have included a sample spreadsheet to serve as an example. See Appendix Y. Such documentation would include NEPA analysis and decision documents and reasons why the route satisfies route designation criteria (see section 3 of Executive Order 11644, 36 C.F.R. [section] 212.55). Routes lacking such documentation should be marked accordingly, and if the Forest Service proposes to designate the route in the action alternatives, it must include site-specific analysis of that route in this process. We request consideration of an additional, separate alternative limited to documented routes in a supplemental DEIS. (Preservation/Conservation, Tucson, AZ - #175.13.40210.131)</p>	<p>#175.13.40210.131:</p> <p>There is no requirement and no utility in documenting previous NEPA decisions over the past several decades for each and every route that exists or may have once existed on the Coconino National Forest. The Travel Management process is a NEPA process including extensive public participation and site specific analysis of impacts of route designation. The Travel Management Rule can be implemented to modify previous NEPA decisions, if appropriate and fully analyzed.</p>

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Road and Trail System: Inventories	4-30 The Forest Service should include all established motorized trails.	<p>TO PRESERVE THE LEVEL AND QUALITY OF MOTORIZED RECREATION IN THE FOREST</p> <p>Even though the DEIS recognizes an additional 99 miles of established and long-used motorized trails in the forest, they appear to have been eliminated from the system. Even if these additional 99 miles were to be included, the total mileage of motorized trails would still be inadequate for a forest of this size. It is particularly disturbing that so many miles of motorized trails would be proposed to be closed given the dedicated work of local organizations like the Coconino Trails Riders to establish a strong working relationship with local district Forest Service personnel and state-wide OHV clubs.</p> <p>Our Club requests that the final EIS include all available mileage if not more than the existing 124 miles currently in use by the public. To preserve the level and quality of the recreational experience of users of motorized trails, we also request that none of the existing 124 miles of motorized trails be closed at all. (Motorized Recreation, Gilbert, AZ - #164.2.40200.530)</p>	<p>#164.2.40200.530:</p> <p>Alternative 1 (no change) is included in the DEIS, and includes analysis of keeping the route system as it currently exists. This alternative clearly shows that the current motorized use on the Forest is resulting in unacceptable resource and social impacts. For this reason Alternative 1 does not meet the purpose and need, which requires the establishment of a sustainable designated system of roads and trails. All of the unauthorized trails considered in the Travel Management planning process included resource impacts along portions of the route that made them unacceptable for designation in both action alternatives. It is important to note that a decision on the Coconino Travel Management Project does not preclude future designations of more appropriate and sustainable motorized trails.</p>
Road and Trail System: Inventories	4-31 The Forest Service should include trails proposed by the Coconino Trail Riders.	<p>TO PROVIDE AN ADEQUATE TRAIL SYSTEM THAT PROVIDES FOR ATV AND FULL-SIZED FOUR-WHEEL DRIVE RECREATION</p> <p>We [BlueRibbon Coalition] recommend the final decision include the trails the CTR [Coconino Trail Riders] has proposed. A key flaw in the Proposed Action is that it fails to acknowledge the importance and properly plan for trail-based motorized use. This is true for ATV users as well. The final decision should attempt to provide an adequate trail system geared for ATV and full-sized four-wheel drive enthusiasts.</p> <p>In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation, sightseeing,</p>	<p>#172.1.54000.410:</p> <p>The Coconino National Forest did design a designated road and trail system under both action alternatives for motorized recreation and access across the Forest. For example, even the most restrictive alternative provides motorized access to within 1/2 mile of almost 80% of the Forest outside of Wilderness areas. This is considered to be an adequate motorized route network to provide the access necessary for the activities mentioned in your comment as well as for motorized recreation, which can</p>

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		<p>photography, rockhounding, hunting, fishing, wildlife and nature study, camping and other similar pursuits. Our members and supporters are interested in, and will be directly affected by, the Forest's Motorized Management Plan. (Motorized Recreation, Pocatello, ID - #172.1.54000.410)</p>	<p>utilize both motorized trails and roads.</p>
<p>Road and Trail System: Inventories</p>	<p>4-32 The Forest Service should revisit the assumption that use of native level 1, 2, and user-created routes is low.</p>	<p>TO ACCOUNT FOR INCREASING USE OF ORVS AND IMPROVEMENTS IN TECHNOLOGY THAT ALLOW MORE USERS TO ACCESS CHALLENGING ROUTES</p> <p>We [Center for Biological Diversity et al.] do not agree with the assumption that traffic use on native level 1, 2, and user-created routes is low. Soil and Water Specialist's Report:5. Please acknowledge whether any traffic counts have been done on native surface routes in the Coconino National Forest that can be used to accurately quantify the level of motorized use on these routes. Given the reported (in the DEIS) increase in the numbers of ORVs, as well as an improvement in technology that allows more people to drive on more challenging routes, this assumption does not make sense. (Preservation/Conservation, Tucson, AZ - #175.100.40000.530)</p>	<p>#175.100.40000.530: Site specific monitoring as well as anecdotal evidence supports the fact that routes with lower maintenance levels are used less by motorized users. Reasons for this are that routes with lower maintenance levels provide less connectivity, are a farther distance from developed sites and communities, and require less maintenance because they receive less wear-and-tear from regular use. We feel the assumption used in the Soil and Water Specialist's Report is a reasonable assumption and is not contrary to any evidence or current study.</p>
<p>Road and Trail System: Inventories</p>	<p>4-33 The Forest Service should ensure that the data in the Infra database meet all applicable data quality standards.</p>	<p>THE FOREST SERVICE SHOULD ENSURE THAT THE DATA IN THE INFRA DATABASE MEET ALL APPLICABLE DATA QUALITY STANDARDS</p> <p>We [Center for Biological Diversity et al.] have grave concerns about the information regarding roads in the Infra database and whether all routes identified as system routes in the database have undergone NEPA analysis. As stated in the TAP [Travel analysis Process], "in some places across the Forest, features that are not roads may still be identified in the inventory as roads with formal road numbers. Some of these may be fence lines and other non-road features; others are unauthorized or user-created routes that were never intended to be a National Forest System Road or Trail." Forest Service 2010b:4.</p>	<p>#175.156-158.40210.160: The Coconino Travel Management planning process did not wholly depend on the INFRA database to identify routes in the action alternatives in the DEIS. The INFRA database was used a starting point to help identify where system roads occur. Yet, each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources and motorized recreational opportunity. As a result, the alternatives in the DEIS were based on site-specific knowledge and</p>

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		<p>From the USDA Information Quality Activities webpage [Footnote 31: http://www.ocio.usda.gov/qiguide/index.html, last visited May 3, 2010.]</p> <p>These general information quality guidelines apply to all types of information disseminated by USDA agencies and offices.</p> <ul style="list-style-type: none"> - USDA will strive to ensure and maximize the quality, objectivity, utility, and integrity of the information that its agencies and offices disseminate to the public. -USDA agencies and offices will adopt a basic standard of quality (including objectivity, utility, and integrity) and take appropriate steps to incorporate information quality criteria into their information dissemination practices. -USDA agencies and offices will review the quality (including objectivity, utility, and integrity) of information before it is disseminated to ensure that it complies with the standards set forth in these Guidelines. -USDA agencies and offices will treat information quality as integral to every step in their development of information, including creation, collection, maintenance, and dissemination. -In accordance with OMB [Office of Management and Budget] guidance, when collecting information that requires OMB clearance under the Paperwork Reduction Act, USDA agencies and offices will demonstrate in the clearance package submitted to OMB that the information collection would result in information that will comply with OMB and USDA information quality guidelines. <p>The following information quality criteria comprise the general quality standards that USDA agencies and offices will follow in developing and reviewing information and disseminating it to the public.</p> <p>Objectivity</p> <ul style="list-style-type: none"> -USDA agencies and offices will strive to ensure that the 	<p>analysis and not solely on information in the INFRA database.</p>

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		<p>information they disseminate is substantively accurate, reliable, and unbiased and presented in an accurate, clear, complete, and unbiased manner.</p> <p>-To the extent possible, consistent with confidentiality protections, USDA agencies and offices will identify the source of the information so that the public can assess whether the information is objective.</p> <p>Utility</p> <p>-USDA agencies and offices will assess the usefulness of the information they disseminate to its intended users, including the public.</p> <p>-When transparency of information is relevant for assessing the information's usefulness from the public's perspective, USDA agencies and offices will ensure that transparency is addressed in their review of the information prior to its dissemination.</p> <p>-USDA agencies and offices will ensure that disseminated information is accessible to all persons pursuant to the requirements of Section 508 of the Rehabilitation Act.</p> <p>Integrity</p> <p>-USDA agencies and offices will protect information they maintain from unauthorized access or revision to ensure that disseminated information is not compromised through corruption or falsification.</p> <p>-USDA agencies and offices will secure their information resources by implementing the programs and policies required by the Government Information Security Reform Act.</p> <p>-USDA agencies and offices will maintain the integrity of confidential information and comply with the statutory requirements to protect the information it gathers and disseminates. These include: The Privacy Act of 1974, as amended; The Paperwork Reduction Act of 1995; The Computer Security Act of 1987; The Freedom of Information Act; and</p>	

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		<p>OMB Circulars A-123, A-127, and A-130. (Preservation/Conservation, Tucson, AZ - #175.156-158.40210.160)</p>	
<p>Road and Trail System: User-Created and Non-System Routes</p>	<p>4-34 The Forest Service should close all unauthorized or user-created routes.</p>	<p>BECAUSE THEY ARE NOT NEEDED TO PROVIDE CHALLENGING ROUTES FOR USERS As noted in the DEIS, “NFSRs [National Forest System Road] across the forest are tending to become primitive in character” and “[o]pportunities for challenge and risk related driving on roads suited only for high-clearance vehicles are increasing on the forest even as opportunities for solitude, tranquility, and relative ‘wildness’ are decreasing.” Forest Service 2010:23. With a large number of motorized, system routes classified as ML [Management Level] 2 and many miles of higher ML levels naturally converting to highclearance type routes due to lack of funds for maintenance and excessive use, there is no evidence of a need to add any unauthorized or user-created route to the designated system. Therefore, all unauthorized or usercreated routes should be closed and scheduled for obliteration as soon as funding will allow. (Preservation/Conservation, Pinetop, AZ - #175.24.40200.835)</p>	<p>#175.24.40200.835: The Coconino National Forest considered both system and non-system (unauthorized) routes for inclusion as a designated system route. Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources and motorized recreational opportunity.</p>
<p>Road and Trail System: User-Created and Non-System Routes</p>	<p>4-35 The Forest Service should avoid adding user-created roads to the road system.</p>	<p>BECAUSE DOING SO REWARDS CREATION OF ROADS AND INCREASES RESOURCE DAMAGE No user-created routes should be added to the road system because this rewards the creation of unauthorized routes, increases resource damage, and will make enforcement more difficult in the future. (Individual, Cottonwood, AZ - #1.3.40200.002)</p>	<p>#1.3.40200.002: Not all non-system (unauthorized) routes were user-created. Many non-system routes are old Forest Service logging trails or roads. For many system and non-system routes the origins are unknown. The Coconino National Forest focused on the impacts of routes to Forest resources and utility for recreational and access purposes, rather than the moral implications of the origins of the route in our efforts to designate a sustainable system of motorized</p>

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			roads and trails.
Road and Trail System: User-Created and Non-System Routes	4-35 The Forest Service should avoid adding user-created roads to the road system.	<p>TO PROTECT THE ENVIROMENT AND THE NON-MOTORIZED EXPERIENCE</p> <p>I definitely do not think that user-created routes would be positive for the environment or the experience of hikers/birdwatchers. (Individual, Tempe, AZ - #41.10.40200.540)</p>	<p>#41.10.40200.540:</p> <p>All routes considered for designation were reviewed based on potential impacts to Forest resources (such as non-motorized recreation opportunities) as well as their utility for motorized recreation and access. Both action alternatives are expected to end cross-country motorized travel throughout the Forest and reduce roads open for motorized use by over a third. This is expected to result in a much better environment for activities such as hiking and bird watching.</p>
Road and Trail System: User-Created and Non-System Routes	4-36 The Forest Service should add user-created trails to the trail system.	<p>BECAUSE USER GROUPS HAVE BEEN WORKING TO ADD THESE TRAILS FOR SOME TIME</p> <p>As a New Mexico resident, off-road motorcyclist, and frequent visitor to Arizona, I would like to concur with the Coconino Trail Riders (CTR) recommendations to your TMP. I have been a volunteer team member in the Travel Management Plan for the Cibola NF. I know you must appreciate the hard work that CTR and other volunteer members are providing.</p> <p>It really is about fairness.</p> <p>As I understand it, CTR has been trying to get these trails designated with the CNF for years, long before the TMR was released. There are many miles of motorized trail in the CNF and only a few are part of the system. Of course, there are additional unauthorized trails that have not been inventoried.” These trails are currently legal for use today and many of them have been identified as important to Forest visitors. These trails should be added to the classified trail system. But because they do not meet</p>	<p>#78.2.40200.530 and #79.1.40200.530:</p> <p>The Challenger Trail was added to Alternative 4 for more detailed analysis. In addition the existing motorized trail system, was inventoried with GPS devices for more a more accurate mileage of 37 miles. Other single track trails submitted through public comment were reviewed but not included in alternatives to be considered in detail due to one or more conflicts with forest resources. Many of the existing single track motorized trails are user-created and were not designated based on conflicts with sensitive resources and other issues. Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally</p>

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		<p>your overly strict definition of the “existing transportation system,” these trails are not considered in your planning process. (Individual, Tijeras, NM - #78.2.40200.530)</p> <p>I would like to give a personal comment on the recently released Travel Management Draft Environmental Impact Statement (DEIS). I would like to say that the plan is entirely incomplete and does not contain the 100s of miles of trails currently in use. Coconino Trail Riders has worked with you extensively to catalog and inventory the trail system, but it seems to have fallen on deaf ears. (Individual, Phoenix, AZ - #79.1.40200.530)</p>	<p>plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Road and Trail System: User-Created and Non-System Routes</p>	<p>4-36 The Forest Service should add user-created trails to the trail system.</p>	<p>TO MEET THE DEMAND FOR MOTORIZED RECREATION</p> <p>I live in Colorado but traditionally make a trip or two each year to Arizona to recreate on Coconino National Forest [CNF] lands. I’ve always enjoyed the area around Flagstaff for its amazing natural beauty.</p> <p>I enjoy hiking, bicycling, and motorcycling, and it is out of concern for the last activity that I am writing this letter. I have been watching the CNF Travel Management plan with interest and not a little alarm, and with the release of the most recent DEIS, I’m shocked to see that there are still only 25 miles of trails considered for OHV use. That is beyond unreasonable. The public you serve is becoming more interested, not less, in OHV recreation, and limiting use to just a few trails will exceed those trails’ sustainable carrying capacity, creating unnecessary degradation, as well as increasing conflicts from overuse. (Individual, Colorado Springs, CO - #76.1.42000.530)</p>	<p>#76.1.42000.530:</p> <p>Many of the existing single track motorized trails are user-created and were not designated based on conflicts with sensitive resources and other issues. Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized</p>

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			system, which we will continue to improve through working with members of the public such as yourself.
Road and Trail System: User-Created and Non-System Routes	4-36 The Forest Service should add user-created trails to the trail system.	<p>TO REDUCE MAINTENANCE COSTS AND INCREASE OPPORTUNITIES FOR GRANT FUNDING</p> <p>We encourage the FS to consider converting unclassified roads to classified trails. Doing so has numerous advantages, including reducing the Road Maintenance budget, allowing for more flexible and ‘relevant’ management and maintenance objectives, and it is sometimes easier to receive OHV or other grant funding for motorized trails than it is for roads. (Motorized Recreation, Pocatello, ID - #172.2.41000.530)</p>	<p>#172.2.41000.530:</p> <p>The Coconino National Forest did not choose to designate many existing roads as motorized trails, and instead decided to designate these routes as roads because it allows for a greater variety of motorized recreation opportunities . We recognize that there are distinct advantages in designating motorized trails to foster a unique recreational trail riding experience. The Coconino National Forest Travel Management Project does not preclude the conversion of designated roads to trails in the future, or prevent the designation of additional motorized trails.</p>
Road and Trail System: User-Created and Non-System Routes	4-36 The Forest Service should add user-created trails to the trail system.	<p>BECAUSE MANY OF THE ROUTES WERE LEGALLY CREATED BY MINING, GRAZING, AND LOGGING OPERATIONS</p> <p>“User-created routes” are not to be construed as illegal routes. Many of these were created by mining, grazing and logging operations, and as such were placed there legally and now are enjoyed by many for family recreation and getting away from the stresses of life in the cities. OHV use is a simple and easy way for “families that play together, stay together.” Don’t, by shortsightedness, take this away from our families. (Individual, Paradise, CA - #61.3.40200.711)</p>	<p>#61.3.40200.711:</p> <p>The Coconino National Forest considered both system and non-system (unauthorized) routes for inclusion as a designated system route. Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources</p>

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<p>Road and Trail System: User-Created and Non-System Routes</p>	<p>4-37 The Forest Service should avoid closing the existing user-created trails until more in-depth planning and evaluation has been conducted.</p>	<p>BECAUSE THESE TRAILS ARE VALUED BY USERS AND THE EXISTING SYSTEM TRAILS ARE INSUFFICIENT TO SUPPORT EXISTING USE PATTERNS</p> <p>The key flaw in the planning effort was that the agency chose to “focus on changes to the existing transportation system” (DEIS page 5). This means you will only consider making changes to routes that are “classified,” or can otherwise be defined as part of the “existing transportation system.”</p> <p>On page 4 of the DEIS, you admit that there are many other motorized routes being used by Forest visitors. “There are 124 miles of motorized trail on the CNF, only 25 of which are part of the system. The remaining 99 miles are unauthorized, and there are additional unauthorized trails of unknown total mileage that have not been inventoried.” These trails are currently legal for use today and many of them have been identified by key stakeholder groups as highly valued by Forest visitors. Many of these trails would make logical additions to the classified trail system. But because they do not meet your bureaucratically constructed definition of the “existing transportation system,” these trails cannot even be considered in your planning process.</p> <p>Limiting the process to the existing “system” might seem logical given the relatively large number of roads existing on the ground and the limited resources available to conduct planning. But roads are not trails, and they cannot provide the same recreational opportunities. OHV users pointed this out in earlier comments. By stubbornly refusing to find a way to consider the other existing trails, you have limited the amount of motorized trails across all Alternatives to an arbitrary and capricious 25 miles. Doing so has resulted in a situation where all of your Alternatives fail to meet the purpose and need of your travel planning project. On page 3 of your DEIS you appear to acknowledge this key flaw: “Following the implementation of</p>	<p>#55.1-2.40200.530:</p> <p>Your statement that “...the agency chose to ‘focus on changes to the existing transportation system’ (DEIS page 5)” is correct, but it is not correct that unauthorized routes were not considered. The Coconino National Forest looked at both designating and not designating both system and non-system (unauthorized) routes. The Coconino National Forest agrees that a decision on the Coconino Travel Management Project does not end travel planning and that decisions may be made through the NEPA process to designate more routes or remove more routes from designation. The Coconino National Forest believes that the forest is the most appropriate scale for designating a sustainable system of motorized routes across the Forest. The Coconino National Forest reviewed all system and non-system routes for resource impacts and motorized opportunities and did include a number of the user-submitted motorized trails for analysis in an alternative. Sever other user-submitted trails were not considered for detail study due to resource conflicts. As a result, the Coconino National Forest does not feel it appropriate to postpone any portion of the implementation of the decision regarding these routes.</p>

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		<p>TMR, the forest will be undertaking a forest-wide motorized trail planning effort to evaluate additional opportunities for designation of trails for motorized travel. Further analysis of such trails will include public involvement under NEPA, thereby allowing further input and a more focused proposal for motorized trails on the CNF.”</p> <p>While I appreciate you acknowledging a forest-wide planning effort evaluating additional motorized trails is needed, simply stating such in the DEIS is not sufficient. I request that your Final EIS and your Record of Decision more clearly state the need for additional trails and provide clear direction for timely planning efforts that will meet that need in the foreseeable future. Also, such planning does not need to be undertaken at a “forest-wide” level, and your Final EIS and Record of Decision should direct that district-level planning can and should occur. I also request that the Final EIS and Record of Decision postpone the closure of any of the 124 miles of existing trails until future planning efforts bring new trails on to the system. (Individual, Phoenix, AZ - #55.1-2.40200.530)</p>	
Road and Trail System: User-Created and Non-System Routes	4-38 The Forest Service should acknowledge that closing user-created roads will cause a significant negative impact to users.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT CLOSING USER-CREATED ROADS WILL CAUSE A SIGNIFICANT NEGATIVE IMPACT TO USERS</p> <p>The proposed alternatives are misleading when referring to the miles of closed roads. There are many hundreds (possibly thousands) of miles of existing roads that will not be open as proposed in Alternative 3 and 4 because of CNF’s [Coconino National Forest] failure to provide an effective inventory. The closure of all of the “existing authorized” routes is a significant negative impact to the user public. (Motorized Recreation, Cottonwood, AZ - #111.6.40210.160)</p>	<p>#111.6.40210.160:</p> <p>Even the most restrictive alternative (Alt. 3) in the DEIS provides motorized access to within 1.2 mile of almost 80% of the Forest outside of Wilderness areas. The impacts of creating a more restrictive designated route system for motorized use is considered and is disclosed in the Recreation and Socioeconomic analyses in the DEIS.</p>
Road and Trail System: User-	4-39 The Forest Service should	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT USERS CREATE ROADS IN RESPONSE TO THE</p>	<p>#172.18.40200.530:</p> <p>The Coconino National Forest considered</p>

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Created and Non-System Routes	acknowledge that users create roads in response to the unmet demand for motorized recreation.	<p>UNMET DEMAND FOR MOTORIZED RECREATION</p> <p>The OHV community is unfairly criticized for the “proliferation of new, unplanned roads and trails.” Although these are important concerns that must be addressed in this planning effort, the situation is not reflective of “out of control” OHV users as much as an indicator of the unmet demand for recreational infrastructure and a lack of planning.</p> <p>An understanding of the supply and demand of recreational opportunities, including opportunities for OHV riders, is important in designating a system of roads, trails, and areas for motor vehicle use. Clearly, there is a demand for the kind of experiences the “user created” routes provide. As the Agency’s Travel Management Rule states, user groups are often an excellent source of demand information and they have identified the importance of including user-created routes in the system. (Motorized Recreation, Pocatello, ID - #172.18.40200.530)</p>	both system and non-system (unauthorized) routes for inclusion as a designated system route. Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources. The Coconino National Forest agrees that there is a large and increasing demand for motorized recreation in Northern Arizona, and the Forest considers the impact of this demand in the Recreation analysis for each alternative in the DEIS.
Road and Trail System: User-Created and Non-System Routes	4-40 The Forest Service should work to reduce use of and creation of new user-created roads.	<p>TO HELP PROTECT THE ADJACENT NATIONAL MONUMENTS</p> <p>We [National Park Service] fully support the USDA Forest Service in implementing the Travel Management Rule on the CNF [Coconino National Forest]. Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments are relatively small management areas surrounded by Coconino National Forest (CNF) and other lands. The cooperation of adjacent land management agencies is essential for the National Park Service (NPS) to protect the nationally significant archeological and geological resources within the Monuments for the enjoyment of this and future generations. We are particularly aware of the proliferation of new routes and the increase in use of ATVs over the last two decades on the CNF in proximity to the boundaries of the Monuments. Forest users often utilize existing unplanned, unofficial CNF roads up to the Monuments’ boundary fences. Because the Monuments have common boundaries with CNF</p>	#174.1.40200.630: We agree.

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		lands, citizens are at times confused about where off-road travel is appropriate. On occasion, forest users violate area closures within the Monuments, resulting in damage to archeological sites and unique volcanic features and landscapes. We would anticipate these problems to continue under the No Action Alternative (Alternative 1). (U.S. National Park Service, Flagstaff, AZ - #174.1.40200.630)	
Road and Trail System: User-Created and Non-System Routes	4-41 The Forest Service should acknowledge that hikers will continue to create trails.	THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT HIKERS WILL CONTINUE TO CREATE TRAILS Hikers will find a way to get to the forest land and this has already resulted in many makeshift “social” trails through the very land the Forest Service purports to wish to “protect”. This problem shall only increase and what will be left will be a criss-cross of meandering trails across the land. (Individual, Sedona, AZ - #16.3.40200.540)	#16.3.40200.540: We agree that hiking and other non-motorized activities also impact Forest resources in a negative manner. The purpose of this project is to implement the Travel Management Rule, which focuses on the management of motorized use on the Forest.
Road and Trail System: Single-Track Trails	4-42 The Forest Service should increase the miles of single-track trails available.	BECAUSE THESE RIDERS HELP MAINTAIN THE TRAILS In addition to riding dirt bikes in the CNF, I regularly participate in trail maintenance programs, which are often better attended by off-road motorcyclists than more traditional users. Treat dirt bikers fairly and we will be among your biggest allies in keeping the forest fit for future generations. (Individual, Phoenix, AZ - #146.3.54120.740)	#146.3.54120.740: We appreciate and value the participation of motorized users in maintaining roads and trails on the Coconino National Forest. We hope to continue this valuable working relationship to maintain those values we all appreciate for future generations.
Road and Trail System: Single-Track Trails	4-42 The Forest Service should increase the miles of single-track trails available.	BECAUSE THERE ARE ORGANIZATIONS TO MAINTAIN IT AND TO SUPPORT FAMILY-BASED RECREATION I am writing to encourage you, in the strongest terms, not to implement the TMR as proposed. It would be a travesty to allow only 25 miles of singletrack for motorized travel, especially since there is almost 200 miles of existing trail, with a ready source of	#179.1.54120.711: Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources. The Coconino National Forest reviewed all system and non-system routes for resource impacts and motorized opportunities and

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		<p>volunteers (Coconino Trail Riders) willing to work with you to maintain them. As a member of CTR, I have personally worked to build new and maintain existing trail, for both motorized and non-motorized travel.</p> <p>I have three daughters and trail riding is what my family does for enjoyment and one of the main reasons my wife and I located our family to Arizona in 2000. We ride in the Coconino in the summer and the desert in the winter. We typically ride three out of four weekends per month. It would be an unjust hardship on my family, to take away our hobby which is used to tie my family together. When we use the forest, my daughters are taught to respect the land and appropriately use it. Trail riding not only provides enjoyment, it teaches responsibility and respect for our natural resources. (Individual, Phoenix, AZ - #179.1.54120.711)</p>	<p>did not include the 99 miles of user-submitted motorized trails because of resource concerns on one or more portions of the route. The Coconino National Forest understands that this may impact the recreational use of some motorized users and this is discussed in the Recreation section of the EIS. A decision on the Coconino Travel Management project does not preclude future efforts to work with the motorized community to designate additional single-track motorized trails in the future.</p>
<p>Road and Trail System: Single-Track Trails</p>	<p>4-43 The Forest Service should not close any single-track trails.</p>	<p>BECAUSE THESE TRAILS DO NOT CAUSE DAMAGE</p> <p>I am extremely disappointed with the proposed closure of almost all motorized single-track in Coconino National Forest.</p> <p>I enjoy the forest in many ways. I am an avid Hiker, Mountain Biker, Camper, Explorer and Motorized-Dirt bike rider.</p> <p>Please do not close any single track. Single track does not damage the forest and is a great way for people to get out and enjoy the beauty of our surroundings. I have personally surveyed hundreds of miles of single track in our forest and photographically documented the trails. The single-track trails used by dirt bikes are almost always in better condition than those used by hikers. Hikers tend to walk two or three abreast and end up widening the trail. (Look for instance at the Humphrey’s Peak Trail, which is only open to hikers and is one of the most damaged trails in the forest).</p> <p>I realize the damage done by 4-wheel drive vehicles and occasionally by ATV riders who are uneducated in proper trail use. However, it is wrong to punish our entire community with</p>	<p>#193.1.54120.740:</p> <p>Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources. The Coconino National Forest reviewed all system and non-system routes for resource impacts and motorized opportunities and did not include the 99 miles of user-submitted motorized trails because of resource concerns on one or more portions of the route. The Coconino National Forest understands that this may impact the recreational use of some motorized users and this is discussed in the Recreation section of the EIS. A decision on the Coconino Travel Management project does not preclude future efforts to work with the motorized community to designate additional single-track motorized trails in</p>

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		<p>such drastic closures due to the misbehavior of a few. Please leave all of the existing single track open to motorized travel. Anything less is unfair to the community. (Individual, Flagstaff, AZ - #193.1.54120.740)</p>	<p>the future.</p>
<p>Road and Trail System: Single-Track Trails</p>	<p>4-44 The Forest Service should add all currently legal trails to the 25 miles of motorized trails considered in the plan.</p>	<p>TO MEET THE DEMAND FOR MOTORIZED RECREATION</p> <p>As many OHV riders that are out there, and the number is growing in Arizona, your forest needs more than 25 miles of quality single track. I am outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan.</p> <p>Adding all the currently legal trails being used today would make logical additions to the classified trail system. (Individual, Prescott, AZ - #71.3.42000.530)</p>	<p>#71.3.42000.530:</p> <p>Each system and known non-system route was considered on a route-by-route basis for potential impacts to Forest resources. The Coconino National Forest reviewed all system and non-system routes for resource impacts and motorized opportunities and did not include the 99 miles of user-submitted motorized trails because of resource concerns on one or more portions of the route. The Coconino National Forest understands that this may impact the recreational use of some motorized users and this is discussed in the Recreation section of the EIS. A decision on the Coconino Travel Management project does not preclude future efforts to work with the motorized community to designate additional single-track motorized trails in the future.</p>
<p>Road and Trail System: Route Closures</p>	<p>4-45 The Forest Service should avoid closing trails.</p>	<p>BECAUSE THE TRAILS BELONG TO THE PUBLIC</p> <p>The most salient point that the US Forest Service seems to be missing is that these forest roads, in fact, belong to the citizens of the United States. They are ours...not the exclusive domain of the Forest Service. This is our land...not the US Forest Service's! It is the Forest Service's obligation to make the existing trails available to the public. (Individual, Sedona, AZ - #16.1.52000.125)</p>	<p>#16.1.52000.125:</p> <p>The Travel Management project does not limit access to the public. Travel management only involves the management of motorized vehicles on the Forest. The purpose of the project is to implement the Travel Management Rule, which focuses on the management of motorized use on the</p>

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Road and Trail System: Route Closures	4-46 The Forest Service should avoid closing more roads.	<p>THE FOREST SERVICE SHOULD AVOID CLOSING MORE ROADS</p> <p>Can you please just stop with the road closures already! (Individual, Phoenix, AZ - #39.1.52000.001)</p>	<p>Forest.</p> <p>#39.1.52000.001: The purpose of the project is to implement the Travel Management Rule, which focuses on the management of motorized use on the Forest. In many instances this involves removing existing roads from access for motorized use as unnecessary roads can result in negative impacts to wildlife, water quality, cultural resources, and lead to conflicts between recreational forest users.</p>
Road and Trail System: Route Closures	4-46 The Forest Service should avoid closing more roads.	<p>TO AVOID REDUCING NEEDED ACCESS FOR FIREFIGHTING</p> <p>As a five season experienced forest fire fighter in the old Flagstaff and Mormon Lake Ranger Districts of the Coconino National Forest, I can assure you the elimination of many of the roads proposed for closure will restrict access to the current fire-fighting crews and take away the ability of using those roads/trails for fire lines while they are trying to get uncontrolled forest fires under control. (Individual, Sedona, AZ - #170.2.52100.270)</p>	<p>#170.2.52100.270: Travel Management includes the designation of routes for public use of motorized vehicles. Non-designated routes may still be used for emergencies such as wildland firefighting.</p>
Road and Trail System: Route Closures	4-47 The Forest Service should implement an open unless marked as closed policy for trails.	<p>BECAUSE ROUTES SHOULD NOT BE CLOSED DUE TO INSUFFICIENT MAPPING</p> <p>I would like to see language added to any plan that states unless a road or trail is shown on a map as closed, it is deemed open for use; for too long the American OHV community has been the victim of a lack of due diligence by the USFS not properly mapping all existing roads and trails and dry washes and properly studying each route on its own merits to determine if it is in any way damaging the environment. The USFS must stop taking away the American public's recreational opportunities by</p>	<p>#33.4.52120.410: The purpose of the Travel Management Rule is to establish a designated system of roads and trails so that unless a route is designated as open, it is closed to motorized use. This changes the current existing system where the Forest is open to motorized use unless specifically closed. The reason for this change is that the current system is difficult to enforce and very hard</p>

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		<p>using coverall studies and stating in route planning that all routes are closed unless shown as open. The American public deserves to be treated fairly, and the USFS lack of funds or manpower is no excuse for not properly mapping all trails/roads and dry washes and providing them on a topographic map for the public to review. (Individual, Las Vegas, NV - #33.4.52120.410)</p>	<p>to understand by motorized and non-motorized users. The Travel Management project will result with the publication of a Motor Vehicle Use Map, which will show where all designated routes are located. This is expected to make a more enforceable and sustainable motorized road and trail system on the Coconino National Forest.</p>
<p>Road and Trail System: Route Closures</p>	<p>4-48 The Forest Service should make road closure and decommissioning decisions based on the criteria set out in Executive Order 11644.</p>	<p>THE FOREST SERVICE SHOULD MAKE ROAD CLOSURE AND DECOMMISSIONING DECISIONS BASED ON THE CRITERIA SET OUT IN EXECUTIVE ORDER 11644</p> <p>Road closures and decommissioning according to the criteria of the Forest Service, in addition to our prior recommendations, should collectively establish a “minimum road system needed for provide safe and efficient travel and for administration, utilization, and protection of National Forest System lands” required by 36 C.F.R. [section] 212.5(b) (see also PA [Proposed Action], page 2) and on the designation criteria set forth in Executive Order 11644, [section] 3, as amended, and the TMR, 36 C.F.R. [section] 212.55 requiring that:</p> <ol style="list-style-type: none"> 1. Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. 2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. 3. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors. 4. Areas and trails shall not be located in officially designated Wilderness Areas or Primitive Areas. Areas and trails shall be 	<p>#175.70.40000.160:</p> <p>Your comments pertain to the requirement of each Forest to complete a Travel Analysis Planning (TAP) process, which includes the identification of a minimum road system. This process is an analysis that forms the basis of the Travel Management planning process. The TAP was completed on the Coconino National Forest in 2007 to provide data and information for the Travel Management planning project, which includes additional considerations.</p>

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		<p>located in areas of the National Park system, Natural Areas, or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values. (Preservation/Conservation, Tucson, AZ - #175.70.40000.160)</p>	
<p>Road and Trail System: Route Closures</p>	<p>4-49 The Forest Service should establish a baseline environmental analysis addressing closed and unauthorized routes.</p>	<p>TO SUPPORT, FACILITATE, AND ENABLE FUTURE SITE-SPECIFIC ACTION</p> <p>Where the travel planning process cannot provide the requisite site-specific analysis (e.g. archeological clearances), it nonetheless can establish a baseline environmental analysis addressing the CNF’s [Coconino National Forest’s] network of closed and unauthorized routes to support, facilitate, and enable future sitespecific action through use of NEPA’s tiering provisions; without establishing this baseline analysis, the Forest Service may unintentionally undermine its site-specific authority or make the exercise of that authority more difficult. See 40 C.F.R. §1502.20, 1508.28. Furthermore, by not preparing a baseline environmental analysis and CNF-level Travel Management Plan to support site-specific route reclamation, and restoration activities, it is difficult to imagine how the Forest Service can assure itself and the public that it is properly prioritizing these activities, in particular given cumulative impacts. We [Center for Biological Diversity et al.] anticipate that the network of decommissioned and user-created routes requiring soft closure or obliteration and complete restoration will be extensive, and we are under no illusions that the Forest Service can wave a magic wand and make these routes disappear. Nonetheless, it is incumbent upon the Forest Service to provide assurances and commitments to address this serious problem—a problem that causes persistent, ongoing, landscape-scale negative impacts to the CNF and its natural and cultural resources. (Preservation/Conservation, Tucson, AZ - #175.21.41300.201)</p>	<p>#175.21.41300.201:</p> <p>The current Travel Management project is considered a site-specific analysis to designate specific routes for motorized use on the Forest. Simply because the project does not include the construction or decommissioning of routes does not mean it is not site specific. Rather, the Travel Management project designates a system of routes for motorized use that can be used as a foundation for future planning, whether it be for route decommissioning, route improvement, or construction. The Travel Management project in no way precludes future planning efforts of this kind.</p>

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Road and Trail System: Route Closures	4-50 The Forest Service should analyze the cumulative impacts of closed or unauthorized routes that have not yet been decommissioned.	<p>BECAUSE THE IMPACTS ARE SIGNIFICANT</p> <p>The persistence of negative impacts caused by closed or unauthorized user-created routes not yet obliterated and restored or disguised by a soft closure are significant, inextricably intertwined components of route designation decisions and their cumulative impacts, and must be addressed as part of the current travel planning process. 40 C.F.R. [sections] 1502.14, 1502.16, 1508.7, 1508.8; see also Kern v. U.S. Bureau of Land Management, 284 F.3d 1062, 2002. (Preservation/Conservation, Phoenix, AZ - #175.22.41300.201)</p>	<p>#175.22.41300.201:</p> <p>We agree that the persistence of non-designated routes continue to result in impacts to Forest resources. However, all action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes; rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes.</p>
Road and Trail System: Seasonal Closures	4-51 The Forest Service should use seasonal closures.	<p>TO PROTECT THE ENVIRONMENT AND WILDLIFE WHILE ALLOWING FOR SUMMER RECREATION</p> <p>A Pro-Recreation Alternative would include the following characteristic, in addition to the current proposal:</p> <p>Use of seasonal closures, where required, to protect the environment and wildlife with the intention of keeping routes open for the summer recreation season. (Motorized Recreation, Helena, MT - #109.12.52110.530)</p>	<p>#109.12.52110.530:</p> <p>The Coconino National Forest Travel Management EIS includes several seasonal closures to ensure routes can be open to the public when appropriate, and not available for public motorized use when they are likely to result in impacts to Forest resources.</p>
Road and Trail System: Decommissioning of Roads and Trails	4-52 The Forest Service should designate unneeded routes as permanently closed and decommission them.	<p>THE FOREST SERVICE SHOULD DESIGNATE UNNEEDED ROUTES AS PERMANENTLY CLOSED AND DECOMMISSION THEM</p> <p>With more than 7,000 miles of roads and motorized trails on the ground, there should be an alternative that designates unneeded routes as permanently closed and scheduled for obliteration. (Individual, Cottonwood, AZ - #1.8.40210.001)</p>	<p>#1.8.40210.001:</p> <p>All action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes, rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes.</p>

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Road and Trail System: Decommissioning of Roads and Trails	4-52 The Forest Service should designate unneeded routes as permanently closed and decommission them.	<p>BECAUSE THERE ARE ALREADY TOO MANY ROADS</p> <p>With more than 7,000 miles of roads and motorized trails on the ground, there should be an alternative that designates unneeded routes as permanently closed and scheduled for obliteration. Those are way too many miles. No wonder this nation is overweight. (Individual, Flagstaff, AZ - #6.11.40210.719)</p>	<p>#6.11.40210.719:</p> <p>All action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes, rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes.</p>
Road and Trail System: Decommissioning of Roads and Trails	4-52 The Forest Service should designate unneeded routes as permanently closed and decommission them.	<p>AND SHOULD INDICATE WHEN NEPA ANALYSIS REGARDING DECOMMISSIONING ACTIVITIES WILL OCCUR</p> <p>The CNF [Coconino National Forest] should identify and obliterate unnecessary routes and develop a route restoration strategy wherein the Forest Service would identify and prioritize the routes slated for decommissioning, reclamation, and restoration, and establish a baseline analysis to support site-specific decommissioning and restoration activities. We [Center for Biological Diversity et al.] continue to strongly object to the Forest Service’s position in the Proposed Action (page 7) that “[d]ecisions to obliterate decommissioned roads are outside the scope of this project because they require further site-specific environmental analysis and clearances before being undertaken.” We recommend that the Record of Decision for this project include information that future decommissioning work will begin and include a timeline for the NEPA analysis required for any on-the-ground, ground-disturbing work that would occur with decommissioning. (Preservation/Conservation, Prescott, AZ - #175.19.41300.162)</p>	<p>#175.19.41300.162:</p> <p>The purpose of the Travel Management Rule is to designate a system of roads and trails for motorized use to minimize impacts to Forest resources while maintaining motorized recreational opportunities. The decommissioning of routes is outside the scope of this project.</p>
Road and Trail	4-53 The Forest	TO ENSURE RESOURCE PROTECTION, PUBLIC	#175.280.41300.200:

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System: Decommissioning of Roads and Trails	Service should acknowledge that closing and decommissioning of routes is part of an effective travel management process.	<p>HEALTH AND SAFETY, AND PROPER USE OF THE TRAVEL SYSTEM</p> <p>Reducing route densities on a map is one thing; reducing them on the ground another. This is key: we [Center for Biological Diversity et al.] firmly reject a narrow view of TMR [Travel Management Rule] process that fixates solely on the production of the MVUM [Motor Vehicle Use Map]. As discussed above, the TMR process should result in the completion of a travel management plan and thereby ensure effective travel management in harmony with the broader landscape, resource management objectives, limited Agency resources, other recreational uses, and enforcement strategies. By definition, therefore, and in light of current on-the-ground dynamics, effective travel management requires closing and reclaiming decommissioned and unauthorized routes to ensure resource protection, public health and safety, and the proper use of the forest's authorized travel system. (Preservation/Conservation, Pinetop, AZ - #175.280.41300.200)</p>	The purpose of the Travel Management Rule is to designate a system of roads and trails for motorized use to minimize impacts to Forest resources while maintaining motorized recreational opportunities. The decommissioning of routes is outside the scope of this project.
Road and Trail System: Decommissioning of Roads and Trails	4-53 The Forest Service should acknowledge that closing and decommissioning of routes is part of an effective travel management process.	<p>BECAUSE CLOSED BUT EXTANT ROUTES CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS</p> <p>A Route Restoration Strategy wherein the Forest Service would identify and prioritize the routes slated for decommissioning, reclamation, and restoration, and establish a baseline analysis to support site-specific decommissioning and restoration activities: We [Center for Biological Diversity et al.] strongly object to the Forest Service's position in the Proposed Action (PA, page 7) that "[[d]]ecisions to obliterate decommissioned roads are outside the scope of this project because they require further site-specific environmental analysis and clearances before being undertaken."</p> <p>First, the travel planning process has already provided some requisite site-specific analysis to support decommissioning</p>	#175.306-307.41300.201: We agree that the persistence of non-designated routes continue to result in impacts to Forest resources. However, all action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes; rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes.

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		<p>projects as viewed in the PA roads layer attribute table. Indeed, the Forest Service should prioritize such site-specific analysis given the serious, persistent degradation caused by the existing route system, and the prolific number of unauthorized, user-created routes to the CNF’s [Coconino National Forest] natural and cultural resources. Once the Forest Service gets a handle on the existing degradation caused by motorized use, the Forest Service can think where off-road vehicle is acceptable—within the CNF’s limited social and ecological confines.</p> <p>Second, where the travel planning process cannot provide the requisite site-specific analysis (e.g. archeological clearances), it nonetheless can establish a baseline environmental analysis addressing the CNF’s network of closed and unauthorized routes to support, facilitate, and enable future site-specific action through use of NEPA’s tiering provisions; without establishing this baseline analysis, the Forest Service may unintentionally undermine its site-specific authority or make the exercise of that authority more difficult. See 40 C.F.R. § 1502.20, 1508.28. Furthermore, by not preparing a baseline environmental analysis and CNF- level Travel Management Plan to support site-specific route reclamation, and restoration activities, it is difficult to imagine how the Forest Service can assure itself and the public that it is properly prioritizing these activities, in particular given cumulative impacts. We anticipate that the network of decommissioned and user-created routes requiring soft closure [Footnote 21: Non-invasive vegetation recovery methods F.3d 1062, 1075 (9th Cir. 2002) (“It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now”).] or obliteration and complete restoration will be extensive, and we are under no illusions that the Forest Service can wave a magic wand and make these routes disappear. Nonetheless, it is incumbent upon the Forest Service to provide assurances and commitments to</p>	

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		<p>address this serious problem—a problem that causes persistent, ongoing, landscape-scale negative impacts to the CNF and its natural and cultural resources.</p> <p>Third, the persistence of negative impacts caused by closed or unauthorized user-created routes not yet obliterated and restored or disguised by a soft closure are significant, inextricably intertwined components of route designation decisions and their cumulative impacts and must be addressed as part of the current travel planning process. 40 C.F.R. § 1502.14, 1502.16, 1508.7, 1508.8; see also Kern v. U.S. Bureau of Land Management, 284 F.3d 1062, 1075 (9th Cir. 2002) (“It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now”).</p> <p>(Preservation/Conservation, Grand Canyon, AZ - #175.306-307.41300.201)</p>	
<p>Road and Trail System: Decommissioning of Roads and Trails</p>	<p>4-54 The Forest Service should clarify how closing but leaving extant routes would meet semi-primitive setting objectives.</p>	<p>BECAUSE CLOSING A ROAD DOESN'T REMOVE THE ROAD FROM THE LANDSCAPE</p> <p>Recreation Setting: There is no indication of how closing almost 2,000 miles of existing National Forest System roads to public motorized access will help the Coconino National Forest meet semi-primitive setting objectives in semi-primitive motorized and semi-primitive non-motorized areas, especially with regards to a more natural appearing landscape. Forest Service 2010:36, 42. We [Center for Biological Diversity et al.] point out that merely administratively closing a road does not remove the road or its impacts (visually or ecologically) from the landscape. Decommissioning and obliteration are necessary to achieve the goal of meeting the SPNM ROS [Semi-Primitive Non Motorized Recreational Opportunity Spectrum] objectives. In addition, while slowing the trend toward less primitive setting characteristics may be achieved simply by limiting the proliferation of unauthorized roads, the trend could be reversed if roads were decommissioned and obliterated. Forest Service</p>	<p>#175.81.41300.540:</p> <p>Though administratively removing a route in SPNM areas may not completely remove the route from the public's view. The definition of SPNM areas are that they are isolated from the sights and sounds of human activity. Reducing the amount of routes open to motorized use reduces the sounds of motorized use and over time will also reduce the visibility of these routes. Thus, both action alternatives would be effective at moving the existing condition toward goals in the Forest Plan for SPNM areas. Lastly, the Travel Management EIS will not preclude any future planning processes to decommission non-designated routes, rather it is likely to facilitate the future planning and funding of</p>

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		2010:37. (Preservation/Conservation, Phoenix, AZ - #175.81.41300.540)	decommissioning of unnecessary routes.
Road and Trail System: Decommissioning of Roads and Trails	4-55 The Forest Service should acknowledge and consider in their analysis that closed roads continue to have environmental impacts.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE AND CONSIDER IN THEIR ANALYSIS THAT CLOSED ROADS CONTINUE TO HAVE ENVIRONMENTAL IMPACTS</p> <p>General Comment for Chapter 3: The resource effects sections imply that after roads are administratively closed, resource impacts would decline, and areas with closed roads would develop into a “more natural looking landscape” (page 37). However, the reality is that roads, whether they are driven on or not, continue to have landscape- and local-level impacts. When existing roads are left unmaintained, they still can be a source of sediment into waters. We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that in developing the biological assessment, the CNF [Coconino National Forest] work with us to describe what the impacts of the different alternatives may be absent specific plans for monitoring, maintaining roads and ditches, and/or putting closed roads to bed. (Federal Agency/Elected Official, Phoenix, AZ - #105.15.41000.220)</p>	<p>#105.15.41000.220:</p> <p>The EIS recognizes that the non-designation of one or more routes has different impacts on Forest and wildlife resources than the decommissioning and obliteration of routes. The EIS includes information that when existing routes are left unmaintained, they still can be a source of sediment into waters. We agree that the persistence of non-designated routes continue to result in impacts to Forest resources. However, all action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes; rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes.</p>
Road and Trail System: Decommissioning of Roads and Trails	4-56 The Forest Service should analyze the decommissioning and obliteration of high-clearance routes.	<p>BECAUSE THESE ROUTES DELIVER THE HIGHEST AMOUNT OF SEDIMENT INTO STREAM CHANNELS</p> <p>It is very important to note that high-clearance roads, which include ML [Maintenance Level] 2 roads, deliver the highest amount of sediment across buffer zones and into stream channels than paved or passenger roads. Forest Service 2010:63. The key concern with high-clearance and ML 2 roads is a combination of the fact that a majority of roads in the CNF [Coconino National Forest] are ML 2s or high clearance (5,820 miles), most of these roads will remain on the ground open to continued public use,</p>	<p>#175.8.41300.220:</p> <p>All action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes; rather it is likely to facilitate the future planning and funding of decommissioning of</p>

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		<p>and while many of these roads are not going to be designated open under any alternative, they will remain on the ground indefinitely. The result is that those routes on the CNF causing the most impacts to streams will continue to do so regardless of the decision made under the proposed alternatives for this planning process. An alternative must be developed and analyzed that would identify, decommission, and schedule for obliteration unnecessary routes in the CNF. We [Center for Biological Diversity, et al.] recommend that unauthorized, high-clearance routes be prioritized for decommissioning and obliteration because, as stated in the DEIS, these routes are probably contributing much more sediment than those routes that were engineered to Forest Service standards. Forest Service 2010:63. (Preservation/Conservation, Grand Canyon, AZ - #175.8.41300.220)</p>	<p>unnecessary routes. The decommissioning of routes is considered outside the scope of this project.</p>
<p>Road and Trail System: Decommissioning of Roads and Trails</p>	<p>4-57 The Forest Service should commit to follow up actions related to closing or decommissioning roads.</p>	<p>TO PROTECT HABITAT AND STREAM CROSSINGS Decommissioning/Follow-up Actions: The FEIS should commit to specific follow-up actions, such as an inventory of stream crossings, inspection of routes identified as being in poor condition, and restoration and decommissioning of closed routes. The FEIS should consider the likelihood of adverse effects to biodiversity, such as habitat loss and fragmentation, as a result of not decommissioning roads. EPA encourages the CNF to evaluate the initial cost of defragmentation versus the cost of repairing a dilapidated forest adjacent to abandoned road systems in the long term. In addition to gates or barriers at road entrances, EPA suggests the CNF restore the roads' original geomorphic and geologic topography, as well as re-plant appropriate native vegetation to accelerate the process of returning the roads to nature. The CNF should consider the number of stream crossings in need of restoration when prioritizing roads for decommissioning. (U.S. Environmental Protection Agency, San Francisco, CA - #205.5.41300.200)</p>	<p>#205.5.41300.200: All action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes, rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes. The decommissioning of routes is considered outside the scope of this project.</p>

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<p>Road and Trail System: Decommissioning of Roads and Trails</p>	<p>4-58 The Forest Service should decommission and revegetate closed and user-created roads.</p>	<p>TO IMPROVE THE CARBON SEQUESTRATION POTENTIAL OF THE FOREST</p> <p>Forests are the most significant terrestrial stores of living carbon, and in fact slow global warming by storing and sequestering carbon. [Footnote 16: See Union of Concerned Scientists, “Recognizing Forests’ Role in Climate Change,” available at http://www.ucsusa.org/global_warming/solutions/recognizing-forests-role-inclimate-change.html. See also Heiken, D., “The Straight Facts on Forests, Carbon, and Global Warming,” available at http://tinyurl.com/2by9kt] “Forest plants and soils drive the global carbon cycle by sequestering carbon dioxide through photosynthesis and releasing it through respiration.” [Footnote 17: Id.] Through photosynthesis, plants capture carbon dioxide and convert it to plant matter that then feeds the base of the entire planetary food chain.[Footnote 18: See Heiken, D., “The Straight Facts on Forests, Carbon, and Global Warming,” available at http://tinyurl.com/2by9kt.] Old-growth forests are able to store massive amounts of carbon in their trunks as well as in the soil. [Footnote 19: Id.]</p> <p>When forests are degraded or logged, their stored carbon is released back into the atmosphere during harvest and through respiration, thus becoming net contributors of carbon to the atmosphere [Footnote 20: Union of Concerned Scientists, 2004.] Forests are able to help mitigate global warming in at least three ways: conserving existing forests to avoid emissions associated with forest degradation or clearing; sequestration by increasing forest carbon absorption capacity—occurring primarily by planting trees or facilitating the natural regeneration of forests—and the substitution of sustainably produced biological products. [Footnote 21: Id.] In other words, to help our forest store more carbon, and thereby alleviate the leading cause of global warming, we need healthy forests. [Footnote 22: Id.]</p> <p>In particular, as related to travel planning, the Forest Service can</p>	<p>#175.130-131.41300.250:</p> <p>All action alternatives included in the Travel Management EIS are expected to move the Forest toward the desired conditions included in the Forest Plan and each alternative is likely to have a positive impact on forest health, thus increase carbon sequestration capacity of the forest. The Travel Management EIS will not preclude any future planning processes to decommission non-designated routes, rather it is likely to facilitate the future planning and funding of decommissioning of unnecessary routes. The decommissioning of routes is considered outside the scope of this project.</p>

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		<p>improve the carbon sequestration potential of National Forests through decommissioning and revegetating roads and user-created trails. The Wilderness Society's report, using Forest Service information and the Carbon Online Estimator, estimates that in Region 3, 2.5-3.0 metric tons of carbon could be sequestered if unneeded Forest Service roads were revegetated. This is the equivalent of removing approximately 540,000 vehicles from our roadways for an entire year. We have attached this briefing memo as Appendix O. (Preservation/Conservation, Tucson, AZ - #175.130-131.41300.250)</p>	
<p>Road and Trail System: Decommissioning of Roads and Trails</p>	<p>4-59 The Forest Service should decommission and obliterate any routes that extend into designated Wilderness areas.</p>	<p>THE FOREST SERVICE SHOULD DECOMMISSION AND OBLITERATE ANY ROUTES THAT EXTEND INTO DESIGNATED WILDERNESS AREAS</p> <p>It appears that 16 routes are extending into designated wilderness areas. If, in fact, these routes present incursions into wilderness areas, they must be obliterated immediately. (Preservation/Conservation, Prescott, AZ - #175.332.41300.621)</p>	<p>#175.332.41300.621: We're not clear what you are referring to in your comment about 16 routes in Wilderness areas. Though there may be some mapping errors that appear to show a portion of a route within a Wilderness boundary, there are currently no known system routes in designated Wilderness on the Coconino National Forest. No user-created routes that may have been identified within Wilderness boundaries will be designated for motorized use. The Coconino National Forest is very concerned about maintaining Wilderness character, which means ensuring there is no unauthorized motorized use in Designated Wilderness areas.</p>
<p>Road and Trail System: Decommissioning of Roads and Trails</p>	<p>4-60 The Forest Service should revegetate any routes that extend into designated Wilderness</p>	<p>THE FOREST SERVICE SHOULD REVEGETATE ANY ROUTES THAT EXTEND INTO DESIGNATED WILDERNESS AREAS</p> <p>We [Center for Biological Diversity et al.] recommend that any routes extending into designated wilderness areas must be</p>	<p>#175.72.41300.621: Though there may be some mapping errors that appear to show a portion of a route within a Wilderness boundary, there are currently no known system routes in</p>

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	areas.	revegetated immediately. (Preservation/Conservation, Prescott, AZ - #175.72.41300.621)	Designated Wilderness on the Coconino National Forest. No user-created routes that may have been identified within Wilderness boundaries will be designated for motorized use. The Coconino National Forest is very concerned about maintaining Wilderness character, which means ensuring there is no unauthorized motorized use in Designated Wilderness areas.
Route Selection, Designation, and Design	4-61 The Forest Service should model their trail system on the one in Colorado.	<p>BECAUSE IT IS WELL MANAGED</p> <p>We [respondent and off-road motorcycle friends] have long admired the well-managed off-road use program in Colorado and have worked to try to influence the establishment of a similar trail system in Arizona and have offered repeatedly to help maintain such a trail system. (Individual, Chandler, AZ - #118.2.42000.530)</p>	<p>#118.2.42000.530:</p> <p>The Coconino National Forest depends heavily on assistance from volunteers such as you to maintain trails and roads. The Travel Management Rule involves the establishment of a designated road and trail system for motorized use. We hope to work with you and others to establish and continue a productive relationship for a safe, sustainable, and fun motorized road and trail system on the Coconino National Forest.</p>
Route Selection, Designation, and Design	4-62 The Forest Service should model their trails systems on selected ones in Idaho, Oregon, and California	<p>THE FOREST SERVICE SHOULD MODEL THEIR TRAILS SYSTEM ON SELECTED ONES IN IDAHO, OREGON, AND CALIFORNIA</p> <p>The following are examples of adequate OHV trail systems that should be used to guide development of this project. The alternatives for this project should be compared to these OHV trail systems. Also, it would help the project team understands the needs of OHV recreationists by visiting these area and experiencing them on an OHV. Examples of the types of systems that should be developed in the project area include:</p> <p>a. Danskin Mountain in the Boise National Forest,</p>	<p>#109.48.42000.530:</p> <p>A main goal of the Travel Management project is to establish a safe, sustainable, and fun motorized road and trail system on the Coconino National Forest. The Coconino National Forest reviewed each route for potential impacts to Forest resources and for potential benefits to recreation to design alternatives for consideration of a motorized system. The Coconino National Forest recognizes there</p>

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		<p>(http://www.stayontrails.com/assets/content/maps/Danskin-Mountains-map.pdf),</p> <p>b. South Fork Boise River in the Boise and Sawtooth National Forests,</p> <p>c. Winom-Frazier in the Umatilla/Whitman National Forest,</p> <p>d. Prospect OHV area in the Rogue River National Forest,</p> <p>e. Paiute OHV System in the Fishlake National Forest,</p> <p>f. East Fork Rock (http://www.fs.fed.us/r6/centraloregon/recreation/cohvops/efrindex.shtml),</p> <p>g. Mendocino National Forest (http://www.fs.fed.us/r5/mendocino/recreation/ohv/, and</p> <p>h. High Lakes and Blue Lake Trail System in the Gifford Pinchot National Forest, (http://www.fs.fed.us/gpnf/recreation/trailbikes/documents/trails5269small.pdf).</p> <p>i. To meet the public's need for motorized recreational opportunities, the project area and every national forest and BLM district must have OHV systems comparable to these examples. (Motorized Recreation, Helena, MT - #109.48.42000.530)</p>	<p>are many well established motorized trail systems in other public lands and endeavors to work toward establishing a system with similar attributes over time while protecting Forest resources for future generations.</p>
Route Selection, Designation, and Design	4-63 The Forest Service should provide a variety of trails.	<p>INCLUDING VARIOUS LEVELS OF DIFFICULTY AND FOR DIFFERENT TYPES OF MOTORIZED USERS</p> <p>An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors, including motorcycles, ATVs, and four-wheel drive vehicles. Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick by which the team should measure travel plan alternatives. (Motorized Recreation, Helena, MT - #109.19.42000.530)</p>	<p>#109.19.42000.530:</p> <p>The Coconino National Forest Travel Management EIS includes a system of designated roads and trails for motorized use. The action alternatives considered between 39 and 126 miles of motorized trail for designation. In addition, there is over 3,000 miles of designated roads for motorized use. Most of this 3,000 miles is high clearance undeveloped routes well suited to use by motorcycles, ATVs, and 4-</p>

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			wheel drive vehicles. For this reason, the Coconino National Forest believes these alternatives provide for an adequate motorized route system.
Route Selection, Designation, and Design	4-64 The Forest Service should retain the current designations for all existing routes.	<p>TO ENSURE A NO-NET LOSS OF MOTORIZED OPPORTUNITIES</p> <p>Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures, and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities with this action. This can be accomplished by implementing a route designation for all existing routes. (Motorized Recreation, Helena, MT - #109.22.52000.530)</p>	<p>#109.22.52000.530:</p> <p>Though there may be cumulative effects from decreasing opportunities for motorized use on the Coconino National Forest and surrounding areas, these effects may or may not be significant. The cumulative effects for impacts to motorized use will be fully considered in the FEIS.</p>
Route Selection, Designation, and Design	4-65 The Forest Service should designate all reasonable routes as dual-use.	<p>TO ALLOW THE SYSTEM TO BE USED BY MOTORIZED RECREATIONISTS</p> <p>The continual closure of motorized trails has forced OHVs to be operated on forest roads to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures, combined with the lack of a reasonable system of roads and trails with dual-use designation, has not been adequately considered in past evaluations and decisionmaking. We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists.</p> <p>Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decisionmaking and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past. (Motorized Recreation, Helena, MT - #109.58.52000.530)</p>	<p>#109.58.52000.530:</p> <p>There is no need for a dual use designation on Coconino National Forest lands. The Travel Management Rule requires the Forest to designation each route as open for all vehicles, open for passenger car only, open for <50 inches, or open to single track vehicles. All ATVs, motorcycles, 4-wheel drive vehicles, and passenger cars can drive on routes designated as open for all vehicles.</p>
Route Selection,	4-66 The Forest	BECAUSE DOING SO INEVITABLY RESULTS IN	#109.18.52000.540:

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Designation, and Design	Service should avoid using the existing motorized trail inventory as the route inventory for both motorized and non-motorized uses.	<p>REDUCTION OF MOTORIZED ACCESS AND FAILS TO CONSIDER OTHER OPTIONS</p> <p>A motorized travel plan is a plan that specifically designates roads, trails, and areas for motorized use, and designates which vehicles will be allowed on which routes and if seasonal restrictions apply. A comprehensive trail designation plan does the same thing except that it includes all trail uses, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a “comprehensive” travel plan by using only the existing inventory of motorized routes. They do this by identifying existing motorized trails that are good for mountain bikes, equestrians, and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn’t mean the Agency can’t take into consideration the effect each alternative will have on non-motorized visitors. It can, and that should be part of the NEPA analysis. But that is totally different from specifically providing a nonmotorized trail system via the existing inventory of motorized routes. We support the creation, designation, and management of non-motorized trails, but not at the expense of motorized visitors. We request that the Agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the Agency should consider options that do not reduce the existing opportunity for motorized users. (Motorized Recreation, Helena, MT - #109.18.52000.540)</p>	The Travel Management Rule requires the Coconino National Forest to designate a forest-wide system of motorized roads and trails, and areas. The scope of this project only extends to the designation of routes and areas for motorized use.
Route Selection, Designation,	4-67 The Forest Service should ensure	TO ADDRESS THE IMBALANCE BETWEEN MOTORIZED AND NON-MOTORIZED TRAILS	#109.47.42000.530: There is no requirement to designate an

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and Design	that an equitable amount of motorized trails are provided in the Coconino National Forest.	To bring equality to the allocation of non-motorized to motorized trails in the Coconino National Forest, [the Forest Service] must either convert 406 miles ((812/2)-0) of non-motorized trails to motorized trails or 812 miles (812-0) of new motorized trail must be constructed. The proposed Travel Plan does not adequately address this imbalance, and it would be a step in the wrong direction and would create an even greater imbalance. This is not a reasonable direction for the Coconino travel plan. (Motorized Recreation, Helena, MT - #109.47.42000.530)	equal number of motorized and non-motorized trails.
Route Selection, Designation, and Design	4-68 The Forest Service should allow ATVs to use roads closed to full-sized vehicles.	<p>THE FOREST SERVICE SHOULD ALLOW ATVS TO USE ROADS CLOSED TO FULL-SIZED VEHICLES</p> <p>All roads to be closed to full-size vehicles should be converted to ATV routes. This is a reasonable alternative for all existing roads. (Motorized Recreation, Helena, MT - #109.25.42000.530)</p>	<p>#109.25.42000.530:</p> <p>Many of the roads not designated for motorized use were given this status because they are located in sensitive wildlife habitat, result in user-conflict, affect cultural resources, or lead to excess sedimentation. Changing these roads all to motorized trails would not resolve these issues, which are to be considered as minimization criteria under the Travel Management Rule. Most of the ATV routes submitted during public comment were designated as ‘all vehicle’ roads in both alternatives, and would continue to be used by ATVs. See the Record of Decision for more detail.</p>
Route Selection, Designation, and Design	4-69 The Forest Service should reconsider allowing recreational access on roads owned or maintained by grazing	<p>BECAUSE IT PLACES AN UNDUE BURDEN ON THE RANCHERS AND MAY CONSTITUTE TRESPASS ON ARIZONA STATE LANDS</p> <p>Regardless of which of the alternatives is depicted or selected as the Preferred Alternative, this comment applies to all maps associated with the Travel Management Plan and any and all</p>	<p>#201.8.40210.823:</p> <p>Routes with no Forest Service jurisdiction are generally not shown on the Motor Vehicle Use Map, except for state highways, interstates, or county roads. The Forest generally avoided designating roads</p>

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	lessees.	<p>other maps produced by the Coconino National Forest for public use.</p> <p>Many of the routes that leave the Forest lands are ranch roads that are owned or maintained by grazing lessees. Identifying these routes for recreational use, without providing funding for maintenance, places an undue burden on the ranchers. Some of the routes cross lands leased for commercial purposes and these lands are not available for recreational use; some are considered to be in trespass by the Department [Arizona State Land Department]. (Arizona State Land Department, Phoenix, AZ - #201.8.40210.823)</p>	<p>on private lands that are not under the agency's jurisdiction. The Coconino National Forest had several meetings with State Lands Department staff to ensure that routes would be correctly displayed for access purposes.</p>
Route Selection, Designation, and Design	4-70 The Forest Service should convert existing Maintenance Level 2 routes to motorized trails rather than creating new routes.	<p>TO AVOID NEW IMPACTS WHILE MEETING THE OVERALL DENSITY OF ONE MILE PER SQUARE MILE</p> <p>In attempting to achieve an overall density of one mile per square mile, the CNF [Coconino National Forest] should be looking at converting existing Maintenance Level 2 roads (within a one mile per square mile road system) to motorized trails rather than creating new "footprints" on the ground, as stated in the FLEA [Flagstaff Lake Mary Ecosystem Analysis] amendment (17) to the Forest Plan (p. 206–269). (Preservation/Conservation, Tucson, AZ - #175.317.41000.410)</p>	<p>#175.317.41000.410:</p> <p>The Forest Plan states, "Convert some roads that are not needed for the road system into motorized trails and decrease to a width suitable for ATV's. Motorized trails will promote Semi-primitive Motorized experiences for individuals and small groups. Allow large group events or races on a case-by- case basis. Motorized trails are well engineered to avoid impacts. Some level II roads (high clearance vehicle use) may be used for portions of motorized trail routes." This does not mean that only existing Level 2 roads can be considered for designation as motorized trails.</p>
Route Selection, Designation, and Design	4-71 The Forest Service should develop a travel management plan that would support requests for additional	<p>BECAUSE CURRENT FUNDING LEVELS ARE INADEQUATE</p> <p>By the Forest Service's own figures, there are insufficient funds to maintain a 3,000+-mile road system, thereby risking public safety and causing erosion to soils. The CNF [Coconino National Forest] can only maintain 11% of its roads under current budget</p>	<p>#175.67-68.41000.835:</p> <p>Both action alternatives in the DEIS involve reducing the route system available for motorized use by over 30 percent. This is expected to increase the percentage of designated routes maintained to standard,</p>

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	<p>route maintenance funding.</p>	<p>conditions. Forest Service 2007:2 [Citation not provided]. The Forest Service also has an annual maintenance backlog of \$2.27 million and a total deferred backlog of over \$40.4 million. Forest Service 2006. This does not account for funds that would be necessary to provide for soft closures or obliteration and restoration of decommissioned or unauthorized routes. We believe that by developing a travel management plan to accompany the MVUM [Motor Vehicle use Map], it would support and justify Forest Service budget requests and appropriations. While some ORV enthusiasts may enjoy the challenge of steep, rutted, and muddy routes, such enjoyment must not come at the expense of the Forest Service’s already inadequate budgetary conditions or its duty to maintain safety standards and to protect and conserve the CNF’s natural and cultural resources.</p> <p>In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreation opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; [begin bold formatting] and the availability of resources for that maintenance and administration [end bold formatting] (36 C.F.R. [section] 212.55(a)).</p> <p>The average number of miles of road maintained from 2005 through 2008 is just over 532 miles, the majority of that being passenger car roads, leaving the vast majority of ML [Maintenance Level] 2 roads in the forest unmaintained, the same roads that cause the most significant amount of damage to natural resources.</p>	<p>thus reducing impacts Forest resources and moving towards goals stated in the Forest Plan. In designating a system of routes and areas, the Travel Management DEIS considers effects to Forest resources including recreation conflicts, access, and impacts to Forest resources.</p>

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		<p>While we [Center for Biological Diversity et al.] agree that “closing all system roads except those that can be maintained is not a viable solution” under the current maintenance funding crisis, there certainly is more room for improvement over the current situation and the proposed road systems. Forest Service 2010b:16.</p> <p>(Preservation/Conservation, Grand Canyon, AZ - #175.67-68.41000.835)</p>	
Route Selection, Designation, and Design	4-72 The Forest Service should not use the lack of funding for maintenance as a reason to close high-clearance trails.	<p>BECAUSE THESE ROUTES DO NOT REQUIRE MAINTENANCE</p> <p>As road maintenance costs appear to be a major concern, it should be pointed out that many of the routes that are suitable for high-clearance 4x4 vehicles not only do not require regular maintenance nor is it desired for maintaining the 4x4 recreation opportunities. (Individual, Sedona, AZ - #112.3.54100.835)</p>	<p>#112.3.54100.835:</p> <p>Road maintenance costs were not a determinant to not designate any specific route or routes. Road maintenance costs were considered in the Travel Analysis Process, which was one consideration in the development of the alternatives in the DEIS.</p>
Route Selection, Designation, and Design	4-73 The Forest Service should include criteria beyond miles of routes available for motorized travel in their analysis of socioeconomic and recreational impacts.	<p>THE FOREST SERVICE SHOULD INCLUDE CRITERIA BEYOND MILES OF ROUTES AVAILABLE FOR MOTORIZED TRAVEL IN THEIR ANALYSIS OF SOCIOECONOMIC AND RECREATIONAL IMPACTS</p> <p>The analysis must determine logical significance criteria for socio-economic and recreational opportunity impacts. Indicators such as miles of routes available for motorized use are useful, but others are needed for adequate analysis, such as number of loops, diversity of modality, number of existing campsites closed, level of difficulty, etc. (Motorized Recreation, Pocatello, ID - #172.11.40210.530)</p>	<p>#172.11.40210.530:</p> <p>Significance of impacts to each resource is decided by the Responsible Official, which is the Forest Supervisor. The Travel Management EIS includes a full analysis of impacts to socioeconomic and recreation issues. Based on your comments, the FEIS was updated to include more specific measures that could be evaluated to determine significance.</p>
Route Selection, Designation, and Design: Connecting/Looping Trails	4-74 The Forest Service should provide for interconnecting OHV routes.	<p>TO ALLOW FOR LEGAL OPERATION OF OHVS</p> <p>Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not</p>	<p>#109.57.41000.530:</p> <p>There is no need for a dual use designation on Coconino National Forest lands. The Travel Management Rule requires the Forest to designation each route as open for all vehicles, open for passenger car only,</p>

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		<p>designated a functional network of dual-use routes to interconnect to OHV routes. Dual-use is essential for the family OHV experience. Therefore, these closure decisions are forcing the OHV recreationists to ride nondesignated dual-use routes illegally. The proposed action must include these designations to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect, be one of the primary objectives of the Travel Management Plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing. Without the dual-use designation, the proposed action would transform family OHV trips from healthy family-oriented recreation to an illegal activity. This is not a reasonable or acceptable outcome.</p> <p>(Motorized Recreation, Helena, MT - #109.57.41000.530)</p>	<p>open for <50 inches, or open to single track vehicles. All ATVs, motorcycles, 4-wheel drive vehicles, and passenger cars can drive on routes designated as open for all vehicles.</p>
<p>Route Selection, Designation, and Design: Connecting/Looping Trails</p>	<p>4-75 The Forest Service should provide long-distance figure-8 motorized routes.</p>	<p>TO MEET THE NEEDS OF MOTORIZED RECREATIONISTS</p> <p>To reasonably meet the needs of the public for motorized recreational opportunities, we [Capital Trail Vehicle Association] request that the proposed alternative include the following: Provide the type of long-distance figure-8 routes, loops, and side destinations desired by OHV recreationists:</p> <ul style="list-style-type: none"> i. Loops ranging from 20 to 60 miles; ii. Many stops and side destinations; iii. Documents and preserves the historic nature of the area; iv. Additional use of dual-use routes so that OHVs can connect with trails systems; v. Grants could be used for signing at each site and the development of interpretative literature, brochures, and maps; 	<p>#109.14.42000.530: Thank you for your suggestions. Many of these suggestions were considered in the design of alternatives for the Travel Management DEIS. The Travel Management DEIS includes designation of a majority of the primitive road system for motorized use that allows for loops, stops and side destinations, preservation of historic areas, and long recreational motorized experiences. We hope to implement a decision on this DEIS with grant funding, volunteers, and use of appropriated funds.</p>

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		vi. Grants could be used where required for route improvements. (Motorized Recreation, Helena, MT - #109.14.42000.530)	
Route Selection, Designation, and Design: Route Design	4-76 The Forest Service should consider the use of water bars.	<p>TO REDUCE SEDIMENT PRODUCTION</p> <p>The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from trails and roads (July 2007 Stream Notes at http://www.stream.fs.fed.us). Many other best management practices are available to control sediment production as demonstrated by the bibliography at http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf. (Motorized Recreation, Helena, MT - #109.37.42200.246)</p>	<p>#109.37.42200.246:</p> <p>We are very aware of water bars and use them, when appropriate to reduce water quality impacts from roads and minimize water damage to routes. All designated routes will be subject to management BMPs where appropriate.</p>
Route Selection, Designation, and Design: Route Design	4-77 The Forest Service should consider using a SWECO trail machine for construction and maintenance of water bars/dips/mounds.	<p>TO FACILITATE MAINTENANCE</p> <p>The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. OHV trail maintenance and gas tax monies are available to fund this maintenance. Each region could set up a program similar to the Trails Unlimited program (http://www.fs.fed.us/trailsunlimited/). AmeriCorps-type labor could also be used. The SWECO could not be used on motorcycle single-track trails but they typically require less maintenance and water bars/dips/mounds can usually be constructed on these trails by hand work. (Motorized Recreation, Helena, MT - #109.36.42200.530)</p>	<p>#109.36.42200.530:</p> <p>Thanks for your suggestions. The Coconino National Forest is familiar with SWECO trail machines and has used these in the past. Trail maintenance and other road and trail maintenance BMPs will be used when appropriate to reduce water quality impacts from roads and minimize water damage to routes.</p>
Route Selection, Designation, and Design: Signage	4-78 The Forest Service should provide for adequate signage.	<p>TO INCREASE COMPLIANCE WITH THE PLAN</p> <p>For the TMR to be effective, an active enforcement plan will need to be implemented, especially if the general public views this plan as unreasonable. Relying on the general public to obtain and be able to interpret maps is an unrealistic assumption. To facilitate an effective enforcement plan, proper signage is a</p>	<p>#165.9.40300.002:</p> <p>The Coconino National Forest is currently actively working to place road and feature signs throughout the Forest to better facilitate user navigation. We feel this will help with enforcement and use of the Motor</p>

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		necessity. (Place-based group, Flagstaff, AZ - #165.9.40300.002)	Vehicle Use Map once a decision is made on the Travel Management EIS.
Route Selection, Designation, and Design: Signage	4-79 The Forest Service should ensure that all routes are appropriately marked.	<p>INCLUDING REMOVING SIGNS FROM ALL CLOSED ROADS TO AVOID USER CONFUSION</p> <p>The Department [Arizona Game and Fish Department] recommends that in addition to the Motorized Vehicle Use Map (MVUM), all open roads should be signed/marked open by the current numbered-sign system and all roads to be closed should have the numbered-signs removed. As funds allow, the Department recommends that closed roads be obliterated and removed from the forest system. It is understood that the MVUM will be the sole means of notifying the forest users which roads are open and which roads are closed.</p> <p>It is also understood that after the implementation of the TMR [Travel Management Rule] all roads currently signed (numbered-sign) will remain signed including roads closed by the TMR process. This will add an aspect of confusion to the forest user because the forest user views a road that has a numbered-sign as an open road. It is understood that removing the signs from closed roads and ensuring all open roads are signed will be an additional workload and an increased financial burden for CNF [Coconino National Forest]; however, the reality of using just a map to designate the open and closed roads throughout the forest would be difficult for many forest users to distinguish open from closed roads on the ground. In addition, signing only the open roads on the ground will allow for more consistent and proper enforcement of the closed roads throughout the forest. CNF has indicated that the numbered-signs need to remain, even on the closed roads, because the roads are still part of the forest road system. The Department recommends if the road is closed, the numbered-sign should be removed from the road; as funds allow, the closed roads should be obliterated and removed from the forest system. (Arizona Game and Fish Department, Phoenix, AZ</p>	<p>#160.13.43000.002:</p> <p>Thank you for your input, and we concur with your statement that depending solely on the MVUM for implementation while allowing closed roads to remain signed may be confusing to the public. The Coconino National Forest will follow the policy described in the Travel Management Rule, which is that the MVUM will be the primary enforcement mechanisms, but signage (specifically the signing of closed roads), will be used to reinforce undesignated roads where necessary. The posting of ‘closed’ signs will be determined based on the availability of resources and monitoring to help identify ‘problem areas’ where non-designated routes continued to be used by motor vehicles.</p>

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Route Selection, Designation, and Design: Signage	4-80 The Forest Service should ensure that signs on routes identify boundaries of State Lands.	<p>- #160.13.43000.002)</p> <p>TO MAKE CLEAR WHERE OFF-ROAD TRAVEL AND FOREST PRODUCT COLLECTION IS PROHIBITED</p> <p>Regardless of which of the alternatives is depicted or selected as the Preferred Alternative, this comment applies to all maps associated with the Travel Management Plan and any and all other maps produced by the Coconino National Forest for public use.</p> <p>Off-road travel is not permitted on State Trust land. Neither is collection of natural products. Both activities are being evaluated in conjunction with the TMP on the Forest lands. Signage must be placed along the routes to identify where the boundary lines between Forest Service and State Trust lands are situated, so the recreating public will be aware of the associated restrictions. (Arizona State Land Department, Phoenix, AZ - #201.9.40210.640)</p>	<p>#201.9.40210.640:</p> <p>The Coconino National Forest hopes to work with the Arizona State Land Department to help educate public lands users on jurisdictional boundaries and rules subject to these lands.</p>
Route Selection, Designation, and Design: Signage	4-81 The Forest Service should acknowledge that improving signage may not be sufficient to stop illegal intrusions into Wilderness areas.	<p>BECAUSE THESE INSTANCES MAY BE REFLECTIVE OF A DISREGARD FOR THE LAW</p> <p>The CNF [Coconino National Forest] is directed to “[I]ocate the wilderness boundaries and post them as needed ... to prevent unauthorized intrusions. Close existing roads ... to prevent intrusions.” Forest Service 1987:106, as amended . The TAP [Travel Analysis Process] states there has been “some motorized use occurring in areas of the Forest that are managed for non-motorized opportunities, including in wilderness areas” and goes on to imply that these trespasses are due to a lack of clarity about where motorized uses are allowed. Forest Service 2010b:8. With more than 100 miles of user-created routes on the ground and clear violations of closures in Wilderness areas, we disagree that these illegal uses of the Forest Service lands is due to confusion or a lack of clarity, but rather due to a disregard for the law. (Preservation/Conservation, Tucson, AZ - #175.160.43000.621)</p>	<p>#175.160.43000.621:</p> <p>The Coconino National Forest continually works to protect Wilderness values and is constantly vigilant to prevent intrusions to Designated Wilderness areas.</p>

Category	Public Concern	Comment	Response
Route Selection, Designation, and Design: Maps	4-82 The Forest Service should identify legally permitted activity on the maps and ensure that the plan is consistent with the 1983 agreement with the Arizona Lands Department.	<p>THE FOREST SERVICE SHOULD IDENTIFY LEGALLY PERMITTED ACTIVITY ON THE MAPS AND ENSURE THAT THE PLAN IS CONSISTENT WITH THE 1983 AGREEMENT WITH ARIZONA STATE LANDS DEPARTMENT</p> <p>Roads legalized as public roads rights-of-way by the Department [Arizona State Land Department] may be depicted as public roads. Many of the major access roads included in this TMP are under a right-of-way exchange agreement dated 1983. Maps published by the Forest Service should identify what is legally permitted and what is not. Further analysis is needed to determine if there are any changes to roads included in the agreement. (Arizona State Lands Department, Phoenix, AZ - #201.5.40210.410)</p>	<p>#201.5.40210.410:</p> <p>We agree. In some circumstances we are unclear on which roads are considered public rights-of-way by the Arizona Public Land Department. We have provided information in the DEIS on which routes may be designated and met with the Arizona Dept. of Public Lands to identify those roads without a legal right-of-way. Those roads without a legal right-of-way on Arizona State Lands Department property have been removed from Alternative 3 and 4 in the FEIS.</p>
Route Selection, Designation, and Design: Maps	4-83 The Forest Service should ensure that a Joint Use Agreement is in place for routes depicted under as instrument (e.g., transmission lines or pipeline service roads).	<p>THE FOREST SERVICE SHOULD ENSURE THAT A JOINT USE AGREEMENT IS IN PLACE FOR ROUTES DEPICTED UNDER AN INSTRUMENT</p> <p>Regardless of which of the alternatives is depicted or selected as the Preferred Alternative, this comment applies to all maps associated with the Travel Management Plan and any and all other maps produced by the Coconino National Forest for public use.</p> <p>Any proposed route that is already under an instrument (e.g., electrical transmission lines and gas pipeline service roads) will not be depicted or otherwise designated without a Joint Use Agreement or other instrument that addresses liability and maintenance. (Arizona State Lands Department, Phoenix, AZ - #201.7.40210.180)</p>	<p>#201.7.40210.180:</p> <p>Currently, the Forest is completely open to motorized use and cross-country travel except in explicit closure areas. As a result, either alternative chosen in a decision on the Travel Management Rule would not increase liability issues or maintenance needs. The Coconino National Forest hopes to work with you over time to establish and update Joint Use Agreements where appropriate to address liability and maintenance issues on designated routes.</p>
Route Selection, Designation, and Design: Maps	4-84 The Forest Service should include a disclaimer on all maps.	<p>THAT CLARIFIES THE ACCESS POLICIES FOR STATE TRUST LANDS</p> <p>The Department [Arizona State Land Department] requests that following disclaimer appear on all maps:</p>	<p>#201.2.40210.640:</p> <p>The Coconino National Forest understands your concerns and will attempt to incorporate some of the disclaimer in your comment on</p>

Category	Public Concern	Comment	Response
		<p>Disclaimer: Travel routes depicted across Arizona State Trust lands do not imply legal public access to use or cross State Trust lands. Any public use of routes on State Trust lands is strictly under the jurisdiction of the Arizona State Land Department, and all users must comply with State policies and regulations in order to legally use or traverse State Trust lands.</p> <p>OHV trails are designated for use by holders of Arizona State Land Department recreational use permits, operators of OHVs bearing a decal issued by the Arizona Department of Transportation, and/or hunters or anglers with valid licenses issued by the Arizona Game and Fish Department. OHV trails are not maintained</p> <p>The State assumes no liability, obligation or responsibility for use or condition of these trails. Use these trails at your own risk. (Arizona State Land Department, Phoenix, AZ - #201.2.40210.640)</p>	<p>the MVUM map. The second part of your disclaimer regarding trails does not seem applicable as the Coconino National Forest is not designating any motorized trails on State lands.</p>
Route Selection, Designation, and Design: Maps	4-85 The Forest Service should acknowledge that major access roads can be designated as OHV routes by the Arizona State Lands Department.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT MAJOR ACCESS ROADS CAN BE DESIGNATED AS OHV ROUTES BY THE ARIZONA STATE LANDS DEPARTMENT</p> <p>Major access roads, if they are not under a legal right-of-way (ROW) or other instrument, may be classified as OHV trails by the Department [Arizona State Land Department] per [section] 28-1171.8. All OHV trails will be reviewed and approved by the Planning and Engineering, Range and ROW Sections before the publication of maps. OHV trails can be upgraded to public access roads upon issuance of a ROW or Special Land Use Permit (SLUP). (Arizona State Land Department, Phoenix, AZ - #201.6.40210.410)</p>	<p>#201.6.40210.410: We're assuming you're referring to access roads on State lands. The Coconino National Forest understands that the Arizona State Land Department may manage routes on State lands. The Coconino National Forest hopes to continue to work with the Arizona State Land Department to coordinate for appropriate and consistent motorized use on these routes.</p>
Route Selection, Designation, and Design:	4-86 The Forest Service should ensure that only roads and	<p>THE FOREST SERVICE SHOULD ENSURE THAT ONLY ROADS AND TRAILS APPROVED BY THE ARIZONA STATE LAND DEPARTMENT ARE INCLUDED ON</p>	<p>#201.4.40210.640: We're assuming you're referring to access roads and trails on State lands. We will</p>

Category	Public Concern	Comment	Response
Maps	trails approved by the Arizona State Land department are included on maps.	<p>MAPS Regardless of which of the alternatives is depicted or selected as the Preferred Alternative, this comment applies to all maps associated with the Travel Management Plan and any and all other maps produced by the Coconino National Forest for public use.</p> <p>Hillshades and/or contour lines are acceptable background imagery. Only the roads and trails approved by the Department [Arizona State Land Department] may be depicted. (Arizona State Land Department, Phoenix, AZ - #201.4.40210.640)</p>	work with you to the extent possible to ensure that those routes depicted on the MVUM map are those approved by the Department.
Route Selection, Designation, and Design: Maps	4-87 The Forest Service should ensure maps do not show dispersed camping sites, stock tanks, windmills, corrals, shooting sites, or dumpsites on State Trust lands.	<p>THE FOREST SERVICE SHOULD ENSURE MAPS DO NOT SHOW DISPERSED CAMPING SITES, STOCK TANKS, WINDMILLS, CORRALS, SHOOTING SITES, OR DUMPSITES ON STATE TRUST LANDS</p> <p>Regardless of which of the alternatives is depicted or selected as the Preferred Alternative, this comment applies to all maps associated with the Travel Management Plan and any and all other maps produced by the Coconino National Forest for public use.</p> <p>No dispersed camping sites, stock tanks, windmills, corrals, shooting sites, dump sites, etc. will be shown on State Trust lands. (Arizona State Land Department, Phoenix, AZ - #201.3.40210.640)</p>	<p>#201.3.40210.640:</p> <p>The MVUM map generally includes routes, camping corridors, and major landmarks. The Coconino National Forest has no plans to include any camping corridors on non-federal lands. Corrals, windmills, stock tanks, dump sites, and shooting sites are not considered major landmarks and will not be on the MVUM map.</p>
Enforcement	4-88 The Forest Service should more strictly enforce restrictions on ORVs.	<p>BECAUSE ORVS DAMAGE THE ENVIRONMENT</p> <p>It is way past time to get ORVs under control. There are too many operators who have no regard for the environment or other people using the Coconino National Forest. There needs to be stiffer penalties, including the confiscation of ORVs. (Individual, Flagstaff, AZ - #6.9.54100.165)</p>	<p>#6.9.54100.165:</p> <p>One of the main purposes of the Travel Management Rule is to address unmanaged recreation, including use of Off-Highway Vehicles on national forest lands. Penalties for illegal activities are based on State and Federal laws and cannot be changed by an executive agency such as the Forest Service.</p>
Enforcement	4-89 The Forest Service should include	TO ENSURE THAT THE PROGRAM IS ADEQUATE TO	#205.6.30100.830:

Category	Public Concern	Comment	Response
	a detailed monitoring and enforcement strategy in the plan.	<p>ENFORCE THE PLAN</p> <p>Monitoring and Enforcement: We [EPA] recommend the FEIS demonstrate that the proposed monitoring and enforcement strategy is adequate to ensure that motorized vehicle use will not violate access restrictions or exacerbate already identified road-related resource problems. Such a strategy should include specific information on the monitoring and enforcement program priorities and focus areas (e.g., issues, specific locations), personnel needs, costs, and funding sources. We recommend the monitoring and enforcement strategy be periodically updated (e.g., annually or biennially). (U.S. Environmental Protection Agency, San Francisco, CA - #205.6.30100.830)</p>	The Coconino National Forest does plan to establish and maintain monitoring and enforcement plans for managing motorized use. Including monitoring and enforcement plans is outside of the Travel Management planning process and administrative in nature. Establishing monitoring and enforcement plans at this point could be considered pre-decisional as a monitoring and enforcement plan would be highly dependent on what alternative is chosen.
Enforcement	4-90 The Forest Service should ensure that enforcement is appropriately considered in the travel management plan.	<p>TO ENSURE THAT VISITORS AND NATURAL AND CULTURAL RESOURCES ARE PROTECTED</p> <p>A Law Enforcement Strategy crafted in light of the adaptive management strategy to ensure that CNF [Coconino National Forest] visitors and natural and cultural resource values are protected, and to guide law enforcement activities. [Footnote 22: Within the Forest Service, law enforcement is ‘stovepiped’; that is, it is largely independent of and separate from resource management activities. Given, as a practical matter, that you cannot rationally decouple law enforcement on the CNF from resource management, the Travel Plan should provide guidance to overcome potential problems implicated by the Forest Service’s internal Agency structure.] As a component of the travel planning and NEPA processes, the CNF would strategize with Forest Service line, law enforcement and forest protection officers, as well as resource specialists, to identify solid, effective strategies to best ensure that motorized use is constrained within the limits defined by the Travel Plan. These strategies could include concentrated enforcement patrols during high-use weekends and highuse areas linked to conditional decisions, such as area closures, such that if there were a certain</p>	<p>#175.309-310.40300.530:</p> <p>The Coconino National Forest does plan to establish and maintain monitoring and enforcement plans for managing motorized use. Including monitoring and enforcement plans is outside of the Travel Management planning process and administrative in nature. The Coconino National Forest plans to use education, enforcement, and engineering efforts in our endeavor to manage motorized use across the Forest. This includes working closely with volunteers and other law enforcement agencies to focus our joint resources for effective results.</p>

Category	Public Concern	Comment	Response
		<p>number of law enforcement violations, line officers would impose an area closure. This provides an important incentive for the motorized community to self-police its activities.</p> <p>Wildlife biologists have recognized problems with open roads that expose large mammals, such as deer, pronghorn, cougar, and bighorn sheep, to heavy hunting pressure, poaching, and harassment (Davidson et al. 1996; Trombulak and Frissell 2000; Bancroft 1990). Closing primitive dirt roads, by reducing access to poachers and other land abusers, affords relief to law enforcement officials tasked with this perennial law enforcement headache (Foreman 2004, Buckley and Pannell 1990). We realize, however, the magnitude of effectively enforcing route closures on the scale necessary to implement the TMR [Travel Management Rule].</p> <p>According to recent crime statistics obtained by a conservation group, off-roading violations account for the lion's share of law enforcement problems on federal lands (PEER 2007). Figures obtained from the Bureau of Land Management indicate that incidents involving off-road vehicles are not only the biggest drain on rangers' resources but, nationally and in the Western U.S., generate more law enforcement citations than all other criminal activity combined (PEER 2007). Visitor education (including the MVUM [Motor Vehicle Use Map] and signage) and decommissioning efforts and other route closure procedures require funding that needs to be addressed in the development of the plan. Volunteer and other projects, such as those conducted by Grand Canyon Wildlands Council, can supplement the agency's closure efforts. Nonetheless, sufficient resources need to be directed toward an effective law enforcement effort. While detailed recommendations regarding law enforcement tactics is beyond the scope of this letter, conservationists have published and promoted proven effective strategies for law enforcement of ORV use on public lands; the most important and relevant to the</p>	

Category	Public Concern	Comment	Response
		TMR is to make a serious commitment to enforcement (Archie 2007—copy attached) [not attached]. (Preservation/Conservation, Tucson, AZ - #175.309-310.40300.530)	
Enforcement	4-91 The Forest Service should implement a noise requirement for OHVs.	BECAUSE SOME OHVS ARE INSUFFICIENTLY MUFFLED We are all for allowing people to utilize the forest road systems in a reasonable manner. It seems as though people do not understand how noise travels in the mountains, and it would seem that some sort of noise restriction should be a component of your decisionmaking. Standard quads that your everyday person buys, which we own ourselves, have good muffler systems and can be utilized most places with minimal noise output. (Private Land Inholding Owner - #26.4.54130.717)	#26.4.54130.717: Restrictions or modification requirements on OHV systems is outside the scope of this project.
Enforcement	4-92 The Forest Service should improve enforcement on the forest.	THE FOREST SERVICE SHOULD IMPROVE ENFORCEMENT ON THE FOREST You need to enforce the laws; in the 38 years I've camped and hunted on CNF [Coconino National Forest], I've never seen Forest Service personnel, not where I've been camping, and I usually camp on a road that currently isn't slated to be closed; it's a numbered road. But it's not by the highway, so that's why I never see Forest Service personnel. How do you propose to enforce your laws? You've failed miserably in the past; the future looks no better. (Individual, Camp Verde, AZ - #28.4.40300.500)	#28.4.40300.500: A decision on the Travel Management planning process will establish a foundation upon which enforcement and other management strategies can be established for improved management of motor vehicle use across the Forest. The Coconino National Forest plans to use education, enforcement, and engineering efforts to manage motorized use across the Forest. This includes working closely with volunteers and other law enforcement agencies to focus our joint resources for effective results.
Enforcement	4-92 The Forest Service should improve enforcement on the forest.	RATHER THAN RESTRICTING ACCESS FOR LAW-ABIDING USERS It is a crying shame when our government reduces access to our National Forest due to the illegal actions of a few. While I	#170.1.52000.165: The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be

Category	Public Concern	Comment	Response
		<p>wholeheartedly agree that something must be done to reduce and/or eliminate the damage done to our forests by a few destructive visitors, I feel enforcement of our existing laws is a far better alternative than restricting access to the elderly that cannot walk as far cross-country as those on horseback or in their youth. It is beyond my comprehension why you want to eliminate our National Forests. (Individual, Sedona, AZ - #170.1.52000.165)</p> <p>My husband and I are for protecting our forests; we practice it any time we are out there. Do something about those people who do not respect and preserve, not penalize every citizen for those few. (Individual, Dupont, CO - #180.2.52000.165)</p>	<p>able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p> <p>#180.2.52000.165: The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>
Enforcement	4-92 The Forest Service should improve enforcement on the forest.	<p>BECAUSE WITHOUT IMPROVED ENFORCEMENT, SCOFFLAWS WILL CONTINUE TO DAMAGE THE FOREST</p> <p>I don't think that limiting access to forest roads is the answer. The "bad apples" will not heed any new regulations put in place—especially with such a poor attempt by the current Officers to enforce and penalize current infractions. Those violators simply do not have any regard for the current laws... so why do you think that they will respect future road closures?—especially when there is such a poor attempt at enforcing the current laws? I truly believe that the violation "fines/penalties" should be much more costly than current fines. Get the word out that you have true enforcement of the abuse, and that any infractions, etc., are going to (and do) cost those violators an arm and a leg... and perhaps they'll pay attention to the laws of the</p>	<p>#32.4.50000.165: The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>

Category	Public Concern	Comment	Response
		<p>land. A slap on the wrist won't dissuade these individuals from doing the same thing over and over... they're the type of people who think it isn't against the law—unless they get caught! (Individual, Camp Verde, AZ - #32.4.50000.165)</p>	
Enforcement	4-92 The Forest Service should improve enforcement on the forest.	<p>TO ENSURE THAT LAW-ABIDING USERS ARE NOT PENALIZED FOR THE ACTIONS OF A FEW Having lived in AZ for 41 years, we've enjoyed hiking, backpacking, biking, horseback riding, fishing, camping, ATViing, and hunting in the Coconino National Forest. I have come to realize that the US Forest Service would rather lock-out those that recreate in the forest, rather than monitor and punish those few bad apples that destroy it. I believe that the majority of the infractions that occur in the forest are from those who (trying to escape the heat of Southern Arizona) don't live in the area. Take any given weekend in the summer and visit popular areas in and around Mormon and Stoneman Lakes, The San Francisco Peaks, Munds Park, the Fry Canyon area, or the Cinder Hills north of Flagstaff, and you'll see campsites as large as 100+ people laden with OHVs tearing up hillsides, trashing camping areas, shooting up road signs and leaving campfires burning. Rarely (if ever!) do you encounter a local Sheriff, Fish and Game Officer, or Forest Service Law Enforcement Officer. The "bad apples" that destroy our opportunities and access have no regard for the land, vegetation, or wildlife in the area... let alone the motorized vehicle laws in existence. (Individual, Camp Verde, AZ - #32.1.50000.200)</p>	<p>#32.1.50000.200: A decision on the Travel Management planning process will establish a foundation upon which enforcement and other management strategies can be established for improved management of motor vehicle use across the Forest. The Coconino National Forest plans to use education, enforcement, and engineering efforts to manage motorized use across the Forest. This includes working closely with volunteers and other law enforcement agencies to focus our joint resources for effective results. This decision is not expected to unduly limit access to any Forest user.</p>
Enforcement	4-93 The Forest Service should require tags for OHVs.	<p>TO HELP LIMIT THE NUMBER OF OVER-POPULATED CAMPSITES My suggestion is to limit this activity [campsites with 100 plus people laden with OHVs] (similar to the way you've limited OHV access by requiring OHVs to purchase "tags" to travel in</p>	<p>#32.2.58200.530: The requirement to have a pass for camping, fishing, hunting or other activities is outside of the scope of the Travel Management planning process. A decision on the Travel</p>

Category	Public Concern	Comment	Response
		<p>the forest). You should do so, in a way similar to the way that the State of Arizona does with their State Trust Land. In short, if a person or family has a hunting or a fishing license in their possession, then they are allowed to camp/fish/hike/bike/explore/hunt/shoot and recreate anywhere on National Forest land. Their hunting or fishing license would be their “pass” to access. Similar to the “Red Rock Pass” required in and around the Sedona, AZ area... a person’s hunting or fishing license would act as their Pass. (Individual, Camp Verde, AZ - #32.2.58200.530)</p>	<p>Management EIS would not require any additional passes for use or enjoyment of the Coconino National Forest.</p>
<p>Enforcement</p>	<p>4-94 The Forest Service should implement a user fee.</p>	<p>TO PROMOTE ENFORCEMENT OF EXISTING RULES I am very upset about the proposed changes to the CNF [Coconino National Forest]. As an Arizona native that has hunted, hiked, camped, road dirt bikes, and picked up more trash in a day than most people will in a lifetime, I feel like I am losing something I love because of a few who abuse it. As a property owner in Munds Park, AZ, I have helped rescue and search for lost or stuck hunters. My family has spent our limited time and hard-earned money enjoying this forest and would love to see another option than those that have been purposed, such as a user fee per forest per year to be applied to that forest only. Some of the funds should be used to promote reporting those who damage or abuse our lands. (Individual - #163.1.57000.520)</p>	<p>#163.1.57000.520: The Purpose of the Coconino National Forest Travel Management EIS is to implement the Travel Management Rule, which requires the designation of s system of roads, trails, and areas for motorized use. The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>

Chapter 5. Recreation Management

Category	Public Concern	Comment	Response
Access to the National Forest	5-1 The Forest Service should allow unrestricted access to the National Forest.	<p>BECAUSE THE NATIONAL FORESTS BELONG TO THE PUBLIC</p> <p>I am writing in response for request about travel into forest lands. I am totally against any restrictions that don't fall within reasonable laws. We the people own our forest, and not just one agency who wants to control everything. They have already proven that their leadership cannot be trusted, i.e., selling off public lands for private profits, such as the Grand Canyon. We should have the right, without restrictions on how far we can enter our forest and what parts we are restricted to use. (Individual, Sedona, AZ - #17.1.52000.125)</p>	<p>#17.1.52000.125:</p> <p>The Travel Management Rule was published in November 2005 as a Federal Regulation directing all National Forests to designate a system of roads, trails, and areas for motorized use. The purpose of this Environmental Impact Statement is to comply with these federal regulations.</p>
Access to the National Forest	5-1 The Forest Service should allow unrestricted access to the National Forest.	<p>BECAUSE OHV USER GROUPS WILL HELP WITH ROUTE MAINTENANCE</p> <p>I am asking you to leave all existing roads, trails, and dry washes open to recreation; that includes motorcycles, ATVs [all-terrain vehicles], UHV, and full-sized vehicles like Jeeps. Citizens of America do not need any more of their access to public lands blocked by road closures.</p> <p>These existing roads/trails do not take much money to maintain and most OHV recreationalists do not expect the USFS to maintain these roads. Many OHV groups would gladly volunteer time to help with the cost of maintenance if the USFS would only ask. Unlike environmental groups that want to shut motorized recreation down on public lands, the OHV community will and has donated everything from time to equipment to maintain road and trails throughout America and will continue to do so. (Individual, Las Vegas, NV - #33.2.52000.050)</p>	<p>#33.2.52000.050:</p> <p>The Coconino National Forest intends to follow the Travel Management Rule which requires the designation of a system of roads, trails and areas for motorized use. Many of these routes are not being designated not because of the cost of maintenance, but because they result in unacceptable and ongoing impacts to wildlife, cultural resources, water quality, and conflicts with other recreational uses. We appreciate the efforts of OHV use to donate time and equipment for volunteer work and we hope to continue these efforts to help maintain our designated route system.</p>

Category	Public Concern	Comment	Response
Access to the National Forest	5-2 The Forest Service should avoid limiting access to the National Forest.	<p>BECAUSE USERS OF THE FOREST PROVIDE ECONOMIC STIMULUS TO THE REGION</p> <p>I and others make two or more annual trips to this area every year. You can't even calculate the amount of money we spend while vacationing there. Don't force us to have to go elsewhere, even out of state to spend our money! (Individual, Sierra Vista, AZ - #56.4.54100.814)</p>	<p>#56.4.54100.814:</p> <p>The Coconino National Forest Travel Management EIS will result in a decision that still allows for an enjoyable experience for motorized recreationists.</p>
Access to the National Forest	5-2 The Forest Service should avoid limiting access to the National Forest.	<p>TO PROMOTE TRUST BETWEEN THE AGENCY AND THE PUBLIC</p> <p>Denying responsible riders and land users access to such cherished recreational activities will do nothing but widen the gap of distrust and misunderstanding between the public and your agency. We very much want to work with you to obtain the best, balanced, workable solution for all concerns, with resource preservation and conservation being high on everyone's list. Please work with us. Please do not lock us out. (Individual, Prescott Valley, AZ - #70.4.52000.060)</p>	<p>#70.4.52000.060:</p> <p>The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. The Coconino National Forest has worked extensively with the public to identify those routes most important for motorized use and hopes to continue this relationship into the future to continually improve management of motorized use on the Coconino National Forest.</p>
Access to the National Forest	5-2 The Forest Service should avoid limiting access to the National Forest.	<p>TO SUPPORT ALL TYPES OF RECREATION AND LOCAL ECONOMY</p> <p>As a native of northern Arizona, born at Flagstaff Medical Center, I grew up practicing all forms of recreation in and around the place I grew up. Mountain biking, rock climbing, hiking, backpacking, skiing (DH and XC), snowmobiling, and motorcycling were just a few of the educational and recreational activities</p> <p>I participated in while I matured into the professional adult I am</p>	<p>#89.3.52000.002:</p> <p>The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative, approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. The Travel</p>

Category	Public Concern	Comment	Response
		<p>today. At all times of the year I frequently visit and recreate in the Coconino National Forest, and the news that so many of the places, roads, and trails I have grown to love over many years were going to be closed in one fell swoop without any real consideration for the impact on the local economies and without any real efforts at true resource management surprised and disappointed me. It's a shame that forest management, which seems like it should be so easy to do, has given themselves such an obvious black eye in the proceedings leading to the "Travel Management Plan" that was brought recently to my attention. (Individual, Mesa, AZ - #89.3.52000.002)</p> <p>Please don't close anymore of the Forest to the taxpayers. We continue to pay but get less and less as time goes by, and that makes it very hard to support any groups or our elected officials. Please leave things alone so we can enjoy the Forest instead of not being able to share them with our children. If choice one is to leave it alone, then do that. (Individual - #13.1.52000.125)</p> <p>Every summer, for as many years as I can remember, my family has traveled from the Phoenix area to Flagstaff and Belmont to visit family and enjoy the outdoors of the Coconino National Forest. Not only is this a trip we look forward to every summer, but it also provides our children with invaluable learning experiences as to what the forest provides to us who enjoy being</p>	<p>Management DEIS did include analysis on the impacts of each alternative to the local economy and Forest resources.</p> <p>#13.1.52000.125: The Travel Management Rule was published in November 2005 directing all National Forests to designate a system of roads, trails, and areas for motorized use. The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p> <p>#104.3.52000.125: The Travel Management EIS is more about protecting important Forest resources for future generations than about reducing access to Forest users. The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>

Category	Public Concern	Comment	Response
		<p>surrounded by the trees, mountains, wildlife and trails we enjoy to ride. We have been in a state of flux as we have to continuously and tirelessly justify the use of our natural resources, by complying with many new laws that are basically money generators and add no value to our natural resource management, other than to provide a means to employ those who are aggressively trying to close our public land. As I go to the polls, as I do every two and four years, I vote and express my right and opinion to empower the right representation that will provide a delicate balance of ensuring our rights are enforced and our natural resources are preserved for many generations to come. (Individual, Mesa, AZ - #104.3.52000.125)</p>	
<p>Access to the National Forest</p>	<p>5-2 The Forest Service should avoid limiting access to the National Forest.</p>	<p>BECAUSE MOTORIZED RECREATION SUPPORTS STRONG FAMILIES My family and I use off-highway vehicles (OHVs) for access and recreation on National Forests and other public lands. We have been doing this for years, and it has provided many opportunities for my wife and me to bond with our three children. (Individual, Mesa, AZ - #101.3.52000.711)</p>	<p>#101.3.52000.711: All alternatives in the Travel Management EIS include thousands of miles of high-clearance, primitive roads. We believe this will continue to provide recreational opportunities for all Forest motorized users including OHVs.</p>
<p>Access to the National Forest</p>	<p>5-2 The Forest Service should avoid limiting access to the National Forest.</p>	<p>BECAUSE THERE ARE ALREADY SUFFICIENT WILDERNESS AREAS As a resident of Arizona and an owner of land in both Coconino and Yavapai counties, I, my wife, my 19- year-old daughter, and my 15-year-old son want to voice our disagreement with your proposed closing of these trails. We and all of our friends are responsible stewards of the environment, always cleaning up after our visit to the forest, taking out trash that we encounter and being mindful of nature. Please, there are plenty of wilderness-designated areas already; do not implement this plan to close down so much of the forest. (Individual, Tempe, AZ - #14.1.52000.200)</p>	<p>#14.1.52000.200: All alternatives in the Travel Management DEIS include thousands of miles of high-clearance, primitive roads. We believe this will continue to provide recreational opportunities for all Forest motorized users including OHVs. The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80</p>

Category	Public Concern	Comment	Response
			percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.
Access to the National Forest	5-2 The Forest Service should avoid limiting access to the National Forest.	<p>TO AVOID CONFLICTING WITH THE MISSION OF THE FOREST</p> <p>A mission statement on the Southwestern Region’s web site is “Caring for the Land Serving the People.” By closing many miles of roads, this TMR [Travel Management Rule] appears to be in conflict with your mission. All of these plans are basically flawed, but number [Alternative] 4 appears, with more study and some changes, to be the best choice. (Motorized Recreation, Cottonwood, AZ - #111.9.52000.720)</p>	<p>#111.9.52000.720:</p> <p>The Travel Management Rule was published in November 2005 by the Chief of the Forest Service to help better care for the land and serve the people. Many uses of Forest users result in recreational conflicts. Motorized use is one example where those who participate in motorized use often conflict with the goals and desires of those who participate in non-motorized recreation, and vice-versa. As a result, the implementation of the Travel Management Rule through the Coconino National Forest Travel Management EIS is expected to help us better meet the mission of the Forest Service.</p>
Access to the National Forest	5-3 The Forest Service should acknowledge that most visitors to the Forest are respectful of the land.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT MOST VISITORS TO THE FOREST ARE RESPECTFUL OF THE LAND</p> <p>I am well aware of the problems associated with people abusing and trashing our lands, but they are in the minor numbers. I and my friends have cleaned up many a site left by people who don’t care about our lands.</p> <p>Many of us respect and take care of our lands and want the ability to see our country when and where we choose. (Individual, Sedona, AZ - #17.2.52000.200)</p>	<p>#17.2.52000.200:</p> <p>The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>
Access to the National Forest	5-4 The Forest Service should provide support for the assertion that	<p>THE FOREST SERVICE SHOULD PROVIDE SUPPORT FOR THE ASSERTION THAT UNFETTERED MOTORIZED ACCESS IS ENJOYED BY MANY FOREST</p>	<p>#175.84.52000.530:</p> <p>Thanks for your comment. Please refer to the comments received by the Coconino</p>

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	unfettered motorized access is enjoyed by many forest visitors.	<p>VISITORS</p> <p>We [Center for Biological Diversity et al.] can find no data or reference for the statement that “unfettered motorized access” is enjoyed by “many” visitors to the forest. Forest Service 2010:38. (Preservation/Conservation, Pinetop, AZ - #175.84.52000.530)</p>	National Forest Travel Management DEIS regarding the desire for access without restrictions to the Forest.
Access to the National Forest: Recreation Opportunity Spectrum	5-5 The Forest Service should acknowledge that unauthorized routes are reducing the amount of semi-primitive non-motorized Recreation Opportunity Spectrum on the forest.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT UNAUTHORIZED ROUTES ARE REDUCING THE AMOUNT OF SEMI-PRIMITIVE NON-MOTORIZED RECREATION OPPORTUNITY SPECTRUM ON THE FOREST</p> <p>Unauthorized routes are reducing the amount of semi-primitive non-motorized (SPNM) Recreation Opportunity Spectrum (ROS) areas available on the forest. Forest Service 2010:24. We [Center for Biological Diversity et al.] note that the ROS is an enforceable prescription in the Forest Plan. Forest Service 1987:46, as amended. Forest visitors seeking the SPNM recreational experience should not be relegated to the extremely rugged terrain of the backcountry, such as is found in Ike’s Backbone/Fossil Creek, Hackberry Mountain, or Deer Basin, which is protected from illegal motorized uses because of the rugged nature of the area, while front-country SPNM areas are destroyed by illegal motorized uses. Forest Service 2010:24. To continue to allow such unauthorized uses to force out front-country primitive users relegates these users to areas that may be impossible to access by the elderly or disabled. (Preservation/Conservation, Tucson, AZ - #175.25.51000.711)</p>	<p>#175.25.51000.711:</p> <p>The designations identified in the Recreation Opportunity Spectrum (ROS) in the Forest Plan are objectives to meet management goals to optimize users' recreational experiences on the Forest. Implementation of the Travel Management Rule through the designation of a system of roads, trails, and areas is expected to move us toward ROS objectives. This information was analyzed in the DEIS and will help inform the decision on the Coconino National Forest Travel Management process.</p>
Access to the National Forest: Recreation Opportunity Spectrum	5-6 The Forest Service should disclose the impacts of motorized recreation on Primitive and Semi-Primitive Non-motorized	<p>BECAUSE THESE AREAS SERVE AS REFUGES FOR NATURAL AND CULTURAL RESOURCES</p> <p>What are the short- and long-term impacts, positive and negative—taking into account whether these impacts are felt at specific points-in-time or persist—of each management alternative to the CNF’s [Coconino National Forest’s] natural</p>	<p>#175.292.62000.530:</p> <p>The designations identified in the Recreation Opportunity Spectrum (ROS) in the Forest Plan are objectives to meet management goals to optimize users' recreational experiences on the Forest.</p>

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	Recreation Opportunity Spectrums.	<p>and cultural resources, in particular: Primitive and Semi-primitive Non-motorized Areas: Even where these two Recreation Opportunity Spectrum (ROS) classes do not overlap with Agency or citizen-inventoried roadless areas, motorized recreation is generally incompatible and should be prohibited. See FSM [Forest Service Manual] 2311.11. Motorized recreation use conflicts with the objectives of primitive and semi-primitive non-motorized areas to provide isolation from the sights and sounds of humans, closeness to nature, tranquility, and self-reliance through the application of outdoor skills.</p> <p>However, route designations and use can nonetheless have indirect or cumulative impacts, and can also enable illegal motorized intrusions, and it's important to recognize that these areas serve as refuges for a host of natural and cultural resources, in particular native wildlife, vegetation, and clean water. (Preservation/Conservation, Tucson, AZ - #175.292.62000.530)</p>	Implementation of the Travel Management Rule through the designation of a system of roads, trails, and areas is expected to move us toward ROS objectives. This information was analyzed in the DEIS and will help inform the decision on the Coconino National Forest Travel Management process. The impacts from motorized routes to natural and cultural resources and impacts from routes in Primitive and Semi-primitive Motorized Areas are analyzed for each alternative in the DEIS.
Access to the National Forest: Recreation Opportunity Spectrum	5-7 The Forest Service should consider the needs of quiet recreationists and wildlife.	<p>WHEN DECIDING ON ROAD DENSITY AND THE RECREATION OPPORTUNITY SPECTRUM GOALS Reducing road density and improving wildlife habitat on the CNF [Coconino National Forest] will represent more areas for 'quiet, non-motorized' recreationists. Although the PA [Proposed Action] refers to meeting ROS [Recreation Opportunity Spectrum] objectives for motorized trails and stresses that with its proposed road closures 79% of the forest will remain within one-half mile of an open route, given the noise that ATVs, dirt bikes, and other motorized vehicles generate, it also means that those seeking quiet recreation—hiking and bicycling, angling, etc.—are also within close proximity to the noise and dust these vehicles create. (Preservation/Conservation, Denver, CO - #175.331.51000.710)</p>	#175.331.51000.710: Though it is correct that all alternatives will still result in an extensive network of motorized routes throughout the Forest, both action alternatives reduce the existing road network by over 30 percent and eliminate cross-country travel throughout the Forest outside of designated areas. This will result in an increase in opportunities for non-motorized recreational activities that depend non-motorized attributes of the Forest landscape.
Access to the	5-8 The Forest Service	THE FOREST SERVICE SHOULD RESTRICT	#52.1.52000.200:

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National Forest: Motorized Access	should restrict motorized access.	<p>MOTORIZED ACCESS</p> <p>I am in favor of Alternative 4 of the TMR [Travel Management Rule] plan. I have traveled, camped, and hunted in the Coconino National Forest for the last 15 years. I wholeheartedly support the CNF's [Coconino National Forest's] plan to close roads and restrict access. I have been appalled by the lack of respect some people, who you would think are in the forest because they enjoy the outdoors, seem to have for our natural resources. (Individual, Cornville, AZ - #52.1.52000.200)</p>	<p>Thanks for your comment. Just one clarification - the Travel Management EIS includes alternatives that would restrict <i>motorized</i> access and not other types of access.</p>
Access to the National Forest: Motorized Access	5-8 The Forest Service should restrict motorized access.	<p>TO PROVIDE FOR QUIET RECREATION</p> <p>I worked for the U.S. Kaibab National Forest Service, bordering the Coconino FS [National Forest] for two seasons as a Forestry Technician/Fire Lookout. I worked all week long on top of Kendrick Mountain, which is a Wilderness Area. I can say that my encounter with wildlife was limited to a skunk, porcupine, elk, deer, coyote that I could hear in the distance, a few snakes, and a bear that lived on the north side of the mountain that I never saw. One Fire Prevention coworker reported seeing a bear one day while she was on patrol in the Forest.</p> <p>I know that my experiences of solitude, peace, and enjoying the wild will be disrupted and greatly reduced by the howling of motorcycles and ATVs if they are given free run of our public lands. (Individual, Glendale, AZ - #44.9.54000.717)</p>	<p>#44.9.54000.717:</p> <p>A decision on the Travel Management DEIS will establish a designated system of roads, trails, and areas for motorized use. This will increase opportunities for wildlife viewing and other non-motorized recreation pursuits.</p>
Access to the National Forest: Motorized Access	5-9 The Forest Service should support motorized recreation.	<p>THE FOREST SERVICE SHOULD SUPPORT MOTORIZED RECREATION</p> <p>As a OHV enthusiast I would like to express my desire that consideration be given to meeting the needs of those of us who enjoy this form of recreation while enjoying our National Forest, when the DEIS is formulated for the Coconino National Forest. (Individual, Wittmann, AZ - #10.1.54100.500)</p> <p>My wife and I have been riding quads and side-by-side UTVs for many years, all over the state of Arizona.</p>	<p>#10.1.54100.500:</p> <p>We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p> <p>#70.3.54100.711:</p> <p>We agree that motorized recreation is a</p>

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		<p>You refer to them as off-highway vehicles (OHVs). One of the reasons we continue living in this state is for the access to recreational opportunities in National Forests and other public lands. We are frequent visitors to the Coconino, Coronado, Kaibab, Prescott, Tonto, and Apache-Sitgreaves National Forests and always exercise good judgment while riding in those lands to ensure our “footprints” are minimally invasive. To that end, we often clean up behind others not so careful of the resources. (Individual, Prescott Valley, AZ - #70.3.54100.711)</p>	<p>legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-9 The Forest Service should support motorized recreation.</p>	<p>TO AVOID POTENTIAL LITIGATION My understanding is that the dirt bike community is gearing up to take legal action if changes are not made to truly recognize motorized use in the plan. There have already been fundraisers for a legal fund to fight this, and I personally have contributed. I hope it doesn't come down to that. We should not have to fight to use public land. (Individual, Phoenix, AZ - #88.5.54000.125)</p>	<p>#88.5.54000.125: We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities. The Coconino National Forest Travel Management process included extensive public involvement to establish a safe, ecologically sustainable, and fun motorized system in compliance with the Travel Management Rule.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-9 The Forest Service should support motorized recreation.</p>	<p>FOR FUTURE GENERATIONS My family has spent many weekends enjoying the trail system, and enjoying the town of Flagstaff. I grew up riding dirt bikes and am a responsible and considerate rider; I am raising my family to have the same respect and consideration for our public lands so that my boy can have the same opportunities to use public lands as I have had. Please reconsider the current DEIS and the impact it has had on a dedicated and responsible segment of the populations using public lands. (Individual, Phoenix, AZ - #79.2.54100.711)</p>	<p>#79.2.54100.711: We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>

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<p>Access to the National Forest: Motorized Access</p>	<p>5-9 The Forest Service should support motorized recreation.</p>	<p>BECAUSE MOTORIZED RECREATION PROVIDES MANY BENEFITS AND MOST MOTORIZED USERS ARE RESPONSIBLE</p> <p>We [Capital Trail Vehicle Association] have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Coconino National Forest Motorized Travel Project. We enjoy riding our OHVs on primitive trails and roads in the Coconino National Forest. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities. We feel strongly about OHV recreation for the following reasons:</p> <p>Enjoyment and Rewards of OHV Recreation:</p> <ul style="list-style-type: none"> -Opportunity for a recreational experience for all types of people. -Opportunity to strengthen family relationships. -Opportunity to experience and respect the natural environment. -Opportunity to participate in a healthy and enjoyable sport. -Opportunity to experience a variety of opportunities and challenges. -Camaraderie and exchange of experiences. -For the adventure of it. <p>Acknowledged Responsibilities of Motorized Visitors</p> <ul style="list-style-type: none"> -Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment. -Responsibility to respect all visitors. -Responsibility to use vehicles in a proper manner and in designated places. -Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through 	<p>#109.3.54100.002:</p> <p>We do not disagree with your assessment of enjoyment and rewards of OHV recreation. We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities. Additionally, this decision would in no way prevent additional planning efforts to improve motorized recreation opportunities in a sustainable and safe manner.</p>

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		<p>problem solving and not closures. -Responsibility to educate the public on the responsible use of motorized vehicles on public lands. (Motorized Recreation, Helena, MT - #109.3.54100.002)</p>	
<p>Access to the National Forest: Motorized Access</p>	<p>5-9 The Forest Service should support motorized recreation.</p>	<p>BECAUSE MOTORIZED RECREATION IS INCREASING IN POPULARITY Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979, the index for recreation spending was 32.537 (year 2000=100 (http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=)). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision. (Motorized Recreation, Helena, MT - #109.5.54100.800)</p>	<p>#109.5.54100.800: We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities. Your discussion that recreation spending has increased over the last 2 or 3 decades is true; however, this increase cannot be fully attributable to motorized recreation. In fact our data suggests that the majority of recreation on the Coconino National Forest has been attributable to non-motorized activities. For more information, please review the recreation and social/economic sections of the DEIS.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-10 The Forest Service should ensure no net loss of motorized access to the National Forest.</p>	<p>BECAUSE OF THE SIGNIFICANT CUMULATIVE EFFECTS OF MOTORIZED CLOSURES Many federal actions have led to the continual closure of motorized recreational opportunities and access, and at the same time the number of OHV recreationists has grown to 50 million, and at the same time other outdoor activities have declined 18 to 25% (Journal of Environmental Management 80 (2006):387–393, http://www.redrockinstitute.org/uploads/PNAS.pdf and http://www.msnbc.msn.com/id/22998037/). Multiple uses of the forest are marginalized every time a forest plan or travel management plan comes up for action. The motorized closure</p>	<p>#109.6.52000.530: The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads and trails. The Coconino National Forest worked closely with the public and users like you to collect information on routes used for camping and other activities. This information was used to establish a designated system of roads and trails to maintain access to the Forest while</p>

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		<p>trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the Coconino National Forest Motorized Travel Project. We would ask that this project address the attached checklist of issues and address the goals and needs identified. Using this checklist will help identify and address concerns and, hopefully, the needs of the public will be adequately met by implementing a more reasonable multiple-use alternative. (Motorized Recreation, Helena, MT - #109.6.52000.530)</p>	<p>protecting those values and resources that are important to our visitors such as you. The studies you reference regarding trends in motorized recreation and other outdoor activities were considered in the DEIS among many other (often contradicting) studies. For more information, please review the recreation and social/economic sections of the DEIS.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-11 The Forest Service should provide equivalent access for motorized and non-motorized users.</p>	<p>TO MEET THE REQUIREMENTS FOR MULTIPLE USE The project area with its current level of motorized access and recreation is where residents from Arizona and surrounding states go to enjoy motorized recreation. The project area is where we [Capital Trail Vehicle Association] go and what we do to create those memories of fun times with family and friends. Management of these lands for multiple-uses, including reasonable motorized use, allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails. (Motorized Recreation, Helena, MT - #109.7.52000.530)</p>	<p>#109.7.52000.530: We do not agree that there is any need or requirement for an equal number of motorized and non-motorized routes on the Forest. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>
<p>Access to the National Forest: Motorized</p>	<p>5-11 The Forest Service should provide equivalent access for</p>	<p>TO COMPLY WITH THE INTENT OF NEPA One of the basic requirements of NEPA is to “achieve a balance between population and resource use which will permit high</p>	<p>#109.81.52000.131: The Travel Management planning process is not aimed at removing the motorized public</p>

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Access	motorized and non-motorized users.	standards of living and a wide sharing of life's amenities" (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the natural and human environment. NEPA was not intended to be used to destroy the human environment. However, the Agency is using NEPA to seriously impact the human environment through a series of travel plan decisions aimed at removing the motorized public from public lands. This trend is not right and must be corrected by implementing a pro-recreation alternative as part of this action. (Motorized Recreation, Helena, MT - #109.81.52000.131)	from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.
Access to the National Forest: Motorized Access	5-11 The Forest Service should provide equivalent access for motorized and non-motorized users.	<p>TO ENSURE THAT ACCESS IS IN BALANCE WITH THE NEEDS OF FOREST VISITORS</p> <p>The evaluation must adequately consider and address the fact that motorized access to the National Forest is relatively limited The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that are available to nonmotorized recreationists. The total route opportunity available to non-motorized recreationists is 510,575 miles; the total miles of exclusive non-motorized trails are 93,088 or 75% of the existing total. The miles of non-motorized cross-country opportunity are infinite.</p> <p>The total miles of roads open to motorized recreationists are 286,445 and the total miles of trails open to motorized recreationists are 31,853 or 25% of the existing total. The cross-country miles are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in the National Forest system is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists. (Motorized Recreation, Helena, MT - #109.69.51000.530)</p>	<p>#109.69.51000.530:</p> <p>We do not agree that there is any need or requirement for an equal number of motorized and non-motorized routes or access opportunities on the Forest. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>

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Access to the National Forest: Motorized Access	5-11 The Forest Service should provide equivalent access for motorized and non-motorized users.	<p>TO AVOID NEGATIVE EFFECTS OF SEGREGATING USERS</p> <p>While we do not support segregation, if segregation is to be implemented on multiple-use lands (which must be considered public places), then a corresponding goal would be to demonstrate an absolutely perfect 50/50 sharing of non-motorized and motorized trails as part of that segregation. Therefore, if the proposed plan further promotes segregation on multiple-use lands, then it must include a corresponding 50/50 sharing and must not tip the balance further in favor of non-motorized trails at the expense of motorized routes.</p> <p>(Motorized Recreation, Helena, MT - #109.46.54000.540)</p>	<p>#109.46.54000.540:</p> <p>We do not agree that there is any need or requirement for an equal number of motorized and non-motorized routes or access opportunities on the Forest. We also disagree that a decision on the Coconino Travel Management EIS will result in segregation of Forest users as there will be no restrictions on what types of Forest users can use motorized routes. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We agree that motorized recreation is a legitimate use of National Forest System lands. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>
Access to the National Forest: Motorized Access	5-12 The Forest Service should acknowledge that both Alternatives 3 and 4 will diminish recreation opportunities.	<p>BY REDUCING MOTORIZED ACCESS</p> <p>The impacts defined for Alternative 3 and 4 say that the closures will “enhance” recreation opportunities. This is not true, as the closures will diminish recreation opportunities for a greater number of people. Motorized access to the forest will be more limited and will make the forest “inaccessible” to a large number of users, especially seniors, young children, people with limited mobility and non-hikers. (Individual, Sedona, AZ - #112.7.52000.711)</p>	<p>#112.7.52000.711:</p> <p>The Travel Management planning process will only affect access to the Forest by motorized vehicles. Forest users will still be able to access the Forest by all other means. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. Research shows that motorized use can reduce recreation opportunities for many non-motorized recreation users.</p>
Access to the National Forest:	5-13 The Forest Service should provide	<p>THE FOREST SERVICE SHOULD PROVIDE FOR MOTORIZED ACCESS PROPORTIONAL TO THE</p>	<p>#109.76.54100.530:</p> <p>For the FEIS analysis the Coconino</p>

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Motorized Access	for motorized access proportional to the volume of motorized users visiting the forest.	<p>VOLUME OF MOTORIZED USERS VISITING THE FOREST</p> <p>Based on our [Capital Trail Vehicle Association] estimate that 40% of the visitors are OHV recreationists, we estimate using the NVUM [National Visitor Use Monitoring] data for total visitors that the total number of OHV visits to the Coconino National Forest is 1,185,200 = (2,963,000 x .40).</p> <p>Our observations of recreationists on multiple-use public lands from 1999 through 2009 ... demonstrates that out of 16,667 observations, 16,175 recreationists, or 97% of the visitors, were associated with motorized access and multiple-uses.</p> <p>Additionally, of the total number of people visiting public lands, 38% (6400 / 16,667) were associated with OHV recreation.</p> <p>Furthermore, and most importantly, out of the 7,291 (6400 + 399 + 178 + 116 + 198) visitors that we observed using trails, 6,400 or 88% were OHV recreationists and 891 or 12% were non-motorized recreationists, including mountain bikes which are a form of mechanized travel (8:1 motorized versus non-motorized and 13:1 mechanized versus non-motorized).</p> <p>Therefore, nearly all (97%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities, which is consistent with our observations.</p> <p>Therefore, 88% of the trail users are motorized, 93% when including mountain bikes, and consequently at least 88 to 93% of the trails system and public land should be managed for multiple-uses, including motorized access and recreation. (Motorized Recreation, Helena, MT - #109.76.54100.530)</p>	<p>National Forest used National Visitor Use Monitoring survey data, regional, and national data sources to estimate levels of OHV use, and they were about half of what was estimated by the Capital Trail Vehicle Association (see Recreation Specialist Report). The travel management rule only restricts motorized travel, so including bicyclists in estimates because they are 'mechanized' would not make sense in discussions about 'motorized recreation'. Despite these disagreements over how motorized recreation levels are estimated we do agree that most users do depend on motorized access to the Forest in some manner. However, it is clear from the National Visitor Use Monitoring data and other data sources on visitor use to the Coconino National Forest that the large majority of visitors to the Coconino National Forest primarily participate in non-motorized recreation such as hiking, nature viewing, and other similar activities. There is also clear evidence that motorized use can have a negative impact on these activities, so the designation of routes and areas must take into consideration designation for allowing access while also considering potential impacts on non-motorized uses (and wildlife, cultural, and water and soil resources). WE recognize the restriction of motor vehicle use will result in impacts to some motor vehicle users, especially those</p>

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			that depend on motorized trails in certain areas of the Forest. This issue is discussed much more specifically in the Recreation Specialist Report.
Access to the National Forest: Motorized Access	5-13 The Forest Service should provide for motorized access proportional to the volume of motorized users visiting the forest.	<p>BECAUSE THERE ARE SIGNIFICANT NUMBERS OF MOTORIZED RECREATIONISTS IN ARIZONA NOT ACCURATELY REPRESENTED IN THE PROCESS</p> <p>The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Arizona 25.5% participated in OHV recreation. The U.S. census determined that the population in 2009 was 6,595,778 (http://quickfacts.census.gov/qfd/states/30000.html). Therefore, the number of OHV recreationists in Arizona is 6,595,778 times 0.291 = 1,681,923.</p> <p>The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Arizona 25.5% or 1,212,000 individuals participated in OHV recreation. These numbers demonstrate the immense popularity of OHV recreation. These numbers demonstrate that there are not enough existing motorized recreational opportunities. These numbers demonstrate that the Agency's motorized closure trend is contrary to the needs of the public. The magnitude of the number of motorized recreationists is real. The misrepresentation of visitor numbers must be discontinued. Proper emphasis must be given to motorized recreation. Additionally, the Agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the Agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law,</p>	<p>#109.66-67.54100.060:</p> <p>The FEIS used estimates based on the state-wide data in the Southern Research Station study you refer to in conjunction with more specific data that focused on motorized use on the Coconino National Forest (see Recreation Specialist Report for more detail). The Forest does recognize that a significant proportion of users participate in motorized recreation on the Forest. However, the need to provide motorized recreation opportunities was not the only factor considered in the designation of routes. Rather, the Forest considered a variety of criteria including impacts to wildlife habitat, damage to soil and watershed function, impacts to cultural resources, and potential user conflict from motorized use. The statement that the Forest was driven by the number of comments submitted is incorrect. The Forest travel management alternatives and analysis were driven by the issues identified from public comments, the requirements of the Travel Management Rule, and standards and guidelines included in law, regulation, and policy.</p>

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		<p>the NEPA process should be driven by issues and needs, and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service, as a public agency, will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests, including individuals and families, are largely ignored. The Agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The Agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 1,212,000 motorized and OHV recreationists. The current proposal does not meet these needs in a multiple-use area that is ideal for motorized use. (Motorized Recreation, Helena, MT - #109.66-67.54100.060)</p>	
<p>Access to the National Forest: Motorized Access</p>	<p>5-14 The Forest Service should acknowledge that most visitors to the forest engage in motorized recreation.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT MOST VISITORS TO THE FOREST ENGAGE IN MOTORIZED RECREATION</p> <p>We [Capital Trail Vehicle Association] feel that we are representative of the needs of the majority of visitors who recreate on public lands but are not organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc.</p> <p>Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking.</p>	<p>#109.4.54100.002:</p> <p>We agree that the large majority of Forest visitors depend on motorized access to the Forest to participate in recreation and other activities. Yet, not all Forest users use the same roads. Evidence from the National Visitor Use Monitoring survey and from data collected on Forest routes clearly shows that the vast majority of Forest users access the Forest on main roads, including paved and graveled roads. All of the paved and graveled roads that provide access to developed sites and trailheads are designated in all action alternatives. A much smaller percentage of users use the native surfaced secondary and tertiary roads for</p>

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		<p>Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account that motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation. (Motorized Recreation, Helena, MT - #109.4.54100.002)</p>	<p>activities including hunting, dispersed camping, motorized recreation, etc. Many of these roads were not considered for designation in alternatives 3 or 4 or were because use of these roads can result in impacts to wildlife, water quality and soil, cultural resources, or user conflict.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-15 The Forest Service should acknowledge the impact on pleasure driving from inadequately maintained routes.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE IMPACT ON PLEASURE DRIVING FROM INADEQUATELY MAINTAINED ROUTES.</p> <p>Impacts to recreationists who enjoy driving for pleasure are described only in a neutral or negative light.</p> <p>While some people may be unhappy with the restriction to drive on the designated system of 3,280 miles of roads (in Alternative 3), these roads are likely to be better maintained given the severely limited resources for road maintenance, which would improve the driving for pleasure experience. If, however, this 3,280 mile road system continues to prove unsustainable (in light of the ability to maintain just 660 or so miles of road), the recreational experience of driving for pleasure would decrease significantly as roads continue to degrade to ML [Maintenance Level] 2-type routes. (Preservation/Conservation, Prescott, AZ - #175.88.54000.410)</p>	<p>#175.88.54000.410:</p> <p>WE do expect a decision to restrict motorized use to a designated system of routes and areas would help increase the percentage of 'public' motorized routes that receive maintenance. Thus, the average user's experience with driving for pleasure would improve. Yet, based on the National Visitor Use Monitoring data, a very large proportion of Forest visitors drive on scenic byways, which are paved state and county roads that are maintained by the State or County, but go through National Forest System lands. This includes routes such as Lake Mary Roads, Highway 260, or 89A in Oak Creek Canyon. None of these routes would be affected in any way by changes proposed under the travel management rule.</p>
<p>Access to the National Forest: Motorized Access</p>	<p>5-16 The Forest Service should reconsider the policy disallowing the use of motorized recreation</p>	<p>BECAUSE MOTORIZED RECREATION IS GOOD FOR CHILDREN AND PARENTS CAN SUPERVISE THEM</p> <p>You have required us to register and provide an OHV sticker and won't let kids ride in the woods any more already.</p> <p>Can all of you that grew up in the woods and the desert</p>	<p>#39.2.54100.711:</p> <p>Thank you for your comment, but whether children should be allowed to use motorized recreation vehicles on National Forest lands is outside the scope of this project.The</p>

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	vehicles by children on the National Forest.	<p>remember when you were 14, and just about the best time of your whole life was that weekend hunting or riding or fishing or better yet all of the above.</p> <p>Are you worried about all the kids who sit around playing video games and surfing the net? Do you understand that if they do not enjoy the outdoors before they're 16, they may never even bother to see what they have missed?</p> <p>Will you please let parents make decisions and watch over their kids again? If they get caught doing something wrong, then they will get in trouble and learn a lesson. (Just like you and I did.) (Individual, Phoenix, AZ - #39.2.54100.711)</p>	regulation of children's use of OHVs is based on state laws. The purpose of the Travel Management planning process is to establish a designated system of roads, trails, and areas for motorized use, not to remove the motorized public from public lands.
Access to the National Forest: Motorized Access	5-17 The Forest Service should recognize off-highway, high-clearance travel as an important recreation activity.	<p>TO AVOID THE SIGNIFICANT NEGATIVE IMPACTS OF CLOSING ROUTES THAT SERVE THIS USER GROUP</p> <p>I am disappointed in the draconian approach that was taken in the development of alternatives. It is quite apparent that the CNF [Coconino National Forest] does not adequately recognize off-highway high-clearance travel as an important recreation activity. Additionally, the lack of recognition of thousands of miles of nonsystem routes on the CNF results in a flawed approach to this issue and to meeting the needs of the OHV community. The many motorized users of the CNF have been seriously shortchanged because of the deficiency in realistic alternatives. The negative results to users from the closing of thousands of miles of routes that have been historically used are a significant impact to the motorized recreationist. (Individual, Sedona, AZ - #112.1.54000.410)</p>	#112.1.54000.410: We believe that motorized recreation is a legitimate use of National Forest System lands. All alternatives in the Travel Management DEIS include thousands of miles of high-clearance, primitive roads. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We believe this will continue to provide recreational opportunities for all Forest motorized users including OHVs.
		<p>TO PROVIDE ROADS TO DESIRABLE LOCATIONS AND TO REDUCE TRAFFIC ON REMAINING ROADS</p> <p>Many of the CNF, Coconino National Forest's, proposals will completely eliminate trails that lead to beautiful views and pristine forest. This will create a traffic and safety nightmare on</p>	#54.1.52100.719: None of the action alternatives completely eliminate motorized trails, but Alternative 3 in the FEIS does substantially decrease the amount of motorized trail open to motorized

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		<p>the few main roads left open. I didn't buy an ATV to drive to Mormon Lake restaurant and back to Munds Park. Surely the CNF is open to some reasonable compromise, such as Mr. Falkenstein's proposal? (Individual -#54.1.52100.719)</p>	<p>use. One important point is that OHVs such as dirt bikes and ATVs will still be able to drive on roads designated as 'all vehicles', which includes over 2,500 miles designated in Alternative 3. Non-system motorized trails reviewed in the travel management planning process are located in sensitive species habitat, located adjacent to communities (high potential for user conflict) or partially on non-National Forest System lands, or are located in areas that would cause damage to soils or watersheds. The Forest recognizes the need for a workable motorized trail system. As a result, we see a decision on this Travel Management EIS as the beginning of this effort and not the end. To illustrate this fact, resources have been dedicated to begin motorized trails planning in the area of the Airport Trail and along the 180 corridor, which will be available for public comment and review through the NEPA process in 2012.</p>
<p>Access to the National Forest: Roads</p>	<p>5-18 The Forest Service should increase the number of roads open to motorized travel.</p>	<p>TO INCREASE SAFETY AND SUPPORT GROWING INTEREST IN MOTORIZED RECREATION</p> <p>Starting January 2009, the Forest Service now requires all OHVs to be registered and pay an annual \$25 OHV (Off Highway Vehicle) tag fee through the MVD (Motor Vehicle Division) to operate an OHV legally on forest roads. Now the Forest Service wants to take away well over a thousand miles of roads that have existed for years and years! Paying a fee for fewer roads? Seems a bit unfair and unreasonable, but not of main concern. Not only are we getting less for more, but this is going to concentrate a</p>	<p>#25.1-2.54100.719:</p> <p>The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads and trails. The DEIS clearly shows that even the most restrictive alternative (Alt. 3) provides motorized access to within 1.2 mile of almost 80% of the Forest outside of Wilderness areas. Your suggestion of increasing motorized access is not currently</p>

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		<p>higher percentage OHVs together in smaller areas or groups, take away much needed space for our freedom to enjoy our forests safely, and disrupt the balance of the human-wilderness interface. More importantly, this will cause an undesired effect for rider safety and increase the chances of collisions, potentially causing a high(er) percentage of serious bodily injury and fatalities due to dense OHV traffic in stricter limited areas. This will make OHV use much more dangerous (especially for children and less experienced riders) whom just want to enjoy a safe and lawful form of recreation. Alternative 3 and 4 is a step in the wrong direction when it comes to public safety for OHV enthusiasts. Wouldn't it be safer and more logical for the forest service to expand and increase the number of roads for OHV use, not take them away by closing over a thousand miles of already existing ones? According to their research, there are more and more OHVs on forest roads every year and studies suggest a steady increase annually in popularity, and the number of OHVs to increase on forest roads each and every year. So wouldn't it make more sense to increase rather than decrease areas and roads for travel to create a safer environment vs. a more dangerous one?</p> <p>OHV use is considered a "high risk" form of recreational activity, and Alternatives 3 and 4 will no doubt create an even "higher risk," a more hazardous and more dangerous environment for everyone who recreates in the forest. Many of us (such as myself) would be willing to pay a higher OHV tag fee if this would help maintain and preserve the existing roads we have, but this is not in any of the alternative proposals. (Individual, Peoria, AZ - #25.1-2.54100.719)</p>	<p>possible considering the entire Forest is open to motorized travel unless specifically closed and an alternative of this nature would not be consistent with the Travel Management Rule. The Coconino National Forest does think there may be a concentration of users on designated roads and trails as was analyzed in the DEIS, but this 'concentration effect' is not expected to result in a substantially degraded recreational experience.</p>
Access to the National Forest: Roads	5-18 The Forest Service should increase the number of	<p>BECAUSE MOTORIZED RECREATION IS INCREASING IN POPULARITY</p> <p>The Ravalli County Off-Road Users Association has found that</p>	<p>#109.61.52000.530: The analysis in the Recreation Specialist Report recognizes that a decision</p>

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	roads open to motorized travel.	<p>“at the end of 2006, there were approximately 2500 ‘stickered’ OHVs in Ravalli County. For the past five years, the growth rate of ‘stickered’ OHVs has been about 20% per year. If this growth rate continues, the number of OHVs in the forest will double every four years. On the Bitterroot National Forest there have been no new OHV ‘system’ routes designated for OHV travel since 1996. History, experience, and common sense tell us that when adequate, responsible, sustainable routes with attractive destinations are provided, OHV enthusiasts will ride responsibly. On the Bitterroot National Forest this means more routes, not more restriction.” The same analysis must be done for the Coconino National Forest, and it will find the same no-growth trend and a lack of an adequate number of existing routes that are further made worse by a lack of new routes to address growth. (Motorized Recreation, Helena, MT - #109.61.52000.530)</p>	<p>authorizing Alternative 3 (as modified) will result in impacts to motorized trail users. However, the motorized trails reviewed under the travel management planning process included several conflicts with wildlife habitat, cultural resources, soil and water resources, and user compatibility. That is not to say that motorized trails and planning to establish additional motorized trails is not needed. The Forest recognizes the need for a workable motorized trail system. As a result, we see a decision on this Travel Management EIS as the beginning of this effort and not the end. To illustrate this fact, resources have been dedicated to begin motorized trails planning in the area of the Airport Trail and along the 180 corridor, which will be available for public comment and review through the NEPA process in 2012.</p>
Access to the National Forest: Roads	5-18 The Forest Service should increase the number of roads open to motorized travel.	<p>BECAUSE THE CURRENT LEVEL OF ACCESS DOES NOT ADDRESS USAGE PATTERNS</p> <p>[T]he ratio of acres available to wilderness/non-motorized visitors versus the acres available to multiple-use visitors is way out of balance in the existing condition with 0.72 acres per wilderness visitor and 0.61 acres per multiple-use visitor for a ratio of about 1.18:1. The proposed action to designate all roadless areas nonmotorized areas makes this inequity even worse by providing 0.92 acres per wilderness visitor and 0.60 acre per multiple-use visitor for a ratio of about 1.55:1.</p> <p>The available multiple-use (MU) acres and acres per MU visitor are less than this example because, even though lands are designated as MU by Congress, the Agency is effectively</p>	<p>#109.74.51000.621:</p> <p>We do not agree that there is any need or requirement for an equal number of motorized and non-motorized routes or access opportunities on the Forest. Additionally, the Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within</p>

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		<p>managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.</p> <p>We recognize the desire for a quiet experience in the forest as a legitimate value. To varying degrees, we all visit the forest to enjoy the natural sounds of streams, trees, and wildlife. Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, i.e, wilderness areas. Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area. Given that vast areas of our forests have been set aside for the exclusive benefit of this relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs. (Motorized Recreation, Helena, MT - #109.74.51000.621)</p>	<p>1/2 mile of a designated route.</p>
<p>Access to the National Forest: Roads</p>	<p>5-19 The Forest Service should avoid reducing the amount of motorized routes.</p>	<p>BECAUSE MOST USERS ARE RESPONSIBLE</p> <p>I am an Arizona native and have enjoyed camping and off-highway vehicle (OHV) use in the Coconino National Forest for over 30 years. I now have kids of my own, and we make frequent trips up to the Mogollon Rim high country to escape the heat of Phoenix and enjoy the beautiful northern country, lakes, and forests. We always stay on trails and leave each campsite cleaner than we found it, and when we ride we practice low-impact OHV use.</p> <p>I recognize that a few irresponsible riders can cause damage, but the vast majority of OHV riders simply use the trail and road system to enjoy the vast national forests that Arizona has to offer. Without OHVs much of this land is unreachable. The simple fact is that “tree-hugger” organizations like the Sierra</p>	<p>#20.1.54100.050:</p> <p>We agree that motorized recreation is a legitimate use of National Forest System lands. The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within</p>

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		<p>Club finance efforts to keep the public off public land. They finance legal efforts to close areas for OHV use and use ridiculous logic like the “riding in the mountains kills fish in the creeks.”</p> <p>I strongly oppose any new laws that restrict or minimize the use of OHV’s in the national forest. Over the past decade, I’ve watched as many of my family’s favorite riding areas have been shut down. Please do whatever you can to keep these places open. The National Forests are there for everyone to enjoy and should remain open forever. (Individual - #20.1.54100.050)</p>	<p>1/2 mile of a designated route.</p>
<p>Access to the National Forest: Trails</p>	<p>5-20 The Forest Service should increase the number of motorized trails.</p>	<p>TO BRING THEM MORE INTO LINE WITH WHAT OTHER STATES OFFER</p> <p>A clear imbalance between motorized and non-motorized recreational trail opportunities exists in Arizona. Clear evidence of this can be found by comparing motorized trail opportunities in Idaho versus those in Arizona. As of FY2006, thirteen national forests in Idaho have approximately 9,199 miles of motorized trail, 6,868 miles of motorized single-track trail, and 14,576 miles of non-motorized trail, as shown in http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf.</p> <p>In the same table, the eleven National Forests in Arizona have about 2,196 miles of motorized trail, 552 miles of motorized single-track trail, and 6187 miles of non-motorized trail. The values for Arizona have been significantly reduced by a number of decisions and ongoing actions. (Note: The Forest Service needs to update these tables to reflect current miles). Therefore, motorized trails in Arizona area are approximately 24% of the motorized opportunity found in Idaho. At the same time, there are far more OHV users in Arizona. (Motorized Recreation, Helena, MT - #109.68.51000.530)</p>	<p>#109.68.51000.530:</p> <p>While it is true that Arizona has fewer <i>designated</i> motorized trails than other states, it is not necessarily true that the state has less motorized recreation opportunities. The Recreation Specialist Report specifically discusses how the 'open unless closed' policy on the Forest for motorized use has resulted in very few designated motorized trails because motorized users could ride where they chose. Additionally, the report also points out that many ATV users on the Coconino National Forest primarily use high-clearance roads. Most of those roads submitted as 'motorized trails' in comments were designated as 'all vehicle' roads in the Record of Decision.</p>

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Access to the National Forest: Trails	5-20 The Forest Service should increase the number of motorized trails.	<p>TO REDUCE TRAFFIC IMPACTS ON MOTORIZED TRAILS IN ADJACENT AREAS</p> <p>The current draft of the DEIS included only a small amount [of] the actual motorized single-track trail that is currently located in CNF [Coconino National Forest]. Most of the motorized trail users in the Flagstaff area use the Fort Valley system primarily as a connector of the “Round the Peaks” single-track and minimize their time spent on the FT Valley section. The current draft of the DEIS will force the motorized use of the Fort Valley Trail system to increase and close the trails that myself and others find the most enjoyable.</p> <p>(Individual, Camp Verde, AZ - #153.1.52100.530)</p>	<p>#153.1.52100.530:</p> <p>The DEIS did include a limited number of motorized trails for analysis. Based on your comments and the comments of others, the 'Round the Peaks' (referred to as Challenger Trail) was added to Alternative 4 in the FEIS for detailed analysis and consideration. The FEIS both showed that this trail is located in a sensitive cultural area, but it also provides an important recreational opportunity for single-track motorized users. A decision on the Travel Management EIS would in no way preclude future planning efforts to establish single-track motorized trails. To this end, I have directed my staff to work with various groups to identify potential motorized trails for analysis and consideration through site-specific National Environmental Policy Act planning in 2012.</p>
Access to the National Forest: Trails	5-20 The Forest Service should increase the number of motorized trails.	<p>TO PROVIDE SUFFICIENT OPPORTUNITY</p> <p>The Department [Arizona Game and Fish Department] supports the proposed motorized trail systems in Alternative 4. However, the Department also recommends the establishment of additional motorized trails systems. CNF [Coconino National Forest] receives heavy off-highway vehicle (OHV) use throughout the summer months. It is recommended that CNF take an active role in managing OHV recreational use, which includes providing opportunity. In the previous—but eliminated—Alternative 5, 99 miles of motorized trails would have been added. It is recommended that these trails be re-evaluated and at least partially included in the Final EIS. (Arizona Game and Fish</p>	<p>#160.16.51000.530:</p> <p>We agree. The Forest did add the 50-mile Challenger Trail for detailed analysis and consideration back into Alternative 4 in the FEIS. The FEIS both showed that this trail is located in a sensitive cultural area, but it also provides an important recreational opportunity for single-track motorized users. A decision on the Travel Management EIS would in no way preclude future planning efforts to establish single-track motorized trails. To this end, I have directed my staff to work with various</p>

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		Department, Phoenix, AZ - #160.16.51000.530)	groups to identify potential motorized trails for analysis and consideration through site-specific National Environmental Policy Act planning in 2012.
Access to the National Forest: Trails	5-20 The Forest Service should increase the number of motorized trails.	<p>BECAUSE MOTORIZED RECREATIONISTS PAY TAXES</p> <p>I'm tired of the Forest Service deciding what's best for our lands and not taking into consideration that there are more than just tree huggers that support your agency financially with tax dollars. Please consider opening up more trails. (Individual, Lufkin, TX - #85.3.52000.833)</p>	<p>#85.3.52000.833:</p> <p>The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>
Access to the National Forest: Trails	5-21 The Forest Service should avoid closing trails to motorized use.	<p>BECAUSE USER GROUPS HELP MAINTAIN LEGAL TRAILS</p> <p>As a responsible off highway recreationist I would vote for "Alternative 1" which closes the least amount of trails for off-road recreation. Groups like the Coconino Trail Riders have put in numerous man hours maintaining legal trails. The other alternatives would close many trails. (Individual - #8.1.54000.050)</p> <p>Please consider the impact to those of us who use the National Forest Service trail system when making changes. I'm 64 years old and my entire recreation and exercise program is based on trail riding. I and my friends who ride are acutely aware of the impact motorized travel has on the forest trail system. We respect the trails and the forest and are stewards in reporting and helping police activity that affects it. Our impact is not even seen</p>	<p>#8.1.54000.050:</p> <p>We appreciate the work that groups like the Coconino Trail Riders have done to maintain trails. The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>

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		<p>after a good rain. We're on the same side when it comes to respecting this beautiful natural resource.</p> <p>Please leave our trail system intact unless it's absolutely necessary to make changes. (Individual, Prescott, AZ - #74.1.54100.711)</p>	<p>Alternative 1 (no change) is included in the DEIS, but is not consistent with the Travel Management Rule and thus does not meet the purpose and need of the project.</p> <p>#74.1.54100.711:</p> <p>It is absolutely necessary to make some changes. The Travel Management Rule was published in November 2005 directing all National Forests to designate a system of roads, trails, and areas for motorized use. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE USER GROUPS HELP MAINTAIN LEGAL TRAILS</p> <p>As a responsible off highway recreationist I would vote for "Alternative 1" which closes the least amount of trails for off-road recreation. Groups like the Coconino Trail Riders have put in numerous man hours maintaining legal trails. The other alternatives would close many trails. (Individual - #8.1.54000.050)</p>	<p>#8.1.54000.050 – Alternative 1 would close no routes or trails, but maintains current management. This alternative would not prohibit cross-country travel, but it provides an opportunity to analyze the current management and to review a broad <i>range</i> of potential management options.</p> <p>In addition, each of the motorized trails included in Alternative 1 were reviewed and considered at some level. Some of the trails that provided unique motorized recreational opportunities such as the Challenger Trail</p>

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		<p>Please consider the impact to those of us who use the National Forest Service trail system when making changes. I'm 64 years old and my entire recreation and exercise program is based on trail riding. I and my friends who ride are acutely aware of the impact motorized travel has on the forest trail system. We respect the trails and the forest and are stewards in reporting and helping police activity that affects it. Our impact is not even seen after a good rain. We're on the same side when it comes to respecting this beautiful natural resource.</p> <p>Please leave our trail system intact unless it's absolutely necessary to make changes. (Individual, Prescott, AZ - #74.1.54100.711)</p>	<p>and Lower Smasher Canyon were analyzed in one or more alternatives.</p> <p>#74.1.54100.711</p> <p>At least 2,500 miles of routes designated in each action alternative would be designated for 'all vehicles'. Based on information received during scoping and the DEIS comment period, the majority of ATV trails submitted are actually high-clearance vehicle roads. Each of these were considered and the majority were designated as 'all vehicles'.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>TO AVOID OVERUSE OF TRAILS AND ATTENDANT SAFETY AND EROSION PROBLEMS</p> <p>I don't think you realize how devastating closing all but 25 miles would be to local Arizonans as well as tourists from around the globe. Personally, my father, brother, and I use the trails around the Flagstaff area to go hunting together. It's a great time to be with family and the relatives or friends that come along and enjoy the outdoors. Millions of other outdoorsmen enjoy the Coconino National Forest for these reasons as well as others. If only 25 miles of trails were open, many people would not even come visit the CNF because it would be extremely crowded, as many people I know use the Coconino NF to get away from people and relax in the wilderness. As for the people that still decide to visit the CNF, they would be soon driven away because of the lack of trails. If everyone were condensed to 25 miles of trail, the existing trail would soon become extremely beat up, silty, and dusty. No amount of maintenance would keep up with</p>	<p>#95.3.52000.002:</p> <p>Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional</p>

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		<p>the silt that would be formed. This would spell disaster for all using the system, because no one wants to ride on silty, beat up trails. Now, almost all users of the CNF would be gone, along with the millions of dollars that tourists and outdoorsmen bring to the CNF.</p> <p>I am a 16-year-old hunter, fisherman, and OHV enthusiast who loves being in the woods around Flagstaff. Please don't force me to surrender my love of the area, as well as millions of others. (Individual, Kingman, AZ - #95.3.52000.002)</p>	<p>unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE OHV USERS HELP MAINTAIN ROUTES FOR FIRE FIGHTERS</p> <p>Remember, if it wasn't for us OHV riders keeping the trails open from growing over, the USFS fire trucks could not get in to fight fires. (Individual, Sierra Vista, AZ - #56.3.54100.270)</p>	<p>#56.3.54100.270:</p> <p>We appreciate the work OHV users and other recreationists have done to maintain trails. Travel Management includes the designation of routes for public use of motorized vehicles. Non-designated routes may still be used for emergencies such as wildland firefighting.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE OHV USERS CONTRIBUTE TO THE LOCAL ECONOMY</p> <p>I just read on the BlueRibbon Coalition site that you are seriously only considering 23 miles of motorized trails in the entire 1.8 million acre Coconino National Forest. Unbelievable!</p> <p>Do you not realize how many of us come up there from Phoenix to ride the trails during the summer? I am up there a least every other weekend and always with 3 to 6 other riders/friends. We buy gas, lunch, dinner at the local establishments. (Individual,</p>	<p>#57.1.52100.814:</p> <p>Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail (Peaks Loop) to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or</p>

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		<p>Phoenix, AZ - #57.1.52100.814)</p> <p>I am outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan. This is simply not acceptable to my family and I, as well as thousands of other families. If this happens, you are basically closing the forest off to us responsible recreationists. Please also consider the financial impact on small towns like Flagstaff that rely on sales tax revenues from us vacationers. With essentially closing the forest to OHV use, we will have to find other areas to spend our money in. (Individual, Surprise, AZ - #83.2.52000.814)</p>	<p>no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p> <p>#83.2.52000.814: Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or</p>

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			<p>no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>TO PROVIDE FOR HIGH QUALITY RECREATION</p> <p>As a large motorcycle-based club, we are deeply concerned by the extremely limited number of miles of motorized trails proposed for the Coconino in your DEIS.</p> <p>It appears that there is a significant amount of routes for full-sized vehicles, but a very low number of motorized trails proposed to be left open. We believe that there should be many more miles of motorized trail left open to help balance the OHV experience. With a proposed 3000+ miles of full-sized vehicle</p>	<p>#164.1.54120.410:</p> <p>Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience.</p> <p>Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or</p>

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		<p>routes, but only 25 miles of motorized trails, it is hard to imagine how this proposal would be considered balance. We believe that a system with only 25 miles of motorized trails will drastically degrade the recreational experience for all OHV users that enjoy motorized trails. (Motorized Recreation, Gilbert, AZ - #164.1.54120.410)</p>	<p>no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>TO PROVIDE FOR SAFE MOTORIZED RECREATION We love to get away from the heat of Phoenix and trail ride in the Coconino National Forest, but it is unsafe and irresponsible for me to take my family trail riding on forest roads used by trucks and RVs. We need a safe, well-defined motorized trail system for users to enjoy. I urge you to keep existing trails open while the DEIS is being created. (Individual, Peoria, AZ - #45.3.52000.719)</p>	<p>#45.3.52000.719: Almost all of the motorized trails identified from public comments coincided with existing Forest system roads that are currently open to trucks or other vehicles. These routes generally include high-clearance vehicle routes that include a very low level of vehicle traffic and are currently used by ATV users for motorized recreation.</p>

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		<p>Keeping 25 miles open is only 1 hour of riding on a motorcycle and will create congestion, overuse and dangerous situation for all riders involved. Simply put, 25 miles is okay for a hiking loop but not for a motorcycle single-track loop. Twenty-five miles is nothing for a dirt bike to do. By limiting use to a completely unrealistic percentage of the existing trails, you will create more chaos, damage, and injuries to OHV riders than imaginable. This will also have the effect of turning law-abiding citizens into criminals because there is no way 25 miles of OHV road is safe and realistic for off-road riders who can easily do 100 miles of tough single-track each day. Please keep the existing single-track [Peak's Loop] open. (Individual, Mesa, AZ - #108.5.52000.719)</p>	<p>#108.5.52000.719: Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p>

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		<p>In January 2009, the Forest Service started requiring all OHVs to be registered with an annual \$25 OHV tag fee through the MVD (Motor Vehicle Department) to operate an OHV legally on forest roads. Now the Forest Service wants to take away thousands of miles of roads that have existed for years! I feel it is unfair and unreasonable to take away thousands of miles of road available for OHV travel, but this is not my main concern. Not only are we getting less for our annual OHV fee, but this is going to concentrate a higher percentage of OHVs together in smaller areas and take away much needed space for our freedom to enjoy the forests safely. More importantly, this will cause an undesired effect for rider safety and increase the chances of collisions, potentially causing a higher percentage of serious bodily injury and fatalities due to dense OHV traffic in stricter limited areas. This will make OHV use much more dangerous (especially for children and less experienced riders) whom just want to enjoy a safe and lawful form of recreation. (With this being a lawyer-driven society, potential lawsuits toward the Forest Service for not providing a safe environment but requiring a fee for OHV use, could arise). (Individual, Phoenix, AZ - #37.1.54100.002)</p>	<p>#37.1.54100.002: The Coconino Travel Management project is implementing the 2005 Travel Management Rule to designate a system of roads and trails. The DEIS clearly shows that even the most restrictive alternative (Alt. 3) provides motorized access to within 1.2 mile of almost 80% of the Forest outside of Wilderness areas. The Coconino National Forest does think there may be a concentration of users on designated roads and trails as was analyzed in the DEIS, but this 'concentration effect' is not expected to result in a substantially degraded recreational experience.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE MOTORIZED USERS ARE TAXPAYERS AND HAVE A RIGHT TO ACCESS THESE ROUTES</p> <p>I am a 42-year-old responsible professional businessman. I am married and have 4 children. We frequently take trips to Flagstaff to recreate in the forest. Our current choice of recreation is riding off-highway vehicles (motorcycles). “We the people” should be able to access all of the existing trails for uses such as hiking, mountain biking, riding OHVs and horses.</p>	<p>#87.3.52000.125: The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative approximately 80 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route. We believe all alternatives included in the Travel</p>

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		<p>Limiting the usage and closing down trails is unacceptable and a violation of our rights. Our tax dollars fund the operations, and your decision to close it all and figure it out later is unacceptable. (Individual, Phoenix, AZ - #87.3.52000.125)</p>	<p>Management DEIS provide for ample motorized recreation opportunities.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE MOTORIZED RECREATION IS A LEGITIMATE USE OF THE NATIONAL FORESTS My family and I use off-highway vehicles (OHVs) for access and recreation on National Forests and other public lands. I've ridden in California extensively, Oregon, Washington (yearly), Idaho, (yearly), Montana, Nevada (occasionally), New Mexico, Texas, Colorado and even Arizona. I'm actually planning a crosscountry off-road expedition next year. I am a strong proponent of full access to our National Forests and other public lands. There is a disturbing trend to reduce OHV recreation and trails in many of the DEIS plans and the rationale is extremely unrealistic. OHV recreation is a legitimate use of National Forests and is highly valued by a significant percentage of the public. I am outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan. Seriously, that is akin to nothing. I can ride 25 miles in an hour or two depending on the trail system. In most of the National Forests I ride, we can ride all day for a week and not cover the hundreds of miles of available trails. (Individual, Danville, CA - #100.3.52000.530)</p>	<p>#100.3.52000.530: We agree that motorized recreation is a legitimate use of National Forest System lands. The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition to these changes based on comments received, the Coconino National Forest considered approximately 40 miles of additional unauthorized (non-system) motorized trail. Those miles of unauthorized motorized trail were not included in one or more</p>

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			<p>alternatives because one or more portions of these routes resulted in unacceptable resource impacts, land jurisdiction issues, or in addition were determined not to provide a unique recreational experience. In addition to the miles of motorized trails in each action alternative, motorized recreationists can access thousands of miles of designated Forest roads (both action alternatives), a majority of which are primitive in nature and provide a similar recreation experience as motorized trails.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>BECAUSE THERE ARE ALREADY TOO FEW MOTORIZED TRAILS FOR THE LEVEL OF USE</p> <p>Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the Coconino National Forest. Therefore, every mile of existing road and motorized trail is very, very important. The evaluation must adequately consider and address the fact that motorized access to the Coconino National Forest is relatively limited, as shown by the miles of roads versus the number of acres in the table. The miles of motorized trails are exceptionally inadequate for the thousands of OHV recreationists looking for those opportunities. Additionally, the miles of motorized trails and especially single-track is way out of balance with the needs of thousands of motorized recreationists in the region surrounding the Coconino National Forest. At the same time, the miles and percentage of nonmotorized trails is excessive compared to the use that they receive, and this does not consider the endless cross-country opportunities that [are] available. The total route opportunity available to non-motorized recreationists is 6786 miles, and the total miles of exclusive non-motorized trails are 813 (100%), and the cross-country miles are infinite. The total miles of roads open</p>	<p>#109.43.51000.530:</p> <p>We do not agree that there is any need or requirement for an equal number of motorized and non-motorized routes or access opportunities on the Forest. Additionally, the Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use and access. Based on the most restrictive alternative over 75 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>

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		<p>to motorized recreationists are 5,598, and the total miles of trails open to motorized recreationists is 0 (0.0%), and the miles of cross-country opportunity is zero.</p> <p>Given the number of motorized recreationists and the miles of routes available, it should be very obvious that motorized recreationists are already squeezed into an inadequate system of routes. (Motorized Recreation, Helena, MT - #109.43.51000.530)</p>	
Access to the National Forest: Trails	5-21 The Forest Service should avoid closing trails to motorized use.	<p>BECAUSE CLOSURES PROMOTE ILLEGAL USE</p> <p>This closure on public land is discriminating against our rights as ATV riders to use our land.</p> <p>Closing all trails only leads to illegal use of closed areas and causes destruction. Instead, offer use of a supported trail system that promotes a safe, clean, and maintained area to pursue our “right to happiness” by a wholesome recreation activity. (Individual, Salome, AZ - #66.3.52000.530)</p> <p>In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trail systems, then the need to create illegal trails would be greatly diminished. Therefore, the catch-22 of the closure trend is that in the end it feeds the illegal activity. In other words, it would be a more advantageous and equitable situation to pro-actively manage motorized recreation. (Motorized Recreation, Helena, MT - #109.59.52000.530)</p>	<p>#66.3.52000.530: The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative over 75 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p> <p>#109.59.52000.530: The Travel Management planning process is not aimed at removing the motorized public from public lands. The purpose is to establish a designated system of roads, trails, and areas for motorized use. Based on the most restrictive alternative over 75 percent of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>

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<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>TO PROVIDE FOR SAFE MOTORIZED ACCESS FOR CHILDREN</p> <p>Closing so much of the current trails will have a very profound effect on my family’s ability to continue our recreation in the CNF. Outside of the 25 miles of trail to remain open, the rest of the motorized routes within the forest will be roads. Although I can make my children’s OHV legal for use on roads, they will not be legal to operate them on roads until they are 16 years old and obtain a driver’s license. I would hesitate to take them on the available 25 miles, as it will be very heavily used my many, many riders, and they are only novice riders. I acknowledge the fact that the Cinder Hills OHV area exists, and there are many miles of trails within this area in which to ride. However, the Cinder Hills area offers a unique type of terrain, and the trails through the forest also offer a unique type of terrain. Neither one is better or worse, but they are different recreational opportunities. (Individual - #154.2.52000.719)</p>	<p>#154.2.52000.719:</p> <p>We do not disagree with your assessment of enjoyment and rewards of OHV recreation. We believe all alternatives included in the Travel Management DEIS provide for ample motorized recreation opportunities.</p>
<p>Access to the National Forest: Trails</p>	<p>5-21 The Forest Service should avoid closing trails to motorized use.</p>	<p>FOR FUTURE GENERATIONS</p> <p>This is truly a beautiful area I have visited many times; denying access to all because of ignorance of a few is not a fair approach. I have lived and worked all my life in hopes that when I retired I would be able to spend time with my grandchildren, teaching them about our responsibility of stewardship as citizens. I served my country; I am a combat veteran. Totalitarianism was not acceptable to us on other continents let alone in our own National Forests. I finally have the time to take my children and grandchildren to these areas, and my access is being restricted, not right, not fair. Please reconsider the closure of trails in the interim of planning. (Individual, Las Vegas, NV - #80.3.52000.700)</p>	<p>#80.3.52000.700:</p> <p>Your concern about access being restricted is understandable, yet this decision is meant specifically to maintain access to the Forest while protecting Forest resources such as wildlife, archeological sites, water quality, and scenery for present and future generations. For example, Alternative 3 designated thousands of fewer miles than what is currently open to motorized use under the current rules, yet it only decreases access by less than 15% (See Recreation Specialist Report for more information).</p>
<p>Access to the National Forest:</p>	<p>5-22 The Forest Service should keep</p>	<p>BECAUSE USERS ARE WILLING TO ASSIST WITH TRAIL MAINTENANCE</p>	<p>#118.1.14220.530:</p> <p>The Coconino National Forest intends to</p>

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Single-Track Trails	single-track trails open.	I respectfully ask that you not close single-track riding trails in the Coconino National Forest. I strongly object to any further closures of “public” lands. I respectfully submit that a better approach is to allow those of us who love the open lands to participate in upkeep and trail maintenance. Most of the people I know that are involved with off-road vehicles, be they motorcycles, ATV’s, mountain bikes, or jeeps, are more than willing to help maintain trails and roads; they just need to be enabled to do so. (Individual, Chandler, AZ - #118.1.14220.530)	follow the Travel Management Rule which requires the designation of a system of roads, trails and areas for motorized use. Many of these routes are not being designated not because of the cost of maintenance, but because they result in unacceptable and ongoing impacts to wildlife, cultural resources, water quality, and conflicts with other recreational uses.
Access to the National Forest: Single-Track Trails	5-23 The Forest Service should develop a motorized single-track trail system.	THAT REFLECTS INPUT FROM ARIZONA GAME AND FISH DEPARTMENT AND OHV USER GROUPS The Department [Arizona Game and Fish Department] also recommends CNF [Coconino National Forest] work collaboratively with the Department and OHV user groups in the future to develop and implement an OHV and motorized single-track trail system on the CNF. The Department recommends longer loop trails throughout the forest, in addition to more concentrated OHV areas. Such a trail system could be based off existing roads and could require nothing beyond designation of the trails, signage, and addition to the MVUM [motorized vehicle use map]. In the future, these OHV trails and areas may be partially managed through an Adopt-a-Trail Program with the forest users. The Department is willing to coordinate our efforts to designate additional motorized trails throughout the forest. (Arizona Game and Fish Department, Phoenix, AZ - #160.17.54000.050)	#160.17.54000.050: We agree. The DEIS did include a limited number of motorized trails for analysis. Based on your comments and the comments of others, the s Challenger Trail was added to Alternative 4 in the FEIS for detailed analysis and consideration. The FEIS both showed that this trail is located in a sensitive cultural area, but it also provides an important recreational opportunity for single-track motorized users. A decision on the Travel Management EIS would in no way preclude future planning efforts to establish single-track motorized trails. To this end, I have directed my staff to work with various groups to identify potential motorized trails for analysis and consideration through site-specific National Environmental Policy Act planning in 2012.
Access to the National Forest: Single-Track	5-24 The Forest Service should allow motorized and non-	TO AVOID SEGREGATING USERS AND TO COMPLY WITH THE CIVIL RIGHTS ACT The availability of motorized single-track trails has declined	#109.26.54120.530: In no way is the designation of motorized trails in violation of the Civil Rights Act of

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Trails	motorized use of single-track trails.	<p>dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use. Additionally, single-track challenge trails are needed for expert riders and trials-type motorcycles.</p> <p>National Forests in Idaho have a long and successful history of sharing single-track trails with motorcycles and we request that this strategy be used in the project area. (Motorized Recreation, Helena, MT - #109.26.54120.530)</p>	<p>1964. Non-motorized users are not restricted from using motorized trails and restricting motorized users to designated routes is required to comply with the Travel Management Rule, which is Federal Regulation. The large majority of research on the social impacts of OHV use shows that the impacts between motorized users and other recreationists (including other motorized uses) are asymmetric; meaning that motorized users affect other recreationists more than they are affected by other recreationists and often this leads to displacement of non-motorized recreationists (see Recreation Specialist Report for more detail). Often motorized and non-motorized users share the same or similar goals, but those seeking quiet and solitude through non-motorized means are more likely to be disturbed by engine noise from an ATV than are those traveling by motor vehicle. As a result, those who are most likely to be disturbed are most likely to be displaced. The Forest reviewed all single track trails submitted in public comments. Many of these trails were located in areas with sensitive wildlife habitat, areas with cultural significance, areas that would cause damage to soil or water quality, or areas that would result in user conflict and thus were either not included in Alternatives 3 or 4 or were not included in the decision. I do agree that</p>

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			<p>there are needs for additional single track motorized trails and to this end, I have directed my staff to work with various groups to identify potential motorized trails for analysis and consideration through site-specific National Environmental Policy Act planning in 2012.</p>
<p>Access to the National Forest: Single-Track Trails</p>	<p>5-24 The Forest Service should allow motorized and non-motorized use of single-track trails.</p>	<p>BECAUSE MOTORCYCLE RIDERS ARE GOOD STEWARDS AND ARE WILLING TO SHARE TRAILS WITH NONMOTORIZED USERS</p> <p>The loss of high quality motorized routes in the Coconino National Forest is not a reasonable alternative given the historic use of these routes and the needs of the public for access and motorized recreation. Specifically, the proposal to close existing motorcycle single-track trail does not adequately address the issues and the needs of the public for these routes. The reasons used are completely unreasonable.</p> <p>Motorcycles can negotiate and prefer to use trails of the same specifications as hiking and pack stock trails.</p> <p>This proposal does not reasonably acknowledge or consider that motorcycle riders are willing to share, practice Tread Lightly, have maintained these trails for years, would rather ride their motorcycles on singletrack trails, and have developed the skills necessary to ride a motorcycle on single-track trails. We are very concerned about the lack of understanding of the needs of single-track motorcycle riders and the complete disregard for their needs. We ask that this very important issue be adequately addressed in the document. (Motorized Recreation, Helena, MT - #109.27.54120.410)</p>	<p>#109.27.54120.410:</p> <p>The analysis in the Recreation Specialist Report recognizes that a decision authorizing Alternative 3 (as modified) will result in impacts to motorized trail users. However, the motorized trails reviewed under the travel management planning process included several conflicts with wildlife habitat, cultural resources, soil and water resources, and user compatibility. That is not to say that motorized trails and planning to establish additional motorized trails is not needed. The Forest recognizes the need for a workable motorized trail system. As a result, we see a decision on this Travel Management EIS as the beginning of this effort and not the end. To illustrate this fact, resources have been dedicated to begin motorized trails planning in the area of the Airport Trail and along the 180 corridor, which will be available for public comment and review through the NEPA process in 2012.</p>

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<p>Access to the National Forest: Single-Track Trails</p>	<p>5-25 The Forest Service should increase the number of single-track trails.</p>	<p>THE FOREST SERVICE SHOULD INCREASE THE NUMBER OF SINGLE-TRACK TRAILS How about considering some more single-track trails for public use? We've been dealing with this for years now and we are still discussing the same issue. My family and I hike, mountain bike, travel forest roads in our vintage 4WD vehicles and use the designated single-track trails around the Flagstaff area. (Individual, Phoenix, AZ - #158.1.54120.530)</p>	<p>#158.1.54120.530: The DEIS did include a limited number of motorized trails for analysis. Based on your comments and the comments of others, the 'Round the Peaks' (referred to as Challenger Trail) was added to Alternative 4 in the FEIS for detailed analysis and consideration. The FEIS both showed that this trail is located in a sensitive cultural area, but it also provides an important recreational opportunity for single-track motorized users.</p> <p>The Forest understands that future planning efforts to establish single-track motorized trails without resource and user conflicts is needed to allow for a satisfactory single track motorized experience. A decision on Travel Management Rule does not preclude future projects for single-track trail systems on the Coconino National Forest. We will work with various groups to identify potential motorized trails for analysis and consideration through site-specific National Environmental Policy Act planning in 2012.</p>
<p>Access to the National Forest: Single-Track Trails</p>	<p>5-26 The Forest Service should distinguish between single-track trails and ATV trails.</p>	<p>TO MEET THE REQUIREMENTS OF THE 3-STATE OHV AGREEMENT Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. The process has not differentiated between ATV and motorcycle trails in the travel plan alternatives. To recognize the different needs and impacts, the evaluation must be differentiated</p>	<p>#109.28.54120.180: The 3-state agreement you refer to in this comment is based on a Bureau of Land Management EIS decision in Montana and the Dakotas. The Coconino National Forest is in no way subject to this decision that was made for lands in other states and for lands</p>

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		<p>between ATV and motorcycle trails. Figure 2.2 and 2.7 on page 14 of Chapter 2 in the 3-State OHV EIS and Decision clearly shows that existing tracks used by motorcycles are to be considered as motorized trails (http://www.mt.blm.gov/ea/ohv/Chapter2.pdf). The evaluation must consider these routes in order to meet the requirements of the 3-State OHV agreement. (Motorized Recreation, Helena, MT - #109.28.54120.180)</p>	<p>managed by another agency. The Coconino National Forest, however, does recognize the importance of differentiating single-track trails from other OHV motorized trails and the availability of single-track motorized trails is clearly discussed in the Recreation Specialist Report.</p>
<p>Access to the National Forest: Single-Track Trails</p>	<p>5-27 The Forest Service should recognize the significant differences between single-track trails and game trails.</p>	<p>THE FOREST SERVICE SHOULD RECOGNIZE THE SIGNIFICANT DIFFERENCES BETWEEN SINGLE-TRACK TRAILS AND GAME TRAILS</p> <p>The statement in the Recreation Specialist report (at page 8) that single-track motorized trails are similar in appearance to game trails is an indication of the lack of understanding of what a single track motorized trail typically looks like. While we [Center for Biological Diversity et al.] appreciate the qualifying statement that “single track trails tend to be much more incised into the ground than game trails and are distinguishable from them[[,]” we disagree that they are similar in appearance in any way other than that they are both single track. The depth, width, vegetation damage and overall structure of these two types of trails are significantly different visually. There is no time period described for how long it would take for evidence of cross-country motorized activity to “fade away” as unauthorized tracks are eventually covered with forest litter and ground cover plants, nor any acknowledgment of the arid nature of southwestern deserts which can severely limit re-establishing ground cover plants. (Preservation/Conservation, Tucson, AZ - #175.78.54120.201)</p>	<p>#175.78.54120.201:</p> <p>The sentence about single-track motorized trails being similar in appearance to game trails was removed from the FEIS, as it is not relevant. The Scenery Specialist Report discusses the impacts of motorized trails in more detail.</p>
<p>Cross-Country Travel, Big Game Retrieval,</p>	<p>5-28 The Forest Service should continue to allow</p>	<p>BECAUSE THIS IS AN APPROPRIATE USE OF THE NATIONAL FOREST</p> <p>We are being more and more restricted in land use that belongs</p>	<p>#30.1.50000.125:</p> <p>Restricting motor vehicles to designated roads, trails, and areas is required by the</p>

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Dispersed Camping	dispersed camping and motorized game retrieval.	<p>to the people. This closing off roads, restricting access, and limiting camping is just wrong. Give the land back to the people, and let the hunters retrieve their game, and allow camping out of expensive campgrounds.</p> <p>The forest belongs to the people and should use all existing roads while the FEDS maintain those roads and expand camping facilities and trash pickup. They started charging people for off road use, so what is the public getting for it? (Individual - #30.1.50000.125)</p>	<p>Travel Management Rule. All alternatives analyzed for implementation of this Rule on the Coconino National Forest still allows for motorized dispersed camping and some level of off-road motorized use for elk retrieval. This analysis only looks at restrictions on motorized use and does not restrict game retrieval or dispersed camping in any way other than the use of vehicles. There are currently no fees for driving off-road on the Coconino National Forest other than required for State registration or sticker fees.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping	5-29 The Forest Service should prohibit dispersed camping and motorized game retrieval.	<p>THE FOREST SERVICE SHOULD PROHIBIT DISPERSED CAMPING AND MOTORIZED GAME RETRIEVAL</p> <p>Motorized big-game retrieval should be prohibited, and dispersed camping corridors should be eliminated. (Individual, Cottonwood, AZ - #1.4.55000.001)</p>	<p>#1.4.55000.001: We thank you for your comment. Completely restricting off-road motorized use for dispersed camping and big game retrieval was considered but eliminated from detailed study in Alternative 7. See the Record of Decision for more information.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping	5-30 The Forest Service should consider dispersed camping and game retrieval as part of a site-specific analysis.	<p>THAT CONSIDERS DEMAND, HISTORICAL BEHAVIOR, AND RELATED PRACTICAL CONCERNS</p> <p>It is important that dispersed camping, parking, and big game retrieval issues be carefully considered and rationally connected to site-specific analysis that considers demand, historical behavior, and related practical concerns. (Motorized Recreation, Boise, ID - #202.25.55000.700)</p>	<p>#202.25.55000.700: We agree. The issues of dispersed camping, parking, and motorized big game retrieval were carefully considered and thoroughly studied at the site-specific level in the FEIS. Demand, historical behavior, and other practical concerns were included in the alternative development and analysis process by reviewing and incorporating public comments, extensive inventory of dispersed camping sites, and thorough analysis of designated areas using wildlife</p>

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			<p>habitat, watershed, and cultural resource spatial data. Additionally, each of these issues was thoroughly discussed with the Arizona Game and Fish Department in meetings where all of the corridors and game management units were specifically reviewed and discussed.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping</p>	<p>5-31 The Forest Service should provide the criteria used to justify the cross-country travel exceptions.</p>	<p>BECAUSE THESE EXCEPTIONS ARE LIKELY TO CAUSE ENFORCEMENT AND RESOURCE PROTECTION CHALLENGES</p> <p>If there are to be any exceptions to the prohibition on motorized cross-country travel, we would like to know what criteria the Forest Service used to deem these exceptions as appropriate. In addition, what plans does the Forest Service have to ensure that these exceptions are implemented and enforced as they are intended (e.g., if motorized big game retrieval is allowed, what plan does the Forest Service have to ensure that only those with a dead and downed animal are actually traveling off-road during hunting season and the rest of the year?). As stated earlier, we strongly support the Coconino’s prohibition against motorized cross-country travel for big game retrieval (PA, pages 7, 8). While hunting is a legitimate use of Forest Service lands, an exception to the ban on cross-country travel for big game retrieval would create enforcement problems and will likely create more conflict and resource damage because many dispersed camp sites and user-created routes receive use only during hunting season. In our [Center for Biological Diversity et al.] view, providing an exception threatens to swallow the general rule prohibiting cross-country travel, and the Proposed Action’s prohibition against motorized cross-country travel should be extended to all alternatives considered by the Forest Service. (Preservation/Conservation, Denver, CO - #175.302.55000.530)</p>	<p>#175.302.55000.530:</p> <p>Criteria used to determine areas authorized for off-road vehicle travel for big game retrieval is included in the Record of Decision. Criteria used for the designation of dispersed camping corridors includes sensitive wildlife habitat, State wildlife waters, location of caves, meadows, drainages and riparian areas, cultural resources, and potential user conflict. We understand your concerns that allowing off-road use for motorized big game retrieval may result in difficulties in enforcement. There is some uncertainty as to the effectiveness of designating off-road use for elk retrieval. To better understand how these designations affect enforcement and impacts to natural and cultural resources, Alternative 3 provides an opportunity to study the effects and compliance with authorizing off-road vehicle use for game retrieval.</p>

Category	Public Concern	Comment	Response
Cross-Country Travel, Big Game Retrieval, Dispersed Camping	5-32 The Forest Service should apply the user conflict minimization criteria from Executive Order 11644.	<p>IN AREAS OPEN TO MOTORIZED GAME RETRIEVAL AND DISPERSED CAMPING</p> <p>For all areas open to motorized cross-country travel for game retrieval or dispersed camping, the Forest Service should apply the minimization criteria from the Executive Orders, which require that the designation of all areas subject to ORV uses be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands. Executive Order 11644 as amended, [section] 3(a). (Preservation/Conservation, Prescott, AZ - #175.34.55000.200)</p>	<p>#175.34.55000.200:</p> <p>See the response above. The Coconino National Forest did consider the minimization criteria when designating off-road motor vehicle use in addition to considering several other criteria, such as practicality, proximity to caves, scenic impacts on grasslands and meadows, and potential for spread of invasive species.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Cross-Country Travel	5-33 The Forest Service should prohibit cross-country travel.	<p>TO AVOID RESOURCE DAMAGE AND PROTECT WILDLIFE HABITAT</p> <p>The Department [Arizona Game and Fish Department] strongly supports the general prohibition against cross-country travel because it will prevent resource damage and improve habitat for all wildlife. (Arizona Game and Fish Department, Phoenix, AZ - #160.1.50000.201)</p>	<p>#160.1.50000.201:</p> <p>We agree. Both action alternatives would prohibit cross-country travel off the designated system as identified on the MVUM and as directed by the Travel Management Rule.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Cross-Country Travel	5-34 The Forest Service should acknowledge that more users visit the forest for quiet recreation than for motorized cross-country travel.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT MORE USERS VISIT THE FOREST FOR QUIET RECREATION THAN FOR MOTORIZED CROSS-COUNTRY TRAVEL</p> <p>There is “no data to determine the number of people who engage in motorized cross-country travel, though survey data suggests the percentage of people who participate in this activity” is small compared to those who visit for other, quiet activities such as hiking and backpacking. Forest Service 2010:27. (Preservation/Conservation, Denver, CO - #175.85.55000.530)</p>	<p>#175.85.55000.530:</p> <p>The Recreation Specialist Report does make it very clear that the majority of Forest visitors participate in non-motorized recreation experiences.</p>
Cross-Country Travel, Big	5-35 The Forest Service should restrict	<p>EXCEPT FOR FIREWOOD GATHERING AND BIG GAME RETRIEVAL</p>	<p>#168.2.54000.002:</p> <p>We thank you for your comment. Both</p>

Category	Public Concern	Comment	Response
Game Retrieval, Dispersed Camping: Cross-Country Travel	motorized cross-country travel.	I went to the meeting at Saguna High School on Tuesday, July 31, in Flagstaff. I agree with this action of no cross-country travel as a means of management of the Coconino [National] Forest. Open cross-country motorized travel can no longer be a viable option for the Coconino Forest due to the potentially huge numbers of ORVs and the impact of (undermanaged, unrestricted) motorized travel off road. Managed crosscountry motorized travel can be managed for gathering firewood and retrieval of big game animals. (Individual, Munds Park, AZ - #168.2.54000.002)	action alternatives would prohibit cross-country travel, but will designate a system of roads, trails and areas for motorized use. However, only Alternative 4 will allow motorized big game retrieval, but both action alternatives will allow cross country travel for gathering firewood.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Cross-Country Travel	5-36 The Forest Service should implement a Wet Roads System plan	<p>TO AVOID DAMAGE FROM CROSS-COUNTRY TRAVEL AND MOTORIZED GAME RETRIEVAL</p> <p>Reduction of resource damage: In times when ground moisture is high, and traveling cross-country would cause obvious damage, the Department [Arizona Game and Fish Department] suggests activating the Wet Roads System plan developed cooperatively with the Department, CNF [Coconino National Forest], and Kaibab National Forest. If the Wet Roads System plan was activated because of excessively wet conditions, it would be unlawful to drive cross-country, including executing MBGR [motorized big game retrieval].</p> <p>Department officers have always, and will continue to, enforce unlawful cross-country travel, assisting the Forest Service law enforcement officers so they do not have to bear the brunt of enforcement.</p> <p>Enforcement of cross-country travel and unlawful motorized game retrieval: The Department regularly flies aerial hunt patrols throughout the CNF looking for violations, such as hunting from a vehicle and vehicles traveling cross-country in the current vehicle closures. The Department will continue to do so. (Arizona Game and Fish Department, Phoenix, AZ - #160.10.54100.160)</p>	<p>#160.10.54100.160:</p> <p>We appreciate the law enforcement assistance the Arizona Game and Fish Department provides. The FEIS restricts off-road motor vehicle use outside of designated areas in compliance with the Travel Management Rule. The decision will make it clear that the Wet Weather Roads Policy established in 2006 is still relevant and can be applied to restrict travel when weather would result in safety issues or road or off-road damage.</p>

Category	Public Concern	Comment	Response
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-37 The Forest Service should prohibit motorized game retrieval.	<p>THE FOREST SERVICE SHOULD PROHIBIT MOTORIZED GAME RETRIEVAL</p> <p>Motorized big-game retrieval should be prohibited. I have been a big-game hunter for 50 years and I have never driven to a kill site yet. When the day comes that I can't drag or carry an animal that I have killed, I'll quit hunting. (Individual, Sierra Vista, AZ - #46.10.55300.540)</p>	<p>#46.10.55300.540:</p> <p>Both alternatives considered would allow for some level of off-road motorized game retrieval for elk. For many hunters, motorized use for retrieval of big game is a very important element of the hunting experience. We suggest you apply for hunt permits in those game management units where motorized big game retrieval for elk is authorized in this decision.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-37 The Forest Service should prohibit motorized game retrieval.	<p>BECAUSE THERE IS NO DOCUMENTED NEED FOR THIS LEVEL OF ACCESS</p> <p>There is absolutely no data or evidence to support the proposed MBGR [motorized big game retrieval] strategy and this part of all the alternatives must be abandoned as a management approach. There is no especially onerous burden on a hunter who will rarely, if ever, be more than 0.5 mile from an open road on the CNF [Coconino National Forest]. Forest Service 2010:30. (Preservation/Conservation, Phoenix, AZ - #175.61.55300.410)</p>	<p>#175.61.55300.410:</p> <p>We disagree. There is evidence that off-road vehicle use for big game retrieval is important to hunter satisfaction (see Recreation Specialist Report). Arizona Game and Fish Department have also claimed that motorized big game retrieval is important to prevent spoilage of meat and to facilitate management of big game populations. Under Alternative 3, more than 20% of the Forest would be more than 0.5 miles from a designated road. Based on comments received the Forest understands it is important to find a balance for allowing motorized big game retrieval for hunter satisfaction, big game management, and preventing spoilage of meat while also reducing off road travel by not off-road motorized use for game retrieval for all species other than elk and for elk on less than half of the Forest.</p>
Cross-Country	5-37 The Forest	BECAUSE IT WILL CREATE ENFORCEMENT	#175.39.55300.520:

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Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	Service should prohibit motorized game retrieval.	<p>PROBLEMS AND RESOURCE DAMAGE</p> <p>An exception to the ban on cross-country travel for big-game retrieval will create enforcement problems and incite more conflict and resource damage because many dispersed campsites and user-created routes receive use only during hunting season. These concerns are supported by the release of a AGFD [Arizona Game and Fish Department] 2006 statewide survey of active hunters that indicated that disruption caused by ORVs was among the top four “barriers to participating in hunting” in Arizona. In fact, 54% of the respondents indicated that disruption caused by ORV use was a significant barrier to their participation in hunting. AGFD 2005 Hunter and Shooting Sports Recruitment and Retention Team Report. (Preservation/Conservation, Prescott, AZ - #175.39.55300.520)</p>	<p>We understand your concerns that allowing off-road use for motorized big game retrieval may result in difficulties in enforcement. There is some uncertainty as to the effectiveness of designating off-road use for elk retrieval. To better understand how these designations affect enforcement and impacts to natural and cultural resources, Alternative 3 was considered and provides an opportunity to study the effects and compliance with authorizing off-road vehicle use for game retrieval. The study referenced in your comment was specifically discussed in the Recreation Specialist Report and was an important factor in considering and alternative to limit off-road travel for motor vehicle use. Yet, this same study also pointed out that loss of access was an even larger obstacle to participation in hunting.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-38 The Forest Service should allow motorized big game retrieval.	<p>THE FOREST SERVICE SHOULD ALLOW MOTORIZED GAME RETRIEVAL</p> <p>I’m in favor of the proposal that allows for game retrieval off-road with motor vehicle. (Individual - #18.1.55300.530)</p>	<p>#18.1.55300.530:</p> <p>We thank you for your comment. This issue was very carefully considered and the Forest hopes to find a balance for allowing off-road game retrieval while minimizing impacts to other forest resources and non-motorized users.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big	5-38 The Forest Service should allow motorized big game retrieval.	<p>TO ALLOW OLDER HUNTERS TO RETRIEVE GAME</p> <p>I strongly support Alternative 4 for the Coconino Travel Management Rule. I’m an avid hunter, and currently 73 years of age. I have a 1947 Willys Jeep and have used it when hunting for many years. I often have had to drive off-road to retrieve game,</p>	<p>#67.1.55300.530:</p> <p>We thank you for your comment. This issue was very carefully considered and the Forest hopes to find a balance for allowing off-road game retrieval while minimizing</p>

Category	Public Concern	Comment	Response
Game Retrieval		and the Jeep hardly every leaves a track. Most of the time I can't even follow my tire tracks back to the road, since very little sign has been left. (Individual, Munds Park, AZ - #67.1.55300.530)	impacts to other forest resources and non-motorized users.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-38 The Forest Service should allow motorized big game retrieval.	<p>BECAUSE MULTIPLE NON-MOTORIZED TRIPS WOULD CAUSE MORE RESOURCE DAMAGE</p> <p>If I were to succeed in a deer or elk hunt, it would take me many hours and many trips from the roadway to the game. This would leave as much, if not more, damage to the forest. Carrying a heavyweight back and forth across the same area would leave more tracks than one trip in and out with an ATV. (Individual - #21.1.55300.201)</p>	<p>#21.1.55300.201:</p> <p>We thank you for your comment. Off-road motorized use for game retrieval may cause vehicle tracks, but it also may cause disturbance to wildlife or other hunters pursuing game. All of these potential impacts were considered in the decision.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-38 The Forest Service should allow motorized big game retrieval.	<p>BECAUSE GAME IS LIKELY TO SPOIL IF NOT COLLECTED QUICKLY</p> <p>Punishing/penalizing hunters and fishermen from retrieving their game is a very bad choice... particularly here in Arizona... even in Coconino County—temperatures soar over 100 degrees, and hard-earned game will spoil before many can make the countless pack trips to return it to their vehicle or camp. The liability of wildlife going to waste cannot and will not be the responsibility of the hunter or fishermen—that liability will fall squarely on the shoulders of the Forest Service. The Game and Fish will then have to contend even more for power with the USFS on whose responsibility it is to enforce game retrieval and reduce waste-of game.</p> <p>To exacerbate the situation—having to camp miles and miles farther from your favorite hunting or fishing area will only compound the distance of “packing” out game. (Individual, Camp Verde, AZ - #32.5.55000.100)</p>	<p>#32.5.55000.100:</p> <p>Concerns of game spoilage as a result of not allowing off-road motor vehicle use for game retrieval was one of the several factors considered in the decision for game retrieval. Those unable to retrieve big game without the assistance of a motor vehicle may choose to hunt in those units that authorize this use for elk. Also, I'd like to point out that under Alternative 3 approximately 78.6% of the Forest outside of Wilderness is within 1/2 mile of a designated route. Lastly, this decision does not restrict dispersed camping and even designates motorized dispersed camping corridors on over 600 miles of road to facilitate camping throughout the Forest.</p>
Cross-Country Travel, Big Game Retrieval,	5-38 The Forest Service should allow motorized big game	<p>BECAUSE MOTORIZED GAME RETRIEVAL WILL OCCUR WHETHER OR NOT IT'S LEGAL</p>	<p>#52.2.55300.165:</p> <p>Many comments received supported off-road</p>

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Dispersed Camping: Big Game Retrieval	retrieval.	I feel Alternative 3 would be a mistake. Elk hunters should have the right to go off-road to retrieve downed game. Unfortunately, I think that many would continue to do so even if it was not legal, and I doubt if this could be adequately controlled. (Individual, Cornville, AZ - #52.2.55300.165)	motorized use for elk retrieval and several comments point to the potential impacts caused by this use. We understand your concerns that allowing off-road use for motorized big game retrieval may result in difficulties in enforcement. There is some uncertainty as to the effectiveness of designating off-road use for elk retrieval. To better understand how these designations affect enforcement and impacts to natural and cultural resources, the decision provides an opportunity to study the effects and compliance with authorizing off-road vehicle use for game retrieval.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-38 The Forest Service should allow motorized big game retrieval.	BECAUSE DOWNED GAME IS OFTEN MORE THAN A MILE FROM THE ROAD The priority to the retrieval of game is a necessity when hunting in Arizona. We need permission to all offroad retrieval of game due to the fact that many of the times the game is more than a mile off the road. We would prefer Alternative 4, which closes fewer roads and allows for some, even if minimal, off-road retrieval. Cannot stress enough the importance in Arizona of the retrieval of game and to allow off-road travel of more than a mile. If we're being given the privilege to hunt in Arizona, we should be able to retrieve an animal that can weigh up to 600 pounds, using an off-road vehicle. Otherwise, we might not be able to retrieve it. (Individual, Camp Verde, AZ - #49.1.55300.530)	#49.1.55300.530: The decision would allow off-road motor vehicle use for elk retrieval on over half of the Forest based on comments such as yours and other input and information. Also, I'd like to point out that under Alternative 3 approximately 78.6% of the Forest outside of Wilderness is within 1/2 mile of a designated route.
Cross-Country Travel, Big Game Retrieval, Dispersed	5-39 The Forest Service should allow game retrieval and wood gathering within	TO BE CONSISTENT WITH THE DISPERSED CAMPING RESTRICTION I was wondering if it had been considered to place the 300-foot dispersed camping suggestion, and apply it to wood gathering	#215.1.52000.127: Off-road vehicle travel for dispersed camping corridor, motorized big game retrieval, and firewood collection differs

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Camping: Big Game Retrieval	300 feet of existing routes.	and big game retrieval. I believe this would look like it was placed in the interest of most CNF [Coconino National Forest] users. (Individual - #215.1.52000.127)	based on the differing motorized needs of these activities, user patterns involved, potential resource impacts, and regulatory direction. For example, the Travel Management Rule specifically allows exemptions for activities occurring under a Federal permit (36 CFR 251.51(8)) such as fuelwood permits. The Travel Management Rule specifically allows for off-road motorized use for dispersed camping and motorized big game retrieval. The Forest chose 300-foot wide camping corridors based on the fact that most car camping occurs adjacent to roads as supported by the input of state, federal, and university recreation managers and researchers (see Recreation Specialist Report for more information). The off-road motorized use need for game retrieval was determined to require a much greater distance since big game generally avoid roads and thus a 300-foot corridor would not be very useful. The Forest chose a mile from designated roads in certain game management units to comply with the Travel Management Rule and to provide motorized use for elk retrieval in all drivable areas not closed to motor vehicle use in these game units.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big	5-40 The Forest Service should reconsider the proposed restrictions on motorized big game	<p>BECAUSE REDUCED HUNTING LEVELS WOULD IMPEDE EFFORTS TO CONTROL ELK POPULATIONS IN THE REGION</p> <p>To meet Arizona big game harvest and management objectives: The Department [Arizona Game and Fish Department] considers</p>	<p>#160.4-5.55300.530:</p> <p>Your concerns about restrictions on motor vehicle use for game retrieval were carefully considered in the analysis and decision-making process. The Coconino</p>

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Game Retrieval	retrieval.	<p>both elk and deer as primary big game species in Game Management Units (GMU) 5A, 5B, 6A, 6B, 7 and 11M. CNF [Coconino National Forest] encompasses all of these GMUs. The Department is concerned that when hunting for large animals, many hunters will not venture far enough from roads to find and harvest large game for fear of having to retrieve the animal. Restrictions on MBGR will especially discourage these hunters from hunting away from roads.</p> <p>In reaction to requests from CNF, the Department has lowered elk populations on the forest over the last several years and tried to maintain the populations at lower levels. This has proven to be difficult. When bad weather, wet roads, or other problems impact hunters, the Department has seen reductions in elk harvest. In response, the Department has added permits, increased numbers of hunts, and split GMUs. Elimination of MBGR for elk will only further reduce our effectiveness in lowering elk populations on CNF.</p> <p>CNF staff have continually commented on the negative impacts of elk on aspen recruitment and survival. To date, it has not been easy to achieve the harvest levels required to reach the desired population levels. The restrictions on MBGR will predictably lower hunt success, thereby adding to the potential impact on aspen by wildlife. To make up for the lower hunt success, the number of permits required to achieve objectives will need to be increased, potentially leading to elevated habitat and road damage issues as well as increased conflicts between forest users.</p> <p>It is currently unlawful to hunt from a vehicle and drive a motorized vehicle cross-county while hunting. The Department regularly flies aerial hunt patrols looking for violations, such as hunting from a vehicle and vehicles traveling cross-country. During these aerial hunt patrols, the Department often sees elk concentrated in the areas between roads. Knowing that the elk</p>	<p>National Forest hopes to work with the Arizona Game and Fish Department to study the effects of a decision on this planning process to determine if changes are needed. This decision will help provide for a better understanding of whether motor vehicle restrictions will truly limit the ability of the State to manage elk and deer populations. The claim that not allowing forest wide motorized big game retrieval would prevent the effective management of game populations is not supported by the fact that other Forests (such as the Grand Mesa Uncompaghre National Forest) have restricted motorized game retrieval without such consequences. Furthermore there are a number of studies (including a joint study by the Coconino National Forest and Arizona Game and Fish Department) showing that motorized restrictions have no or slightly positive impacts on hunter success. Furthermore, almost 80% of the Forest outside of Wilderness will be within 1/2 mile of a road <i>and</i> off-road vehicle use for elk retrieval would be allowed on more than half of the Forest. Based on this information it is unclear whether hunt success and thus big game population management would be negatively affected in any way. However, this decision will provide the opportunity to study game populations in areas with and without motorized big game retrieval. If annual state</p>

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		<p>may have already learned to avoid hunters by moving away from roads, the Department is very concerned that any disincentive for hunters to get farther from roads will have an effect of lowering hunt success and reduce our ability to meet the harvest objectives and control elk populations. (Arizona Game and Fish Department, Phoenix, AZ - #160.4-5.55300.530)</p>	<p>game surveys show that elk or deer populations are unmanageable without motorized game retrieval, it would result in additional planning to change the motor vehicle designations since, as you point out, both agencies have a joint interest in managing big game species at appropriate levels.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping, Big Game Retrieval</p>	<p>5-40 The Forest Service should reconsider the proposed restrictions on motorized big game retrieval.</p>	<p>TO ALLOW ATV ACCESS AND TO AVOID REDUCING HUNTER SUCCESS RATES</p> <p>Game Retrieval: If the “hunter success” is now only 40–60% for many of the hunts, this proposed policy will reduce that success. Because people will not be able to either find their elk within a mile of the road, or want to hunt an antelope or deer without walking many miles, or hunt after November 1st and still retrieve their game, Alternative 4 will cause more problems than it solves. As a result of poorer hunter success, Game and Fish [Arizona Game and Fish Department] will probably feel compelled to issue more tags, which translates into more people and additional impact, exactly what you don’t want. For these reasons, we believe you should consider retrieval off-road with ATVs (and only ATVs) because the impact is far less than with 4-wheel drive pickups. We also believe you should allow retrieval of all big game species. We further believe that you should allow game retrieval with all hunts, not just those prior to November 1st.</p> <p>A current example of where this does not work is Hay Lake, where motorized vehicular travel is not allowed.</p> <p>Very few hunters hunt there, as the distance to pack an elk out could very well be more than a mile. Meanwhile the elk herds are large there because they feel protected. This is not a suggestion to change the designation at Hay Lake, but rather use</p>	<p>#161.3.55300.530:</p> <p>Your concerns about restrictions on motor vehicle use for game retrieval were carefully considered. A decision on this EIS will allow the opportunity for a better understanding of whether motor vehicle restrictions will truly limit the ability of the State to manage elk and deer populations. The claim that not allowing forest wide motorized big game retrieval would prevent the effective management of game populations is not supported by the fact that other Forests (such as the Grand Mesa Uncompaghre National Forest) have restricted motorized game retrieval without such consequences. Furthermore there are a number of studies (including a joint study by the Coconino National Forest and Arizona Game and Fish Department) showing that motorized restrictions have no or slightly positive impacts on hunter success. Furthermore, almost 80% of the Forest outside of Wilderness will be within 1/2 mile of a road and off-road vehicle use for elk retrieval would be allowed on more</p>

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		of an existing example. (Domestic Livestock Industry - #161.3.55300.530)	than half of the Forest. Based on this information it is unclear whether hunt success and thus big game population management would be negatively affected in any way. However, this decision will provide the opportunity to study game populations in areas with and without motorized big game retrieval. If annual state game surveys show that elk or deer populations are unmanageable without motorized game retrieval, it would result in additional planning to change the motor vehicle designations since, as you point out, both agencies have a joint interest in managing big game species at appropriate levels.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-40 The Forest Service should reconsider the proposed restrictions on motorized big game retrieval.	<p>TO ALLOW ATV ACCESS AND TO FACILITATE GAME MANAGEMENT</p> <p>By reducing the options for game retrieval, there will be areas where hunting will not be feasible. Our hunting population is becoming older and walking long distances will become more challenging. This may result in some unintended consequences—i.e., fewer hunters, greater concentrations of game in specific areas—making game management challenging. For these reasons, we believe you should consider retrieval off-road with ATVs (and only ATVs) because the impact is far less than with 4-wheel drive pickups. We also believe you should allow retrieval of all big game species. We further believe that you should allow game retrieval with all hunts, not just those prior to November 1st. (Place-based group, Flagstaff, AZ - #165.10.55300.711)</p>	<p>#165.10.55300.711:</p> <p>We agree that the November 1st date would not work well for motorized game retrieval and this was removed from consideration in all alternatives based on input from your comment and comments from the Arizona Game and Fish Department and due to consistency problems with the Kaibab National Forest. We also agree that there should be some areas where off-road vehicle use for big game retrieval is authorized for big game species such as elk. We also agree that hunting participation is decreasing; however, it is not just because the hunting population is getting older. Some studies have pointed to 'OHV disruption' as a major barrier to</p>

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			<p>participation in hunting (see Recreation Specialist Report for more detail). The decision to allow off-road vehicle travel for elk in some portions of the Forest, but not others will provide hunters the choice and opportunity for hunting in areas where off-road motorized game retrieval is authorized or not. The issue of allowing retrieval of all game species is discussed in the FEIS under Alternatives Considered, but Eliminated from Detailed Study for Alternative 8.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping, Big Game Retrieval</p>	<p>5-40 The Forest Service should reconsider the proposed restrictions on motorized big game retrieval.</p>	<p>BECAUSE THEY UNFAIRLY SINGLE OUT HUNTERS FOR RESTRICTIONS ON CROSS-COUNTRY TRAVEL Need for fairness. Regulations up to this point have allowed the public to drive cross-country year-round unless wet conditions dictate otherwise. While the Department [Arizona Game and Fish Department] supports a change to prohibit cross-country travel, what CNF [Coconino National Forest] proposes for MBGR [motorized big game retrieval] is unfair to hunters as a singled-out forest user. By allowing livestock permittees, and to some extent fuel wood cutters (under special permits), the ability to drive cross-country, CNF is singling out and limiting a traditional user group. We are not arguing that livestock permittees and/or wood cutters be limited, but rather advocating that similar rules for hunters (in the form of MGBR) be in place as outlined above, to be fair for permitted activities on the Forest. (Arizona Game and Fish Department, Phoenix, AZ - #160.12.55300.700)</p>	<p>#160.12.55300.700: 1) The primary reason that we are proposing restrictions on MBGR, but not permitted activities in our Travel Management EIS is that the management proposals under this planning effort are specifically tied to the language in the Travel Management Rule. The Travel Management Rule is Federal regulation and thus we need to fully comply with the specific language in the rule. The Travel Management Regulations specifically says: (b) Motor vehicle use for dispersed camping or big game retrieval. In designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an</p>

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			<p>individual who has legally taken that animal.</p> <p>There is different language for permits (under which livestock grazing and fuelwood collection occur). Motorized use authorized under a written Federal permit is specifically exempt in the travel management rule at 212.51(a)(8).</p> <p>These key differences in the TMR Regulations themselves mean that we need to manage these activities differently. To be in compliance with the regulations we are required to consider the limited use of motor vehicles for big game retrieval and these designations need to be considered in terms of specified distance from designated routes and season of use. Motorized use authorized under a written Federal permit is limited to the terms specific in the permit.</p> <p>2) Another reason these activities are being treated differently is based on the nature of permit administration and its relationship to the Travel Management Rule. Just because the Travel Management Rule does not include restrictions on fuelwood collection or other activities does not mean permitted use would allow for unlimited cross-country travel. Federally permitted motorized use is specifically exempt from the regulations is because permitted use is limited to the terms in the permit. The terms for most Federal permits may be adjusted administratively. It would not make any sense for us to create Forest-wide restrictions on motorized use</p>

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			<p>for all permitted uses through the National Environmental Policy Act process. Doing this would make the TMR process much more complex, much more confusing, and it would strongly limit the Forest's ability to manage permitted use in a reasonable manner.</p> <p>The Coconino is implementing TMR in-line with the intent of the regulations, which is to manage permitted motorized use administratively through the permit process.</p> <p>3) Motorized big game retrieval and permitted uses such as fuelwood are very different in nature. To treat these activities the same way because they both involve some level of motorized use would mean ignoring the fact that permitted uses and MBGR result from different user needs, desires, and habits. Some permitted uses (such as fuelwood) are much more dependent on off-road motorized use to be feasible than big game retrieval. For example, loading a cord of wood in your vehicle with a 100-yard distance to transport is generally considered infeasible. Loading a dead elk or deer in your car with a 100-yard distance to transport may take an extra hour or so, but is quite feasible.</p> <p>4) Treating MBGR and permitted activities the same does not meet the intent of the Travel Management Rule. Although it does seem reasonable that we treat all off-road motorized use the same, this is not included in the Rule and may prevent the ability to</p>

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			<p>meet the intent of the Rule, which focuses on minimizing impacts to Forest Resources while providing excellent opportunities for outdoor recreation and access.</p> <p>I think we both agree that we are not meeting the intent of the Rule based on current management. To meet the intent, we need to determine a balance of where impacts to resources can be minimized without resulting in unacceptable negative impacts to user access and recreation opportunities. Some argue that off-road motorized use for fuelwood collection is likely of greater magnitude than off-road use for big game retrieval. Yet off-road use for fuelwood is more likely to occur adjacent to designated roads, outside of meadows and sensitive riparian areas, and usually has little or no impact on other forest users. Off-road motorized use for big game retrieval is much more likely to involve more off-road use (many people try to get away from roads to hunt), often occurs in canyons and meadows, and is a common complaint among other hunters (see Recreation Specialist Report for more detail). Additionally, if off-road use from fuelwood collection is causing problems, the terms of the permit can be changed administratively to address this.</p> <p>5) The Coconino National Forest, Fish and Wildlife Service, and the Arizona Game and Fish Department have agreed in the past that there are some places on the Forest</p>

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			<p>where MBGR is just really not needed and/or may be contributing to negative impacts to sensitive habitat or social/recreational values. Discussion included that most of unit 5A is in a sensitive watershed area where off-road motorized use for big game retrieval would work against ongoing efforts to restore watershed conditions to facilitate the recovery of downstream sensitive, threatened, and endangered species. There was also agreement that off-road motorized use for game retrieval in 11M is likely more of an impact than a benefit due to the greater degree of roads available in this area and the areas intermix with private land, which makes off-road use in this area more likely to trigger user conflict. In other words, the Forest made great efforts to work with the Department and other partners and publics to best figure out where the balance is for off-road use related to MBGR.</p> <p>6) Lastly, based on the persistence of the Arizona Game and Fish Department, public comment, and a really hard look at this issue the Forest has made great efforts to find a solution that would provide opportunities for all Forest users. The Forest analyzed an alternative that would authorize motorized big game retrieval on 53% of the Forest, including some of the most heavily hunted game management units. By authorizing off-road use for game retrieval on about half of the Forest hunters of all</p>

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			<p>stripes will have the ability to determine for themselves what type of hunting experience best suits them (One AZGF survey suggests that off-road use by others is a major barrier to those interested in hunting on public lands). This approach would also give the Forest Service, Fish and Wildlife Service, and Arizona Game and Fish Department a very valuable opportunity to really understand the effect (or not) of off-road motorized big game retrieval on a number of elements including watershed, user experience, user conflict, and wildlife habitat. We see this as a valuable opportunity to learn and better understand the effects of off-road motorized use restrictions and hope to use this knowledge to improve management over time to better meet the multiple use mission of the FS and partner agencies.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-41 The Forest Service should modify the motorized big game retrieval rule as recommended by the Arizona Game and Fish Department.</p>	<p>The Forest Service should modify the motorized big game retrieval rule as recommended by the Arizona Game and Fish Department</p> <p>The Department [Arizona Game and Fish Department] recommends the Coconino National Forest adopt the following rule for Motorized Big Game Retrieval.</p> <ul style="list-style-type: none"> • Motorized big game retrieval is allowed for legally taken and tagged elk and deer during an open season for those animals as designated by the Arizona Game and Fish Commission, and for 24 hours following the end of each season. • Only one vehicle (one trip in and one trip out) would be allowed for motorized big game retrieval per harvested animal. 	<p>#160.2.55300.530: See the response above. Many of the terms advised for the authorization of motorized big game retrieval were added to the alternatives in the FEIS based on your comments on the DEIS.</p>

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		<ul style="list-style-type: none"> • Hunters will be required to use the most direct and least ground-disturbing route in and out of the area to accomplish the retrieval. • Motorized big game retrieval would not be allowed in existing vehicle travel restricted areas, such as quiet areas and Wilderness areas or when conditions (wet conditions) are such that travel would cause damage to natural and/or cultural resources. • Motorized vehicles would not be permitted to cross riparian areas, streams and rivers, except at hardened crossing or crossings with existing culverts. • CHAMP hunters (Challenged Hunter Access/Mobility Permit), as defined by the Arizona Game and Fish Commission, have permission to recover all legally taken big game during their permitted season and for 24 hours following the close of that season, provided it could be done without causing resource damage. (Arizona Game and Fish Department, Phoenix, AZ - #160.2.55300.530) 	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping; Big Game Retrieval</p>	<p>5-41 The Forest Service should modify the motorized big game retrieval rule as recommended by the Arizona Game and Fish Department.</p>	<p>TO REDUCE LOSS DUE TO SPOILAGE</p> <p>For big game retrieval, we [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] appreciate the CNF’s [Coconino National Forest] attention to the issue, which is uniquely important given the important elk hunting opportunity in Arizona but potential for high daytime temperatures during many elk seasons. We are concerned that the DEIS alternatives are not fully consistent with the input of the Arizona Game and Fish Department, who we believe has well-documented conservation credentials and a record of conservative management. Even “nonmotorized” hunters may face substantial challenges in avoiding illegal meat spoilage when harvesting elk in many areas under the DEIS action alternatives. (Motorized Recreation, Boise, ID - #202.24.55300.030)</p>	<p>#202.24.55300.030:</p> <p>Concerns of game spoilage as a result of not allowing off-road motor vehicle use for game retrieval was one of the several factors considered in the decision to allow off-road game retrieval for elk in slightly more than half of the Forest. The Forest closely considered this issue in Alternative 3 and 4. Also, I'd like to point out that under Alternative 3, which is more restrictive, approximately 78.6% of the Forest outside of Wilderness is within 1/2 mile of a designated route. Lastly, this decision does not restrict dispersed camping and even designates motorized dispersed camping</p>

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			corridors on over 600 miles of road to facilitate camping throughout the Forest.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-42 The Forest Service should ensure that motorized game retrieval is allowed for the entire hunting season.	<p>TO AVOID SPOILAGE OF BIG GAME AND COMPLY WITH STATE LAW</p> <p>Need to avoid spoilage of big game. Warm weather and slow retrieval can lead to spoilage of big game meat.</p> <p>Not only is spoilage unethical, but wasting game meat is unlawful in Arizona. The Department [Arizona Game and Fish Department] recommends that MBGR [motorized big game retrieval] be allowed when the seasons for elk and deer are open plus 24 hours after the close of the season, based on the unpredictability of weather in Arizona. It is strongly recommended that the month restriction, August through October 31st, be removed. Not only does it add another unnecessary aspect of complexity, but even at higher altitudes the weather can be unpredictably warm in the typically colder months and warm temperatures can occur throughout the fall and into December. As a reference, the following seasons in 2010 start after November 1st: the 2nd half of the general deer season starts on the last Friday in October, the late archery elk season starts the 2nd Friday in November, the rifle bull elk season starts the last Friday in November (Thanksgiving weekend), and the late antlerless elk season starts the first Friday in December. (Arizona Game and Fish Department, Phoenix, AZ - #160.7.55300.180)</p>	<p>#160.7.55300.180:</p> <p>We agree that the November 1st date would not work well for motorized game retrieval and this was removed from consideration in all alternatives based on input from your comment and comments from the Arizona Game and Fish Department and due to consistency problems with the Kaibab National Forest. Deer were not included for motorized game retrieval, more detailed discussion on this issue is included in the FEIS under Alternatives Considered but Eliminated from Detailed Study, Alternative 8.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-43 The Forest Service should acknowledge that the Arizona Game and Fish Department's position on motorized game retrieval	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THE ARIZONA GAME AND FISH DEPARTMENT'S POSITION ON MOTORIZED GAME RETRIEVAL CONFLICTS WITH NFMA REQUIREMENTS TO PRESERVE WILDLIFE RESOURCES</p> <p>In the National Forest Management Act (NFMA), at 16 U.S.C.</p>	<p>#175.46.52000.133:</p> <p>The Coconino National Forest worked very closely with the Arizona Game and Fish Department on the issue of motorized big game retrieval, but the Forest did not fully adopt their recommendations for the reasons discussed in response to comment</p>

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	<p>conflicts with NFMA requirements to preserve wildlife resources.</p>	<p>1531, Congress declared that wildlife resources of the nation make a material contribution to the health, recreation, employment, and well-being of the nation’s citizens; that citizens, particularly those in urban areas, have insufficient opportunity to participate in recreational opportunities designed to foster human interaction with wildlife, such as hunting. Each state is encouraged under NFMA to develop a plan for the conservation of fish and wildlife. The AGFD [Arizona Game and Fish Department] position on MBGR [motorized big game retrieval] does not facilitate the conservation of fish and wildlife, but rather could seriously negatively impact wildlife as well as the opportunities for citizens residing in urban areas to participate in wildlife-human interactions. (Preservation/Conservation, Phoenix, AZ - #175.46.52000.133)</p>	<p>160.12.55300.700, which includes consideration of a broad number of resources including other wildlife.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-44 The Forest Service should acknowledge that the Travel Management Rule only provides for limited exceptions to the ban on cross-country travel.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THE TRAVEL MANAGEMENT RULE ONLY PROVIDES FOR LIMITED EXCEPTIONS TO THE BAN ON CROSS-COUNTRY TRAVEL</p> <p>The Travel Management Rule [TMR] allows for only limited exceptions to the ban on cross-country travel, exceptions which are to be applied sparingly along certain routes. National guidance on the issue includes: Travel Management Rule, 36 C.F.R. [section] 212.51(b):</p> <p>Motor vehicle use for dispersed camping or big game retrieval. In designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain forest roads or trails where motor vehicle use is allowed, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal. Preamble for the TMR, 70 Fed. Reg. 68,264, 68,285 (Nov. 9, 2005):</p>	<p>#175.41-43.55300.200:</p> <p>We agree and we believe that by restricting motor vehicle use for big game retrieval to all species except elk and to approximately half of the Forest meets the intent of the term 'sparingly'. Furthermore, we believe that by designating less than half of all designated routes and then including 300-foot motorized dispersed camping corridors on approximately 20% of those routes, the authorization for off-road motorized use for dispersed camping met the intent of the term 'sparingly'. In response to (4), the Forest is not proposing to designate off-road travel except from a specified distance of designated National Forest System roads. The consideration of not allowing any off-road travel for dispersed camping or game retrieval as you suggest in (5) is addressed</p>

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		<p>The Department expects the Forest Service to apply this provision sparingly, on a local or State-wide basis, to avoid undermining the purposes of the final rule and to promote consistency in implementation. Provision for cross-country travel for big game retrieval and dispersed camping will be at the discretion of the responsible official.</p> <p>Letter from Dale Bosworth, Chief, U.S. Forest Service, to Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Staff (June 8, 2006) Dispersed Camping and Game Retrieval (36 CFR 212.51(b)). The responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes solely for the purposes of dispersed camping or big game retrieval. Such designations represent site-specific decisions associated with specific roads and trails or road or trail segments, rather than a blanket exception to the rule. Designations under 36 CFR 212.51(b) will be applied sparingly to avoid undermining the purposes of the rule and to promote consistency in implementation. Regional foresters will coordinate designations within states and between adjoining National Forests to promote consistency.</p> <p>Forest Service Manual 7703.11(4):</p> <p>Designation of roads and trails may include the limited use of motor vehicles within a specified distance of certain forest roads and trails solely for the purposes of big game retrieval or dispersed camping. Apply the provision for big game retrieval and dispersed camping sparingly, after conducting travel analysis and appropriate site-specific environmental analysis and public involvement.</p> <p>1. Forest Service Manual 7715.74 - Motor Vehicle Use for Big Game Retrieval and Dispersed Camping</p> <p>1. The responsible official may include in a designation the limited use of motor vehicles within a specified distance of</p>	<p>in the FEIS under Alternatives Considered, but Eliminated from Detailed Study.</p>

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		<p>certain forest roads and forest trails where motor vehicle use is allowed, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal (big game retrieval).</p> <p>2. The authority in FSM 7715.74, paragraph 1, should be used sparingly to avoid undermining the purposes of the travel management rule and to promote consistency in its implementation.</p> <p>3. To promote consistency, the Regional Forester should coordinate designations pursuant to FSM 7715.74, paragraph 1, within states and among adjoining administrative units.</p> <p>4. Prior to including in a designation the limited use of motor vehicles within a specified distance of state and county roads for dispersed camping and big game retrieval, the responsible official shall obtain written concurrence from the public road authority with jurisdiction over those routes.</p> <p>5. Consider designating routes, including existing terminal facilities (FSM 7716.1), to dispersed camping sites, instead of authorizing off-route motor vehicle use.</p> <p>Further, regional guidance states that forest supervisors should consider “providing for cross-country travel for the purpose of big game retrieval where it would play an important role in meeting State big game harvest or management objectives.” AGFD [Arizona Game and Fish Department] complains that its efforts to reduce elk populations have proven difficult largely to “bad weather, wet roads and other problems ... [resulting in] reduction in harvest levels combined with road damage.” AGFD 2007. Since the Agency provides no further explanation or justification, we [Center for Biological Diversity et al.] are mystified as to how opening up the area to cross-country travel would mitigate the effects of wet weather and associated resource damage. In fact, the contrary is likely to occur. If</p>	

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		<p>hunters are allowed to use crosscountry travel for MBGR [motorized big game retrieval] during bad weather or utilize wet roads, damage to the habitat of elk and roads will in fact increase, likely reducing the success of future elk harvests and making it more difficult for hunters to use previously damaged roads. (Preservation/Conservation, Tucson, AZ - #175.41-43.55300.200)</p>	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-45 The Forest Service should consider the New Mexico Game and Fish Department's assertion that an exception for motorize game retrieval is unnecessary.</p>	<p>THE FOREST SERVICE SHOULD CONSIDER THE NEW MEXICO GAME AND FISH DEPARTMENT'S ASSERTION THAT AN EXCEPTION FOR MOTORIZED GAME RETRIEVAL IS UNNECESSARY</p> <p>We urge the CNF [Coconino National Forest] to consider the New Mexico Game and Fish Department's (NMGFD) position that an exception for motorized game retrieval is unnecessary. NMGFD recognized "that any OHV use off designated roads and trails establishes tracks that stimulate additional unintended use and subsequent habitat degradation, thereby compromising effective control." NMGFD 2006. In addition, NMGFD "encourages USFS to consider hunting-related OHV activities similar to any other OHV recreational activity that occurs on USFS lands and apply appropriate restrictions equally." NMGFD 2006. In contrast, the Arizona Game and Fish Department (AGFD) is the only state wildlife agency, to our knowledge, requesting an exemption to the general prohibition of motorized game retrieval. The AGFD, in a 2007 letter to the Coconino National Forest (AGFD 2007), insisted that the Forest Service provide "sufficient sites for the maximum number of hunter camps that could be permitted in a single hunt," ignoring the USFS resource and experiential responsibilities to the American public and other visitors.</p> <p>This stance is perplexing to us, not only because of well-known wildlife habitat impacts outlined by NMGFD, but also because of the concern expressed by Arizona hunters regarding ORV</p>	<p>#175.38.55300.180:</p> <p>First, we believe you are misconstruing the policy of New Mexico Game and Fish Department, which has not argued that motorized big game retrieval is unnecessary. Rather, they have stated the Forest Service should treat, "hunting-related OHV activities similar to any other OHV recreational activity that occurs on USFS lands and apply appropriate restrictions equally." Arizona Game and Fish Department has made this very same point. Please see our response to comment 160.12.55300.700 for more information on this issue.</p>

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		<p>impacts. (Preservation/Conservation, Grand Canyon, AZ - #175.38.55300.180)</p>	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-46 The Forest Service should acknowledge that in other National Forests the exception for motorized game retrieval has been systematically abused.</p>	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT IN OTHER NATIONAL FORESTS THE EXCEPTION FOR MOTORIZED GAME RETRIEVAL HAS BEEN SYSTEMATICALLY ABUSED</p> <p>Experiences on forests beyond Region 3 are illustrative. In the Grand Mesa National Forest [GMNF] in Colorado, a provision allowing cross-country travel for MBGR [motorized big game retrieval] was discontinued after a determination that the privilege of MBGR had been “systematically abused.”</p> <p>Notification to Discontinue Downed Game Retrieval Off-route on the Grand Mesa National Forest, February 2005. The GMNF discovered that under the guise of game retrieval, travel into areas outside game retrieval areas was common; law enforcement challenges and disruption of the hunting experience of others was extensive; travel occurred outside the designated time; additional illegal routes were created, and new routes “continue to be pioneered into areas”; and unacceptable environmental effects resulted with the creation of additional illegal routes in the forest. The GMNF also found that the privilege imposed “an unreasonable burden on law enforcement personnel to demonstrate proof that a rider is actually traveling to a downed animal.” Id. at 1-2. (Preservation/Conservation, Phoenix, AZ - #175.40.55300.002)</p>	<p>#175.40.55300.002:</p> <p>We are very aware of the experiences and subsequent decision made by the Grand Mesa-Uncompaghre (GMUG) National Forest and have taken the Forest's experiences into consideration along with the public comments and comments from Arizona Game and Fish Department, and analysis in the FEIS in consideration of authorization of motorized big game retrieval. The Coconino National Forest may have similar results as the GMUG, but it also may not since it is located in a different cultural landscape with different customs and a different ecological landscape with different ecological tolerances and thresholds. Blindly applying the decision of another Forest on this Forest is not in the interest of Coconino National Forest users or those natural and cultural resources managed by the Forest.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-47 The Forest Service should provide justification for each area open to motorized big game retrieval.</p>	<p>TO COMPLY WITH THE TRAVEL MANAGEMENT RULE, THE ENDANGERED SPECIES ACT, AND NFMA</p> <p>We [Center for Biological Diversity et al.] are not convinced that cross-country travel is necessary to meet the state’s big game harvest and management objectives. We do not believe there is any evidence offered by AGFD [Arizona Game and Fish</p>	<p>#175.36.55300.100:</p> <p>The Forest has provided analysis of the <i>change</i> included in each alternative for motorized big game retrieval in the FEIS. Currently, almost 1.5 million acres is open to off-road travel for any purpose. Both</p>

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		<p>Department] that supports cross-country travel. The MBGR [motorized big game retrieval] exception has the potential to open up relatively secure habitat if hunters do not have to pack their game out by non-motorized means, has the potential to undermine the purpose of the TMR [Travel Management Rule], and is not consistent with the TMR. Prohibitions on cross-country travel do not limit big game hunting, but simply imply that successful hunters will have to resort to traditional methods of game retrieval. The Forest Service must provide justification, providing full site-specific NEPA analysis, for each area open to MBGR under the TMR, the ESA [Endangered Species Act], and the NFMA [National Forest Management Act]. (Preservation/Conservation, Grand Canyon, AZ - #175.36.55300.100)</p>	<p>Alternative 3 and 4 (though allowing some level of motorized big game retrieval) would substantially reduce the amount of off-road vehicle use for game retrieval. This is because both alternatives would limit game retrieval to elk and both alternatives would restrict off-road travel for other purposes. The decision for including consideration of big game retrieval was not based on Arizona Game and Fish Department's claims regarding big game management, but did consider this in context of resource protection, hunter satisfaction, and impacts on other Forest users.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-48 The Forest Service should provide support for the assertion that motorized big game retrieval would reduce spoilage.</p>	<p>THE FOREST SERVICE SHOULD PROVIDE SUPPORT FOR THE ASSERTION THAT MOTORIZED BIG GAME RETRIEVAL WOULD REDUCE SPOILAGE</p> <p>There is a reference to an Arizona Game and Fish Department document, AZGFD 2009a, but this document reference is not found in the DEIS list of references or in the list of references for the specialist report. This document is referenced to support the proposition that about 3,300 to 3,500 big game animals are retrieved using MBGR [motorized big game retrieval], that MBGR is necessary to reduce meat spoilage during warm season hunts and ensure an adequate pool of hunters, and that “[m]ost game retrieval results in little or no lasting evidence of the activity”. Forest Service 2010:30. It is unclear why a small minority of forest users, just 3% (Forest Service 2010:29), are given special permission to travel throughout nearly the entire CNF [Coconino National Forest] under the guise of preventing game spoilage without any data to support the rates of game spoilage or the current level of motorized big game retrieval.</p>	<p>#175.59.55300.160:</p> <p>The DEIS was updated and the FEIS uses the 2010 Arizona Game and Fish hunt data (available online) to estimate off-road vehicle trips for elk retrieval. The Forest considers authorizing off-road vehicle travel for game retrieval (and motorized dispersed camping) because the Travel Management Rule specifically provides the opportunity to do so based on local needs (such as local custom/tradition, management of big game, or hunter satisfaction). The preamble to the rule specifically states, "To address specific local needs for limited cross-country motor vehicle use for big game retrieval or dispersed camping, the Department is adding a paragraph to § 212.51 of the final rule. This new paragraph provides that in</p>

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		<p>(Preservation/Conservation, Grand Canyon, AZ - #175.59.55300.160)</p> <p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>How does allowing MBGR prevent game meat spoilage? Is there a significant problem with meat spoilage when hunters pack out the meat using traditional, non-motorized methods? (i.e., how long does retrieval take using traditional methods vs. MBGR, given that most downed game will be within 1/2 mile of an open route?</p> <p>There is a conclusory statement in the DEIS that hunters could get game to coolers more quickly, but this is not quantified in any way nor is the need to get to coolers more quickly documented.) The CNF [Coconino National Forest] should recognize and consider that average monthly temperatures in Arizona and New Mexico differ by an average of less than 7 degrees Fahrenheit [3 NOAA, United States Climate, Average Mean Temperature Index by Month, Climatology by state based on climate division data: 1971–2000.</p> <p>Available at: http://www.cdc.noaa.gov/USclimate/tmp.state.19712000.climo, accessed May 10, 2010.] We ask that the Forest Service provide information on the mean daily temperatures at which meat spoilage occurs and information on the mean daily temperatures for the CNF during the times of proposed MBGR.</p> <p>Without this information, neither the public nor the Forest</p>	<p>designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of big game retrieval or dispersed camping."</p> <p>#175.54.55300.180:</p> <p>Meat spoilage was one issue considered in regards to authorization of motorized big game retrieval, yet as you can see from the responses here there were a great number of other issues also considered. Meat spoilage was one issue considered because species such as elk can result in over 300 pounds of meat to be transported, which can spoil if not kept out of daytime heat, which can occur during fall hunts. As you can plainly see from the comments in this document, there are many hunters that are very concerned about this issue as meat from hunting can provide for a substantial source of substitute income for Arizona residents and is important to a satisfactory hunting experience.</p>

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		Service can determine if there is a legitimate, science- and fact-based need for MBGR. (Preservation/Conservation, Grand Canyon, AZ - #175.54.55300.180)	
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-49 The Forest Service should evaluate the effects of motorized big game retrieval on other hunters.	<p>TO PROVIDE A NEPA-COMPLIANT ANALYSIS</p> <p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>How much of a positive impact would a ban on MBGR have on other hunters? [Footnote 2: We note that the DEIS, at page 39, includes the statement that: "Some hunters would be discouraged from hunting without provisions for motorized big game retrieval; others who favor nonmotorized hunting experiences could be encouraged to apply for hunting tags in areas where motorized vehicles are limited to the designated system." However, this conclusory statement is not supported by data or research, nor is it quantitative. Therefore, it is insufficient for NEPA analysis.] (Preservation/Conservation, Tucson, AZ - #175.52.55300.520)</p>	#175.52.55300.520: While we do not have exact numbers on how many hunters may be discouraged from hunting without the ability for motorized big game retrieval, it is clear from the comments received (and included in this response-to-comments) that many hunters feel very strongly about this issue. Furthermore studies conducted on the Coconino National Forest have pointed out that "It is estimated that 80 to 90 percent of successful elk hunters on the Coconino National Forest drive to their kill."
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-50 The Forest Service should evaluate all land potentially affected by motorized big game retrieval for impacts.	<p>USING THE MINIMIZATION CRITERIA OF THE APPLICABLE EXECUTIVE ORDERS</p> <p>Allowing MBGR [motorized big game retrieval] for up to 1 mile off either side of all Forest Service roads for elk would open up areas along 3,507 miles of road and 29 miles of trail to cross-country uses. All Forest Service land that would be impacted must be evaluated using the minimization criteria from the Executive Orders, which results in the need to analyze all Forest Service land in the CNF [Coconino National Forest] outside of Wilderness areas for impacts from ORVs. Given that 96% of the CNF is within 1 mile of a road (outside Wilderness areas) using the "recommended system" from the TAP [Travel analysis Process], this requires analysis and minimization of impacts to</p>	#175.57.55300.160: Allowing motorized game retrieval does to 'open up' the forest to motorized use since off-road use for game retrieval is limited to only hunters that have successfully killed an elk under a state hunting permit, which would limit the amount of off-road travel to an average of 2,922 off-road vehicle trips (under Alternative 4). The Forest has provided analysis of the change included in each alternative for motorized big game retrieval in the FEIS. Currently, almost 1.5 million acres is open to off-road travel for

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		<p>nearly the entire forest. Forest Service 201 Ob: Appendix G, Distance to an open road, recommended system. (Preservation/Conservation, Pinetop, AZ - #175.57.55300.160)</p>	<p>any purpose. Both Alternative 3 and 4 (though allowing some level of motorized big game retrieval) would substantially reduce the amount of off-road vehicle use for game retrieval. This is because both alternatives would limit game retrieval to elk and both alternatives would restrict off-road travel for other purposes. Furthermore, each alternative includes a number of terms and conditions under which off-road motorized big game retrieval can occur such as taking a direct route to retrieve game, not crossing streams or riparian areas, and not causing damage to natural or cultural resources.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-51 The Forest Service should consider allowing hunters access to Management Level 1 routes rather than allowing motorized big game retrieval.</p>	<p>BECAUSE MANY HUNTERS OBJECT TO CROSS-COUNTRY MOTORIZED GAME RETRIEVAL As revealed in the DEIS, “many hunters prefer nonmotorized methods of hunting and see the proliferation and use of specialized vehicles” as detracting from their hunting experience and some hunters complain about having their hunting experience compromised by people driving cross-country and scaring game. Forest Service 2010:29-30. The CNF [Coconino National Forest] should consider alternatives to this management approach, including issuing special use permits to hunters to allow them to use ML [Management Level] 1 roads during hunting season solely for the purpose of retrieving downed game. (Preservation/Conservation, Phoenix, AZ - #175.58.55300.510)</p>	<p>#175.58.55300.510: The Travel Management Rule includes specific provisions for considering and authorizing motorized travel off the designated system of roads, trails, and areas (which would include using Management Level 1 roads) for the purpose of retrieving downed game. Providing each hunter with a special use permit to do this is simply not feasible, nor does it fall within the intent of the Travel Management Rule, which specifically includes provisions for this exact purpose.</p>
<p>Cross-Country Travel, Big Game Retrieval,</p>	<p>5-52 The Forest Service should clarify the policy regarding</p>	<p>BECAUSE THE CURRENT PROPOSAL IS LIKELY TO CONFUSE VISITORS TO THE FOREST Alternative 3, Direct and Indirect Effects, Recreation Activities,</p>	<p>#105.8.55300.160: The issue of motorized big game retrieval was further clarified in the FEIS based on</p>

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Dispersed Camping: Big Game Retrieval	motorized game retrieval in Alternative 3.	Hunting and Game Retrieval (page 38–39): As written, we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] find it difficult to fully evaluate the impacts of this proposal on listed species and their habitat. This section states that though this alternative has no provisions for MBGR [motorized big game retrieval], it will be allowed in game management units where the majority of the unit area occurs on an adjacent National Forest that allows MBGR. Therefore, this could occur where the CNF [Coconino National Forest] abuts the Williams Ranger District, Kaibab National Forest, and potentially other National Forests. In addition, this section states that the Cinder Hills OHV area would allow for MBGR. This could become a very confusing issue for the public if some areas of the CNF operated under the decision an adjoining forest makes regarding MBGR, while the other portions of the forest could be closed to MBGR (except for the Cinder Hills OHV area). Alternative 3 seems likely to result in confusion regarding whether MBGR is allowed or not allowed in a particular game management unit on the CNF. We recommend either closing the forest to MBGR or opening it to MBGR, so that the public can clearly understand the rules, implementation can be more effective, and we can better understand the impacts of implementation on natural resources, particularly listed species and their habitats. (U.S. Fish and Wildlife Service, Phoenix, AZ - 105.8.55300.160)	your comments. In addition based on your input and advice not to allow motorized big game retrieval in some game management units (such as 5A) and the input of the Arizona Fish and Game Department strongly advising for off-road motorized game retrieval in other units, the Forest has considered designating portions of the Forest open to off-road motorized game retrieval and some portions closed to this use. The ability for game retrieval would be indicated based on game management unit and we have worked very hard to ensure that game units where motorized game retrieval would be authorized is consistent with adjacent national forests that share the same game management units and that game management units with differing game retrieval policies are clearly delineated by main roads and highways, or significant boundaries.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-53 The Forest Service should acknowledge that elk avoid roads and areas of motorized travel.	AND THAT MOTORIZED BIG GAME RETRIEVAL IS NOT AN EFFECTIVE METHOD OF POPULATION CONTROL AGFD [Arizona Fish and Game Department] also reports “during [[agency]] aerial patrols we often see elk concentrated in the areas between roads. Knowing that the elk have already learned to avoid hunters by moving away from roads, we are very concerned that any disincentive for hunters to get further	#175.4445.33000.530: Your comment brings up an important point, which is there is clear disagreement between Arizona Game and Fish Department, scientific studies, and other Forest users on exactly how different motorized game retrieval policies will affect hunter success and management of big

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		<p>from roads will have an effect of lowering hunt success and reduce our ability to meet the Department’s harvest objectives and control elk populations.” AFGD 2007. The fact that many wildlife species, including mule deer and elk, avoid roads (see Thiessen 1976; Rowland et al. 2005; Rost and Bailey 1979; Berry and Overly 1976; Lyon 1979, 1983; Yarmaloy 1988) and prefer roadless areas is well documented in the literature (Stritthold and Dellasalla 2001). If the CNF [Coconino National Forest] allows MBGR [motorized big game retrieval] into areas where elk have concentrated because of a lack of roads, the intrusion into these areas by motorized vehicles is likely to push elk further away, making hunter success less likely, rather than increasing it. MBGR in prime big game habitat will increase motorized access to comparatively secure areas, to the detriment of the big game species as well as other wildlife, negatively impacting species diversity contrary to NFMA [National Forest Management Act] and where endangered species habitat is located, requiring analysis of each area where MBGR is permitted under [section] 7 of the Endangered Species Act by the CNF.</p> <p>AGFD’s concern is curious because it seems logical that quality wildlife habitat would be a positive incentive for hunters to go hunting. The excess numbers of elk and the inability or unwillingness of hunters to reduce those numbers only reinforces the urgency to restore ecological integrity through recovery of ecologically effective populations of large carnivore populations, including wolves. Ripple and Beschta 2003; Smith et al. 2003 [Citation not provided]; Ripple and Larsen 2002 [Citation not provided].</p> <p>Although AGFD maintains “further restrictions on motorized game retrieval will predictably lower hunt success” (AGFD 2007), this position is in fact contradicted by earlier research</p>	<p>game populations. Though we respect the professional judgment of Arizona Game and Fish Department, the studies you point to clearly show that hunting success can increase with motorized restrictions and this evidence has not been clearly addressed by the Department. As a result, the Forest analyzed alternatives with vastly different policies for motorized game retrieval and is considering game retrieval options that fall within the range of these alternatives.</p>

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		<p>findings demonstrating that road closures actually increase hunting opportunities and hunter satisfaction.</p> <p>Rowland et al. 2005. In addition, Gratson et al. (2000) found hunter success almost doubled when open road density is reduced from 4.25 mi/sq mi to about 1.0 mi/sq mi (2.54 km/sq km to 0.56 km/sq km). Arizona apparently is the only state requesting an exemption to the general prohibition on motorized game retrieval, and AGFD offers no explanation for this disparity. (Preservation/Conservation, Grand Canyon, AZ - #175.4445.33000.530)</p>	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping, Big Game Retrieval</p>	<p>5-54 The Forest Service should coordinate development of the game retrieval policy with adjacent forests.</p>	<p>TO AVOID CONFUSION</p> <p>I am deeply concerned that in your proposed action you choose to close over 1,937 miles of roads and have decided to prohibit the retrieval of big game from legal hunts as regulated by the Arizona Game and Fish Department.</p> <p>I am also troubled by the fact that when you compare the proposed actions for the Kaibab Forest (Williams District) and North Kaibab and your proposed action, they seem miles apart and indicate a difference in philosophy as it relates to the use of OHVs and hunting activities.</p> <p>Kaibab (Williams) has 1,500 miles of road and proposes to close 380 miles and add 34 miles. North Kaibab has 1,876 miles of road and will close 380 miles and add 26 miles. Additionally, both districts allow big game retrieval off-road. North Kaibab's proposed big game retrieval policy is the following:</p> <p>Designate corridors on all system roads, 1 mile off either side, to allow motorized cross-country travel in order to retrieve a legally harvested elk or bison during any hunting season.</p> <p>This difference in philosophy and action leads to an unnecessary confusion between forests. It would seem you could align the big game retrieval policy across both forests. I realize you have</p>	<p>#166.2.55300.160:</p> <p>Your concerns regarding differences in policies between the Kaibab and Coconino have been addressed by (a) removing the November 1st date for motorized big game retrieval from both alternatives in the FEIS, and (b) considering in Alternative 4 allowing off-road motor vehicle travel up to one mile off either side for game retrieval. Since the Coconino National Forest does not include any bison hunts, Alternative 4 would allow us to have exactly the same policy for motorized big game retrieval as the Kaibab. Your second point appears to refer to the fact that the Coconino National Forest may be closing a greater percentage of roads compared to each of the Kaibab National Forest Districts. One point to consider is that the Coconino National Forest receives 22 times the amount of Forest users than the Kaibab National Forest (see Recreation Specialist Report for more detail). Because of this there are a lot more</p>

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		<p>deferred to the policy of Kaibab on adjoining areas of both forest, but I cannot understand why you wouldn't have uniform policy across all areas. (Individual, Litchfield Park, AZ - #166.2.55300.160)</p>	<p>unauthorized routes (almost a thousand inventoried), and a lot more recreation users that can be affected by motorized use on (and off) these routes.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-56 The Forest Service should clarify whether the motorized big game retrieval strategy will be applied to all game units adjacent to other forests.</p>	<p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>Will this strategy be applied to all game units that are adjacent to other forests? (Tonto, Apache-Sitgreaves, Prescott?) (Preservation/Conservation, Phoenix, AZ - #175.49.55300.630)</p>	<p>#175.49.55300.630: Per the Travel Management regulations, each National Forest shall go through the National Environmental Policy Act process to review, analyze, disclose, and decide on a motorized game retrieval policy that is most appropriate for the environmental conditions and cultural and traditional needs for that Forest. The Coconino National Forest made an independent assessment for determining what was most appropriate for motorized big game retrieval on the Forest, but also worked closely with other Forests to identify potential discrepancies and the issues those differences between forests may cause.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-57 The Forest Service should disclose whether there are game units adjacent to more than one forest.</p>	<p>AND HOW ANY POLICY CONFLICTS RELATED TO GAME RETRIEVAL WOULD BE RESOLVED</p> <p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>Are there any game units that are adjacent to more than one forest and if so, how will this be addressed? (Preservation/Conservation, Tucson, AZ - #175.50.55300.630)</p>	<p>#175.50.55300.630: Fortunately, there are no game management units that include portions with the Coconino National Forest and two other national forests. There are several situations where the Coconino and another national forest share portions of a game management unit. In these situations, the Forest did one of two things: (1) where possible the Forest tried to maintain consistency with the adjacent National Forest within the same game management unit. This is why</p>

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			<p>Alternative 3 includes motorized big game retrieval only in game management units 7W and 8 - because both of these units include substantial portions of land on the Kaibab National Forest and smaller portions of land on the Coconino National Forest. (2) In the situation of game management unit 22, which is only slightly located on the Coconino National Forest and is generally not drivable due to rough terrain, the Forest deferred a decision on this game management unit to the Tonto National Forest. Consistency of game retrieval policies with adjacent national forests was a major issue we considered in alternative, however, it was one of many that were considered in the decision on this issue.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-58 The Forest Service should prohibit motorized cross-country travel in wet weather regardless of temperature.</p>	<p>BECAUSE SUCH TRAVEL IS ESPECIALLY DAMAGING During wet weather, cross-country travel will be especially damaging and must be prohibited, regardless of the temperature. There is no information on whether implementation of the wet weather game retrieval provision results in increased game spoilage or reduced hunter participation. (Preservation/Conservation, Phoenix, AZ - #175.60.55300.220)</p>	<p>#175.60.55300.220: The Forest implemented a wet weather travel policy in 2006 (http://www.fs.fed.us/r3/coconino/conditions/wet-weather.shtml) to allow the Forest Service and Arizona Fish and Game Department to restrict motorized use on the Forest during periods of wet weather for safety and resource protection purposes. This policy is based on professional judgment to allow the Forest to administratively close roads when needed based on local weather events rather than set dates. This wet weather policy will still be effective regardless of the decision on the Travel Management EIS.</p>

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Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-58 The Forest Service should only allow motorized game retrieval for disabled hunters.	<p>THE FOREST SERVICE SHOULD ONLY ALLOW MOTORIZED GAME RETRIEVAL FOR DISABLED HUNTERS</p> <p>We [Center for Biological Diversity et al.] do not support exceptions to the ban on cross-country travel for big game retrieval for any length of time except in the case for disabled hunters. (Preservation/Conservation, Grand Canyon, AZ - #175.35.55000.711)</p>	<p>#175.35.55000.711:</p> <p>We thank you for your comment. The travel management rule specifically allows for off-road travel for motorized big game retrieval where designated. We understand you do not support this provision, but the provision in the regulations means the Forest has a responsibility to consider this possibility and analyze the potential impacts (positive and negative) of this policy on a variety of resources.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-59 The Forest Service should allow disabled hunters to engage in motorized game retrieval.	<p>TO BE CONSISTENT WITH EXISTING STATE PROGRAMS</p> <p>Need to provide for State programs related to disabled hunters: CHAMP [Challenged Hunter Access/Mobility Permit] hunters have a greater need for big game recovery because of their mobility limitations. The Department [Arizona Game and Fish Department] proposes allowing CHAMP hunters permission to recover all legally taken big game. (Arizona Game and Fish Department, Phoenix, AZ - #160.11.54100.711)</p>	<p>#160.11.54100.711:</p> <p>The need of disabled hunters for motorized big game retrieval was considered by including an alternative that allowed motorized big game retrieval for elk throughout the Forest (Alternative 4). Also, I believe there are other options to address special circumstances such as CHAMP hunters such as providing additional permits specifically for game retrieval or the employ of hunter/guide entities that can provide services for game retrieval.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-60 The Forest Service should reevaluate the amount of use hunters make of the forest.	<p>BECAUSE IT'S BEEN UNDERESTIMATED IN THE DEIS</p> <p>While there are many people who talk about hiking the outdoors, I know that there are many hundreds more hunters that hunt these areas than hikers. Everyone talks about hikers, but the preponderance of forest access is done by hunters in and out of season than hikers. Hikers stay on trails, but hunters explore the forest and enjoy it. I think you have very much underestimated the role that hunters play in the conservation of our forests. This should be recognized in the plan. (Individual, Chandler, AZ -</p>	<p>#58.3.55300.200:</p> <p>We agree that hunters play a major and significant role in conservation of our forests and we believe that the alternatives considered in the FEIS will strongly enhance the experience of many hunters that use the Coconino National Forest. The alternatives to restrict motorized use under the Coconino National Forest Travel</p>

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		#58.3.55300.200)	Management EIS are not meant to favor hikers over hunters or compare the needs of any user-types versus any others. Rather the purpose of the Travel Management EIS is to comply with the Travel Management Rule, which is to consider and minimize impacts to a number of forest resources such as wildlife habitat, cultural resources, soil and water resources, and user experiences.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-61 The Forest Service should disclose the distance hunters would have to travel if motorized game retrieval was not allowed.	<p>THE FOREST SERVICE SHOULD DISCLOSE THE DISTANCE HUNTERS WOULD HAVE TO TRAVEL IF MOTORIZED GAME RETRIEVAL WAS NOT ALLOWED</p> <p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>If MBGR were not allowed, how far would hunters have to travel using non-motorized means to retrieve downed game outside of wilderness areas under all alternatives? (Preservation/Conservation, Pinetop, AZ - #175.51.55300.540)</p>	<p>#175.51.55300.540:</p> <p>Your question strongly depends on what unit a hunter may be in, what game a hunter is hunting, and specifically where the hunter has killed an animal. Such a broad question cannot be answered with precision due to the vast number of possibilities that can be involved; however, it is possible to provide you an answer in terms of averaged data. In areas where motorized big game retrieval is not authorized, hunters would have to walk less than 1/2 mile from a designated road in approximately 78.6% of the Forest outside of Wilderness to retrieve game.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-62 The Forest Service should disclose the number of hunters that participate in non-motorized game retrieval.	<p>THE FOREST SERVICE SHOULD DISCLOSE THE NUMBER OF HUNTERS THAT PARTICIPATE IN NON-MOTORIZED GAME RETRIEVAL</p> <p>Regarding the plan to apply the MBGR [motorized big game retrieval] management strategy adopted by forests with adjacent game units:</p> <p>How many hunters in the CNF [Coconino National Forest] participate in non-motorized game retrieval? (Preservation/Conservation, Tucson, AZ - #175.53.55300.540)</p>	<p>#175.53.55300.540:</p> <p>It is estimated from a study on the Forest that 80-90% of big game hunters on the Coconino National Forest participate in motorized big game retrieval. It is unclear if this is a result of the Forest being open to motorized big game retrieval and these numbers representing an opportunistic tactic or if this is based on hunter preference.</p>

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<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval</p>	<p>5-63 The Forest Service should reconsider the 1-mile restriction on motorized big game retrieval.</p>	<p>BECAUSE IT WOULD BE DIFFICULT TO ENFORCE AND INEFFECTIVE</p> <p>One-mile restriction. The Department [Arizona Game and Fish Department] recommends removing the 1- mile restriction from the MBGR [motorized big game retrieval]. Figure 10 (Distance in half-mile increments from Alternative 4 roads) [from the DEIS] shows approximately 82 areas where MBGR would not be lawful.</p> <p>Although 82 may appear to be a lot, in actuality, many of these areas are so small they would not be enforceable. The addition of a 1-mile restriction would add yet another unnecessary aspect of complexity. For any regulation on MBGR to be effective, it will need to be clear, concise, reasonable, and understandable by the hunters. (Arizona Game and Fish Department, Phoenix, AZ - #160.8.55300.530)</p>	<p>#160.8.55300.530:</p> <p>We chose to designate motorized big game retrieval in specific game units (differs by alternative) up to one mile from designated roads for two main reasons: (a) the Travel Management Rule specifically says to designate motorized big game retrieval a specified distance from designated roads in section 36 CFR § 212.51(b). Thus each alternative included a specified distance to comply with the Travel Management Rule. (b) to be consistent with the adjacent Kaibab National Forest which decided to allow motorized big game retrieval (for elk and bison) one mile from all designated routes on the Williams and Tusayan districts. Lastly, it is important to understand that those 82 polygons you have identified are largely unavailable to motorized travel as a result of steep topography, fences and boulders, dense vegetation and other barriers (e.g. some of these polygons are actually lakes). We do not feel that enforcing motorized big game retrieval in these 82 polygons will be a problem since among the several dozen we reviewed we were unable to find one that was actually accessible by motor vehicle.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big</p>	<p>5-64 The Forest Service should add bear to the list of species eligible for motorized game</p>	<p>BECAUSE BEAR CAN BE VERY HEAVY AND THE IMPACT WOULD BE SMALL</p> <p>I would request you add bear to the list of allowed animals for motor vehicle retrieval. I hunt bear annually, and a 300-pound bear is not easily carried out of the woods before spoilage</p>	<p>#19.2.55300.352:</p> <p>We considered adding bear for motorized game retrieval, but chose not to for two reasons: (1) the potential resource and enforcement impacts from off-road driving</p>

Category	Public Concern	Comment	Response
Game Retrieval	retrieval.	occurs! Since there are only three to five animals killed during any given season in a game area, the USFS impact would obviously be negligible and not adding bear would be totally unsupported by logic and therefore unjustified. (Individual, Cottonwood, AZ - #19.2.55300.352)	for bear retrieval outweighed the potential benefits that would be afforded to hunters for this use, and (2) to be consistent with game retrieval policy on the Kaibab National Forest, which shares several game management units with the Coconino National Forest.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-65 The Forest Service should allow big game retrieval for deer.	<p>BECAUSE DEER ARE OFTEN QUITE HEAVY</p> <p>Reason for including deer in the motorized big game retrieval. The Department [Arizona Game and Fish Department] is recommending that deer be included with elk as a big game animal that can legally be retrieved by the use of a motorized vehicle. The average dressed weight of a deer in these GMUs [Game Management Units] is between 130 and 180 pounds. Like elk, deer move farther from roads as pressure and human presence increases throughout the fall. The general deer season is in late October and early November. This is well into the fall hunting seasons that begin in August. Therefore, the hunters traditionally have to hike farther from the roads to harvest a deer. Adding deer to the MBGR [motorized big game retrieval] exception will help increase hunter acceptance of the Travel Management Rule and assist the Department in meeting harvest objectives. If a one-trip-in, one-trip-out approach were adopted for retrieval of deer, we believe the potential for resource damage would be low enough that the benefits would outweigh the costs. (Arizona Game and Fish Department, Phoenix, AZ - #160.6.55300.352)</p>	<p>#160.6.55300.352:</p> <p>We disagree that authorizing motorized big game retrieval for deer should be included for big game retrieval. One reason provided was due to the weight of the deer. According to North Dakota State University, the average field-dressed weight of a deer is 107 pounds and not 130 - 180 pounds (http://www.ag.ndsu.edu/pubs/yf/foods/he125w.htm). Other websites display similar weights (http://www.butcher-packer.com/index.php?main_page=document_general_info&cPath=36&products_id=331). This is one-third the average weight of a field-dressed elk. Although retrieval of a downed deer will not be easy without motor vehicle access, considering 78.6% of the Forest will be within 1/2 mile of a designated road outside of Wilderness (even in the most restrictive alternative), the retrieval of deer will still be very feasible. Additionally the argument that allowing motorized big game retrieval will assist in the Department's harvest objectives is not supported by a number of studies that show</p>

Category	Public Concern	Comment	Response
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-66 The Forest Service should extend the cutoff date for motorized big game retrieval in Alternative 4.	<p>TO MORE CLOSELY MATCH THE HUNTING SEASON FOR ELK</p> <p>I definitely support Alternative 4, which allows for some MBGR [motorized big game retrieval]. Although it should be noted, most of the elk seasons extend into the first week of December. So the October 31 cutoff would not work. It is extremely difficult to try to bring an 800-plus-pound elk out of the forest without some help from an ATV. It would require multiple trips to the kill site and carrying it out in pieces most likely in the dark. (Individual - #24.1.55300.530)</p>	<p>hunter success often increases with motor vehicle restrictions.</p> <p>#24.1.55300.530: Thanks with sharing your preference with us. We removed the November 1st date on motorized big game retrieval due to your comment and many others. Alternative 4 was fully considered, which would authorized motorized elk retrieval throughout the Forest.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big Game Retrieval	5-67 The Forest Service should allow motorized big game retrieval when the ground is frozen.	<p>THE FOREST SERVICE SHOULD ALLOW MOTORIZED BIG GAME RETRIEVAL WHEN THE GROUND IS FROZEN.</p> <p>Exceptions to the proposed rules for big game retrieval should include “when the ground is frozen, off-highway use for big game retrieval should be allowed”. (Individual, Sedona, AZ - #112.10.55300.530)</p>	<p>#112.10.55300.530: Due to the very high variability of the Forest with environs from alpine tundra to desert scrub, the Forest does not think this is a viable approach. For example, in late fall and winter portions of the forest in the ponderosa pine type may be frozen whereas the meadows in-between may thaw out during the day. In other situations, the very top layer of soil maybe frozen, but the weight of vehicles could still cause rutting by breaking through the top layer and compacting the soil below causing increased erosion potential and decreased soil function.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Big	5-68 The Forest Service should select Alternative 4.	<p>BECAUSE IT ALLOWS FOR MOTORIZED GAME RETRIEVAL</p> <p>Alternative 4 is the only logical way for hunters to get their elk out of the forest reasonably. Any other way is just plain stupid. (Individual - #48.1.55300.530)</p>	<p>#48.1.55300.530: We thank you for your comment.</p>

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Game Retrieval			
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-69 The Forest Service should tightly control dispersed camping corridors.	THE FOREST SERVICE SHOULD TIGHTLY CONTROL DISPERSED CAMPING CORRIDORS. Dispersed camping corridors should be tightly controlled. (Individual, Sierra Vista, AZ - #46.11.55500.165)	#46.11.55500.165: We thank you for your comment.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-70 The Forest Service should exclude montane meadow areas from motorized dispersed camping corridors.	THE FOREST SERVICE SHOULD EXCLUDE MONTANE MEADOW AREAS FROM MOTORIZED DISPERSED CAMPING CORRIDORS. We [Center for Biological Diversity et al.] are especially concerned about any montane meadows intersected by routes that would be designated with the 300-foot motorized dispersed camping corridor. These areas are heavily impacted by recreational ORV use and camping and “a high majority of these meadows currently have areas of compacted surface soils.” Soil and Water Specialist’s Report:10. All montane meadow areas should be excluded from use as a motorized dispersed camping corridor. (Preservation/Conservation, Tucson, AZ - #175.102.34000.530)	#175.102.34000.530: We agree that the large majority of meadows should be excluded from motorized dispersed camping. Based on your comments we reviewed the proposed dispersed camping corridors against aerial photos from 2010 and 2007 to remove portions of corridors located in meadows. Thus the alternatives analyzed in the FEIS generally include few to no motorized dispersed camping corridors in meadow vegetation types.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-71 The Forest Service should reconsider limiting dispersed camping.	FOR FUTURE GENERATIONS My wife and three young girls have spent previous years enjoying the beautiful surroundings of the forest and don’t want to lose the use. Please reconsider your plans to limit and close these precious areas that have provided wonderful memories for my kids. We as parents teach our kids about nature and how to respect all aspects of the forest. It would be an absolute nightmare if all we had were the photographs taken “back when” we went camping and exploring with our ATVs in the woods. No more campfires, no more stories by the fire, no more smores. What a shame. (Individual, Phoenix, AZ - #69.3.55500.711)	#69.3.55500.711: The travel management rule does not restrict access to the Forest and in no way restricts campfires, stories by the fire, or smores - which are delicious. The travel management rule will restrict motor vehicle use to designated roads, trails and areas for the purpose of providing motorized recreation opportunities while protecting forest resources such as wildlife, scenic views, and cultural resources for present

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			<p>future generations. Alternative 3 and 4 considered in the Travel Management EIS include designation of over 2,500 miles of routes open to 'all vehicles', which means there will still be ample opportunities for motorized recreation and access</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping</p>	<p>5-71 The Forest Service should reconsider limiting dispersed camping.</p>	<p>TO AVOID PENALIZING CONSCIENTIOUS CAMPERS BECAUSE OF THE ACTIONS OF A FEW</p> <p>These alternatives are totally unacceptable to anyone who enjoys camping and hunting. It's obvious that you are attempting to control where we camp and what roads we utilize. But to tell me I can't camp in the forest except for your so-called camping corridors is to destroy the reason I love being in the forest. I want to get away from people, not be with them! My campsites don't look like a campsite when I leave. They are clean, with no trash and no fire ring. You want me to camp with everyone else in an area that ironically shows the wear and tear of years of camping by lots of people. (Individual, Camp Verde, AZ - #28.1.55500.711)</p>	<p>#28.1.55500.711:</p> <p>This is a common misunderstanding - the travel management rules will not restrict where you or anyone else can camp or hunt. A decision on the Travel Management EIS will only restrict motor vehicle use, and to facilitate those who prefer to car camp, we have included designations for over 600 miles of motorized dispersed camping corridors where Forest visitors will be able to drive up to 300 feet to car camp. Others like yourself may still camp anywhere you like, but you may need to walk, hike, or ride a horse to get there.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping</p>	<p>5-71 The Forest Service should reconsider limiting dispersed camping.</p>	<p>TO AVOID PUSHING CAMPING AND ASSOCIATED RESOURCE IMPACTS TO ADJACENT NON-FEDERAL LANDS</p> <p>Additional recreation pressure on State and Private Lands: The current policies regarding camping will put pressure on adjacent lands. This will do to those lands just what is trying to be prevented on Federal lands, i.e. resource damage, increased conflicts among users, increased hazardous travel, and reduction of the public enjoyment of these areas. For example: Because camping is proposed to be eliminated everywhere on Melatone Mesa between the Forest Boundary on Forest Route 69 and Hay Lake, with the exception of Long Lake, camping will most likely</p>	<p>#161.7.52000.002:</p> <p>While in some areas, restrictions on motorized use may increase public use or pressure on adjacent private lands we expect this rule will result in an overall decrease in user conflict, a decrease in resource damage, and provide for a safe motorized system of routes and areas. The example you point to of Melatone Mesa is one of those areas where it is possible that 'pressure' from Forest visitors to camp may increase on adjacent private and state lands;</p>

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		move to private and State land north of the Forest Boundary. (Domestic Livestock Industry - #161.7.52000.002)	however, this area is in a very isolated portion with access only via very rough roads. As a result this part of the Forest generally only gets camping 'pressure' during hunting season. Though there are no designated camping corridors in this part of the Forest in either action alternative there is a great amount of available area for motorized camping adjacent to the many miles of road in this area including 69F, 69B, 9723F, and 9729F.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-71 The Forest Service should reconsider limiting dispersed camping.	<p>TO AVOID REDUCING THE QUALITY OF THE CAMPING EXPERIENCE</p> <p>Concentrating camping as you have depicted for Alternative 4, will result in diminishing the quality of the camping experience. There will be excessive dust, noise, and traffic, being that close to the roads. Sanitation may become an issue. Allowing only 30 feet from the edge of the road is unrealistic. And some of the areas selected are not good choices. (See spreadsheet) (Domestic Livestock Industry - #161.2.55500.710)</p>	<p>#161.2.55500.710:</p> <p>The Forest does not only allow camping 30 feet from the edge of the road. Alternatives 3 and 4 considered over 600 miles of motorized dispersed camping corridors where Forest visitors can drive up to 300 feet (a football field) from the edge of the road to camp. This would allow for a camping experience away from other cars and dust. In areas without a designated dispersed camping corridor, we are still allowing Forest visitors to park within 30 feet of the road and camp where they choose. The travel management rules only affect where Forest visitors can drive vehicles and not where they can camp.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed	5-71 The Forest Service should reconsider limiting dispersed camping.	<p>BECAUSE CAMPING IS A LOW-COST METHOD OF ACCESSING THE SPIRITUALLY RESTORATIVE ASPECTS OF THE FOREST</p> <p>With our present economy, camping is the only vacation (albeit a great one) for many family vacations. Your new camping</p>	<p>#131.4.55500.713:</p> <p>This is a common misunderstanding - the travel management rules will not restrict where you or anyone else can camp or hunt. A decision on the Travel Management EIS</p>

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Camping		proposals—being so close to roads—do not allow for the regeneration of the soul that camping provides. These are public lands and we are the public. (Individual, Sedona, AZ - #131.4.55500.713)	will only restrict motor vehicle use, and to facilitate those who prefer to car camp, we have included designations for over 600 miles of motorized dispersed camping corridors where Forest visitors will be able to drive up to 300 feet to car camp. Others like yourself may still camp anywhere you like, but you may need to walk, hike, or ride a horse to get there.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-72 The Forest Service should reconsider allowing dispersed camping.	<p>BECAUSE THE AGENCY DOES NOT HAVE THE RESOURCES TO ENFORCE THE RESTRICTIONS</p> <p>Implementation of the proposed motorized dispersed camping strategy would “require more active management of dispersed camping on the CNF[[],] “yet there is no information on the ability of the CNF</p> <p>[Coconino national Forest] to increase active management practices to properly implement this management approach.” Forest Service 2010:40. Designating fixed distances from open routes in which motorized crosscountry travel is allowed for dispersed camping is difficult to enforce, maintain, and if users are allowed to travel off-route to find a camping spot, will very likely result in increased user-created routes within the camping corridor. See attached a PowerPoint: Motor Vehicle Assisted Dispersed Camping in National Forest, Southern Rockies Conservation Alliance, especially noting slides 9, 10, and II. This is attached as Appendix W . We have also attached Appendix X, a satellite image of a dispersed camping corridor in the Coronado National Forest in southern Arizona. This area is currently closed to motorized cross-country travel except in a 300-foot camping corridor. The result of an inability to manage this corridor has been the development of user-created routes that are approximately 900 feet from the designated route as well as a user-created “race track.” (Preservation/Conservation, Tucson,</p>	<p>#175.65.55500.165:</p> <p>We understand that the designation of dispersed camping corridors may result in impacts from concentrated use in these corridors. Yet the designation of dispersed camping corridors to allow motorized use for the purpose of camping within a fixed distance from designated routes is specifically authorized in the Travel Management Rule under § 212.51(b). Furthermore, the Forest considered not allowing dispersed camping in fixed corridors, but this alternative was eliminated from detailed study (see the Record of Decision for more detail). Lastly, we specifically analyzed and disclosed the impact of concentrated use from designation of motorized dispersed camping corridors on vegetation cover and other resources in the FEIS for both Alternatives 3 and 4. We understand that in some areas, such as the Coronado, similar designations may have resulted in impacts. Yet, what has occurred on the Coronado is not necessarily true of</p>

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		AZ - #175.65.55500.165)	what may occur on the Coconino as the two forests contain different vegetation types, are used by different amounts of Forest visitors, and have different areas open to motorized dispersed camping. We feel that designation of a system of roads, trails and areas will create a more enforceable system for managing motorized use.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-72 The Forest Service should reconsider allowing dispersed camping.	<p>BECAUSE THE PROPOSED PLAN IS AN EXCESSIVE USE OF THE CROSS-COUNTRY TRAVEL BAN EXCEPTION</p> <p>We have calculated that 45,673 acres of Forest Service land will be open to cross-country travel under the proposed dispersed camping regime. [Footnote 5: 5,628 miles x 5,280 feet = 3,315,840 linear feet x 600 feet (corridor width on each side of the road) = 1,989,504,000 square feet % 43,560 (square feet per acre) = 45,673 acres. We note that if you apply this same calculation to the MBGR [motorized big game retrieval] regime, it demonstrates a clearly excessive use of this exception to the ban on cross-country travel given that the entire forest, outside of wilderness or other areas closed to motorized uses, would be subjected to the continued impacts of cross-country travel.] This is three times larger than the Cinder Hills OHV area.</p> <p>While the CNF [Coconino National Forest] recognizes that approximately 160,000 recreation visits during 2005 involved camping outside developed campsites, there is no information about how many of these visits utilized motorized camping or any analysis of whether this level of recreational visitation is sustainable.</p> <p>Forest Service 2010:27. The CNF should analyze the impacts of these 160,000 visits and determine if there are significant</p>	<p>#175.63.55500.200:</p> <p>One important point here is that these designated areas are only available to motorized use for the specific purposes of dispersed camping or big game retrieval. Motorized elk retrieval as proposed in alternative 3 and 4 is expected to result in between 74 to 2,922 average off-road vehicle trips per year; which would be a substantial decrease from the current policy of unrestricted off-road vehicle travel. Similarly, the designation of approximately 49,478 acres of dispersed camping corridors represents less than 3% of the land area of the Forest. Designating less than 3% of the Forest for dispersed camping meets the intent of the Travel Management Rule and is clearly no 'excessive'. The Recreation Specialist Report was updated to address your concerns regarding uncertainty with the amount of dispersed camping by including information on inventoried dispersed camp sites throughout the Forest.</p>

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		<p>negative impacts to wildlife, watershed, and other forest users. However, in another section of the DEIS, the CNF states that the “[t]otal existing demand for dispersed campsites is not clear[.]” Forest Service 2010:40. There is no quantification or analysis of the impacts of 1.77 campsites per mile of road in the CNF, just the statement that this is the ratio that recent surveys suggest exists on the ground. Recreation Specialist Report to DEIS:14. (Preservation/Conservation, Prescott, AZ - #175.63.55500.200)</p>	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping</p>	<p>5-73 The Forest Service should close areas that have been damaged by dispersed camping.</p>	<p>TO COMPLY WITH THE FOREST PLAN</p> <p>The Soil and Water Specialist’s Report indicates that dispersed camping itself is not causing the resource damage, but rather that the activities associated with motorized dispersed camping, such as repeated crosscountry travel, sometimes a single pass, causes soil damage such as rutting and erosion and loss of productivity. Soil and Water Specialist’s Report:23.</p> <p>The CNF [Coconino National Forest] Forest Plan directs that dispersed camping areas that are damaged due to use should be closed and restored. Forest Service 1987:57, as amended. This management approach must be utilized rather than the current plan to designate damaged areas as motorized camping corridors. We again ask the CNF to refer to direction in the TMR [Travel Management Rule] and the FSM [Forest Service Manual]. Note that paragraph 5 of FSM 7715.74 recommends that forests “[c]onsider designating routes, including existing terminal facilities (FSM 7716.1), to dispersed camping sites, instead of authorizing off-route motor vehicle use.” (Preservation/Conservation, Tucson, AZ - #175.66.55500.200)</p>	<p>#175.66.55500.200:</p> <p>We understand that the designation of dispersed camping corridors may result in impacts from concentrated use in these corridors. Yet the designation of dispersed camping corridors to allow motorized use for the purpose of camping within a fixed distance from designated routes is specifically authorized in the Travel Management Rule under § 212.51(b). Furthermore, the Forest considered not allowing dispersed camping in fixed corridors, but this alternative was eliminated from detailed study (see the Record of Decision for more detail). Lastly, we specifically analyzed and disclosed the impact of concentrated use from designation of motorized dispersed camping corridors on vegetation cover and other resources in the FEIS for both Alternatives 3 and 4. Lastly, dispersed camping corridors include less than 3% of the Forest and these areas were located outside of areas that would result in impacts to sensitive wildlife habitat, meadows, riparian areas, cultural</p>

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			resources sites, and other areas to be managed for non-motorized use under the Forest Plan.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-74 The Forest Service should enforce camping rules rather than close camp sites.	<p>THE FOREST SERVICE SHOULD ENFORCE CAMPING RULES RATHER THAN CLOSE CAMP SITES.</p> <p>If you want to crack down please feel free to write tickets for not cleaning up your camp site. Please don't eliminate the camp site! (Individual, Phoenix, AZ - #39.3.50000.165)</p>	<p>#39.3.50000.165:</p> <p>Implementation of any of the alternatives in the Travel Management EIS would not result in the elimination of any camp sites. A decision on the Travel Management EIS would only restrict motorized use.</p>
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-75 The Forest Service should explain the method for deciding how far from roads dispersed camping would be permitted.	<p>THE FOREST SERVICE SHOULD EXPLAIN THE METHOD FOR DECIDING HOW FAR FROM ROADS DISPERSED CAMPING WOULD BE PERMITTED.</p> <p>Alternative 3, Direct and Indirect Effects, Recreation Activities, Motorized Dispersed Camping (pages 39– 40): Driving a motorized vehicle off of designated roads for dispersed camping would be allowed up to 300 feet from either edge of the road for about 628 miles of road proposed for designated camping corridors.</p> <p>Parking along designated roads outside of designated camping corridors would be allowed within one vehicle length, or up to 30 feet, from the edge of the road. It would be helpful to know how these distances were derived and how resource-protection objectives influenced these determinations. Currently, the 300 feet corridor along each side of 628 miles of road equates to allowing off-road motorized use of approximately 45,673 acres. This comment applies to Alternative 4, as well. (U.S. Fish and Wildlife Service, Phoenix, AZ - #105.9.55500.200)</p>	<p>#105.9.55500.200:</p> <p>The 300-foot distance is a result of a multi-organizational 'recreation quorum' that occurred in January 2008. This quorum involved gathering information from dozens of recreation land managers and resource specialists and researchers from the Forest Service, Arizona Game and Fish Department, Northern Arizona University. The large majority of these participants said that in their experience they had observed that the large majority of motorized dispersed camping occurred within 300 feet of roads. This was later supported by spatial data collected on almost 4,000 dispersed campsites on the Coconino National Forest. The 30-foot distance is to allow for vehicles to park off of the road in areas where no motorized dispersed camp sites are designated. A distance of 30 feet was chosen because it would accommodate the width of any vehicle while providing</p>

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		<p>For dispersed camping, the DEIS will allow limited cross-country travel within 300 feet of 628 miles of routes. Outside these “camping corridors” parking will be allowed “within one vehicle length” which is stated to be 30 feet. DEIS at 39. There is no attempt to connect any of these prescriptions with existing campsites or demand for dispersed camping. There may exist sites where dispersed camping can occur with minimal impacts, due to soil conditions, camping practices, or other factors. It may be the camping corridors reflect some of this analysis. However, there is no way to know, given the manner in which the topic and DEIS conclusions are presented.</p> <p>We [Specialty Vehicle Institute of America, Motorcycle Industry Council, BlueRibbon Coalition, and Coconino Trail Riders] question the validity of the 30-foot parking allowance. The 300-foot allowance is a recognized approach that has been implemented in Montana and the Dakotas via the 2001 “Three State EIS,” which has been considered in various Forests under the TMR [Travel Management Rule]. We are aware of no Forest which has implemented a “one vehicle length” prescription, nor are we aware of any Agency guidance proposing this approach. We have seen a “vehicle plus associated trailer length” prescription adopted by the Lewis and Clark National Forest, but adoption of that strategy was declared unlawful as a result of the uniquely inadequate method of disclosure. (Motorized Recreation, Boise, ID - #202.23.55500.160)</p>	<p>enough clearance from the road to prevent safety issues and to be consistent with travel management decisions or proposals on adjacent national forests such as the Kaibab National Forest.</p> <p>#202.23.55500.160: The Coconino National Forest inventoried almost 4,000 dispersed camp sites and used this information in addition to professional input from Arizona Game and Fish Department game officers and Forest Service recreation and law enforcement staff to identify the location of designated dispersed camping corridors. The information on existing camp sites and input from field-based professionals was screened against a number of Forest resources such as wildlife habitat, meadows, cultural resource sites, and other resources to designate corridors in those areas that would have the least impact to Forest Resources. A distance of 30 feet was chosen because it would accommodate the width of any vehicle while providing enough clearance from the road to prevent safety issues and to be consistent with travel management decisions or proposals on adjacent national forests such as the Kaibab National Forest.</p>
Cross-Country Travel, Big	5-76 The Forest Service should provide	THE FOREST SERVICE SHOULD PROVIDE SUPPORT FOR THE ASSERTION THAT MOST DISPERSED	#175.83.55500.530: The Recreation Specialist Report was

Category	Public Concern	Comment	Response
Game Retrieval, Dispersed Camping: Dispersed Camping	support for the assertion that most dispersed camping is accessed by motorized vehicle.	<p>CAMPING IS ACCESSED BY MOTORIZED VEHICLE</p> <p>We [Center for Biological Diversity et al.] can find no data or reference for the statement that “[a]most all dispersed camping access on the Coconino National Forest is by motorized vehicle.” Forest Service 2010:27. (Preservation/Conservation, Prescott, AZ - #175.83.55500.530)</p>	revised to provide more specific information relative to dispersed camping access.
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-77 The Forest Service should define the acceptable level of dispersed camping and provide support for the conclusion.	<p>THE FOREST SERVICE SHOULD DEFINE THE ACCEPTABLE LEVEL OF DISPERSED CAMPING AND PROVIDE SUPPORT FOR THE CONCLUSION</p> <p>How many dispersed sites are necessary to accommodate an acceptable level of this type of recreational activity consistent with Forest Plan management objectives? We agree that the Forest’s dispersed camping strategy outlined in the Proposed Action provides a practical approach to accommodate this type of recreational activity. However, the Forest Service should explain, through application of legal and science-based sideboards and the NEPA analysis, what is and is not an acceptable level of dispersed camping—an explanation that, at present, is lacking. According to the Proposed Action (PA, page 4), the Forest Service has inventoried over 2,600 existing dispersed camping sites accessible by motor vehicle, most of which lie within 100 feet of proposed designated roads. These sites represent approximately half of the estimated dispersed camping that occurs on the forest (Forest Service 2007:6). Arguably, this question is best addressed during the concurrent Forest Plan revision process, in which case the dispersed camping issue underscores the need to closely integrate both planning processes to define and attain future desired conditions. It could also be addressed as part of the TMR [Travel Management Rule] process and, at least, needs to be considered as part of the NEPA analysis. (Preservation/Conservation, Santa Fe, NM - #175.301.55000.160)</p>	<p>#175.301.55000.160:</p> <p>Thank you for stating the proposed alternatives provide a practical approach to accommodate dispersed camping. Neither the Travel Management Rule nor the National Forest Management Act requires the Coconino National Forest to define the acceptable level of dispersed camping. Rather, the Travel Management Rule states "In designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping..." (36 CFR 212.51(b)). The Coconino National Forest uses the guidance provided in the preamble to the Travel Management Rule that this provision should be used 'sparingly' (Federal Register Vol. 70, No. 216; Wednesday, November 9, 2005; Rules and Regulations, p. 68285) in addition to professional judgment, and available data in the National Visitor Use Monitoring survey and from inventoried dispersed campsites. The proposed dispersed camping corridors included in the</p>

Category	Public Concern	Comment	Response
			<p>Proposed Action (2007) were made available to public review and comment. These corridors were then revised based on this public comment and input from the January 2008 'recreation quorum'. The revised designated dispersed camping corridors were then made available for public comment and review in the DEIS. These were then again revised based on public comments and input from recreation managers on the Coconino National Forest and Arizona Game and Fish, and additional review based on spatial data of sensitive forest resources.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping</p>	<p>5-78 The Forest Service should coordinate with the Arizona Game and Fish Department on decisions related to dispersed camping.</p>	<p>TO ENSURE THAT SUFFICIENT SITES ARE PROVIDED TO SUPPORT HUNTERS</p> <p>The Department [Arizona Game and Fish Department] previously met with CNF [Coconino National Forest] staff and provided several comments regarding camping corridors and designated camping sites.</p> <p>Additionally, the Department has reviewed, at the CNF's request, additional camping corridors comments related to camping within 0.25 mile of available waters. The Department has delivered these comments on maps provided by CNF to the Supervisor's office. The Department asks that the CNF review and evaluate all the camping corridor comments and consider them in the Final EIS. In order to properly understand the Department's comments regarding the camping corridors, it is recommended that the CNF and Department have an additional meeting between the CNF staff and Flagstaff Wildlife Managers.</p> <p>Ultimately, the Department wants to ensure that there are sufficient sites for the maximum number of hunter camps that could be permitted in a single hunt. The Department would like</p>	<p>#160.19.55500.530:</p> <p>The Coconino National Forest met with employees of the Arizona Game and Fish Department on July 29, 2010; August 25, 2010; and October 14 and 25, 2010 to specifically discuss and review opportunities for hunter camps, motorized designated camping corridors near state designated wildlife waters, and any other hunting or wildlife related comments on specific route or corridor designations.</p>

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		<p>to offer its assistance in designating additional campsite locations. The DEIS does not include historically used campsites; the Department is aware of many of these sites and areas. The Department is willing to coordinate our efforts to designate additional designated dispersed camping sites. (Arizona Game and Fish Department, Phoenix, AZ - #160.19.55500.530)</p>	
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping</p>	<p>5-79 The Forest Service should allow camping at historically established campsites that are not along established camping corridors.</p>	<p>THE FOREST SERVICE SHOULD ALLOW CAMPING AT HISTORICALLY ESTABLISHED CAMPSITES THAT ARE NOT ALONG ESTABLISHED CAMPING CORRIDORS</p> <p>The Department [Arizona Game and Fish Department] supports control of dispersed camping. The Department also agrees there has been increasing habitat damage related to vehicular dispersed camping on the CNF [Coconino National Forest] and there is a need to regulate the distance a vehicle should be allowed to pull off a road. As noted in the DEIS, visitors camping on the CNF are using larger RVs such as campers, motor-homes, and trailers, which are continually moving campsites further from the main roads. It is understood that camping will be allowed adjacent to open roads and along designated corridors within 300 feet of specified routes. The Department highly recommends camping also be permitted at many of the historically established campsites that are not along established camping corridors. (Arizona Game and Fish Department, Phoenix, AZ - #160.18.55500.530)</p>	<p>#160.18.55500.530: We feel this comment generally supports Alternatives 3 and 4. We worked extensively with Arizona Game and Fish Department to include historically established campsites in designated motorized camping corridors or by designating routes that provide access to these campsites by meetings and discussions referenced in the comments above.</p>
<p>Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed</p>	<p>5-80 The Forest Service should allow dispersed camping within 300 feet of all existing roads.</p>	<p>THE FOREST SERVICE SHOULD ALLOW DISPERSED CAMPING WITHIN 300 FEET OF ALL EXISTING ROADS.</p> <p>A Pro-Recreation Alternative would include the following characteristic in addition to the current proposal: Dispersed camping within 300 feet of all existing routes. (Motorized</p>	<p>#109.11.55500.001: Dispersed camping within 300-feet of all existing routes was considered within the range of alternatives in the EIS because Alternative 1 would allow for this use.</p>

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Camping		Recreation, Helena, MT - #109.11.55500.001)	
Cross-Country Travel, Big Game Retrieval, Dispersed Camping: Dispersed Camping	5-81 The Forest Service should allow dispersed camping within 500 feet of roads.	<p>TO PROVIDE ACCESS TO MOST DISPERSED CAMPING SITES</p> <p>I would ask that you continue to allow and expand dispersed camping opportunities. I believe you have a good start, and I would ask that you considered allowing up to 500 feet off roads to access dispersed campsites. I believe 500 feet would allow access to almost all dispersed sites within the forest. (Individual, Litchfield Park, AZ - #166.4.55500.410)</p>	<p>#166.4.55500.410:</p> <p>We considered camping corridors of width greater than 300 feet, but this was eliminated from detailed study based on a January 2008 'recreation quorum', which included input from dozens of state, federal, and university recreation and resource managers and researchers. The quorum generally resulted in the finding that the large majority of motorized dispersed camping occurs within 300 feet of roads. Spatial data collected on dispersed campsites supported this finding.</p>
Senior Citizens and Handicapped Access	5-82 The Forest Service should provide motorized access for the senior citizens and the handicapped.	<p>BECAUSE PUBLIC LAND IS NOT JUST FOR THE YOUNG AND HEALTHY</p> <p>I am writing to encourage as much motorized-use areas as possible. Twenty-five miles of trails is not enough! The elderly and handicapped must have motorized access or the public land is effectively taken from them. Public land is for all the public, not just a select few who are young and healthy enough to hike. (Individual, Snohomish, WA - #59.2.52000.711)</p>	<p>#59.2.52000.711:</p> <p>The Travel Management planning process is not aimed at removing the motorized public from public lands. Alternative 3 is analyzing the designation of 39 miles of motorized trail and Alternative 4 is considering the designation of 89 miles of motorized trail. In addition, both alternatives include over 2,500 miles of road designated as 'all vehicles', which would allow for ATV or other OHV use. The purpose is to establish a designated system of roads, trails, and areas for motorized use in compliance with the Travel Management rule. Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile of a designated</p>

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Senior Citizens and Handicapped Access	5-83 The Forest Service should provide motorized access for senior citizens.	<p>THE FOREST SERVICE SHOULD PROVIDE MOTORIZED ACCESS FOR SENIOR CITIZENS</p> <p>We are senior citizens that travel and use the forest roads and trails in various forests across the country. We can no longer hike, so therefore the only way we can enjoy the forest is by motor vehicle. If you close most of the roads and trails in the Coconino Forest, we will no longer be able to enjoy “our” public lands, which we support as taxpayers. (Individual, Las Cruces, NM - #82.2.52000.711)</p> <p>I used to hike a lot but due to problems with my knees, I am not able to do so anymore, and OHV access to the forest and other public lands is very important to me and many others. (Individual, Wittmann, AZ - #75.2.54100.711)</p>	<p>route.</p> <p>#82.2.52000.711: The Travel Management planning process is not aimed at removing the motorized public from public lands. Alternative 3 is analyzing the designation of 39 miles of motorized trail and Alternative 4 is considering the designation of 89 miles of motorized trail. In addition, both alternatives include over 2,500 miles of road designated as 'all vehicles', which would allow for ATV or other OHV use. The purpose is to establish a designated system of roads, trails, and areas for motorized use in compliance with the Travel Management rule. Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p> <p>#75.2.54100.711: The Travel Management planning process is not aimed at removing the motorized public from public lands. Alternative 3 is analyzing the designation of 39 miles of motorized trail and Alternative 4 is considering the designation of 89 miles of motorized trail. In addition, both alternatives include over 2,500 miles of road designated as 'all vehicles', which would allow for ATV or other OHV use.</p>

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			<p>The purpose is to establish a designated system of roads, trails, and areas for motorized use in compliance with the Travel Management rule. Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>
<p>Senior Citizens and Handicapped Access</p>	<p>5-83 The Forest Service should provide motorized access for senior citizens.</p>	<p>BECAUSE MOTORIZED RECREATION IS INCREASING IN POPULARITY AND SENIOR CITIZENS HAVE INCREASED TIME FOR RECREATION</p> <p>The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles. (Motorized Recreation, Helena, MT - #109.53.54000.711)</p>	<p>#109.53.54000.711:</p> <p>The Travel Management planning process is not aimed at removing the motorized public from public lands. Alternative 3 is analyzing the designation of 39 miles of motorized trail and Alternative 4 is considering the designation of 89 miles of motorized trail. In addition, both alternatives include over 2,500 miles of road designated as 'all vehicles', which would allow for ATV or other OHV use. The purpose is to establish a designated system of roads, trails, and areas for motorized use in compliance with the Travel Management rule. Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.</p>
<p>Senior Citizens and Handicapped Access</p>	<p>5-84 The Forest Service should provide motorized access for handicapped or</p>	<p>TO AVOID DISCRIMINATING AGAINST DISABLED USERS</p> <p>I am legally disabled, with very limited walking ability, and have no way to access the outdoors without a vehicle. I feel any</p>	<p>#60.4.52000.711:</p> <p>Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile</p>

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	disabled citizens.	closures are discriminating against disabled people like myself. I think you should be increasing access for us to your forest, not eliminating it! (Individual, Quartzsite, AZ - #60.4.52000.711)	of a designated route. This includes a sufficient number of diverse routes available to motorized recreationists and no additional provision is necessary for people with disabilities who depend on motorized transportation to enjoy the Forest. 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. 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 travel management program (7 CFR §15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory.
Senior Citizens and Handicapped Access	5-84 The Forest Service should provide motorized access for handicapped or disabled citizens.	<p>BECAUSE MOTORIZED ACCESS IS THE ONLY WAY THESE USERS CAN ACCESS THE FOREST</p> <p>My family and I use Toyota 4wd trucks as off-highway vehicles (OHVs) for access and recreation on National Forests (Ouachita NF is my closest) and other public lands. OHV recreation is a legitimate use of National Forests and is highly valued by a significant percentage of the public, whether it be 4-wheelers, motorcycles, jeeps, or Toyota trucks. I am personally outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan. I hope to be able to visit the Coconino National Forest and since I suffered a broken back 3 years ago, the only way I can enjoy the forests is by my</p>	<p>#98.3.52000.711:</p> <p>We believe all alternatives included in the Travel Management EIS provide for ample motorized recreation opportunities. Based on comments received on the DEIS, Alternative 4 was modified to include the 50-mile single-track Challenger Trail to provide a long-distance high-elevation motorized recreation experience. Alternative 3 was modified by adding the 1.8-mile 4x4 Lower Smasher Canyon trail, which was determined to have very little or</p>

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		small truck. (Individual, Arkadelphia, AR - #98.3.52000.711)	no resource impact. Both alternatives 3 and 4 were updated with more accurate GPS-data so that the amount of existing system motorized trail was changed in the DEIS from 25 miles to 37 miles. In addition, both alternatives include over 2,500 miles of road designated as 'all vehicles', which would allow for ATV or other OHV use. The purpose is to establish a designated system of roads, trails, and areas for motorized use in compliance with the Travel Management rule. Based on the most restrictive alternative approximately 78.6% of the Forest outside of Wilderness areas will be within 1/2 mile of a designated route.
Non-Motorized Access	5-85 The Forest Service should provide a more robust analysis of impacts to non-motorized recreationists.	<p>TO ACKNOWLEDGE THE SHORTAGE OF QUIET RECREATION OPPORTUNITIES</p> <p>The analysis of impacts to non-motorized recreationists is cursory and conclusory. A clear impact to non-motorized recreationists from all alternatives is that those “seeking non-motorized forest settings away from the sights and sounds of motorized activity” are relegated to visiting the backcountry, on just 156,000 acres of Coconino National Forest Wilderness. Forest Service 2010:30. The idea that quiet recreationists could find this type of recreation opportunity in the 118,000 acres of semi-primitive non-motorized areas is rebuked within this DEIS. See also, for example, Forest Service 2010:33, second paragraph. (Preservation/Conservation, Denver, CO - #175.89.55000.540)</p>	<p>#175.89.55000.540:</p> <p>The FEIS provides a more clear description of impacts to each alternative on non-motorized recreation. Both action alternatives are expected to largely increase primitive and semi-primitive non-motorized recreation experiences. See the Recreation Specialist Report for more detail.</p>
Non-Motorized Access	5-86 The Forest Service should adopt a landscape-level	<p>TO BEST ADDRESS MULTIPLE USES AND PROTECT QUIET RECREATION OPPORTUNITIES</p> <p>Landscape-scale environmental analysis of this sort best</p>	<p>#175.283.55000.540:</p> <p>We agree with many of the points you bring up in your comment. We use a higher</p>

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	analysis.	<p>accounts for the full suite of the CNF's [Coconino National Forest's] multiple uses and users and best ensures motorized recreation impacts will be properly minimized, such that large areas of the forest will remain relatively quiet and undisturbed for the majority of forest users who enjoy its hiking, backpacking, horseback riding, bird watching, canoeing, hunting, and fishing opportunities. According to a recent Forest Service Survey (Forest Service 2001b), a substantial majority of visitors to the Coconino National Forest prefer quiet recreational activities, such as viewing nature (including wildlife), relaxing, picnicking, hiking and walking, and "escaping noise." Only a small minority, about 11%, actually participate in off-road activities (ATV or all-terrain vehicles, dirt bikes, etc.).</p> <p>In addition, a U.S. Forest Service-funded survey by the California State Parks Planning Division found that the four highest unmet recreation needs were for camping, hiking, walking, and wildlife viewing.... [Footnote 13: Public Opinions and Attitudes on Outdoor Recreation in California 2002: An Element of the California Outdoor Recreation Planning Program. December 2003.]. The high-impact nature of motorized recreation (due to noise, pollution from two-stroke engines, habitat fragmentation, and dust that extend far beyond the trail itself) diminishes the quality of the natural experience and displaces non-motorized visitors.(Preservation/Conservation, Grand Canyon, AZ - #175.283.55000.540)</p>	estimate of people who participate in motorized recreation compared to your comment by drawing from a broader collection of studies and surveys. More detail is available in the Recreation Specialist Report.
Non-Motorized Access	5-87 The Forest Service should acknowledge the extensive access that non-motorized recreationists have to the forest.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THE EXTENSIVE ACCESS THAT NON-MOTORIZED RECREATIONIST HAVE TO THE FOREST</p> <p>Note that non-motorized recreationists can use routes that are both open and closed to motorized recreationists, including roads, and the evaluation of the opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can</p>	#109.40.54000.540: We disagree that motorized recreationists are 'already squeezed into an insignificant and inadequate system of roads' considering the great majority of the Forest is open to motor vehicle travel and there are over 7,000 miles of road open to this use. The Forest Service considered the designation of

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		<p>use an infinite amount of cross-country opportunity and motorized recreationists cannot. A reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into an insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources. (Motorized Recreation, Helena, MT - #109.40.54000.540)</p>	<p>roads based on a number of criteria including the provision of recreational opportunities such as impacts to wildlife habitat, user conflict, safety, damage to soil and watersheds, and impacts to cultural resources. More information on how specifically submitted routes were considered is included in the Record of Decision.</p>
<p>Non-Motorized Access</p>	<p>5-88 The Forest Service should recognize that many non-motorized recreation opportunities rely on motorized access.</p>	<p>THE FOREST SERVICE SHOULD RECOGNIZE THAT MANY NONMOTORIZED RECREATION OPPORTUNITIES RELY ON MOTORIZED ACCESS.</p> <p>Page 19, Recreation use: The dichotomy between “motorized” and “nonmotorized” activities is deceptively presented. Many of the “nonmotorized” activities rely heavily on motorized access and/or the routes currently or formerly associated with motorized access, including horseback riding, bicycling, and cross-country skiing. Given the range limitations of many non-motorized forms of recreation, the sufficiency and location of the basic transportation system is of particular importance. One enjoying “day hike” activities on the CNF [Coconino National Forest] may not necessarily support massive road closures when such closures eliminate access to preferred hiking areas. Finally, it is unclear how, if at all, the DEIS addresses “motor vague” or “motor neutral” activities, such as fishing, hunting, photography, or camping, all of which can occur in a wide range of ROS [Recreation Opportunity Spectrum] settings or degree of connection to motorized transport. (Motorized Recreation, Boise, ID - #202.39.52000.540)</p> <p>Page 30, Nonmotorized activities: Again, we [Specialty Vehicle</p>	<p>#202.39.52000.540: We agree that many 'non-motorized' recreation activities depend on motor vehicles for access to the Forest and this is more clearly presented in the FEIS and Recreation Specialist Report. Many activities that you refer to as 'motor neutral' would still be facilitated by the minimum of 3,000 miles of roads included in the action alternatives that allow for approximately 78.6% of the Forest outside of Wilderness areas to be within 1/2 mile of a designated route.</p> <p>#202.42.55000.530:</p>

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		Institute of America, Motorcycle Industry Council, Blue Ribbon Coalition, and Coconino Trail Riders] note and disagree with the assertion that the identified activities can be placed on the “nonmotorized recreation” side of a dichotomy, and therefore dispute the statement that “primary participation” levels for non-motorized recreation are five times greater than motorized recreation. Even if the statement is correct, it is important to acknowledge, but conveniently unstated, that motorized access undergirds virtually all human use and enjoyment of the CNF [Coconino National Forest]. (Motorized Recreation, Boise, ID - #202.42.55000.530)	We agree that the non-motorized uses really heavily on motorized access. But this level of motorized access generally uses motorized vehicles to get to a location for recreation and is not used as part of the recreation experience itself. Much of the Recreation Specialist Report was revised to be more specific about the fact that most recreation activities use some kind of motorized use for access.
Non-Motorized Access: Quiet Recreation	5-89 The Forest Service should protect the National Forest for quiet recreation.	THE FOREST SERVICE SHOULD PROTECT THE NATIONAL FOREST FOR QUIET RECREATION I am someone who uses Arizona National Forests for hiking and bird-watching with my husband and young son. These experiences have helped me appreciate Arizona and connecting with nature. It is my desire that the quiet, peaceful experiences that National Forests offer people be preserved as much and as long as possible. (Individual, Tempe, AZ - #41.9.55200.717)	#41.9.55200.717: We thank you for your comment. The FEIS shows that both Alternatives 3 and 4 would likely enhance most non-motorized recreational opportunities such as hiking and bird-watching.
Non-Motorized Access: Quiet Recreation	5-90 The Forest Service should provide for quiet recreation.	THE FOREST SERVICE SHOULD PROVIDE FOR QUIET RECREATION It is very difficult to get away from motorized recreation in the Coconino National Forest outside of wilderness areas. Those seeking quiet and solitude will have a difficult time escaping the sounds of ORVs, which reduces the ability of these users to access the forest in a manner which they enjoy. (Preservation/Conservation, Tucson, AZ - #175.93.54000.717)	#175.93.54000.717: We thank you for your comment. The FEIS shows that both Alternatives 3 and 4 would likely enhance most non-motorized recreational opportunities by restricting off-road vehicle travel, closing over a thousand miles of roads, and making motorized use across the Forest much more predictable.
Non-Motorized Access: Quiet Recreation	5-91 The Forest Service should close quiet area routes that are currently closed	THE FOREST SERVICE SHOULD CLOSE QUIET AREA ROUTES THAT ARE CURRENTLY CLOSED SEASONALLY	#175.329.52000.530: Quiet areas and other areas restricted to motorized use (such as Wilderness) would

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	seasonally.	<p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are: Permanent closure of current seasonally closed “quiet areas,” and other areas restricted to motorized use. (Preservation/Conservation, Phoenix, AZ - #175.329.52000.530)</p>	not be changed under any of the alternatives included in the Travel Management EIS.
Developed Recreation: Campgrounds	5-92 The Forest Service should interact more frequently with campers.	<p>TO INCREASE THE LIKELIHOOD THAT CAMPERS WOULD OBEY RULES If the Forest Service were able to initiate more contact with the “slum” recreationists in their campsites—I believe that they would be more prone to leave the forest in as good—if not better—condition than they found it, particularly if the Officer were able to convey to the campers/ATVers that that they would be held accountable for any trash, fires, destruction of habitat upon them leaving their campsite. (Individual, Camp Verde, AZ - #32.3.55500.165)</p>	<p>#32.3.55500.165: The Coconino National Forest makes great efforts to contact those camping on the Forest to provide information on rules and requirements, minimize impacts to Forest resources, and address safety issue or criminal activities. Patrols to dispersed camping areas occur each weekend during the summer and fall and the Forest Service organizes and participates in enforcement and education 'blitzes' with the Arizona Game and Fish Department and Coconino County law enforcement to focus on highly concentrated recreation areas or problem areas. The Coconino National Forest hopes to increase public contact to an even greater extent than current levels with the Forests participation in the OHV Ambassador program, which is currently recruiting for volunteers to help share information with Forest users and work on road and trail maintenance.</p>
Other Access Considerations	5-93 The Forest Service should provide interpretive routes.	<p>TO PRESERVE THE MINING HERITAGE IN THE AREA To reasonably meet the needs of the public for motorized recreational opportunities, we [Capital Trail Vehicle Association] request that the proposed alternative include the following:</p>	<p>#109.13.59000.530: Establishing interpretive routes to preserve the mining heritage in the area is outside the scope of this project. The Coconino National Forest has been home to several</p>

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		Interpretive routes to preserve the mining heritage in the area. (Motorized Recreation, Helena, MT - #109.13.59000.530)	mines in the past, yet, this Forest was not a center of mining activity such as the adjacent Prescott National Forest.
User Conflicts	5-94 The Forest Service should acknowledge that there are few user conflicts between motorized and non-motorized recreationists.	<p>THE FOREST SERVICE SHOULD ACKNOWLEDGE THAT THERE ARE FEW USER CONFLICTS BETWEEN MOTORIZED AND NON-MOTORIZED RECREATIONISTS</p> <p>Out of the 16,667 recreationists that were observed, 198 were hikers and all of the meetings were pleasant. We [Capital Trail Vehicle Association] have not experienced any user conflict in ten years of observations. (Motorized Recreation, Helena, MT - #109.78.55200.510)</p>	<p>#109.78.55200.510:</p> <p>The Coconino National Forest primarily relied on best available science for the issue of user conflict meaning peer-reviewed studies, primary information, and local survey data. Another important point here is that much of the research points out the fact that motorized use often results in displacement of non-motorized uses (see Recreation Specialist Report for more detail). So, just because you have not seen conflict on motorized trails does not mean the motorized use has no effect on non-motorized uses.</p>
User Education	5-95 The Forest Service should implement a robust user education strategy.	<p>THAT INCLUDES WORKSHOPS AND INTENSIVE SIGNAGE</p> <p>An Educational Program explaining TMR [Travel Management Rule] implementation, the CNF [Coconino National Forest] MVUM [Motor Vehicle Use Map] and Travel Management Plan, and the need to protect the CNF's natural and cultural values. The MVUM would, of course, serve as the cornerstone of our [Center for Biological Diversity et al.] educational strategy. Additionally, the CNF would host post-Travel Plan/MVUM workshops for motorized recreationists wherein the purpose behind the route designations is explained, as well as the consequences of violations of the route designations that impede the achievement of resource protection goals, objectives, standards, and guidelines (given provisions for</p>	<p>#175.308.54000.530:</p> <p>We agree. Over the past several months the Coconino National Forest has spent time informing Forest users of the upcoming travel management rules by staging at major Forest intersections to provide information on TMR and discussing this change with all passersby. In addition, the Forest has recently approved through the NEPA process, the installation of 78 large, 30-panel kiosks with pull-outs at major Forest intersections and entry locations to provide information about TMR and more detailed maps on motorized opportunities and rules</p>

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		<p>conditional decisions, these consequences will be real, concrete, and objectively defined such that the motorized users are provided clear notice, and Forest Service officials are provided with clear authority). The Travel Management Plan would also require more intensive signage to explain and educate the motorized user community—with a focus on placing large, visible, and compelling signs at key points of the route network that focus not simply on the designations, but the resource protection goals, objectives, standards, and guidelines that underscore those designations. (Preservation/Conservation, Denver, CO - #175.308.54000.530)</p>	<p>in the nearby area.</p>
<p>Effects Analysis</p>	<p>5-96 The Forest Service should provide sit-specific data to support impact assessments.</p>	<p>TO AVOID ARBITRARY AND CAPRICIOUS DECISIONS Theoretical or assumed impacts must not be used to close motorized recreational opportunities. This is happening way too often. For example, an impact on wildlife by OHV recreation is assumed on a theoretical basis, but there is no site specific data or monitoring to back that statement. A similar situation is happening in other resource areas, including sedimentation and noxious weeds. Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. To avoid arbitrary and capricious decisions, site-specific data and monitoring must be presented and demonstrate a measure significant impact. (Motorized Recreation, Helena, MT - #109.33.52000.201)</p>	<p>#109.33.52000.201: The Coconino National Forest used site-specific data where available; but more often relied on the best available science of measured impacts on wildlife from motorized use. Best available science includes peer-reviewed studies, primary information, and local survey data. In addition the Forest considered research submitted during public comment and when relevant incorporated this information into the analysis of effects in the FEIS.</p>
<p>Effects Analysis</p>	<p>5-96 The Forest Service should provide sit-specific data to support impact assessments.</p>	<p>INCLUDING THE SPECIFIC IMPACT OF CLOSURE ON MOTORIZED RECREATIONISTS The site-specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site-specific value of a road or trail proposed for closure to motorized recreationists. It</p>	<p>#109.29.52000.530: The risk and benefits of each route were valued through the Travel Analysis Plan, which helped inform the Proposed Action. The proposed action was modified using an iterative process that incorporated information and data for public comment</p>

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		<p>must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements. (Motorized Recreation, Helena, MT - #109.29.52000.530)</p>	<p>and further review of spatial data and professional input. The Recreation Specialist Report does identify that there would be a cumulative effect from alternatives 3 and 4 to many Forest users such as single track motorized users, and motorized users that use particular parts of the Forest such as the Mogollon Rim.</p>
Effects Analysis	5-96 The Forest Service should provide sit-specific data to support impact assessments.	<p>TO COMPLY WITH THE NATIONAL OHV RULE Site-specific monitoring of motorized versus non-motorized use must be provided for each route, as required by the National OHV Rule. Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route, and then the appropriate decision should be made on that basis. (Motorized Recreation, Helena, MT - #109.30.54000.500)</p>	<p>#109.30.54000.500: There is no rule that requires site-specific monitoring on each and every motorized and non-motorized route as this is infeasible. The Coconino National Forest has created a monitoring plan, which is located on the website. Each route was evaluated based on the risks and benefits of motorized use during the Travel Analysis Plan process, which formed the basis of the proposed action.</p>
Effects Analysis	5-96 The Forest Service should provide sit-specific data to support impact assessments.	<p>TO ENSURE THAT DECISIONS APPLY TO THE LOCAL CONDITIONS National OHV criteria and standards are not entirely applicable to conditions in the Coconino National Forest project area and Arizona, i.e., one size does not fit all. The analysis needs to allow for judgment on site-specific conditions so that the decision is a better match for local conditions and customs which center on motorized access and motorized recreation. (Motorized Recreation, Helena, MT - #109.52.54100.160)</p>	<p>#109.52.54100.160: We agree. The Travel Management Rule preamble specifically discusses how local conditions are important for determining elements such as designation of motorized dispersed camping corridors and designation of motorized big game retrieval. The Coconino National Forest used spatial data, professional judgment, and survey and inventory data from the Forest to help inform the decision on these subjects.</p>

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Effects Analysis	5-97 The Forest Service should provide site-specific detail in the Recreation Opportunity Spectrum analysis.	<p>TO ENSURE SUFFICIENT ANALYSIS</p> <p>Page 36, ROS [Recreation Opportunity Spectrum] discussion: The discussion of ROS is vague and completely lacking in site-specific detail or documentation. Divorced from what is or will be happening under the specific alternatives at any site(s), this analysis is insufficient to justify any management decision. (Motorized Recreation, Boise, ID - #202.44.51000.500)</p>	<p>#202.44.51000.500:</p> <p>The discussion on Recreation Opportunity Spectrum was revised in the FEIS and discussed in a more quantitative manner to address your comment.</p>
Effects Analysis	5-98 The Forest Service should set a reasonable baseline that includes some limits on cross-country travel.	<p>TO COMPLY WITH NEPA AND ENSURE THAT THE ANALYSIS IS USEFUL</p> <p>Cross-country motorized travel will end as a result of TMR [Travel Management Rule] implementation even if no additional routes are designated. In our experience, Forests that have adopted a current condition baseline that includes cross-country travel have tended to describe all designation alternatives as a “net environmental positive,” thus rendering the analysis useless and exposing the analysis to litigation because of a misunderstanding of NEPA’s significance threshold. This is especially true where forests have not established a legal existing, designated system baseline. (Preservation/Conservation, Pinetop, AZ - #175.15.54000.161)</p>	<p>#175.15.54000.161:</p> <p>The Forest analyzed environmental impacts based on the change from existing conditions. Thus, the Forest set the environmental baseline as the existing condition, which is the current management of 'open to motorized use, unless designated closed'. Analyzing the change of each alternative from existing conditions is based on Council for Environmental Quality guidance for analysis under the National Environmental Policy Act.</p>
Effects Analysis	5-99 The Forest Service should revisit visitor use data.	<p>TO ENSURE THAT THE DATA ACCURATELY REFLECT THE LEVEL OF MOTORIZED USE</p> <p>The agency has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percentage of the total population. However, the percentage of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.</p> <p>The total number of individuals that visit our National Forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service,</p>	<p>#109.63-65.54000.060:</p> <p>The Coconino National Forest thoroughly discusses the assumptions and methodology of the National Visitor Use Monitoring data used in the Recreation Specialist Report. The NVUM data was used in conjunction with several other studies to estimate levels of OHV use, motorized recreation, and other types of recreation such as non-motorized recreation. The recreation report does point out the increasing popularity of motorized recreation, but the data also</p>

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		<p>November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% (56 million / 286 million) of the total U.S. population actually visits our national forests. This number needs to be used as the denominator (baseline) for total forest visitors.</p> <p>Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech, which stated, "Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000." We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3, dated October 2004 (www.idahoparks.org/assets/content/docs/2004_usfs_RecStatUpdate3.pdf). This document reports that the total number of OHV users has grown from 36 million to 49.6 million, or 38%, by the fall 2003/spring 2004.</p> <p>Based on the 2000 estimates, OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).</p> <p>This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000), titled "Outdoor Recreation Participation in the United States" (http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf), which asks the question, "During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?" The percentage responding "Yes" was 63.1% and the total number in millions was estimated at 130.8 million. Additionally, NSRE is often referenced by the agency, but the summary</p>	<p>shows that non-motorized recreation is also increasing. We disagree that, "The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities." First, it is unclear what exactly a 'reasonable' existing motorized recreational opportunity is. Second, the Forest primarily depended on the minimization criteria included in the Travel Management Rule at 36 CFR 212.55(b) to determine the designation of motorized trails.</p>

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		<p>statistics are skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation, and if they are added together, they are as large as any other group in the survey, which correctly demonstrates the magnitude of motorized recreation.</p> <p>Additionally, the Southern Research Station, in their report “Off-Highway Vehicle Recreation in the United States, Regions and States” (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf), determined that of the total U.S. population in the West, 27.3% participated in OHV recreation and that out of the total population in Arizona, 25.5% participated in OHV recreation. It appears that the study is diluting the actual percentage of OHV recreationists by using total population and not the population actually visiting and using the forest. As discussed above, only 20% of the total U.S. population visits the forest. The percentage of Arizona residents that actually visit our national forests is higher than the national average and is estimated at half of the total state population. Based on this estimate, it is our opinion that about 51% (25.5% x 2) of the actual visitors to Arizona National Forests participate in OHV recreation.</p> <p>These surveys and data demonstrates the significant popularity of motorized and OHV recreation, and the tremendous public support and need for motorized and OHV recreational opportunities. We maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the National Forest, visiting the forest 5 or more days per year. The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities.</p>	

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		(Motorized Recreation, Helena, MT - #109.63-65.54000.060)	
Effects Analysis	5-99 The Forest Service should revisit visitor use data.	<p>TO MORE ACCURATELY REFLECT THE RELATIVE POPULARITY OF VARIOUS ACTIVITIES</p> <p>Page 20, Table 9 [of the DEIS]: Primary vs. participation visits on the CNF. This does not seem to accurately depict what is occurring on the land on which we operate (and have made our residence since the 1920s). We see very little “Wildlife Viewing,” other than scouting. Hunting is the primary recreation, along with horn hunting. Camping is the second most popular recreation experience, and it is primarily during the popular weekends: Labor Day, Memorial Day, and 4th of July. “Viewing Natural Features” and “Hiking/Walking” are not nearly as popular in our particular area. Therefore, camping, hunting, and ATV and 4-wheel drive pickup use are our primary concerns. (Domestic Livestock Industry - #161.4.50000.530)</p>	<p>#161.4.50000.530:</p> <p>It is true that the primary vs. participation visits, which is from the National Visitor Use Monitoring (NVUM) survey data, is likely not accurate in all parts of the Forest. To address your point, we revised the Recreation Specialist Report to provide more information on the assumptions and likely shortcomings of the NVUM data. Furthermore, we used supplementary data sources to provide more accurate estimates regarding motor vehicle use, dispersed camping, and other recreational activities on the Coconino National Forest.</p>
Effects Analysis	5-100 The Forest Service should analyze the cumulative effects of motorized route closures.	<p>TO COMPLY WITH CEQ GUIDANCE AND NEPA</p> <p>One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where “several actions have a cumulative ... environmental effect, this consequence must be considered in an EIS.” <i>Neighbors of Cuddy Mountain v. U.S. Forest Serv.</i>, 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting <i>City of Tenakee Springs v. Clough</i>, 915 F.2d 1308, 1312 (9th Cir. 1990)). A cumulative effect is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 18 40 C.F.R. § 1508.7. 3. The cumulative effect of all motorized closures has been significant and is growing greater every day, yet they have not</p>	<p>#109.21.52000.130:</p> <p>We agree that the National Environmental Policy Act requires consideration of cumulative effects. The FEIS provides information on cumulative impacts for each resource. The Recreation Specialist Report specifically discusses the cumulative impact of closures to motorized use.</p>

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		<p>been adequately addressed. Ignoring cumulative effects allows the Agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ [Council on Environmental Quality] guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA. (Motorized Recreation, Helena, MT - #109.21.52000.130)</p>	
Effects Analysis	<p>5-100 The Forest Service should analyze the cumulative effects of motorized route closures.</p>	<p>TO ADDRESS THE NEEDS OF MOTORIZED RECREATIONISTS</p> <p>Our [Capital Trail Vehicle Association] comments document that the current management trend towards massive motorized closures (25 to 75% of the existing routes) is not responsible to the public’s needs for motorized access and recreation and is contrary to the multiple-use management directives specified by Congress. The Agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors. The Agency can no longer ignore the needs of motorized recreationists and act irresponsibly by continuing to close a large percentage of existing motorized access and recreation opportunities. The Agency can no longer ignore the need for new motorized recreational opportunities. The Agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists. We cannot tell you how many times we have met motorized recreationists (many of them families from the project area) and they have asked us “What is going on?” This question will be even more prevalent if the travel plan is pushed by the public in a short time frame. In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation of this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as</p>	<p>#109.8.52000.530: The Recreation specialist report does include cumulative impact analysis of motorized recreation opportunities and of motorized access opportunities. While we understand that there are many Forest motorized users that are not happy about the closures to motorized use, the satisfaction for motorized users is not the only factor considered in the Travel Management EIS. Rather, the EIS considers a very broad range of forest resources (including motorized recreation and access), based on the language and direction of the Travel Management Rule and other Federal and State rules and requirements such as the National Environmental Policy Act, Endangered Species Act, National Historic Preservation Act, and others. Also, it is important to realize that while there are not many established motorized trails on the Coconino National Forest, there are over 2,500 miles of road for designation under both alternatives to be designated for 'all vehicles', which would allow for motorized recreation opportunities. Most of the ATV users on this Forest use existing, unmaintained National Forest System roads which are currently</p>

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		possible. We are asking that this project establish a baseline evaluation and address this significant impact. (Motorized Recreation, Helena, MT - #109.8.52000.530)	open to all vehicles. Information provided in the Record of Decision shows that most of the user-submitted 'trails' are included for designation as 'all vehicle' roads.
Effects Analysis	5-101 The Forest Service should analyze the effect of reduced motorized access on the number of visitors to the forest.	<p>THE FOREST SERVICE SHOULD ANALYZE THE EFFECT OF REDUCED MOTORIZED ACCESS ON THE NUMBER OF VISITORS TO THE FOREST</p> <p>The current trend of excessive motorized access and motorized recreational closures is having a significant impact on the number of visitors to the forest as shown in the recently released NVUM report</p> <p>http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf, http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt) and the following graphic based on that data. This trend has created significant issues in regards to adequate public access and adequate motorized recreation which must be analyzed adequately during the process. (Motorized Recreation, Helena, MT - #109.16.52000.500)</p>	<p>#109.16.52000.500:</p> <p>The data you refer to is nation-wide in scope and in no way illustrates a causal relationship between declining visitor use to National Forests and motorized closures. The FEIS and specialist reports depend on best available science, which includes peer-reviewed studies, primary information, and local survey data. With respect to visitor use, the FEIS depends on data specific to the Coconino National Forest or the State of Arizona to the greatest extent possible and not news articles based on nationwide summary statistics.</p>
Effects Analysis	5-102 The Forest Service should consider travel plans, forest plans, and resource management plans as reasonably foreseeable actions in their analysis.	<p>BECAUSE THESE ACTIONS HAVE SIGNIFICANTLY AFFECTED THE AVAILABILITY OF MOTORIZED RECREATION OPPORTUNITIES</p> <p>Past actions have had a significant impact on motorized recreationists in Arizona and surrounding states. Reasonably foreseeable actions, including travel plans, forest plans, and resource management plans, will produce additional significant impacts. These actions have produced or will produce a significant debt in the mitigation bank for motorized recreational opportunities in the Coconino National Forest and immediate surrounding areas, and this issue must be adequately addressed. (Motorized Recreation, Helena, MT - #109.24.54000.160)</p>	<p>#109.24.54000.160:</p> <p>The FEIS provides information on cumulative impacts for each resource. The cumulative effects analysis considers past, present and reasonably foreseeable actions such as travel management planning on adjacent national forests. The Recreation Specialist Report specifically discusses the cumulative impact of closures to motorized use.</p>

Chapter 6. Socio-Economic Concerns

Category	Public Concern	Comment	Response
<p>Costs of Implementation</p>	<p>6-1 The Forest Service should consider the economic impacts of closing roads on local businesses.</p>	<p>THE FOREST SERVICE SHOULD CONSIDER THE ECONOMIC IMPACTS OF CLOSING ROADS ON LOCAL BUSINESSES</p> <p>Consider the economic impact on many businesses like mine (motorcycle dealership) which just further suffers in this economy, if you then add closing miles of trails for our customers.</p> <p>If you value your jobs, which are dependent upon U.S. taxpayer dollars, then please do what is right and do not close further areas. (Individual - #8.2.52100.815)</p>	<p>#8.2.52100.815:</p> <p>The Coconino National Forest does value the potential impacts of management decisions on jobs and the local economy. The Travel Management EIS included a hard look at the potential impacts of the alternatives in the Travel Management EIS. The Economic Impact Analysis for the Coconino National Forest Travel Management EIS uses the Impact Analysis for PLANning Professional Version 2.0 (IMPLAN) model to determine expected effects to the local economy. IMPLAN translates changes in final demand for goods and services into resulting changes in economic effects, such as labor income and employment of the affected area's economy. The IMPLAN model is valuable because it captures the direct, indirect, and induced effects resulting from a change in demand. IMPLAN is an input-output model, which</p>

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			<p>depends on the inputs of spending profiles and industry sector data. It then outputs a 'response coefficient', which captures the employment response from the effect of a specified demand for goods or services. For example, in the case of this analysis, more trails and roads is assumed to result in slightly more spending from motorized uses. More motorized use on the Forest could then lead to direct effects such as more hotel stays, indirect effects such as more jobs to clean hotel rooms, and induced effects such as more spending in local restaurants and hardware stores because of more local employment. The IMPLAN model does not provide information on changes in demand to any one individual business or even specifically grouped types of businesses such as the Specialty Vehicle Institute of America. Rather IMPLAN focuses on the manufacturing, distributing, and other sectors of the economy separately and aggregates the economic effects on these industries for an</p>

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			estimate of effects on jobs and income within the local economy. More information on the IMPLAN model or how it was used can be found in the Economic Impact Analysis Report located on the Coconino National Forest website.
Costs of Implementation	6-2 The Forest Service should evaluate the positive economic impact of motorized recreation on the surrounding community.	<p>BECAUSE THE EFFECT IS SIGNIFICANT</p> <p>The positive economic impact on the economy of the area is another socio-economic factor that must be adequately considered in the decisionmaking and especially during these times of economic recession.</p> <p>Arizona State Parks has prepared a good example of an economic analysis of OHV recreation for Coconino County, AZ (http://www.gf.state.az.us/pdfs/w_c/OHV 20Report.pdf). The economic impacts of OHV recreation in one county are significant, with a \$258.3 million statewide impact and a \$215.3 million impact locally that supports 2,580 jobs. Off-highway vehicle recreation activity is an immensely powerful part of the Arizona collective economic fabric, generating nearly \$3 billion in retail sales during 2002 (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). (Motorized Recreation, Helena, MT - #109.84.54100.814)</p>	<p>#109.84.54100.814:</p> <p>The positive economic effects of OHV use are considered in the Coconino Travel Management EIS. The Economic Impact Analysis for the Coconino National Forest Travel Management EIS uses the IMPLAN Professional Version 2.0 (IMPLAN) model to determine expected effects to the local economy. IMPLAN translates changes in final demand for goods and services into resulting changes in economic effects, such as labor income and employment of the affected area's economy. The Economic Impact Study determined that the overall effect of the impact from the alternatives in the DEIS are extremely small compared to the size of the local economy. Also, the report you cite was one of</p>

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			<p>the main studies used in contrast to the site-specific National Visitor Use Monitoring data to determine economic impacts of changes to motorized use opportunities on the Coconino National Forest.</p>
<p>Costs of Implementation</p>	<p>6-3 The Forest Service should consider the economic impacts on OHV-related businesses.</p>	<p>THE FOREST SERVICE SHOULD CONSIDER THE ECONOMIC IMPACTS ON OHV-RELATED BUSINESSES SVIA [Specialty Vehicle Institute of America] has members that manufacture, distribute, market-and are otherwise connected, largely by and through dealerships located in Arizona, Utah and California, to commerce associated with-ATVs or other OHVs that are used in the CNF [Coconino National Forest]. These members derive income from the use of such vehicles on the Forest, with which they directly or indirectly support their employees, agents, and other businesses in and beyond their respective communities. The CNF TMP [Travel Management Plan] will influence and potentially adversely affect the above-described interests of these SVIA members. (Motorized Recreation, Boise, ID - #202.4.70000.500)</p>	<p>#202.4.70000.500: The Economic Impact Analysis for the Coconino National Forest Travel Management EIS uses the IMpact Analysis for PLANning Professional Version 2.0 (IMPLAN) model to determine expected effects to the local economy. IMPLAN translates changes in final demand for goods and services into resulting changes in economic effects, such as labor income and employment of the affected area's economy. The IMPLAN model is valuable because it captures the direct, indirect, and induced effects resulting from a change in demand. IMPLAN is an input-output model, which depends on the inputs of spending profiles and industry sector data. It then outputs a 'response coefficient', which captures the employment response from the effect of a</p>

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			<p>specified demand for goods or services. For example, in the case of this analysis, more trails and roads is assumed to result in slightly more spending from motorized uses. More motorized use on the Forest could then lead to direct effects such as more hotel stays, indirect effects such as more jobs to clean hotel rooms, and induced effects such as more spending in local restaurants and hardware stores because of more local employment. The IMPLAN model does not provide information on changes in demand to any one individual business or even specifically grouped types of businesses such as the Specialty Vehicle Institute of America. Rather IMPLAN focuses on the manufacturing, distributing, and other sectors of the economy separately and aggregates the economic effects on these industries for an estimate of effects on jobs and income within the local economy. More information on the IMPLAN model or how it was used can be found in the Economic Impact Analysis</p>

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			Report located on the Coconino National Forest website.
Costs of Implementation	6-4 The Forest Service should include a socio-economic analysis that evaluates the effects of denying access to motorized recreationists.	<p>THE FOREST SERVICE SHOULD INCLUDE A SOCIO-ECONOMIC ANALYSIS THAT EVALUATES THE EFFECTS OF DENYING ACCESS TO MOTORIZED RECREATIONISTS</p> <p>Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles. (Motorized Recreation, Helena, MT - #109.31.54100.700)</p>	<p>#109.31.54100.700:</p> <p>The Economic Impact Analysis completed for the Coconino National Forest Travel Management EIS estimates the total economic impact via the effect on jobs and labor income as compared to the local economy. This provides a broad view of the economic impact of each alternative based on professionally accepted economic analysis practices. Identifying the economic impact of each route based on those who would like to use that route would be subjective. These same routes that a nearby private landowner may value for OHV use may be valued by others for non-motorized uses or for wildlife habitat or water quality. Simply assigning a subjective value to each and every route based on those who value it for one purpose would not result in an accurate economic analysis.</p>
Costs of Implementation	6-5 The Forest Service should include non-	<p>TO ENSURE THAT THE ANALYSIS IS COMPLETE AND ADEQUATE</p> <p>We [Center for Biological Diversity et al.] have concerns about the</p>	<p>#175.73.70000.540:</p> <p>Thank you for your input. The Economic Impact Analysis has</p>

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	<p>motorized recreation in the economic analysis.</p>	<p>information used by the CNF [Coconino National Forest] to identify the number of ORV users visiting the forest. Rather than rely solely on the National Visitor Use Monitoring reports from 2000 and 2005 (USDA 2006), the CNF has relied on two additional, outside sources: a 2003 inventory of statewide "OHV" use by county (Silberman 2003 and ASU 2003), and the "collective professional opinion of the CNF recreation staffs (USDA 2008b)." Forest Service 2010:18.</p> <p>The analysis of economic impacts, for all alternatives, does not include the impacts of non-motorized recreation. This failure to include non-motorized impacts analysis yields the DEIS invalid and this oversight must be corrected.</p> <p>While we have considerable concerns regarding the validity of the Silberman/ ASU study based on how "OHV" was defined and the way questions were asked and question whether the impact of off-road vehicle recreation is in fact \$4.25 billion annually, this is just a percentage of the economic impact generated by the "active" outdoor recreation industry (hiking, biking, camping, wildlife viewing) which is nearly \$350 million in annual state tax revenue, nearly \$5 billion in retail sales and service, and supports more than 82,000 jobs in Arizona. We have attached the Active Outdoor Recreation Economy Report for Arizona, prepared by the Outdoor Industry Foundation in 2005. Appendix A. (Preservation/Conservation, Pinetop, AZ - #175.73.70000.540)</p>	<p>been updated to include consideration of the economic benefits of non-motorized recreation, and FEIS contains the analysis of impacts to non-motorized recreation from the alternatives.</p>
<p>Costs of Implementation</p>	<p>6-6 The Forest Service should use the economic analysis provided on the impacts of non-motorized recreation.</p>	<p>BECAUSE NON-MOTORIZED RECREATION GENERATES MORE THAN TWICE WHAT MOTORIZED RECREATION GENERATES</p> <p>We [Center for Biological Diversity et al.] have attached two spreadsheets that demonstrate the [economic] impacts of non-motorized recreation far exceed the impacts of motorized recreation on the CNF. Appendices B and C . The methodology for this analysis is also attached and we would be happy to provide more information if requested. Appendix D. The CNF should utilize this information in place of, or at least in addition to, the Silberman/ASU study and the collective</p>	<p>#175.74.70000.500: We agree that the National Visitor Use Monitoring data shows that most Forest visitors are non-motorized users and that non-motorized users also contribute greatly to the economic impact of the Forest on surrounding communities. The IMPLAN model includes</p>

Category	Public Concern	Comment	Response
		<p>opinions of CNF recreation staff. Our calculations using the attached spreadsheets reveal that motorized recreational impacts from uses on the CNF would be around \$44.7 million, while non-motorized recreation generates more than twice that amount, \$109.9 million. These numbers would make much more sense in light of the Outdoor Industry Foundation report and likely represent a much more accurate picture of the economic impact of motorized and non-motorized recreation in the CNF. These numbers are also more logical given the national forest visits reported in the DEIS showing 1.47 million visits were primarily for non-motorized uses while just 300,000 visits were primarily for motorized uses. We have pasted Table 9 from the DEIS to demonstrate this graphically: (Preservation/Conservation, Santa Fe, NM - #175.74.70000.500)</p>	<p>information on the economic impact of non-motorized recreation opportunities.</p>
<p>Costs of Implementation</p>	<p>6-7 The Forest Service should evaluate strategies to increase funding.</p>	<p>TO SUPPORT THE VIABILITY OF MODIFIED ALTERNATIVE 3</p> <p>The FEIS should evaluate strategies to increase funding to support the viability of Modified Alternative 3. (U.S. Environmental Protection Agency, San Francisco, CA - #205.4.22630.835)</p>	<p>#205.4.22630.835:</p> <p>Including strategies to increase funding to support the viability of Modified Alternative 3 is outside the scope of the purpose and need. The Forest Service, including the Coconino National Forest is funded by annual congressional appropriations. In addition to these funds, the Coconino National Forest uses every means possible to improve and augment program funding through grants, volunteer participation, and developing efficiencies to improve the effect of funded programs. The Coconino National Forest plans to continue to pursue every possible method of funding</p>

Category	Public Concern	Comment	Response
			<p>motorized and non-motorized recreation and road and trail management throughout the Forest regardless of which alternative is chosen in the Travel Management EIS.</p>
<p>Social Concerns</p>	<p>6-8 The Forest Service should evaluate the potential effects on low-income and minority populations in the region.</p>	<p>TO COMPLY WITH EXECUTIVE ORDER 12898 AND TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 Environmental Justice and Community Involvement: The FEIS should identify how the proposed alternatives may affect the mobility of low-income or minority populations in the surrounding area and provide appropriate mitigation measures for any anticipated adverse impacts as defined under Title VI of the Civil Rights Act of 1964 and Executive Order 12898. Executive Order 12898 addresses Environmental Justice in minority and low-income populations; more information can be found regarding Environmental Justice at EPA’s website (http://www.epa.gov/compliance/ej/index.html). (U.S. Environmental Protection Agency, San Francisco, CA - #205.14.52000.743)</p>	<p>#205.14.52000.743: The EIS clearly does address Environmental Justice potential impacts by specifically discussing that there are no known disproportionate effects on any minority or low income communities as is required by Executive Order 12898. Information on the Environmental Justice analysis is included on page 53 of the DEIS and will be included in the FEIS. Your statement that The FEIS should identify how the proposed alternatives may affect the mobility of low-income or minority populations was considered as part of the Environmental Justice assessment, but since all of the main travel corridors in the Forest are to be designated under all alternatives, none of the alternatives are expected to affect the mobility of any portion of the population.</p>

Category	Public Concern	Comment	Response
Social Concerns	6-9 The Forest Service should evaluate the effect of motorized recreation on non-motorized users.	<p>INCLUDING HOW MANY ARE DRIVEN AWAY BY NOISE, POLLUTION, AND OTHER USER CONFLICTS</p> <p>There is no [economic] analysis of the impact motorized recreation has on non-motorized users and how many of these users are driven away from the CNF [Coconino National Forest] because of the noise, pollution, and other conflicts associated with motorized ORV uses of the CNF. This is an oversight in the analysis that must be corrected. (Preservation/Conservation, Tucson, AZ - #175.76.70000.510)</p>	<p>#175.76.70000.510:</p> <p>The Economic Impact Analysis does include information about how in the absence of motorized recreation, there may be more non-motorized recreation opportunities. The FEIS incorporates more science-based information on the relationship between motorized and non-motorized recreation.</p>
Social Concerns	6-10 The Forest Service should evaluate the potential for motorized recreation to reduce the suicide rate.	<p>THE FOREST SERVICE SHOULD EVALUATE THE POTENTIAL FOR MOTORIZED RECREATION TO REDUCE THE SUICIDE RATE.</p> <p>Sadly, one indicator of the condition of the human environment in Arizona is the suicide rate. Arizona ranks number 11 in the nation (http://www.suicide.org/suicide-statistics.html). This significant problem requires special attention. Motorized recreation is popular and is a very healthy and positive human activity that can help address this significant human issue. The Forest Service can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment. (Motorized Recreation, Helena, MT - #109.82.54000.719)</p>	<p>#109.82.54000.719:</p> <p>There is no clear evidence that there is any relationship between motorized recreational opportunities and the suicide rate. Your statement that the Coconino National Forest, by providing adequate quantity and quality of motorized recreational opportunities, can have any affect on the suicide rate in Arizona is not supported by any data or information. This claim is not supported by fact.</p>
Social Concerns	6-11 The Forest Service should evaluate the potential for motorized recreation to reduce	<p>BECAUSE VIDEOPHILA IS A GROWING PROBLEM</p> <p>Videophilia: The new human tendency to focus on sedentary activities involving electronic media has become a significant social problem in the U.S. (Pergams, O. R. W. and P. A. Zaradic. 2006. Is love of nature in the US becoming love of electronic media? 16-year downtrend in national park visits explained by watching movies, playing video games, internet use, and oil prices. Journal of Environmental</p>	<p>#109.83.54100.719:</p> <p>Your statement that non-motorized recreation is decreasing and OHV use is increasing is not accurate, and depends heavily on the partial conclusions of one study</p>

Category	Public Concern	Comment	Response
	videophilia in the United States.	<p>Management 80:387–393). The study shows that people in the U.S. and other developed nations are spending far less time in nature than ever before. The study tested trends in nature participation in 16 time series in the categories of visitation to various types of public lands in the US, Japan, and Spain; number of various types of game licenses issued; amount of time spent camping; and amount of time spent backpacking or hiking. The four activities with the greatest per capita participation were visits to Japanese National Parks, U.S. State Parks, U.S. National Parks, and U.S. National Forests, with an average individual participating 0.74–2.75 times per year. All four are in downtrends and are losing between 1% and 3% per year. The longest and most complete time series show that these declines in per capita nature participation typically began between 1981 and 1991, are losing about 1% per year, and have so far lost between 18% and 25%. At the same time, the interest and desire to participate in OHV recreation in the outdoors is increasing and strong as previously documented. OHV recreation is a reasonable alternative to increase participation in outdoor activities, and we request that this issue and solution be adequately addressed by this plan. (Motorized Recreation, Helena, MT - #109.83.54100.719)</p>	<p>completed in 2008 (Pergams). Where the science is the least clear is in the area of how nature-based recreation has changed in the last 10 years. Nature-based recreation is a subsector of non-motorized recreation, which includes viewing wildlife and birds, primitive camping, backpacking, and visiting Wilderness and primitive areas (Cordell 2008c). These types of activities are the least compatible with motorized recreational activities. The National Survey on Recreation and the Environment (NSRE) found that nature-based recreation activities have increased since 1994 (Cordell et al. 2008c). Other studies show that while total visitation for nature-based recreation may have been even or slightly increased overall over the last two decades, per capita nature-based recreation actually declined since 1987 (Pergams 2008). Thus, though nature-based recreation may have the same or an increased total number of people involved, the total percentage of people</p>

Category	Public Concern	Comment	Response
			<p>participating in nature-based recreation may have decreased by as much as 25% between 1981-2007 (Pergams 2008). These two studies appear to have contradictory conclusions about trends in nature-based recreation in the last decade. It is important to realize; however, that the studies include different research methods (the NSRE is based on survey data and the Pergams study uses National Park Service visitation data) and both express their results differently (total number of persons versus per capita numbers).</p> <p>Overall the data on recreation trends tell us that the total amount of outdoor recreation has increased through 2007, but that nature-based recreational activities may have actually decreased when looking at a per capita basis. This data illustrates two distinct, yet opposite trends that are occurring at the national scale. There is no comparable data source to determine whether or not these trends are occurring at the local scale of the Coconino National Forest or if they are</p>

Category	Public Concern	Comment	Response
			<p>not.</p> <p>While the statistics may present seemingly contradictory conclusions, it is clear that public lands visitation is continuing to increase, but the activities people are choosing to participate in on public lands is changing from what was observed in past decades. In particular viewing, studying, and photographing nature, and in particular wildlife, have grown strongly since 1994 (Cordell et al. 2008c). Other activities such as walking, family gathering outdoors, gathering mushrooms and berries, kayaking, snowboarding, or visiting water also increased in the total number of people participating between 2000-2007 (Cordell et al. 2009). As you stated in your comment, driving off-road has also grown during the 2000-2007 period. According to various survey-based studies, the growth in off-road driving is only behind the growth in photographing nature and kayaking in magnitude (Cordell et al. 2009). Based on this</p>

Category	Public Concern	Comment	Response
			<p>information, off-road driving or use of OHVs is one of the many outdoor activities that continues to grow in popularity. The Coconino National Forest Travel Management planning process is a response to the issue of growing demands for motorized recreation, non-motorized recreation, and forest conservation for wildlife habitat and water quality.</p>
Other Concerns	6-12 The Forest Service should reconsider incorporating Kim 2009 by reference.	<p>THE FOREST SERVICE SHOULD RECONSIDER INCORPORATING KIM 2009 BY REFERENCE Page 49, Socioeconomic Analysis: The attempt at incorporating by reference "Kim 2009 in the project record" is not reasonable. (Motorized Recreation, Boise, ID - #202.48.70000.001)</p>	<p>#202.48.70000.001: The Draft Environmental Impact Statement includes summaries of each specialist report to provide a concise and readable document. The DEIS socioeconomic analysis section includes all of the key points and conclusions of the Economic Impact Analysis completed by Yeon-Su Kim. This full specialist report is available to the public electronically on the Coconino National Forest website or a hard copy can be made available upon request.</p>

Chapter 7. Site Specific Comments

This section includes responses to ‘site-specific’ comments, which means any comment that discusses concerns or observations of a specific area, part of the Forest, or route. This information is documented here to illustrate that each comment was reviewed and rationale provided for the reason routes may or may not have been designated.

Issue	Comment	Response
<p>Single track motorized trails</p>	<p>I am a founding member of Coconino Trail Riders, and have spent many a day doing shovel work with a variety of CNF [Coconino National Forest] workers, whether it was out on Diablo Trust land, or on the Fort Valley Trail system, or one of the other non-motorized trail days. As I live in Valley Crest backing Schultz Pass Road, I have also spent hundreds of hours maintaining the Peaks Loop Trail, a trail that was developed in the 70's and utilized two times in the early 80's for a CNF permitted singletrack national motorcycle event and ridden and maintained by many singletrack motorcycle riders and mountainbike riders ever since.</p> <p>But I am simply stupified that after all these years of promises and co-operative work between singletrack motorcycle volunteers and the CNF that you have offered so little with your proposed alternative.</p> <p>Not only is 24 miles not nearly enough, but you have, I think purposely, proposed the singletrack motorcycle trails on the Fort Valley Trail system to put us in direct conflict with as many hikers, bikers and horsemen as possible. Why else would you locate the only singletrack trail system so close to town adjacent to the most utilized general use trail? Surely the leadership on the CNF cannot be that dumb.</p>	<p>Many of the existing single track motorized trails are user-created and were not designated based on conflicts with sensitive resources and other issues. Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p> <p>The Fort Valley motorized trail system is a pre-existing and signed multi-use single track trail system that has already gone through the National Environmental Policy Act (NEPA) process (decision signed on September 19, 2000). We disagree that the inclusion of this system within the Travel Management EIS would increase user</p>

Issue	Comment	Response
	<p>If you go through with your proposed alternative, you can certainly expect litigation. I also believe many will treat your new "rules" as yet another stupid government decision that most will simply ignore.</p> <p>So, please reconsider the one option of approximately 100 miles of singletrack trails that you dismissed. It is the only effective way to work with the public.</p>	<p>conflict.</p>
<p>Single track motorized trails</p>	<p>I currently live in Flagstaff, off Lake Mary Road. I've lived in Flagstaff for 10 years now, and a large part of my decision to move here was the access to the outdoor activities that I love. I grew up hiking, camping, mountain biking, and off-road motorcycling. I have greatly enjoyed access to the Coconino National Forest (CNF) and hope that I can do my part to keep the CNF open for these activities in the future!</p> <p>My father, two brothers, and their families also enjoy spending time in Flagstaff and the CNF. They all live in Minnesota and make regular trips to visit us in Arizona, and they also enjoy spending time in the CNF riding off-road motorcycles with us. It has become a family gathering to ride motorcycles here in Flagstaff every fall. We hope to continue this in the future as well!</p>	<p>Based on your input and the input of others, the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision. It should also be noted that the large majority of routes to be designated in Alternative 3 and 4 include designation for 'all vehicles', which would allow for motorized use by off-road vehicles (ATVs, UTVs and dirt bikes).</p>
<p>Single track motorized trails</p>	<p>I live in Sedona and I previously lived in Munds Park. As someone who uses CNF [Coconino National Forest] trails almost daily for motorcycling and mountain biking and hiking and trail running (and in the past I trail-rode horses too), I want to see these trails remain open to all users. It is irresponsible of the Forest Service to force all the motorized users onto a relatively few miles of trails knowing full well that its decision will create greater user conflict and a crowded, unsafe</p>	<p>None of the alternatives included in the DEIS force motorized users onto designated motorized trails. Single track riders will be able to use the several thousand miles of roads designated for motorized use by all motorized vehicle types.</p>

Issue	Comment	Response
	environment for all trail users.	
Single track motorized trails	I have taken many of my friends dirt biking in that area [Flagstaff] and all have been drop jawed in amazement as to what we have here in Coconino National Forest. All want to preserve it and keep it for others to have that same sort of enjoyment of our land. Here in Fountain Hills, AZ, we are local to Tonto National Forest and work closely with them in an effort to keep those lands available for all OHV to enjoy. I have dirt biking friends in the Flagstaff area who also work close with the Coconino National Forest personnel. They are constantly helping with all sorts of projects motorist and non-motorized for the benefit of all. Please keep them in your thoughts when deciding the fate of our land.	We heavily depend on volunteers such as yourself and others to work with us to help establish, re-route, and maintain Forest trails. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.
Single track motorized trails	We [Center for Biological Diversity et al.] are especially concerned about the statement in the Recreation Specialist Report for this DEIS that "trails, such as the Challenger Trail that circles the San Francisco Peaks just outside the wilderness boundary, have been located and built...sometimes with advice and oversight from Forest Service personnel, but without any official authorization or analysis of the trail's existence." Recreation Specialist Report:12.	Based on the current Coconino National Forest policy of allowing motorized use across the Forest except in areas that specifically prohibited motorized use, there were approximately 100 miles of motorized trails established - some of which may have included input from Forest Service personnel. The Travel Management Rule changes this and includes detailed analysis and consideration of both positive and negative impacts of all routes and areas to be used by motorized vehicles.
Single track motorized trails	Keeping 25 miles open is only 1 hour of riding on a motorcycle and will create congestion, overuse and dangerous situation for all riders involved. Simply put, 25 miles is okay for a hiking loop but not for a motorcycle singletrack loop. 25 miles is nothing for a dirtbike to do. By limiting use to a completely unrealistic percentage of the existing trails you will create more chaos, damage and injuries to OHV riders than imaginable. This will also have the effect of turning law abiding citizens into criminals because there is no way 25 miles of OHV road is safe and realistic for offroad riders who can easily do 100 miles of	Based on your comments and those of others, the 50-mile Challenger Trail (Peaks Loop) was added for detailed study in Alternative 4. The Recreation Specialist Report specifically included analysis on the potential impacts to motorized recreation users from limiting single track motorized use to the Fort Valley Motorized Trail System.

Issue	Comment	Response
	<p>tough single track each day. Please keep the existing single track [Peak's Loop] open.</p>	
<p>Single track motorized trails</p>	<p>If the DEIS is implemented as is, these 12 or so miles of trails will be the only designated motorized single track trail on the Coconino National Forest. Currently, motorized single track use is dispersed over not only the 124 miles of user created trails near Flagstaff, but also on what most likely amounts to several hundred more miles of single track throughout the Forest.</p> <p>This trail system will not reasonably be able to bear the significant increase in motorized use. Assuming for the sake of discussion that all motorized single track use is currently focused on the 124 miles of user created trails cited by the DEIS and the Fort Valley System, this would arguably result in a ten-fold increase in motorized use on the Fort Valley System once it was the only legal single track riding opportunity available. This focusing of use will lead to significant damage to this beloved trail system and significant user conflict issues.</p> <p>I have worked extremely hard to not only build this, and other trails, but to build partnerships and cooperation among all of the various trail users in the Flagstaff area; the Peaks and Mormon Lake Ranger and staff, current and former, will attest to validity of this assertion. I cannot stress enough how important it is to me, and others, that the appropriate volume of opportunities be provided for motorized single track in order to mitigate the impacts of too heavily focused use on these trails and the trail user community in Flagstaff.</p>	<p>The FEIS considered the designation of the 20.5 mile single track Fort Valley Motorized Trail system in Alternative 3 and the Fort Valley System and 50-mile challenger loop in Alternative 4. While it is true that the selection of Alternative 3 may result in crowding and a resulting single-track motorized trail system that results in little satisfaction to motorized users, your assumption that all single track users will be limited to single track trails is incorrect. All Forest roads designated for 'all vehicle use' will allow for ATV and dirt bike use as well. Additionally, this decision would not preclude additional trails planning to establish motorized trails that do not occur in sensitive wildlife or cultural resource habitat (such as the Challenger Trail and other existing single track trails). The Coconino National Forest has begun inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012.</p>
<p>Single track motorized trails</p>	<p>I ride my motorcycle in the National Forest and on the many hundreds miles of wonderful single track trails that are in the forest. I am very disappointed with the Forest Service plan to close most of these trails. These single track trails are very low</p>	<p>Based on your comments and the many comments of others, the 50-mile Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement. Additionally, we</p>

Issue	Comment	Response
	<p>impact on the environment. These trails are not destructive like places where other OHV riders make wide trails in small areas (i.e. Cinder Pits, other popular areas). The single track motorcycle community is very helpful in maintaining and building new trails. Many of the existing trails that mountain bikers, hikers, and horse riders use were built by the motorcyclists. These trails will be closed off to motorcycles under the proposed plan. The proposed 25 miles of trails are not enough trails and will be too busy. This will lead to overcrowding of these trails. Riders will be passing other riders off of the trails as well as the extra traffic will have more impact to the forest in this localized spot. Please do not close these wonderful trails in the forest. Allow the trails that the Coconino Trail Riders have mapped out to remain open.</p>	<p>re-inventoried the existing motorized trails and revised the FEIS to reflect 37 miles of existing motorized trail rather than 25 miles. We understand that limiting single track motorized trails may result in concentration of motorcycles on the Fort Valley Motorized Trail System, yet motorcycles would still be able to drive on the over 2,500 miles of routes to be designated as 'all vehicles' or '< 50 inches'. Lastly, the Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. The Coconino National Forest has began inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>My family has spent many weekends enjoying the trail system, and enjoying the town of Flagstaff. I grew up riding dirt bikes and am a responsible and considerate rider. I am raising my family to have the same respect and consideration for our public lands so that my boy can have the same opportunities to use public lands as I have had. Please reconsider the current DEIS and the impact it has had on a dedicated and responsible segment of the population using public lands.</p>	<p>Thank you for your comments. The Forest has included additional motorized trails in Alternative 4 for more detailed consideration. In addition, the Forest re-inventoried the existing trail system to provide more accurate data for designation of existing motorized trails. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>My family, my friends and I live in Phoenix and use off-highway vehicles (OHV) for access and recreation on National</p>	<p>We work closely with the Coconino Trail Riders and depend on the CTR's network of single track motorcycle</p>

Issue	Comment	Response
	<p>Forests and other public lands. We ride in Tonto from fall until the temperature climbs, then we come up and ride in Coconino, on Wing Mountain, Airport Loop, and the Humphrey's loop. These are some of the best single track this side of Colorado. The single track is well cared for because of the actions of Coconino Trail Riders, which I can proudly say I am a member.</p>	<p>users and other OHV riders to help maintain trails. Many of the existing single track motorized trails are user-created and were not designated based on conflicts with sensitive resources and other issues. Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>I am a 36 year old woman, who has been dirt biking (motorized) for the last 11 years and mountain biking (non-motorized) for the last 16 years and I'm shocked to hear how the CNF [Coconino National Forest] is choosing to manage our public land!</p> <p>As a Phoenix resident, I spend a lot of time in the summer camping and riding my dirt bike in the CNF and other public lands. OHV recreation is a legitimate use of National Forests and is highly valued source of recreation. I am outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan.</p> <p>Interestingly enough the trails that are included are part of the Fort Valley trail system which is predominantly used by mountain bikers. While this trail system is currently multi-use,</p>	<p>Based on your comments and the many comments of others, the 50-mile Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement. Additionally, we re-inventoried existing motorized trails and revised the FEIS to reflect 37 miles of existing motorized trail rather than 25 miles. We understand that limiting single track motorized trails may result in concentration of motorcycles on the Fort Valley Trail System, yet motorcycles would still be able to drive on the over 2,500 miles of routes to be designated as 'all vehicles' or '< 50 inches'. Lastly, the Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized</p>

Issue	Comment	Response
	<p>there isn't a lot of motorized traffic on it. When we as motorized users are kicked off the Peaks Loop and the Wing Mountain Loop it with concentrate all the motorized use on the Fort Valley Trail System. This won't be good for the motorized or non-motorized users and has the potential to create a dangerous situation due to excessive traffic.</p>	<p>system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>I do not understand why so many miles of premier trail are scheduled to be closed. I frequent the area trails on a regular basis and seldom see anybody else out there. If there was user conflict (Schultz Creek) or environmental damage I would support the proposed closures, but neither exist. It appears to be another case of "let's close it so nobody can use it."</p>	<p>We reviewed each and every motorized trail submitted by users. Many of the 'trails' submitted by ATV users were located on existing Forest Service roads and were included for designation as 'all vehicle' roads. Many single track trails are user-created trails that occur in sensitive wildlife habitat, or in some circumstances on non-Forest Service managed land. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>

Issue	Comment	Response
Single track motorized trails	<p>I'm an Arizona native, and lived in Flagstaff for 14 years. I still visit the Flagstaff area in the summer months to enjoy recreation. Flagstaff offers a great area for OHV use. I ride a motorcycle and enjoy riding single track at areas around the state, such as Flagstaff, Sycamore Creek, and the Mile Markers. There are not many areas for motorcycles-only trails; closing these discussed areas does not make much sense. I have been involved with the Tonto National Forest and the Travel Management Plan for the Sycamore Creek area since it started in '04, granted some of the trails will close, [but] they are not going to close all of them. It's a give and take. From what I see here it's all take for the Forest Service.</p>	<p>Based on your comments and the many comments of others, the 50-mile Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement. Regardless of the selected alternative, motorcycles would still be able to drive on the over 2,500 miles of routes to be designated as 'all vehicles' or '< 50 inches.' Lastly, the Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
Single track motorized trails	<p>I currently live in the Timberline area northeast of Flagstaff and make use of the many forest roads near my house multiple times per week. Whether this is on my dual sport bike, truck, or mountain bike. I am not thrilled that you are closing roads that are currently open. Much of the enjoyment I get out of the forest is wandering around on these roads for hours on end.</p> <p>I am unhappy that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan. There are already very few authorized trails for use by motorcycles within the forest and by closing such a large number of the existing roads you have eliminated most of the places that are "authorized" for riding. While the Cinder Hills is a great spot for quads and sand rails it is not the type of riding enjoyed by all OHV users.</p>	<p>Based on your input and the input of others the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision. It should also be noted that the large majority of routes to be designated in Alternative 3 and 4 include designation for 'all vehicles', which would allow for motorized use by motorcycles. Lastly, we see this travel management planning as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
Single track motorized trails	<p>I regularly and responsibly participate in motorized use of our National Forests, particularly on the East side of Shultz Pass, an area that will now have no legal trail, and already has some of</p>	<p>Many of the existing single track motorized trails are user-created and were not designated based on conflicts with sensitive resources and other issues. Considering</p>

Issue	Comment	Response
	<p>the worst user interaction. Having grown up in Black Bill Park, and spent a great deal of time exploring the Cinder Hills Rec[reation] area I have seen first hand the effects of concentrated use. Since reaching adulthood I have found much more interest in closing the great majority of the currently legal trails. The new plan will disenfranchise many if not most of the current responsible motorcycle community and focus all recreation on a resource too limited to handle it. We can be your ally or your enemy, and having now worked within the system for the last 5 years, and seeing not one positive change in the outcome of the plan, it is hard to consider myself an ally anymore.</p>	<p>there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>With our current network of which includes the Challenger Loop around the North of the Peaks, user interactions are already a significant problem. By limiting all single track riders to the legal trail, where the most mountain bikers and hikers are found, the new plan is nearly guaranteeing an increase in user conflict, and a decrease in Forest enjoyment for all users. What will the bicycle community and hiker community think when they see 100 or more motorcycles on Upper Moto during the height of the season? Do you honestly think that the legal network on the Peaks can handle all motorcycle use being concentrated onto it? Or is that your plan, to force us onto only a few trails, so they will deteriorate and you can lock us out entirely. Disenfranchisement can be a slippery slope and lead to many very angry users.</p>	<p>The Challenger Trail was added to Alternative 4 for detailed consideration based on your comments and the comments of others. While it is true that the selection of Alternative 3 may result in crowding and a resulting single-track motorized trail system that results in little satisfaction to motorized users, this decision would not preclude additional trails planning to establish motorized trails that do not occur in sensitive wildlife or cultural resource habitat (such as the Challenger Trail and other existing single track trails). The Coconino National Forest has begun inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012.</p>
<p>Single track motorized trails</p>	<p>We all live in Mesa, Arizona, and often travel to the Flagstaff area to ride our dirt bikes. We camp near the peaks and near Wing Mountain. We have enjoyed the "Peaks Loop" many times. This is the only loop of more than about 65 miles that is available to us. This is one of the nicest single track loops in the</p>	<p>Based on your comments and those of others, the 50-mile Challenger Trail (Peaks Loop) was added for detailed study in Alternative 4. The Recreation Specialist Report specifically included analysis on the potential impacts to motorized recreation users from</p>

Issue	Comment	Response
	<p>state and is maintained by the motorcycle riders. Please keep this one of a kind loop open so that we can experience these areas and at the same time challenge ourselves with endurance and physical fitness. I want my kids to grow up with the opportunity to experience a day long rider around the Peaks, stopping to see the sights and experience the outdoors. Without this they will not be able to experience the outdoors like their father and his father did.</p>	<p>limiting single track motorized use to the Fort Valley Trail System. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself so that your children shall be able to experience the outdoors just as you have.</p>
<p>Single track motorized trails</p>	<p>Specifically, we ride dirt bikes on singletrack trails, we do not want to ride on jeep roads or quad trails. Please reconsider your decision and designate the "Peaks Loop", "Airport Loop" and "Wing Mountain" single-track trails as motorized use. They have been in existence for over 20 years and were made by single-track dirt bike riders.</p>	<p>All three of these trails - Peaks Loop, Wing Mountain, and Airport were considered. The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and Airport trail were not considered for designation because these trails are located in sensitive species habitat or include other issues, such as the fact that the Airport Trail is partially located on non-Forest System managed lands.</p>
<p>Single track motorized trails</p>	<p>The moto trails. I have flown with DPS Ranger, have friends who work for multiple law enforcement agencies, and am somewhat aware of the level of manpower available to patrol the Coconino National Forest. As a realist I am aware people are going to ride the trails anyway. People will travel cross country on their quads and side by sides and not get caught. I believe the Coconino Trail Riders and FBO do a pretty good job of maintaining the trails on both an organized and non-organized basis. The moto trails have the fallen trees removed before the bike trails for the past 3 spring seasons. The maintenance of the trails is what I believe will suffer. Riders will not be able to repair environmental or use damage.</p>	<p>Maintenance is not the only issue for consideration of whether to designate a motorized trail or not. Many motorized trails have been established in sensitive wildlife areas or culturally significant areas. Use of these trails, even if well maintained, may still result in negative impacts to wildlife and cultural resources. To further analyze this issue, the Challenger Trail (Peaks Loop) was added to Alternative 4 for a detailed analysis of the potential impacts.</p>

Issue	Comment	Response
	<p>I believe there is a group of motivated individuals that will try to do everything that is requested by the Forest Service to help in any way possible to keep the Airport Loop, Wing Mountain loop, and the Peaks Loop open and well maintained.</p>	
<p>Single track motorized trails</p>	<p>Another point I would like to bring up is that in all my riding on the singletrack that I call the Peaks Loop and the Wing Mountain Loop in the CNF [Coconino National Forest] it is rare that I run into anyone else on motorcycles and even more unusual to run into hikers. I can also say that I have never seen a mountain bike (non-motorized) on any of these trails. I bring this up because for the most part, we are the only trail users on this portion of the trail system. It seems unreasonable to me to exclude motorized use when traffic from all other users is extremely light.</p>	<p>Based on your input and the input of others the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision. The Wing Mountain Trail was not included in either Alternative 3 or Alternative 4 because it is a very short, looped motorized single track trail located partially on the steep, cinder slopes of Wing Mountain and in sensitive wildlife habitat.</p>
<p>Single track motorized trails</p>	<p>Do you honestly think that the legal network on the Peaks can handle all motorcycle use being concentrated onto it? Or is that your plan, to force us onto only a few trails, so they will deteriorate and you can lock us out entirely. Disenfranchisement can be a slippery slope and lead to many very angry users.</p>	<p>Based on your input and the input of others the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision. It should also be noted that the large majority of routes to be designated in Alternative 3 and 4 include designation for 'all vehicles', which would allow for motorized use by motorcycles. So it is unlikely that motorcycles will be heavily concentrated onto just a few trails.</p>
<p>Single track motorized trails</p>	<p>Let's cut to the chase. Please don't close down the single track trails in Flagstaff to motorized use, i.e. dirt bikes. I have been riding there for 20 some odd years, and it will be a real shame if those trails were lost; let me remind you that most of the trails around Flagstaff were put in by old timers on dirt bikes. Remember that America was founded on "The Pursuit of Happiness". Dirt biking makes my wife and myself very happy,</p>	<p>The Challenger Trail was added to Alternative 4 for detailed consideration based on your comments and the comments of others. While it is true that the selection of Alternative 3 may result in crowding and a resulting single-track motorized trail system that results in little satisfaction to motorized users, this decision would not preclude additional trails planning to establish motorized</p>

Issue	Comment	Response
	<p>and is how we enjoy the outdoors and the back country, it is not a hobby, it is a life style!</p> <p>All user groups have an impact one way or another, either from hiking boots, to steel shod hoofs, mountain bike tires, to motorcycle tires. To force out one user group over the others is discriminatory. If you close us out you should close it down to all user groups; that would only be fair.</p> <p>Let's not forget that these trails in the Coconino are built on a volcano. Which erupted roughly 1100 years ago, which geologically speaking is not long ago. Mother Nature can wipe out the country side effortlessly. Compared to the destructive force of a volcano, single track trails that we dirt bike enthusiasts ride upon is not that bad at all.</p> <p>We don't need trail closures we need to simply get along. Let's promote peace among the user groups. Discriminating towards one user group over others only adds resentment and anger.</p>	<p>trails that do not occur in sensitive wildlife or cultural resource habitat (such as the Challenger Trail and other existing single track trails). The Coconino National Forest has begun inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012.</p>
Single track motorized trails	<p>I am a frequent user of national forests and State Trust land for off road motorcycle use as well as hunting and fishing and hiking and camping. I request that trail use not be further restricted as we have already lost many areas that used to be closed riding areas. The Coconino National Forest is one of my favorite places to ride and I contribute significantly to your tourism by purchasing food, fuel, equipment, and lodging in your area. Riding around the Peaks is my favorite ride in Arizona. I typically ride locally in Phoenix but venture to Flagstaff and other areas several weekends per year. My group and I particularly love singletrack and the peaks loop is one of the groups favorites.</p>	<p>The Challenger Trail (50-mile single track trail that goes around the Peaks) was added to Alternative 4 for site-specific study and analysis.</p>
Single track motorized	I wanted to voice my displeasure with hearing the current plan	None of the alternatives considers closing all motorized

Issue	Comment	Response
trails	<p>to close all trails for motorized vehicles. My family goes to Flagstaff all summer for this type of recreation. As a matter of fact, we were there this past weekend at the Wing Mountain area.</p> <p>Our typical weekend consists of camping at an area such as the Wing Mountain area, riding and respecting the trails, usually going out for a family dinner (La Fonda), using the services at KOA, then leaving our trailers at AllGuard Storage. I don't even know how much money our typical weekend brings to Flagstaff each trip, but it's not cheap. If the trails are closed, there will be no reason for us to come to Flagstaff.</p> <p>I am an avid motorcyclist that enjoys mountain trails while respecting the environment around us. Hopefully my e-mail, along with many others I'm sure you are receiving, will urge you to reconsider this closure.</p>	<p>trails since the establishment of many motorized trail systems such as the 20.5 mile Fort Valley Motorized Trail System and 9.3 mile Munds Park Trail System were established through site-specific review and NEPA under previous decisions. The Wing Mountain Trail was considered, but eliminated from detailed study since the trail is located in rare plant habitat and is adjacent to a northern goshawk post-fledgling area.</p>
Single track motorized trails	<p>My family and I recreate on National Forests and other public lands using our dirtbikes. It is a significant part of our family enjoyment. We ride all over the state of Arizona including Coconino, Tonto, Prescott, Apache-Sitgreaves National Forests. Additionally we have traveled out of state riding in Utah, Nevada, Idaho, Michigan, New Mexico, and California. We have enjoyed riding at the Cinders, around the Peaks, by Williams, Munds Park, and south of Flagstaff on the Rim. We have ridden more than the 25 miles proposed and we would lose some of our most precious riding areas!</p>	<p>Based on your comments and the many comments of others, the 50-mile Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement. Regardless of the selected alternative, motorcycles would still be able to drive on the over 2,500 miles of routes to be designated as 'all vehicles' or '< 50 inches' under either alternative. Lastly, the Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
Single track motorized	I am a resident of Munds Park and a long time enjoyer of	We disagree that single track motorized trails have been

Issue	Comment	Response
trails	<p>responsible forest use. Hardly a week goes by that I am not out in the forest as a hiker, a backpacker, mountain biker and a dirt bike rider. One of the greatest draws for me to this area is the many uses of our national forest.</p> <p>It is my understanding that you have been working diligently to prepare a travel management plan for the Coconino Forest and you are nearing the end of this great undertaking. It is also my understanding that you are ignoring the majority of the hundreds of miles of single track that motorcycles have enjoyed over the years.</p>	<p>ignored. The Challenger Trail was added to Alternative 4 for more detailed consideration. In addition, each trail was specifically reviewed, but many of these user-created trails, such as the original Secret Trail, are located in areas that result in unacceptable impacts. The large majority of roads to be designated for motorized use in both action alternative would allow for single track users.</p>
Single track motorized trails	<p>I am extremely disappointed with the proposed closure of almost all motorized single-track in Coconino National Forest.</p> <p>I enjoy the forest in many ways. I am an avid hiker, mountain biker, camper, explorer and motorized-dirt bike rider.</p> <p>Please do not close any single track. Single track does not damage the forest and is a great way for people to get out and enjoy the beauty of our surroundings. I have personally surveyed hundreds of miles of single track in our forest and photographically documented the trails. The single track trails used by dirt bikes are almost always in better condition than those used by hikers. Hikers tend to walk two or three abreast and end up widening the trail. (Look for instance at the Humphrey's Peak trail which is only open to hikers and is one of the most damaged Trails in the forest).</p> <p>I realize the damage done by 4-wheel drive vehicles and occasionally by ATV riders who are uneducated in proper trail use. However it is wrong to punish our entire community with such drastic closures due to the misbehavior of a few.</p>	<p>All of the user submitted single track trails were reviewed and considered. The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and Airport trail were not considered for designation because these trails are located in sensitive species habitat or include other issues, such as the fact that the Airport Trail is partially located on non-Forest System managed lands.</p>

Issue	Comment	Response
	<p>Please leave all of the existing single track open to motorized travel. Any thing less is unfair to the community.</p>	
<p>Single track motorized trails</p>	<p>The Peaks Loop and the Wing Mountain Loop are some of the best dirt bike (motorized) trails in Arizona. For these to not be included in the new plan as motorized use trails, which they have historically been, is criminal.</p> <p>I have spent many a weekend around a campfire, with 15 or 20 of my friends and their families escaping the summer heat in the cool pines. We usually camp by Wing Mountain so the kids can ride in the cinder pit close to camp, while the adults break up into groups riding the Wing Mountain Loop and the Peaks Loop. These are trails that can't be replaced.</p>	<p>Based on your input and the input of others the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision. The Wing Mountain Trail was not included in either Alternative 3 nor Alternative 4 because it is a very short, looped motorized single track trail located partially on the steep slopes of wing mountain and in sensitive wildlife and plant habitat.</p>
<p>Single track motorized trails</p>	<p>The trails around the Peaks and the Airport loop are world class trails enjoyed by not only me, not only by people from Flagstaff, not only by people from Arizona, but by people from all over the Western United States of America.</p> <p>There are no trails anywhere that can replace these unique trails that have been enjoyed by so many for so long.</p> <p>The trails have been designed in such a way that although they have seen years and years of use, very little wear has been shown. There is no damage to the area from these trails and the recreational value to those that use them is tremendous.</p> <p>Please, please find some way to keep these trails open.</p>	<p>Based on your comments and several others, the Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed analysis. The Airport Trail was not included for detailed analysis because the route appears to go through multiple land ownerships where there is no Forest Service right-of-way.</p>
<p>Single track motorized trails</p>	<p>My two sons and I use motorcycles for access and recreation on National Forests and other public lands. OHV recreation is a legitimate use of National Forests and is highly valued by a significant percentage of the public. My family lives in the Phoenix metro area, and our weekend escapes to Flagstaff are</p>	<p>All three of these trails - Peaks Loop, Wing Mountain, and Airport were considered. The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and Airport Trail were not considered for designation</p>

Issue	Comment	Response
	<p>key to our quality of life. While we enjoy riding and our motorcycles in the CNF [Coconino National Forest] we are good stewards of the land. It's a shame the bureaucratic process can threaten the legality of such wholesome family activity. I urge you to reconsider and add the rest of the Peaks Loop, Wing Mountain Loop, and the Airport Loop to the plan.</p>	<p>because these trails are located in sensitive species habitat or include other issues such as, the Airport Trail is partially located on non-Forest System managed lands.</p>
<p>Single track motorized trails</p>	<p>I am 44 years old, an avid mountain biker, road rider and bicycle tourist. I have ridden around the world and think Flagstaff has some of the greatest trails I have ever experienced. As a mountain bike rider I have ridden up until 3 years ago without any exposure to dirt bikes except one ride up Schultz maybe 15 years ago. I was completely unaware of the Airport Trails, the Wing Mountain Loop, and had heard about singletrack around the Peaks but rode the past Cosmic Soulstice route for my around the Peaks needs.</p> <p>Three years ago around the 4th of July I purchased a dirt bike and discovered a whole new world of fun and forest exploration. That is about when we (the dirt bikers) traded Schultz for Fort Valley trails and I thought that was great! I have recently acquired the skills to complete the around the Peaks Loop and enjoy Wing Mountain throughout the summer and the Airport Trails in the spring.</p> <p>I have been to Trail Days where the motorized singletrack users have always outnumbered the hikers and mountain bikers. I have only had one uncomfortable meeting with a mountain bike on the Fort Valley system where the individual was unaware that motos were in fact allowed and his friends were great and informed the gentleman.</p> <p>If the only motorized singletrack allowed is the Fort Valley system the trails may become seriously overused and cause</p>	<p>The Airport Trail and Wing Mountain Trail are shorter motorized trails that occur in sensitive wildlife habitat and/or are not fully located within Forest Service lands. The Challenger Trail (Peaks Loop) was added to Alternative 4 for a detailed analysis of the potential impacts and benefits of a long-distance motorized trail in forest vegetation types on the Coconino National Forest.</p>

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	<p>more conflicts between mountain and motor bikes. The Fort Valley system is my favorite area to take beginner mountain bikers and my nieces and nephews. Known unofficially as the best "date trails" short of Campbell Mesa but are closer for me. I am always courteous and respectful but if all the motos from the Coconino are concentrated in a small area, without assessing blame, I believe more conflicts will arise.</p>	
<p>Single track motorized trails</p>	<p>I am adding my voice to others who are expressing their disappointment and anger about CNFs [Coconino National Forests] seemingly conscious decision to disenfranchise the Arizona OHV community by refusing to acknowledge and accommodate motorized trails that have been used by Arizonans for years in and around Flagstaff. Trails which are legal and upon which the CNF has even allowed motorcycle racing in the past.</p>	<p>It is unclear what you are referring to when you say that there are 'Trails which are legal and upon which the CNF has even allowed motorcycle racing in the past.' It is true that the Fort Valley Motorized Trail system was inaccurately pictured in the DEIS, and based on GPS data this information was corrected for the FEIS. You may also be referring to special use events that were approved in the past for motorized use events. Though these events may have been cleared and made legal under a permit by the Forest Service, that does not mean these trails are available for public use at any time. There are many areas that may be made legal for use under a permit for a specific time of year or under specific requirements, but this differs from designation of motorized trail for public use under the Travel Management Rule.</p>
<p>Single track motorized trails</p>	<p>With our current network of which includes the Challenger loop around the north of the peaks, user interactions are already a significant problem. By limiting all single track riders to the legal trail, where the most mountain bikers and hikers are found, the new plan is nearly guaranteeing an increase in user conflict, and a decrease in Forest enjoyment for all users. What will the bicycle community and hiker community think when they see 100 or more motorcycles on Upper Moto during the height of the season?</p>	<p>The Challenger Trail was added to Alternative 4 for detailed consideration based on your comments and the comments of others. While it is true that the selection of Alternative 3 may result in crowding and a resulting single-track motorized trail system that results in little satisfaction to motorized users, this decision would not preclude additional trails planning to establish motorized trails that do not occur in sensitive wildlife or cultural resource habitat (such as the Challenger Trail and other</p>

Issue	Comment	Response
		existing single track trails). The Coconino National Forest has begun inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012.
Single track motorized trails	I was deeply disappointed that the CNF [Coconino National Forest]has refused to recognize the existing trail system around the San Francisco Peaks as a motorcycle trail. My family and I enjoy riding motorcycles and the trail system in Flagstaff provides a safe area for my family to enjoy a riding area that is free from quads, jeeps, and other off road vehicles that are not compatible with motorcycles. Forcing motorcycles to use jeep roads and trails is equivalent to closing hiking trails and telling hikers to go hike roads. The experience is not the same.	Based on your input and the input of others the Challenger Trail (Peaks Loop) was added to Alternative 4 to provide long-distance, looped single track motorized trail opportunity in forested vegetation. This trail was added to Alternative 4 for detailed analysis and consideration for decision.
Single track motorized trails	There is no evidence to support the statement that the Challenger Trail provides a "rare" opportunity for single track motorized use in a high-altitude, sub-alpine setting. Forest Service 2010:26.	We disagree. The Recreation Specialist Report revised for the FEIS inventories all of the other designated motorized recreation opportunities in northern and central Arizona, and from this information it is clear that the Challenger Trail does provide a rare opportunity for long-distance single track motorized use in a high-altitude, sub-alpine setting. It was for this very reason that the Challenger Trail was added to Alternative 4 for detailed analysis.
Single track motorized trails	Please keep all the old trails around the Peaks, Wing Mountain and the Airport open to motorized. These trails are very special. If they are closed you will be putting users of all categories together in the same 25 miles and conflicts will arise.	All three of these trails - Peaks Loop, Wing Mountain, and Airport were considered. The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and Airport trail were not considered for designation because these trails are located in sensitive species habitat or include other issues, such as the fact that the Airport Trail is partially located on non-Forest System managed lands.

Issue	Comment	Response
<p>Single track motorized trails</p>	<p>I have worked to establish and maintain trails with the Forest Service on a monthly basis, and was shocked to find that "Secret Trail" was one of the trails left off the map. A lot of "Sweat" was left on these trails.</p> <p>This kind of recreation [OHV] is what makes America great. So much more can be done.</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley motorized trail system, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.</p>
<p>Single track motorized trails</p>	<p>As noted in the DEIS, currently the Coconino National Forest (CNF) has over 124 miles of motorcycle single track (trail less than 3' wide) available to ride.</p> <p>This is some of the best riding in the state and is why when the TMR [Travel Management Rule] came out in 2005, concerned local motorcycle enthusiasts officially formed Coconino Trail Riders (CTR a 501c3 corp.) to try and protect this highly valued recreational opportunity. At the time, in 2005, there was only 1 mile of inventoried and classified motorcycle single track in the entire CNF, this was Schultz Creek trail (has since been closed due to Arizona trail).</p> <p>Since 2005 CTR, Flagstaff Bicycling Organization (FBO) and the Munds Park Trail Stewards (MPTS) have worked with the CNF to add 25 miles of "multiuse" trail that are now inventoried and classified. This 25 miles of trail is insufficient to replace the existing 100+ miles that has been in use for well over 30 years, especially in light of the increases in OHV users which was presented in the TMR as a major motivating factor for the TMR itself. This summarizes a major flaw with the DEIS which has totally neglected considering the additional 100+ miles of trail that currently exists and is legal to ride. These trails are indeed part of the "existing transportation system" as myself and</p>	<p>The Challenger Trail was added to Alternative 4 for detailed consideration based on your comments and the comments of others. While it is true that the selection of Alternative 3 may result in crowding and a resulting single-track motorized trail system that results in little satisfaction to motorized users, this decision would not preclude additional trails planning to establish motorized trails that do not occur in sensitive wildlife or cultural resource habitat (such as the Challenger Trail and other existing single track trails). The Coconino National Forest has began inventorying and working with motorized groups such as the Coconino Trail Riders to identify potential locations of motorized trails for future planning efforts in 2012.</p>

Issue	Comment	Response
	<p>many other CNF visitors currently frequent them. But the CNF failed to inventory or classify them. In fact, they are neglected completely and no evaluation was conducted whatsoever, NEPA or otherwise.</p>	
<p>Single track motorized trails</p>	<p>I would like to stress, that as a mountain biker, I see significant opportunity in the adoption of user created, or the creation of new, motorcycle routes. Properly built motorized single track increases opportunities for me, and my customers, to ride mountain bikes. As an example, the adoption of appropriate sections of the Hart Prairie, Hochdorfer Hills, Walker Lake Hills and White Horse Hills segments of the "Around the Peaks Loop" in the proposed alternative submitted by the Coconino Trail Riders would lead to trail maintenance and realignments of this trail which would make it an even better opportunity for a long mountain bike loop using the newly constructed Arizona Trail. Please recognize the dual benefit to the recreating public, that of non-motorized as well as motorized use, that motorized trails can provide.</p>	<p>Generally we agree with your points of dual benefits of motorized trails and of the possibility of adopting portions of user-created trails for designation. However, adopting portions of user-created trails cannot occur as is, since these trails include loops and thus additional route-finding and planning would be needed to plan and analyze a workable motorized trail system. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Single track motorized trails</p>	<p>Note that Secret Trail is not included as "Motorized Trail-Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007, Map 1 (http://www.fs.fed.us/r3/coconino/projects/tmr/tmr-graphics/pa-and-maps/pa-map-1.jpg). Many motorized forest user volunteer hours were spent rerouting this trail to meet environmental needs, it would be a shame if it was closed to use due to simple over sight.</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.</p>
<p>Single track motorized trails</p>	<p>I personally, together with other Coconino Trail Rider and dedicated Forest Service Trail Crew members, spent considerable time maintaining and Rerouting Secret Trail-an authorized motorized system trail. It is inexplicably missing from "Motorized Trail-Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007,</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track</p>

Issue	Comment	Response
	Map 1. Please fix.	motorized use in Alternative 3 and 4 based on comments such as yours.
Single track motorized trails	Please note that Secret Trail is not included as "Motorized Trail - Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007, Map 1 (http://www.fs.fed.us/r3/coconino/projects/tmr/tmr-graphics/pa-and-maps/pa-map-1.jpg). As we of the Coconino Trail Riders have done much of the work to construct this new trail, this is obviously unacceptable.	The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.
Single track motorized trails	Extremely important! Secret Trail, a single track route between the Schultz Pass area and the top of "Upper Moto" trail in the Fort Valley Trail System, was designated as a motorized route as part of the Fort Valley Ecosystem Restoration Project. It is not shown on any of the action-alternative maps issued with the DEIS. Please correct this significant omission!	The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.
Single track motorized trails	<p>Please note that Secret Trail is not included as "Motorized Trail - Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007, Map 1 (http://www.fs.fed.us/r3/coconino/projects/tmr/tmr-graphics/pa-and-maps/pa-map-1.jpg). As we of the Coconino Trail Riders have done much of the work to construct this new trail, this is obviously unacceptable.</p> <p>I regularly and responsibly participate in motorized use of our National Forests, particularly on the East side of Shultz Pass, an area that will now have no legal trail, and already has some of the worst user interaction. By closing the great majority of the currently legal trail, the new plan will disenfranchise many if not most of the current responsible motorcycle community. We</p>	The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.

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	<p>can be your ally or your enemy, and having now worked within the system for the last 5 years, and seeing not one positive change in the outcome of the plan, it is hard to consider myself an ally anymore.</p>	
<p>Single track motorized trails</p>	<p>Note that Secret Trail is not included as "Motorized Trail-Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007, Map 1: http://www.fs.fed.us/r3/coconino/projects/tmr/tmr-graphics/pa-and-maps/pa-map-1.jpg</p> <p>Also keep in mind that if this proposal became law, all of the motorized trail users in the CNF will be crowded into that single yellow line. First, that seems quite unsafe, and second, seems to be a poor excuse for "travel management".</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.</p>
<p>Single track motorized trails</p>	<p>Note that Secret Trail is not included as "Motorized Trail-Single-track" on the Coconino National Forest Travel Management Rule Proposed Action June 2007, Map 1 (http://www.fs.fed.us/r3/coconino/projects/tmr/tmr-graphics/pa-and-maps/pa-map-1.jpg).</p> <p>Please correct the mistake and include Secret Trail as to include Motorized Trail-single track. My father and I have used that trail for years and he just passed away. I would love to teach my son how to ride and take him to our Secret Trail. My friends and family work to keep these trails in good shape every year. We will continue to do so.</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments such as yours.</p>
<p>Single track motorized trails</p>	<p>A major flaw with the DEIS is the exclusion of what is commonly known as "Secret Trail" from the inventoried and classified 25 miles of trail that are proposed on the map. CTR [Coconino Trail Riders] provided substantial labor resources in agreement with the CNF [Coconino National Forest] that this trail would be classified as multiple use or motorized legal when it was completed. This trail is now complete and is even</p>	<p>The 'Secret Trail' was re-routed and included as part of the Fort Valley Motorized Trail System, and is located where the trail ties into the Schultz Pass trailhead. This Fort Valley Trails System was re-inventoried and modified from the proposed action and was changed in the DEIS. It is included for designation as single track motorized use in Alternative 3 and 4 based on comments</p>

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	<p>marked as motorcycle legal (Carsonite marker) at the trailheads. I hope that this is just an oversight by the CNF and this section of trail will be added to the DEIS final version.</p>	<p>such as yours.</p>
<p>Single track motorized trails</p>	<p>The 6051 road in Fort Valley is no longer there. A motorized single track trail established as a part of the FVERP [Fort Valley Ecosystem Restoration Project] is now in its place, and it is not shown on the maps. Please correct this.</p>	<p>Only a small portion of the 6051 is included in part of the Fort Valley Trail System; this trail was re-routed onto FR6050 and from FR6050 to FR516 to relocate access from the main highway180 corridor and establish a more sustainable trail.</p>
<p>Single track motorized trails</p>	<p>There is a bit of detail lacking from the alignment of the Ft. Valley Trail System in Alternatives 3 and 4 that should ultimately be corrected once all of the routes are completed and better GIS data is available. I submitted roughly accurate maps to Jim Beard that show a .gpx file of the actual trail alignments in Ft. Valley, but these must have not met required standards.</p>	<p>Based on your comments and others, the Fort Valley Trail System was GPS'd by Forest Service employees to collect precise data on the location of the existing trail system. Previous information in the DEIS included GIS-based estimates of the trail system. Recent GPS'd data collected shows that the trail system is actually 37 miles instead of 25 miles. This information is incorporated into the Final EIS.</p>
<p>Single track motorized trails</p>	<p>Concerns and opportunities recognized as a non-motorized user and steward of the Fort Valley Trail System:</p> <p>I have been heavily involved in the layout and construction of the trails that were established by the Fort Valley Ecosystem Restoration Project. I frequently ride on these trails on my mountain bike as well as my motorcycle. These trails are extremely important to my customers at Absolute Bikes who are avid mountain bikers. I have held a special event permit for a charity bicycle race on these trails and would like to continue to host a quality event on this system.</p>	<p>All of the trails included for motorized use in the Fort Valley Ecosystem Restoration Project were included as motorized trails in the FEIS. To address your comments the trail system was re-inventoried since the publication of the DEIS and mistakes made showing reduced mileage to the system were corrected in the FEIS.</p>
<p>Single track motorized trails</p>	<p>We [Center for Biological Diversity et al.] object to the single-track motorized trail south of the Kachina Peaks Wilderness and north of Flagstaff. Authorization of this trail contradicts the criteria for designating motorized trails under 36 CFR 212.55(b)</p>	<p>The trails you are referring to are called the Fort Valley Motorized Trail System. The Fort Valley Motorized Trail system is an established single-tack multi-use trail system that has been authorized for single-track motor</p>

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	<p>that states that such trails should minimize the harassment of wildlife and significant disruption of wildlife habitats. In this case most of the trail network intrudes on a Mexican spotted owl Protected Activity Center and two Northern goshawk Post Family Fledging Areas.</p>	<p>vehicle use for approximately a decade. This trail is located within two goshawk PFAs and one MSO PAC. Action alternatives address impacts of motorized use in these sensitive wildlife areas by not designating several miles of nearby road in these sensitive habitat areas including: 6275, X-04304, 6273, X-04086, 522, X-04922, 9251S, X-05415, X-05380, , X-05096, X-04741, and several other spur routes. Designation of this motorized trail in Alternative 3 and 4 does not establish new motorized use as this motorized trail has been in existence for many years.</p>
<p>Single track motorized trails</p>	<p>My name is Clint Brown. I live in Prescott, attended college at NAU [Northern Arizona University] in Flagstaff, and have recently reviewed the preliminary DEIS you have released for the CNF [Coconino National Forest]. I regularly take trips to Flagstaff, often times spending a weekend in the community with my family, and routinely spend significant money with local Flagstaff businesses during these camping trips to the CNF. I have regularly ridden the many miles of beautiful motorized single-track trail that surround the San Francisco Peaks. My family and I use off-highway vehicles (OHV) for access and recreation on National Forests and other public lands. OHV recreation is a legitimate use of National Forests and is highly valued by a significant percentage of the public. I am outraged that you have stubbornly refused to even consider more than 25 miles of motorized trails in your travel plan.</p>	<p>Based on your comments and the many comments of others the Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement.</p>
<p>Single track motorized trails</p>	<p>The current draft of the DEIS included only a small amount [of] the actual motorized single-track trail that is currently located in CNF [Coconino National Forest]. Most of the motorized trail users in the Flagstaff area use the Fort Valley system primarily as a connector of the "Round the Peaks" single-track and minimize their time spent on the Fort Valley section. The</p>	<p>Based on your comments and the many comments of others the Challenger Trail (Peaks Loop) was added to Alternative 4 for detailed consideration in the Final Environmental Impact Statement.</p>

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	<p>current draft of the DEIS will force the motorized use of the Fort Valley Trail system to increase and close the trails that myself and others find the most enjoyable.</p>	
<p>Single track motorized trails</p>	<p>I like to ride single track in the Coconino National Forest (my backyard). This includes the Peaks Loop, Wing Mountain Loop, Airport Loop as well as Frog Tank Loop in Munds Park. I am also a member on the Coconino Trail Riders.</p> <p>The proposed Travel Management Rule [TMR] you have been working on is severely flawed. The TMR leaves out a huge local population that uses existing trails and roads for recreation and livelihood. I understand this is more about money than what's good for the forest or the public. That is no excuse for not doing what's right. Do I think I should be able to ride my bike anywhere? No. However there is plenty of space in the Coconino National Forest for everyone. This includes hikers, mountain bikers, equestrian, and motorized vehicles. Your proposed 25 miles of legal motorized trails is a joke. These trails already exist and require only minor maintenance which the Forest Service is receiving from CTR [Coconino Trail Riders] for free. Why don't you see the potential of the existing trails we have here? Instead of closing everything lets use what's already there to create revenue for yourself and the local community. This town needs to embrace the motorized community just as it has with the mountain bike community. I understand this is not completely up to you or your problem, but I think it's relevant.</p>	<p>All three of these trails - Peaks Loop, Wing Mountain, and Airport were considered. The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and Airport trail were not considered for designation because these trails are located in sensitive species habitat or include other issues such as, the Airport Trail is partially located on non-Forest System managed lands. All of the motorized trails submitted by users were reviewed and those without direct conflicts were included in or both alternatives for additional analysis. Many of these user-submitted trails were included in the alternatives for designation (see Record of Decision for more detail).</p>
<p>Single track motorized trails</p>	<p>I am hopeful that the trails out by Wing Mountain will remain open and up on our Peaks.</p>	<p>The Peaks Loop (a.k.a. Challenger Trail) was added to Alternative 4 in the DEIS for detailed analysis and consideration. Wing Mountain and was not included for designation because the trails is located in sensitive species habitat .</p>
<p>Single track motorized</p>	<p>Closing so much of the current trails will have a very profound</p>	<p>Thanks for your input. It is important to understand that</p>

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trails	<p>effect on my family's ability to continue our recreation in the CNF [Coconino National Forest]. Outside of the 25 miles of trail to remain open, the rest of the motorized routes within the forest will be roads. Although I can make my children's OHV legal for use on roads, they will not be legal to operate them on roads until they are 16 years old and obtain a driver's license. I would hesitate to take them on the available 25 miles, as it will be very heavily used by many, many riders, and they are only novice riders. I acknowledge the fact that the Cinder Hills OHV area exists, and there are many miles of trails within this area in which to ride. However, the Cinder Hills area offers a unique type of terrain, and the trails through the forest also offer a unique type of terrain. Neither one is better or worse, but they are different recreational opportunities.</p>	<p>the large majority of routes designed for motorized use under both Alternative 3 and 4 are open to all vehicles, including ATVs and motorcycles. Additionally, based on your comments and those of many others, Alternative 4 was modified to include an additional 52 miles of single track motorized trail.</p>
Smasher Canyon/Horseshoe Trails	<p>Alternative 4: Smasher Canyon (see Forest Service 2010:45): We [Center for Biological Diversity, et al.] have concerns regarding the proposal to designate 3 miles of user-created trails in Smasher Canyon:</p> <p>Currently, there is an extensive network of unauthorized trails in Smasher and Horseshoe Canyons which purportedly serve as a "favored" "destination" for rock crawlers in Arizona. However, just 3 miles of this network will be designated as open to motorized uses. Is there any evidence/documentation that those recreationists seeking rock crawling experiences will be content with just 3 miles of motorized routes or that they will remain on these 3 miles of routes?</p>	<p>Well, it is hard to say. Rock crawling is a very technical oriented experience, that doesn't require very much mileage compared to enduro motorcycle riding or ATV use. There is no requirement to ensure that the designated motorized routes must be enough to satisfy all users. On the other hand, based on your comments it is highly unlikely that you are suggesting more miles of 4x4 trails be designated to provide rock crawlers with a very satisfying recreational experience. The preamble of the Travel Management Rule states that, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations." The Smasher Canyon and adjacent routes were included in Alternative 4 and the lower Smasher Canyon trail was included in Alternative 3 for detailed analysis to determine impacts to wildlife, soil, water, and cultural resources. This information was used to determine the appropriateness</p>

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		of these routes.
Smasher Canyon/Horseshoe Trails	<p>Alternative 4: Smasher Canyon (see Forest Service 2010:45): We [Center for Biological Diversity, et al.] have concerns regarding the proposal to designate 3 miles of user-created trails in Smasher Canyon:</p> <p>Is there any evidence or documentation that providing 3 miles of "rock crawling" trail would indeed provide a "unique motorized opportunity" for the area? If yes, please provide this evidence/documentation</p>	<p>There is no requirement to justify with evidence that each designated route or trail provides for a 'unique motorized opportunity'. The preamble of the Travel Management Rule states that, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations." The Smasher Canyon trail was included in Alternative 4 and the lower Smasher Canyon trail was included in Alternative 3 for detailed analysis to determine impacts to wildlife, soil, water, and cultural resources. This information was used to determine the appropriateness of the route.</p>
Smasher Canyon/Horseshoe Trails	<p>Alternative 4: Smasher Canyon (see Forest Service 2010:45): We [Center for Biological Diversity, et al.] have concerns regarding the proposal to designate 3 miles of user-created trails in Smasher Canyon:</p> <p>How was the statement "[[t]]he area does not appear to get regular pedestrian or equestrian traffic" and assumption that designation of this route would not create a conflict between motorized and non-motorized users arrived at?</p>	<p>The canyon represents a boulder-strewn canyon with no discernable trail. We received no comments other than from your letter and motorized users regarding the smasher canyon area. Professional judgement from the recreation managers for the Red Rock District indicate that there is very little or no use by hikers or equestrians in this canyon.</p>
Smasher Canyon/Horseshoe Trails	<p>Alternative 4: Smasher Canyon (see Forest Service 2010:45): We [Center for Biological Diversity, et al.] have concerns regarding the proposal to designate 3 miles of user-created trails in Smasher Canyon:</p> <p>What are the potential impacts from rock crawlers utilizing Smasher Canyon but not remaining on the designated routes?</p>	<p>Analysis of the alternatives in the FEIS does not dwell on speculation such as the possibility of motorized travel outside of designated routes. There will be some level of motorized use outside of designated routes regardless of the designated road and trail system. Yet even if this level of unauthorized use is very high, both alternatives 3 and 4 would still substantially reduce impacts from unmanaged off-road travel under the current rules.</p>

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Smasher Canyon/Horseshoe Trails	<p>Alternative 4: Smasher Canyon (see Forest Service 2010:45): We [Center for Biological Diversity, et al.] have concerns regarding the proposal to designate 3 miles of user-created trails in Smasher Canyon:</p> <p>What is the capacity of the CNF to manage this site given the statement that "[[m]]anagement of the site could become more complex and expensive" if it becomes popular? Has the Agency considered the management difficulties and environmental impacts that will accrue from increased use inherent in creating a "destination" spot?</p>	<p>It is not clear that designation of a 3-mile system of Forest Service road and trail would create a 'destination' as your letter even states, "... just 3 miles of this network will be designated as open to motorized uses. Is there any evidence/documentation that those recreationists seeking rock crawling experiences will be content with just 3 miles of motorized routes..." The quote in your comment is taken out-of-context. It is not likely that management of this site would become more complex or expensive based on the fact the designation of this route would reflect existing use.</p>
Smasher Canyon/Horseshoe Trails	<p>In regard to roads omitted from plans [Alternatives] 1, 3, and 4, Lower Smasher Canyon is included in plan [Alternative] 4, but Lower and Upper Smasher Canyon, along with Horseshoe Canyon, should be included in all of the plans [Alternatives]. Forest road 9235N (Off Highway 175) and FR 502C should also be included in the plan [Alternative]. The former runs off Highway 179 to an old ranch area bordered by Dry Beaver Creek. The area is very scenic and almost impossible to get to without that road (the same road that formerly was used by the rancher). The latter, which runs along Ike's Backbone, likewise provides great view of the Verde River plus leads to communication towers. Servicing these towers means a road is needed. We [Verde Valley 4 Wheelers] think mistakes have been made.</p>	<p>The Lower Smasher Canyon Trail was added to Alternatives 3 and 4, and fully surveyed along with the nearby Upper Smasher and Horseshoe Trails. The Upper Smasher and Horseshoe Trails were considered but not fully analyzed in an alternative due to areas with potential soil and watershed impacts that would need site-specific planning and mitigations. The Lower Smasher Canyon Trail was fully analyzed and considered likely to have minimal impact on soil and watershed resources. The 9235N road follows a streamcourse, by a spring, and through a population of invasive salt cedar. Considered, but not analyzed in detail because may cause accelerated sedimentation, propagation of invasive species, and into the Dry Beaver Creek Riparian Area. The 502C road (Ike's backbone) was considered, but not designated to reduce sedimentation into the nearby Verde River, to protect cultural resources, and to minimize the traffic on the 708/502 roads (which are now regularly closed on holiday weekends to address traffic jams).</p>
Smasher	We [Center for Biological Diversity et al.] do not find any	We agree that there are a substantial number of

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Canyon/Horseshoe Trails	documentation of the rarity of the type of ORV activity that is found on the unauthorized route in Smasher Canyon. Id. We do note, however, that unauthorized motorized trail creation seems to be quite prolific in the Coconino National Forest: Challenger Trail, Smasher Canyon, Pulliam Airport, Wing Mountain, Camp Verde, Cottonwood, Blue Ridge, and the Barbershop Trail. Photos of trails illegally used by single track riders or other unauthorized uses attached as Appendix E.	unauthorized motorized trails on the Forest. That is one of the very reasons for the Coconino National Forest Travel Management EIS. There is no requirement to justify with evidence that each designated route or trail provides for a 'unique motorized opportunity'. The preamble of the Travel Management Rule states that, "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations." The Lower Smasher Canyon Trail was included in Alternatives 3 and 4 for detailed analysis to determine impacts to wildlife, soil, water, and cultural resources. This information was used to determine the appropriateness of the route.
Smasher Canyon/Long Route	pp. 45-46 Trails Discussion: The analysis, though limited, of Smasher Canyon and Long Route demonstrate the minimal adverse impacts and recreational opportunity benefits of designating such motorized trails for continuing use. An effective collaborative relationship with the referenced user groups [Specialty Vehicle Institute of America, Motorcycle Industry Council, Blue Ribbon Coalition, and Coconino Trail Riders] (and others) should be a priority which has many benefits for the Forest in transitioning to effective recreation management on a designated road/trail/area system. Similar analyses could occur for other trails on the CNF [Coconino National Forest], but has been unjustifiably ignored in the current project.	None of the user-submitted trails were ignored. All trails were considered, some were considered in more detail than others. Trails such as Lower Smasher Canyon, the Long Route, and the Challenger Trail were considered in great detail by including them in Alternative 3 and/or 4 of the EIS.
Long Route	Our [Center for Biological diversity et al.] concerns regarding Long Route include the following: Long Route would require full consultation with the State	We agree, consideration of this route would require consultation with the State Historic Preservation Office and consultation with tribes and consideration of impacts on important sites such as Historic Landmarks. The

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	Historic Preservation Officer, Advisory Council on Historic Preservation, and the Hopi Tribe is routed through Winonoa Village National Historic Landmark. Forest Service 2010:59.	analysis for Alternative 4 includes this information (See Cultural Resource Specialist Report) and the decision shall take this information into account.
Long Route	<p>Our [Center for Biological diversity et al.] concerns regarding Long Route include the following:</p> <p>How was the assumption made that designating the Long Route would reduce use and maintenance needs for other routes? Are there data or statistics or studies to support this assumption?</p>	Designation of the long route would likely lead to a change in maintenance levels of some roads along the route allowing for many routes to be maintained for high-clearance vehicle use instead of passenger car use, which would lower maintenance requirements.
Long Route	<p>Our [Center for Biological diversity et al.] concerns regarding Long Route include the following:</p> <p>Do the funds exist to maintain this trail to standard if motorized uses increase in order to protect natural resources and ensure safe travel?</p>	Both action alternatives would substantially reduce the amount of routes open to motorized travel and would thus allow the Forest to maintain the designated road system at a much greater level than currently. So, in response to your question, the Forest would be able to maintain the Long Route to ensure safe travel and to minimize impacts to soil and water resources. Alternative 6 was an alternative designed to only designate those routes which the Forest Service could afford to maintain each year. This alternative is included in Alternatives Considered, but Eliminated from Detailed Study in the FEIS.
Long Route	<p>Our [Center for Biological diversity et al.] concerns regarding Long Route include the following:</p> <p>An increase in motorized use of the Long Trail is expected if it is designated and emphasized for recreational motorized activity. Forest Service 2010:46.</p>	Should the Long Route be designated it may experience a slight increase in motorized use, yet this in and of itself is not necessarily a problem. The Long Route was included in Alternative 4 so that this route could be analyzed in the context of the larger motorized system to identify and disclose the effects of motorized use on the designated system of roads, trails and areas.
Long Route	Alternative 4: Long Route: The DEIS fails to provide a clear justification for this route.	The motorized trail section of the Long Route are generally not for providing shortcuts, but for providing access in areas where mixed vehicle traffic could be a

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	<p>The motorized trail sections of the Long Route are proposed for the purpose of providing shortcuts to connect road sections of the proposed Long Route, which are outside the scope and purpose of the Proposed Action and not within the purview of the TMR [Travel Management Rule]. Forest Service 2010:46.</p>	<p>safety issue. The Travel Management Rule identified "provision of recreation opportunities" as one of the main criteria for the designation of roads, trails, and areas 36 CFR 212.55(a). Portions of the long route were designated as motorized trails to provide for a motorized recreation opportunity.</p>
<p>Long Route</p>	<p>Alternative 4: Long Route: The DEIS fails to provide a clear justification for this route.</p> <p>We [Center for Biological Diversity, et al.] believe the trail is unnecessary if based upon the expressed desire for "long-distance, high-clearance roads and motorized trails" because there are more than 2,768 miles of "high-clearance" roads in Alternative 3 and 2,294 miles in Alternative 4. Forest Service 2010: 11-12.</p>	<p>You are correct that there are over 2,500 miles of high-clearance vehicle roads considered under both alternatives, but these do not all connect to provide a <i>connected</i> route where motorized users could enjoy a motorized recreational experience. The purpose of analyzing the long route in Alternative 4 was to consider a connected series of routes that could provide for a multi-day recreation experience.</p>
<p>Cinder Hills OHV Area</p>	<p>Chapter 2. Alternatives, Including the Proposed Action, Actions Common to Alternatives 3 and 4 (page 10): We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that throughout the document, the DEIS use the same precision for acreages and/or road miles rather than rounding the number off in some cases and using a different number in other situations to describe the same area or length of road. This occurs with several commonly stated numbers in the DEIS. One example is the acres used to refer to the Cinder Hills OHV Area. In some cases the Cinder Hills OHV Area is shown as having 13,711 acres and in others it is 13,000. We realize that this is not a significant difference in acres, but for consistency's sake, using the same number throughout the document would be helpful.</p>	<p>The Final EIS will use fewer approximations of acreage and more precise information when discussing conclusions or elements of one or more alternatives.</p>
<p>Cinder Hills OHV Area</p>	<p>There are several routes to the north of the 6010 Road or "Dump Road" that connect to the Cinder Hills OHV area. At least one more of these routes, the route just across the 6010 road from</p>	<p>We understand that this is a popular access area to the OHV Cinder Hills Area for local residents, it is also a source of complaints from others who live in the same</p>

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	9126G, should be left open as this is a popular access route to the Cinder Hills OHV area for residents of Doney Park.	community since OHV riders that use this area have a habit of off-road driving before they get into the Cinder Hills boundary. Additionally, much of this area has recently been re-shaped into a series of berms to hold runoff diverted from the east side of the San Francisco Peaks, portions of which were severely burned in the 2010 Schultz Fire. For safety and health reasons, we want to avoid facilitating OHV recreational use in the Cinder Lakes area where the Forest has just worked with the City to construct berms, canals, and low-lying areas to facilitate the infiltration of flood waters.
Cinder Hills OHV Area	Alternative 4 includes the 9143T Road in the Cinder Hills OHV area whereas Alternative 3 inexplicably does not. It is this sort of random omission that seems to demonstrate a haphazard and careless attention to detail within this extremely important planning process.	9143T is mostly within the Cinder Hills OHV Area and thus would be accessible to motorized use within the boundaries. Portions of the route outside of the boundary were not included in Alternative 3, because it is redundant with 9123Q and 9144D, which provide connectivity. This route was considered in the DEIS in Alternative 4 based on user comments.
Cinder Hills OHV Area	My biggest concern is keeping the Cinder Hills OHV area open for use, regardless of what the Forest Service does with the rest of the forest. Access to this area is vital to the economies of both Flagstaff and the State of Arizona, and provides us with recreational possibilities that are the envy of off-roading enthusiasts across the country. Nowhere else in the United States can you find such a wonderful mix of challenging hill climbs, gorgeous views, and a wonderful place to set up large campsites with motor homes and trailers. Not to mention, it's right next to a national monument, serving as an example of the ability to protect the environment while providing a valuable recreational asset. If the Cinder Hills ORV area is ever closed, it will serve only as a reminder of how the government is bowing to radical environmentalism and the big money behind them,	There will be no changes to the Cinder Hills OHV Area in either Alternative 3 or 4.

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	<p>without any regard for the will of the people. My family and I have been camping at the Cinders for almost 30 years and look forward to many more. It is important to remember that this area was used in this way long before Flagstaff annexed it and it should stay open.</p>	
Cinder Hills OHV Area	<p>There is a what seems to be either a substantial mistake or a substantial change to the designated road system on the north end of the 776 road where it connects to the 545 Road in both Alternatives 3 and 4. Both of these maps show the heavily developed passenger car accessible 776 road being eliminated on its north end, and the connection from the 776 alignment to the paved 545 Road being directed on high clearance 4x4 cinder sand 777 Road and maybe the 244A Road. (My uncertainty regarding road numbers stems from the lack of detail on the maps.) This is either a significant mistake in need of correction or a terrible management concept. The money needed to obliterate and restore the 776 Road would be substantial. Please ground-truth and correct this. The 776 to 545 route is a popular route for dual-sport motorcycle rides and driving for pleasure as well as being an important connector for access to the Cinder Hills OHV area.</p>	<p>The north end of the 776 road where it connects to County Road 545 is not being considered for designation based on comments from the Sunset Crater National Monument that identified access from 776 as a major point of user conflict and as a way that many people are using to get into the National Monument without paying the entrance fee by going around the guard stations. Not designating the northern 1/2 mile of 776 would address the comments of the National Monument, reduce user conflict on the 545 road, and still provide ample access to the Cinder Hills OHV Area on maintained roads.</p>
Cinder Hills OHV Area	<p>Resource impacts are to be monitored only in the Cinder Hills OHV area. This is completely inappropriate as impacts from ORV uses must be monitored throughout the Coconino National Forest, especially if cross-country travel continues to be permitted throughout nearly the entire forest.</p>	<p>This is not correct. Page 48 of the DEIS states, "...it will be necessary to monitor the effects of motor vehicle use on designated roads and trails and in the Cinder Hills OHV Area." Thus, motorized use on roads, trails, and areas will be monitored to some extent. Cross-country travel is expected to be substantially reduced throughout the Forest under both Alternative 3 and Alternative 4.</p>
Closure/Quiet Areas	<p>Figure 10 (Distance in half-mile increments from Alternative 4 roads) [from the DEIS] also shows that there would be several larger areas created by the 1-mile restriction. Large areas such as these may create more misunderstanding and invite illegal</p>	<p>None of the alternatives included in the Travel Management EIS would change the existing quiet areas, such as the Pine Grove and Rattlesnake Quiet Areas. Creating additional quiet areas is outside the scope of the</p>

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	<p>activity rather than prevent it. If CNF [Coconino National Forest] decides to maintain the 1-mile restriction, the Department [Arizona Game and Fish Department] recommends establishing vehicle closure or quiet areas in the larger areas. CNF already has several of these areas such as Pine Grove and Rattlesnake Quiet Areas. This will promote proactive management, provide for the hunter that regularly seeks out roadless areas and make enforcement of unlawful cross-country travel enforceable. The Department recommends working collaboratively to determine and establish these additional quiet areas.</p>	<p>purpose and need for the travel management plan, which is to establish a designated system of roads, trails, and areas for motorized use to minimize impacts to forest resources. Areas specifically designated for the management of wildlife are being considered under the Forest Plan Revision process (e.g. wildlife habitat management areas), and impacts to these areas were analyzed in the Special Areas Report to inform the decision. Lastly, your request to establish several designated closure areas to motor vehicles is exactly what the Travel Management Rule is trying to change (the current condition is 'open unless closed' and the Rule changes this to 'closed unless designated open').</p>
<p>Closure/Quiet Areas</p>	<p>Our [Center for Biological Diversity et al.] recommended designations would permanently close the Pine grove, Rattlesnake, Woods (including Schnebly Rim), Anderson Mesa/Antelope, Cottonwood Basin and Nordic Ski Center seasonal closure areas (PA, p.12) to motorized recreation use. These closures were implemented to protect significant and sensitive wildlife and plant habitats, watershed, and archaeological resources. While seasonal closures benefit some wildlife during critical reproductive periods, these routes, and their use, as described in detail in our February 28th Travel Management Rule Preliminary Route Recommendations (attached as Appendix Z [ATT 33]), cause persistent, serious, and longterm impacts that should be permanently eliminated.</p> <p>According to the Forest Service, even temporary routes present most of the same risks posed by permanent routes, although some may be of shorter duration. Forest Service. 2000: 3-150,3-164, and 3-176 [See ATT 9 for citation]. The physical footprint and use of temporary routes may have the same long lasting and significant ecological effects as permanent routes, such as the</p>	<p>Both action alternatives in the travel management rule substantially restrict off-road motorized use and close thousands of miles of system and unauthorized roads and trails to minimize impacts to forest resources. The closure areas you mention include specific dates to minimize impacts to specific wildlife. The dates of these closure orders were transferred to the routes and the closures will be kept in place to prevent new or additional impacts. Closing these areas to all vehicle use year-round to eliminate all impacts from motor vehicle use does not meet the intent of the purpose and need as based on the Travel Management Rule. For example, the preamble of the rule states: "It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation</p>

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	<p>introduction of nonnative vegetation and degradation of stream channels. In the absence of compelling reasons to open these areas to non-essential uses, and protective measures that ensure that impacts to natural and cultural resources are minimized within acceptable levels, and will not cause considerable adverse impacts, it is prudent and responsible to close these areas for the entire year.</p>	<p>would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands."</p>
<p>Diablo Trust/Anderson Mesa/Jacks Canyon Area</p>	<p>In Chapter 3 Table 9 of all the activities you list hunting is less than 20. On our [Flying M Ranch] part of Anderson Mesa that number seems off. From the time school starts around Aug 20th till the 10th of December most of the recreational use is from hunters and some people cutting firewood. There are very few hikers and nature viewers just driving across the Mesa. We have some fishing traffic that goes to Kinnikinick Lake and family camping on the big weekends, Memorial Day, 4th of July and Labor Day but the bulk of our recreation is from the hunting public. If lots or resource damage is occurring during those "big" weekends perhaps more Forest Service Personnel should work weekends and spend time talking and interacting with the public. Rules and signs are only part of the story; person to person communication seems to go farther.</p>	<p>Thanks for your input regarding the hunting and fuelwood collection on the Coconino National Forest. The information used for Table 9 in the Draft Environmental Impact Statement comes from the National Visitor Use Monitoring study conducted on the Coconino National Forest in 2005. This study looked at Forest-wide use patterns and may not represent the types of uses occurring in the Anderson Mesa area. We agree that personal communication and education regarding the wise use of Forest resources is absolutely necessary. Education; however, cannot be the only tool in the toolbox. We plan to use not only education, but also route designation, engineering, and enforcement to better manage motorized use.</p>
<p>Diablo Trust/Anderson Mesa/Jacks Canyon Area</p>	<p>The Diablo Trust area reflects a complicated land ownership pattern where Federal, State and private lands are intermingled. Lands are not always delineated by ownership boundary fences. Recreationists are often rightfully confused and unaware of whose property they are visiting. If implemented, this will result in additional travel pressure on adjacent State and Private Lands. People who find the Rule too complicated and restrictive will move onto adjacent lands to recreate where the Rule does not apply. This will probably do to those lands just what is trying to be prevented on Federal lands, i.e. resource damage, increased conflicts among users, increased hazardous travel, and reduction</p>	<p>Due to the methods of implementing the Travel Management Rule, through the use of the Motor Vehicle Use Map we do not expect impacts to increase very much to private or State lands. The Motor Vehicle Use Map only shows routes and areas where motor vehicle use is allowed, so Forest visitors would only be directed to those routes and areas on Forest Service lands.</p>

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	<p>of the public enjoyment of these adjacent lands. For example, because camping is proposed to be eliminated everywhere on Melatone Mesa between the Forest Boundary on FR69 and Hay Lake, with the exception of Long Lake, camping will most likely move to private and State land north of the Forest boundary.</p>	
<p>Diablo Trust/Anderson Mesa/Jacks Canyon Area</p>	<p>By eliminating the large traditional established camping areas and increasing the number of individual camps closer to roads, the quality of the camping experience may be reduced. Although this may facilitate trash removal by a concessionaire, it may diffuse and increase the number of areas that are "trashed." Sanitation may become a significant issue. In addition, in some popular areas, one can envision numerous small camps along main roads, potentially creating a "barrier" for wildlife movement. The prescriptions offered in the PA [Preferred Alternative] come off more as a response to problems caused by the TMR [Travel Management Rule] than to the actual impacts of dispersed camping. The CNF [Coconino National Forest] within the Diablo Trust rural planning area is host to long periods of intense camping pressure. It is in the interest of all parties that TMR at least not exacerbate and intensify conflict and resource impact. A place where the quality of the camping experience will be compromised is along FR82. It is extremely dusty from being heavily used and infrequently maintained. In addition, the proposal eliminates all camping in the Red Hill area which is heavily used during elk season. Camping is proposed to be concentrated on the road on the north side of Quayle Field. That will not provide a quality experience, as the road is not maintained, nor is there any room off of the road for camping.</p>	<p>None of the alternatives are eliminating camping areas; rather the alternatives would restrict the use of motor vehicles to get to some dispersed camping locations. In some places we agree that this may concentrate use, but it is highly unlikely that it would concentrate dispersed campsites to such an extent as to establish a complete barrier to wildlife movement or increase the number of areas to be trashed. We do agree that concentration of motorized camping may occur in some areas. For example dispersed camping may increase concentration along some portions of FR 82, yet several miles of this route include designation of motorized dispersed camping corridors where Forest users can drive up to 300 feet from either side of the road to camp to get away from the dust of the road. In addition there are dozens of spur roads connecting to this route where visitors can choose to camp. We disagree that all motorized dispersed camping opportunities are eliminated in the Red Hill area as there are a number of spur roads designated for this exact reason, including 9718P, 9739K, 9734J, 9732L, 9710B, and 9738P. There are also several opportunities for camping north of Quayle Field along Jacks Canyon in designated dispersed camping corridors and spur roads X-20463, X-20544, and X-20528.</p>
<p>Diablo Trust/Anderson</p>	<p>The area of the National Forest that Flying M Ranch runs its</p>	<p>Thank you for your comments. We agree that</p>

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Mesa/Jacks Canyon Area	livestock on, primarily Anderson Mesa, does not have the density of roads that other parts of the Forest do. Mostly due to limited logging in past years, very rocky terrain, and distance to populated areas. We feel that the existing roads on our allotment that are very close to the right level and density with a few exceptions. Our comments on those specific roads are included as an attachment.	maintaining access for Forest management activities is important, and it is important to understand that administrative access may still occur in some circumstances where routes are not designated for motorized use. We will respond to your specific comments separately.
Diablo Trust/Anderson Mesa/Jacks Canyon Area	Additional recreation pressure on State and Private Lands: The current policies re: camping will put pressure on adjacent lands. This will do to those lands just what is trying to be prevented on Federal lands, i.e. resource damage, increased conflicts among users, increased hazardous travel, and reduction of the public enjoyment of these areas. For example: Because camping is proposed to be eliminated everywhere on Melatone Mesa between the Forest Boundary on FR69 and Hay Lake, with the exception of Long Lake, camping will most likely move to private and State land north of the Forest Boundary.	While in some areas, restrictions on motorized use may increase public use or pressure on adjacent private lands we expect this rule will result in an overall decrease in user conflict, a decrease in resource damage, and provide for a safe motorized system of routes and areas. The example you point to of Melatone Mesa is one of those areas where it is possible that 'pressure' from Forest visitors to camp may increase on adjacent private and state lands; however, this area is in a very isolated portion with access only via very rough roads. As a result this part of the Forest generally only gets camping 'pressure' during hunting season. Though there are no designated camping corridors in this part of the Forest in either action alternative there is a great amount of available area for motorized camping adjacent to the many miles of road in this area including 69F, 69B, 9723F, and 9729F.
East Clear Creek	Alternative 3 provides a reduction in road density in the East Clear Creek watershed from the current 4.1 mi/sq mi to 1.7 mi/sq mi While we [Center for Biodiversity et al.] commend this action, and believe it should result a significant reduction in adverse impacts to the watershed, native aquatic and other wildlife, and recreational experience of most forest visitors, we strongly believe additional route closures, stabilization and decommissioning is necessary. East Clear Creek's unique	The Coconino National Forest carefully reviewed the routes in the East Clear Creek area. Alternative 3 was further modified from the DEIS to the FEIS to not designate several routes in the East Clear Creek watershed (based on the previous East Clear Creek Watershed Health Decision) to protect watershed resources.

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	<p>abundance of free flowing streams and wetlands provide tremendous ecological benefits to wildlife. The area contains significant wildlife habitat for Little Colorado River spinedace and other native fish; the listed Chiricahua and northern leopard frogs, beaver, Mexican spotted owl, northern goshawk and other raptors, black bear, and strongly interactive species including mountain lion, Abert squirrel, and beaver.</p> <p>The East Clear Creek watershed, especially the canyons, contains significant remnant old growth mixed conifer and ponderosa forest. These values are significant, given that more than 200 years are required to develop old growth structure in southwestern ponderosa pine forests (Reynolds et al. 1992; 2006:308) [See ATT9 for citation]. Ecologists (Noss et al. 1995) [See ATT9 for citation] have determined that old growth ponderosa pine forests constitute one of America's most endangered ecosystems. They report that old-growth ponderosa pine has suffered an estimated 85-98% area loss due to destruction, conversion to other uses, and significant degradation in structure, function, and composition. Logging is one of the principal causes of this decline.</p>	
Flagstaff Area	<p>Please block access to the Observatory Mesa forest area at UTM coordinates 12S 438897mE 3897106mN (35deg 12.907' 111deg 40.280') due to the muddy road conditions. This is an access point for Friday and Saturday night high school keggers in the woods, parties, and mud bogging in the spring. I see it every year up there and it's getting worse as evident from the fire pits left smoldering with beer bottles and cans piled high. There could not be a better road to close to all public access than this one for the new FS road reduction plan. During the summer months this is the quick access for those who are living in the woods well beyond the legal limit and leave their trash and open toilet pits and paper scattered about. This morning (4/24/10) I</p>	<p>Thanks for your input and information about the Forest damage and truck you found. Many of the side and spur roads in the observatory mesa area have not been designated in one or more alternatives. For example, routes 9225V, 9003X, 515C, X-09128, 9224X, X-07883, X-90220, and all of the routes west of road 506 on the slopes of A-1 Mountain have not been designated in one or more alternatives. This will substantially decrease the road density in this area to allow vehicular travel on the main routes while limiting access to 'party spots' and other places where Forest damage has been</p>

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	<p>discovered a Toyota truck buried to the axles in the mud at approximately 35deg13.024'N 111deg40.891'W. I took pictures that I will be happy to share. The license plate is AZ 855EZX. The destruction this vehicle has caused both on and off the road is huge. I can only imagine how much more damage will occur when they go back today with multiple bigger trucks to extract it! I tried to phone it in but all offices are closed on Saturday. Please do something to prevent this careless destruction to our beautiful surrounding forest.</p>	<p>occurring.</p>
<p>Flagstaff Area</p>	<p>I currently live in Ponderosa Trails. My family and I go into the forest multiple times a week in our Rhino and Dirtbikes to enjoy the wildlife and peacefulness of the forest. I completely stand behind the Coconino Trail Riders organization and their support to keep the forest trail systems intact. Closing down any of the trails/roads that are currently in place would be a shame.</p>	<p>We understand you and your family get great satisfaction out of using OHVs on the Forest, yet unmanaged OHV use on the Forest results in impacts to sensitive wildlife, archeological and historic resources, soil and water quality. In addition, we get many complaints from private landowners and other recreation users about OHV use - particularly in the Ponderosa Trails area. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Flagstaff Area</p>	<p>We have been concerned about vehicular traffic through the green space to the north and east of the Pulliam airport. ATVs, cars and trucks not only destroy the forest trails, but destroy the habitat of the few remaining birds and rodents. We appreciate your efforts to support the peaceful quiet and ecosystem of the forest.</p>	<p>This includes portions of the Airport Trail system and unauthorized routes used by nearby residents (as discussed in the Recreation Specialist Report). Neither Alternative 3 or 4 include designated routes through this area to minimize user-conflict near private lands and to minimize impacts to scenery.</p>
<p>Flagstaff Area</p>	<p>Over the years, and in an accelerated capacity this spring, there has been destructive and unsafe activity from off-roaders in the USFS land both north and south of the airport. Meadows have</p>	<p>9113J is not designated and off-road motorized use would be restricted in both alternatives. This area also includes portions of the Airport Trail system and</p>

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	<p>been torn up with numerous and parallel tracks, Dumping has occurred, and target shooting has occurred within sight of both the runway and residential homes. I encourage the USFS to close off public access to USFS lands around the airport, including the access point at the future Lake Mary/Powell Blvd interchange, as well as along FR9113J. I would also suggest gating these roads for access only to emergency personnel.</p>	<p>unauthorized routes used by nearby residents (as discussed in the Recreation Specialist Report). Neither Alternative 3 or 4 include designated routes through this area to minimize user-conflict near private lands and dumping. Portions of this area have recently been gated by the City of Flagstaff.</p>
<p>Interstate 17 Corridor</p>	<p>Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Zones of dispersal These are areas that represent the best passage for large mammals between the east and west sides of the forest along I-17. This interstate highway has been identified as a major fracture zone for dispersal and migration. The Arizona Department of Transportation, working with the Arizona Game & Fish Department, Northern Arizona University and other cooperators are attempting to decrease animal highway fatalities by focusing on means to make under highway passages a more effective means for animal movement between the east and west sides of the forest. A key component of such a plan is the availability of desirable habitat on both sides of the passage. Thus reducing motorized vehicle densities in those areas will decrease wildlife harassment, particularly of bears and mountain lions as they use the wilderness and roadless area complex on both sides of the highway.</p>	<p>We agree and are glad to contribute to this effort of facilitating large mammal dispersal. There are many portions along I-17 where motorized use would be greatly decreased, thus facilitating the travel patterns of large mammals. For example, the area just south of I-40, most of the roads between Lake Mary Road and the Woody Mountain Road are not designated, supporting animal movement in this area. The upper reaches of Pumphouse Wash, where James Canyon crosses under the Interstate includes an area with dozens of miles of closed roads. Wildlife may also cross better in the area north of the Willard Springs rest area, which will also include fewer roads with motorized use that access drainages. Motorized use has also been minimized north of the State Highway 179 intersection, which provides access from the nearby rugged Bias Canyon. In all of these areas, routes would not be designated on either side of the Interstate, thus reducing barriers to animal movement in canyons and pass-throughs to the Interstate.</p>
<p>Mogollon Rim</p>	<p>[From ATT 34] Our [Center for Biological Diversity et al.] criteria for route closure and decommissioning are:</p> <p>Black bear core habitat: A large wide-ranging omnivore that has crucial den habitat along the Mogollon Rim and uses the forest</p>	<p>The purpose of the Coconino NF Travel Management Plan is to designate a system of routes and areas to manage motorized use. This does not include route decommissioning. Those routes not designated will not be available to public use without a permit. Wildlife</p>

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	<p>for dispersal. Bears avoid humans and generally need non-motorized habitat. Also a focal species recognized by conservation biologists.</p>	<p>habitat and potential impacts on wildlife from route designation was considered in the designation process.</p>
<p>Munds Park Area</p>	<p>I moved to Munds Park in 1991, I love the forest and go hunting when I get drawn. I am 88 years old have limited mobility (back and legs) and use a quad to get around to enjoy the forest. I ride with friends to Morman Lake, Sedona, and Mountainair for a refreshing ride and lunch. Other times we go riding for fresh air and have a picnic along the way to Morman Mountain which has many different trees.</p> <p>I am a very, very responsible user of the forest and realize the need for change as there are many who don't respect the forest as I have seen first hand.</p> <p>Please consider providing for cross-country travel for the specific purpose of cross-country, and properly tagged, elk and large deer for those of us that have medical issues. This permit would only be used to retrieve the animal and have no other purpose in use for cross-country travel.</p> <p>Arizona Game and Fish laws [Arizona Revised Statute 17-309A5] specify that you cannot knowingly permit an edible portion thereof to go to waste. You must pack out all edible portions of the animal. With this law and my physical condition it puts me in jeopardy of breaking this law.</p>	<p>The Coconino National Forest has proposed off-road vehicle travel for elk retrieval in all game management units in Alternative 4 and in game management units 7W and 8 in Alternative 3. The issue of game retrieval was closely considered and discussed thoroughly with other state and federal agencies and informed by public comment. The Record of Discussion includes designation of off-road vehicle use for elk retrieval in more than half of the Forest (see Record of Decision for full rationale). Those who may strongly prefer the ability to drive off road for game retrieval may choose to hunt in those units that are designated for this use.</p>
<p>Munds Park Area</p>	<p>I would like to see more of the vertical numbered roads around the Munds Park area included in the open road system plan.</p>	<p>A majority of the existing motorized routes in the Munds area are designated for motorized use in one or more alternatives. Generally, only those routes that are located in sensitive wildlife habitat or in areas that cause negative direct impacts to water quality and soil (drainages, steep slopes) were not designated in this</p>

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		area. We assure you that all alternatives included in the DEIS will still provide for the motorized access and experience you and your son enjoy.
Munds Park Area	I would like to see more roads added around Munds Park on both sides of I-17. Most of us are older (60). A lot of us have medical limitations as how we get around in the forest. Here is one particular road subject to closure that my friends and I use most often. Road 0949D. In going to Sedona, we use this route to the 226 to Schnebly Hill to Sedona.	There is no route 0949D; we think you are referring to the 09492D route, which connects from Munds Park to Forest Road 226. This route was not designated in any alternative because it goes through the middle of Threatened and Endangered Species habitat. Forest Road 228, however, can be access from Munds Park to connect to Forest Road 226 to provide the same connectivity to the Sedona area you are looking for.
Munds Park Area	I would say Alternative 4 is my choice. But I would also like to see more roads other than just the main roads in the Munds Park area.	Thanks for your input. The large majority of roads in the Munds Park area to be designated in all alternatives are level 2 roads, which are roads maintained for high clearance vehicles. These routes designated in one or more alternatives are designated for all vehicles.
Munds Park Area	In reviewing the Draft Environmental Impact Statement map that shows remaining roads and trails in the Munds Park and Mormon Lake area. I am surprised by [the] huge number of 4-digit roads that [are] proposed for closure. I feel that this proposal is wrong because on summer weekends and holidays the traffic would be nightmare. Opening some more of the 4-digit vertical roads would help to disburse the ATV traffic off the main roads.	A majority of the existing motorized routes in the Munds and Mormon Lake areas are designated for motorized use in one or more alternatives. Generally, only those routes that are located in sensitive wildlife habitat or in areas that cause negative direct impacts to water quality and soil (drainages, steep slopes) were not designated in this area. Since a majority of roads are designated for motorized use in each alternative, and those routes that are designated generally include those routes with the majority of traffic, increased traffic from holidays and weekends on a smaller designated route system is not expected to be an issue.
Munds Park Area	I've been a Munds Park summer and fall resident since 1980 and am an enthusiastic ATV trail rider. The current Draft Environmental Impact Statement that proposes closure of many	There is a large body of scientific research showing that motorized use can have negative impacts on wildlife, watershed, soil, and other Forest resources including the

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	<p>miles of forest roads near Munds Park seems to me to be uncalled for and unworkable. This is because new closure rules would probably be ignored, and because there's no proven relationship between road use and damage to the forest. It is my observation that damage usually results from careless campers. The forest is the public's asset, and all of those ATV drivers I know would do nothing to damage it.</p>	<p>experiences of other recreational users (see DEIS/FEIS for more specific information). The Travel Management Rule is meant to continue ATV and other motorized use in the Forest in a manner that allows for multiple uses while minimizing impacts to Forest resources.</p>
<p>Munds Park Area</p>	<p>We have had a home in Munds Park at 1370 Antelope Trail for over fifteen years. We enjoy the forest and all the things we can do out there and think that Alternative 4 would be the best for our needs.</p> <p>We hope you will vote for the interest of all in the community and think of our needs and wants too.</p>	<p>Thank you for your input.</p>
<p>Munds Park Area</p>	<p>I am for closing a lot of the existing old logging roads. However there should be more trails added in their place. I think there should be a single track loop tying in the Airport Loop with Frog Tank Loop down here in Munds Park and then over to Mormon Lake and then back up to Airport Loop, with maybe a trail or two that split the loop in half.</p>	<p>Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with members of the public such as yourself.</p>
<p>Munds Park Area</p>	<p>I am very upset about the proposed changes to the CNF [Coconino National Forest]. As an Arizona native that has hunted, hiked, camped, road dirt bikes, and picked up more trash in a day than most people will in a lifetime, I feel like I am losing something I love because of a few who abuse it. As a</p>	<p>A majority of the existing motorized routes in the Munds area are designated for motorized use in one or more alternatives. Generally, only those routes that are located in sensitive wildlife habitat or in areas that cause negative direct impacts to water quality and soil</p>

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	<p>property owner in Munds Park, Arizona, I have helped rescue and search for lost or stuck hunters. My family has spent our limited time and hard earned money enjoying this forest and would love to see another option than those that have been purposed, such as a user fee per forest per year to be applied to that forest only. Some of the funds should be used to promote reporting those who damage or abuse our lands.</p>	<p>(drainages, steep slopes) were not designated in this area. Though the Coconino National Forest charges user fees in some areas with developed facilities under the Forest Land and Recreation Enhancement Act, it is illegal for the Forest Service to charge fees for general access without additional legislation from Congress. We assure you that all alternatives included in the DEIS will still provide for the motorized access and experience you enjoy.</p>
Munds Park Area	<p>I ask you to consider adding more of the vertical 4 digit roads to the system around Munds Park. I don't go out on the weekends and holidays because of the high rate of traffic. I just go on the weekdays. I realize it would be much easier in policing the main roads as there is the element that has no regard as to the rules.</p>	<p>A majority of the existing motorized routes in the Munds area are designated for motorized use in one or more alternatives. Generally, only those routes that are located in sensitive wildlife habitat or in areas that cause negative direct impacts to water quality and soil (drainages, steep slopes) were not designated in this area.</p>
Munds Park Area	<p>I owned a cabin in Mund Park since 1971 and moved here permanently in 2000. I am retired, was a helicopter pilot in the Army with 3 purple hearts and was injured with bad knees and bad foot. I use the forest for pleasure, hunting and wood gathering. I have over the years reported violations to John Nelson and picked up trash and put out unmanned camp fires and reported lighting strike fires. I have seen the change over the years and see the need for a change and enforcement. Most all full-time residents of Munds Park have a great respect of the Coconino Forest. Many that don't live in this area and come up from other areas don't have the respect as the full-time residents. I feel the proposed closures are penalizing us responsible users of the national forest.</p>	<p>The Travel Management planning process only affects motorized use of the Forest. The Travel Management plan is not intended to penalize any user on the Forest, but to establish a designated system of routes and areas to continue motorized use throughout the Forest while protecting and minimizing impacts to wildlife, watershed, archaeological, and recreational resources for current and future generations.</p>
Munds Park Area	<p>I think you have gone too far in your choice of roads as most of the roads left open are main roads. In the summer with all the traffic from Phoenix looking for camping and riding coupled</p>	<p>The large majority of roads in all alternatives are level 2 roads, which are maintained for high clearance vehicles. These roads are designated for all vehicles in</p>

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	<p>with the large numbers of ATV in Munds Park with over 3000 homes not counting the part south of I-17. This looks to me to be the making of a nightmare on weekends and holidays.</p>	<p>Alternatives 3 and 4. Though the designation of a system of routes and areas is expected to limit motorized use on the Forest, it is not expected to reduce access to such an extent as to cause hazardous conditions.</p>
<p>Munds Park Area</p>	<p>I am 67 years old, born and live in Arizona all my life. Over the 47 years I have used the Coconino [National] Forest as a hiker, camper, hunter, fisherman and riding. I retired 8 years ago and moved to Munds Park full time after having a summer place in Kachina Village for 20 years because I love this area of the forest. I have a 42 year old son that is brain damaged and we use a Polaris Ranger to take him with us as we ride at time, one of his few enjoyments.</p> <p>My family enjoys the opportunity to see all the beautiful places that Coconino [National] Forest has all the recreation opportunities that offers, including the use of ATVs. We operate them in a safe and environmentally conscious manner. Family time is often spent riding quads exploring dirt road gathering firewood, taking pictures of landscapes and wildlife, exercising our 2 Irish setter dogs and enjoying the fresh air.</p>	<p>A majority of the existing motorized routes in the Munds area are designated for motorized use in one or more alternatives. Generally, only those routes that are located in sensitive wildlife habitat or in areas that cause negative direct impacts to water quality and soil (drainages, steep slopes) were not designated in this area. We assure you that all alternatives included in the DEIS will still provide for the motorized access and experience you and your son enjoy.</p>
<p>Munds Park Area</p>	<p>I am for closing a lot of the existing old logging roads. However there should be more trails added in their place. I think there should be a single track loop tying in the Airport Loop with Frog Tank Loop down here in Munds Park and then over to Mormon Lake and then back up to Airport Loop, with maybe a trail or two that split the loop in half.</p>	<p>Considering there are approximately 7,484 routes that were reviewed and analyzed under this EIS, it was simply not feasible to additionally plan for the establishment of a new motorized trail system with the requisite level of analysis and public involvement needed to satisfy the National Environmental Policy Act. The Travel Management EIS will help establish a system of routes and areas for motorized use that minimizes impacts to important forest resources such as wildlife, cultural resources, soil and water quality. We see this as the foundation of a motorized system, which we will continue to improve through working with</p>

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		members of the public such as yourself.
Munds Park Area	<p>I am writing to express my comments about the Draft Environmental Impact Statement (DEIS) for Travel Management on the Coconino National Forest, especially as the DEIS applies to proposed road and trail closures to motorized vehicles in the Coconino National Forest. I have owned a summer cabin in Munds Park, AZ since 1985. For many years I enjoyed the roads and trails in the forest by bicycling and hiking. About three years ago I switched to an ATV, and continue to enjoy the forest throughout the summer months.</p> <p>In reviewing the DEIS maps that show the existing and remaining roads and trails in the area accessible from Munds Park, I am struck by the huge number of miles that are proposed for closure. On the maps for the Munds Park area it appears that a large percentage of the roads, especially 4 digit and unnumbered roads and trails, would be closed. In my opinion, that proposal is a disaster. The large number of ATV owners in the Munds Park area, coupled with the high percentage of road closures would create a traffic nightmare on the few remaining open roads, especially on summer weekends and other high use periods.</p> <p>I understand and agree with the need to eliminate cross-country, or off-road/trail travel. There is no reason that a motorized vehicle should be using anything other than established roads and trails in the forest. However, closing the vast majority of the miles of roads and trails accessible from Munds Park goes way beyond controlling cross-country travel. There are a large number of existing roads that serve a purpose that are proposed for closure.</p> <p>Here is my proposal:</p>	<p>Thanks for your input. The large majority of roads in the Munds Park area to be designated in all alternatives are level 2 roads, which are roads maintained for high clearance vehicles. The Alternatives designate those roads with the highest use (most connectivity) in the Munds Park area, and therefore we find it unlikely that the designation of roads will increase traffic to unmanageable levels. These roads are designated for motorized use by all vehicles in the proposed action. Your proposal includes many of the same factors considered in the designation of routes in Alternative 3 or 4. Generally those routes that led to a destination and provided connectivity to other routes were designated. Those routes that dead-ended without a destination or were parallel to another route were not designated. In addition to these factors, the Coconino National Forest also considered other important issues when deciding whether or not to designate a route, including: whether the route is in sensitive habitat, whether the route is located in an or alongside an archeological site, whether the route is located in areas resulting in water quality and erosion impacts, or whether a route results in conflict with private landowners or is needed for private land access.</p>

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	<ul style="list-style-type: none"> - If a road/trail exists and has a destination, leave it open. - If a road/trail exists and connects two or more other roads, leave it open. - If a road/trail exists and is a dead-end, with no apparent destination, close it. - If a road closely parallels another road going to the same place, close it. 	
Munds Park Area	<p>I am writing to express my comments about the Draft Environmental Impact Statement (DEIS) for Travel Management on the Coconino National Forest, especially as the DEIS applies to proposed road and trail closures to motorized vehicles in the Coconino National Forest. I have owned a summer cabin in Munds Park, AZ for many years. For many years I enjoyed the roads and trails in the forest by bicycling and hiking. A few years ago, I switched to an ATV, and continue to enjoy the forest throughout the three seasons it's open.</p> <p>I'm concerned that limiting the roads available to ATVs will create excessive traffic, noise, dust and erosion of the remaining trails.</p>	<p>Thanks for writing with your concerns. Both Alternatives 3 and 4 include the 9.3 mile Munds Park Trail system and dozens of miles of roads designated as 'all vehicles' which would allow for ATV use. Restricting motorized traffic to a system of designated roads, trails, and areas may slightly concentrate use; however, it is highly unlikely to result in excessive traffic, noise, or dust considering most high-clearance roads currently receive very low-levels of traffic.</p>
San Francisco Mountains	<p>There are numerous roads, currently "numbered" and open, between The Waterline Road and Highway 89 that have been eliminated by both Alternatives 3 and 4. While some of these may be redundant, several are useful for exploring and riding. Please reconsider eliminating such a high number of these roads.</p>	<p>There are a large number of roads in this area that have not been designated to avoid impacts to sensitive and Threatened bird habitat, to remove routes on steep slopes, and to minimize user conflict from motor vehicle use noise and trespass into the adjacent private lands. Given the massive impact of the 2010 Schultz Fire in this exact area and post-fire flooding and hazard tree danger, many of these roads are no longer drivable nor safe for motorized use.</p>
Sedona Area	<p>As an event organizer, I would like to see the forest plan expanded to welcome events to the Sedona area.</p>	<p>Outside of the scope.</p>

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Sedona Area	<p>The US Forest Service in the Sedona area has for years charged for use of the trails. They have the backing of multiple volunteer agencies to do their work for them. Volunteers do the rescue work for hikers in distress. Volunteers do the trail maintenance. Volunteers man the ranger station and the list goes on and on. They have chosen to use the monies available to them for a multimillion-dollar ranger station at the southern border of Sedona. In all the years we've hiked on the Sedona trails we have encountered Forest Service personnel once and that person made it clear that people were not welcome to hike the trails of Sedona and that the Forest Service was definitely trying to make it much more difficult to do so.</p>	<p>The Coconino National Forest depends heavily on the tremendous efforts of volunteers and hopes to continue to do so. The Coconino National Forest Travel Management planning effort only affects motorized use and will in no way change or close any existing hiking trails.</p>
Sedona Area	<p>Your proposal is misleading when it says 3,950 miles of roads will remain open, because if these are the roads shown in green on the map tiles, your numbers are wrong. There is even a proposal to close part of a county road - Oak Creek Valley Road. Is this a mistake or an example of bad road analysis? This makes me uncomfortable that other mistakes are on the plan.</p>	<p>The Forest Service isn't proposing to close part of the County Road, because the Forest Service does not have jurisdiction over this county road, which primarily leads to private lands.</p>
West Clear Creek	<p>The Forest considers West Clear Creek an important watershed because it contains stream habitat for federally listed and candidate fish species, Region 3 Sensitive Species and forest management indicator species (MIS) (Forest Service 2010:74). It is known that roads are the greatest contributors of sediment of all land management activities (Gibbons and Salo 1973, Meehan 1991 [[citations not provided]]. Sediment impacts on TES [Threatened, Endangered, or Sensitive] fish species on the CNF [Coconino National Forest] include filling of backwaters that provide larval and juvenile fish rearing habitat, smothering of invertebrates (including MIS) which provide the food base for many TES fish species, interference with fish reproduction by smothering and suffocation of eggs, and direct mortality (Forest Service 2010:74). While Alternative 3 significantly</p>	<p>Please refer to the response to specific routes you recommended for closure. We agree that West Clear Creek is an important watershed and designating a system of routes in either Alternative 3 or 4 will substantially decrease the extent of regular motorized use in the watershed.</p>

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	<p>reduces the road density of West Clear Creek vicinity from 2.7 to 1.4 mi/sq mi (Forest service 2010:78), we [Center for Biological Diversity et al.] strongly urge the closure, and in most cases decommissioning of the impacting, unnecessary routes we have recommended.</p>	
<p>Private Lands Access</p>	<p>This law firm represents local Flagstaff Doctor, Dr. Robert Dahl, whose company Peaks & Ponderosa, LLC owns approximately 60 acres located in Section 18, Township 23N, Range 6E. My client and his predecessors have historically accessed this private property over Forest Service property via an existing two track road off of Highway 180.</p> <p>While my client presently is able to physically access his property via the road referenced above, my client does not have recorded legal access to the private property. As such, Dr. Dahl has made application to the Forest Service to obtain recorded legal access over the alignment of the existing two track road referenced above.</p> <p>In reviewing the draft EIS, and specifically Figure 4 (Alternative 3) and Figure 5 (Alternative 4), we observed that the Draft EIS has proposed to legalize the route of the existing two track road as a permitted Forest Service road. We have attached a blown up version of the Figure 4 (Alternative 3) and Figure 5 (Alternative 4) EIS maps showing the road as well as the approximate boundaries of my clients private property.</p> <p>For the record, please be advised that Mr. Dahl strongly supports the Draft EIS as it relates to the roadway referenced above and his private property.</p>	<p>We're glad to hear Mr. Dahl supports this option. Where possible, road use permits or road easements can be used to provide legal access. Often due to the costs or time associated with these methods, designation of the road is a more viable option. Road 9131U was designated for this purpose.</p>
<p>Private Lands Access</p>	<p>I am the general partner of Little Horse Ranch, LLLP, which holds a grazing lease on the Casner Park and Kelly Seep</p>	<p>Thank you for your comments. The current 133A route was removed from designation in Alternative 3 in the</p>

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	<p>Allotments and holds several parcels of deeded land used in conjunction with our cattle operation. One of these deeded parcels encompasses Little Horse Park where our ranch headquarters is located.</p> <p>Currently, the 133A road is identified as a road to remain open in the TMR [Travel Management Rule] DEIS. The current route is located in a drainage that contains riparian vegetation and the entire length of the road is located almost entirely in a drainage bottom that cannot be adequately drained and maintained. I am proposing a change to the travel management designation for Forest Road 133A by proposing a relocation of the route. The proposed new road location is on a ridge top, will decrease the total amount of open roads (1 mile vs. 2.78 miles) and will improve the ability of the Forest Service to adequately maintain the 133A road, as well as remove a road from a drainage bottom. About half of the proposed new road location occurs on an existing road that was closed the last time the area was logged. In collaboration with the Forest Service, the proposed location of the new road has been established by 52 GPS stations and flagged.</p>	<p>FEIS based on your comments. An additional NEPA process is currently occurring to re-route the 133A road to a more sustainable location outside of the drainage and onto the ridge top as you suggest. This new route is expected to be included in one or more alternatives in the Final EIS based on your comments.</p>
Private Lands Access	<p>There is a need to allow for access to the Little Horse Property, so I am proposing that the short roads off of FS700 we currently use to access our ranch headquarters be included as open roads. In discussions with Pete Mourtson and Dick Fleishman, the access points are appropriate to access our house and ranching facilities without crossing the meadow. One of these existing roads is not shown in the TMR [Travel Management Rule] road inventory. For many years, it has provided access to our house on the SE portion of our private property and the other is a small portion of the existing 133A which provides access to our cattle operations at the NW corner of the property. A special use permit for maintenance requirements of these roads would take</p>	<p>Thank you for bringing these issues to our attention. Based on your comments, we have added designation of the existing route to the west side of your property for legal access. Access to the east side of your property for cattle may be included in your grazing permit. A special use permit for road maintenance can be established by working with District personnel, but is outside the scope of the Travel Management planning process, which primarily focuses on route designation for public motorized use.</p>

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	<p>the maintenance responsibilities of these roads out of Forest Service responsibility. Enclosed is a map showing these roads. The table summarizes the activities that would occur on each road.</p> <p>The District has provided me with the following information concerning the proposal. Road analysis (Southeast RAP [Road Analysis Process]) identifies FR 133A as level 2, open road and FR 9469W and 9469X as a level 1 closed roads. This decision would modify the RAP to change the 9469W and 9469W roads to decommissioned roads because the roads will lead off of a decommissioned roadbed and will no longer have a connecting route.</p>	
Private Lands Access	<p>(cont from cmt no. 3)</p> <p>The project lies within the Oak Creek watershed. All of the existing roads will remain in place until the new road 133A is constructed, so there will be minimal impacts to forest access during construction. The relocated road 133A does not provide access to any private land. I have been advised that the project is not within ¼ mile of any Mexican Spotted Owl (MSO) Protected Activity Center (PAC), but is in critical MSO habitat and that there is potential Leopard frog habitat in the existing pools adjacent to or in the current 133A road. The area is in a heavy ATV use area and may require a fence at the north and south ends of the current 133A road once it is obliterated to deter ATV use in the stream channel bottom.</p>	<p>The construction of the new 133A road was considered through site-specific analysis in an other project planning effort and is outside of the scope of this project.</p>
Private Lands Access	<p>I have proposed this option to the Peaks and Mormon Lake Ranger Districts and have had meetings on-site with Soil and Water Specialist Dick Fleishman, Forest Realty Specialist Pete Mourtson, Deputy District Ranger Mike Chaveas, and District Engineering Technician Mike Bathen. I have also recently met with District Ranger Mike Elson and feel that I have the</p>	<p>Based on your input, 9469W and 9469X are not designated on either Alternative 3 or 4. 9469W is located in a drainage and 9469X has no other destination than private land. Thanks for your help and involvement with this process.</p>

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	<p>District's support on this project. Please feel free to contact any of the above to discuss the project. The project occurs on the Mormon Lake Ranger District at T18N, R8E, Sections 7 and 18, and T18N, R7E, Section 12. In discussions with the district, they have added to the proposal the obliteration of FR 9469W because this road leads off of a segment of FR 133A that would be obliterated, as well as FR 9469X. These two roads are not scheduled to be maintained as open roads in the current Travel Management Rule Draft Environmental Impact Statement (TMR DEIS)-please see Appendix F of the TMR Draft EIS.</p>	
<p>Private Lands Access</p>	<p>I have reviewed the Draft Environmental Statement for Travel Management on the Coconino National Forest and want to again request and explain the need to eliminate FS Road 9002L across my deeded land.</p> <p>FS Road 9002L traverses my family's historical private property, much of which is still owned by our family, that was homesteaded at the end of the 1800s and "proved up" in 1904, before the United States National Forest Service was in existence. The original wagon road was used by my grandparents, Veronica and Peter Michelbach, and my parents, Ann and A.P. Michelbach to access the homestead ranch house, the corrals, potato fields and adjoining grazing property. Somewhere along the way, the Forest Service numbered the road. I have no idea why. The road that is titled "9002L" is not used to cross the property. There is a road agreement that is recorded in Coconino County by the now other property owners who use the reciprocal recorded road to access their property. The old wagon road was fenced for grazing many years ago and the property is gated at the reciprocal road, which is not, nor will be open for public use.</p> <p>I gave Michael Chaveas of the Coconino National Forest a copy</p>	<p>The portion of 9002L that is located across your land was removed from designation in both Alternatives 3 and 4. Our apologies for any inconvenience this has caused you.</p>

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	<p>of said reciprocal road agreement for his file in February 2008. In a letter to me dated April 23, 2009, Nora Rasure, Forest Supervisor, was encouraging and said that there will be an attempt to resolve my issue, that my letter was among the first to be received with such a request and assured me that my issue will be one of the first to be considered.</p> <p>Therefore, I am again making a formal request for the removal of FS 9002L on the Travel Management Plan that shows it as an open road across private deeded property.</p>	
Private Lands Access	Letter dated April 9, 2009, to USFS concerning Tobias/Flynn Access Proposal	Thank you for the support of the Travel Management planning process. Constructing or building new roads on the Forest for private property access is outside of the scope of this project. The purpose of this project is to designate a system of routes and areas for motorized use on the Forest, not new access areas of private property.
Private Lands Access	Please be advised that I own 10 (approx) acres along the Oak Creek River in Sedona, Arizona and my property is located in Section 24, Township 17 North, Range 5 East. My property is located along the Oak Creek River and is adjacent to Forest Service property to the east and south. To the north and east, my property is located adjacent to private property owned by developers "Tobias and Flynn" who do not have legal or physical access to their 27 acres of development property. It should be pointed out that Tobias and Flynn have made application to the Forest Service and have triggered NEPA proceedings in an effort to construct a large road bridge over Oak Creek on Forest Service lands to access their property for development purposes. For the reasons set forth in my letters dated 3/23/2007, 3/6/2008 to 4/6/09, I am personally very opposed to the construction of this bridge for access purposes.	Thank you for the support of the Travel Management planning process. Constructing or building new roads on the Forest for private property access is outside of the scope of this project. The purpose of this project is to designate a system of routes and areas for motorized use on the Forest, not new access areas of private property.

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	<p>In review of the draft EIS referenced above, I observed that the Forest Service is not proposing to legalize or establish any new roads or bridges on Forest Service property in the vicinity of my property referenced above. For the reasons set forth in my letters attached and provided a bridge crossing is not constructed over Oak Creek on Forest Service property in the vicinity of my private property, I am very supportive of the draft EIS and strongly encourage the Forest Service to adopt it.</p>	
Private Lands Access	<p>Road: 10D; Common Allotment Name: Little Springs; Description of Road Change Request: This isn't our [Bar T Bar Ranch] property, but the owner will need access (Highley Falkner).</p>	<p>Based on your comments a portion of this road was designated in Alternative 3 to provide legal access to private property.</p>
Specific Routes	<p>Road: 69; Common Allotment Name: Cow Trap; Description of Road Change Request: There is no other connection between Chavez Pass and Highway 87.</p>	<p>Most of FR 69 is designated in Alternatives 3 and 4. A small portion of 69 is not designated where the route is in Chavez Draw and crosses Jacks Canyon due to wildlife and watershed concerns. This does not limit the connectivity of the road system as each side of 69 connects to other routes.</p>
Specific Routes	<p>I recommend closing road 75, which is within a so-called 'quiet area.' Closing all the roads in this 'quiet area' would be wonderful. It is a major elk corridor, and during the hunting season is constantly abuzz with ATVs and other vehicles, the occupants of some of which are not very mindful of staying on the roads that do exist, even though there are Arizona laws outlawing such behavior, as 'hunting from a vehicle.' Not allowing any vehicles in this area would give the elk a break. It would also give hunters with a quieter and more law-abiding approach a break.</p>	<p>Route was not designated to allow for reduced motorized use in high use wildlife area. Should provide for non-motorized hunting opportunities.</p>
Specific Routes	<p>There will be potential for more hazardous travel for ATVs on the Open Routes, simply due to increased traffic. An option which could mitigate a degree of the potential ATV</p>	<p>By reducing the amount of routes open to motorized use on the Forest, it is expected that there may be a 'concentration effect' that results in some increase of use</p>

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	<p>concentration on open routes would be to provide specific areas for ATV travel, e.g. "a course." We would also encourage this concept for single track motorized bike use. For example, on the Bar T Bar Allotment, FR82 is one of the roads designated for camping. It is already heavily used by all types of vehicles and especially ATVs during holiday weekends and hunting season. By concentrating most of the camping on that road the ATV use will be much worse, to the point of being hazardous.</p>	<p>on designated routes. This 'concentration effect' is expected to slightly increase above current use because all of the main roads are being kept open to motorized use. There is no evidence on other Forests that have established a designated system, use increases to such an extent as to become unsafe. While it is true that FR82 may include designated camping corridors in the proposed action, the corridors were designed to capture use that is already existing. Thus, the designation of a camping corridor is not expected to introduce new motorized use into this area or other areas on the Forest.</p>
Specific Routes	<p>Hazardous travel for ATVs and others: There will be potential for hazardous travel on the Open Roads due to increased traffic during peak times. For example, FR 82 is already hazardous during peak holiday weekends and hunting season. By designating it a camping corridor, will only worsen the problem.</p>	<p>By reducing the amount of routes open to motorized use on the Forest, it is expected that there may be a 'concentration effect' that results in some increase of use on designated routes. This 'concentration effect' is expected to slightly increase above current use because all of the main roads are being kept open to motorized use. There is no evidence on other Forests that have established a designated system, use increases to such an extent as to become unsafe. While it is true that FR82 may include designated camping corridors in the proposed action, the corridors were designed to capture use that is already existing. Thus, the designation of a camping corridor is not expected to introduce new motorized use into this area or other areas on the Forest.</p>
Specific Routes	<p>Road maintenance: By concentrating more use on fewer roads, those roads will have to be maintained more frequently than is the current policy. Given today's USFS economic situation, this doesn't seem realistic. For example, FR 82 and 211, will need maintenance more often.</p>	<p>While 82 and 211 are heavily used routes and use may be concentrated on these routes, we expect that having a smaller designated system of routes, trails, and areas will allow the agency to conduct more frequent maintenance on those routes designated for public use, which receive the most use.</p>
Specific Routes	Road: 82 and 868; Common Allotment Name: Hay Lake Ranch	In response to your comment, to minimize user conflict,

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	Headquarters; Description of Road Change Request: A portion of the camping corridor on 82 is in our [Bar T Bar Ranch] horse pasture. They already camp (and shoot) near our houses and it would be our preference to not even have them camping there.	and to minimize impacts to other resources a portion of corridor was removed in a meadow where FR82 intersects with FR93D. Additionally, a portion of the corridor near private land (Bar T Bar) was removed to reduce potential user conflict.
Specific Routes	I have been hunting this area [FR 109 loop] for elk and have found that it is very important to have the ability to retrieve the downed animal with a vehicle. I am getting older and I cannot carry the heavy weight of a downed elk, but I can put it on an ATV to bring it out. I do not hunt from an ATV, but I do use it to retrieve the animals and I would very much want this privilege to continue.	Forest Road 109 is a main route, which receives heavy use by Forest users and hunters such as yourself. This route is designated in Alternative 3 and 4. Unfortunately, because much of the route goes through Threatened Species habitat, many of the connecting spur roads that result in additional motorized use in this habitat are not designated to provide for species protection. The 109 route and connecting routes that are designated would allow for ATV use on the route, but in off-road areas because of potential impacts to watershed and sensitive species.
Specific Routes	I have been using and caring for the Coconino National Forest for the last 50 years and there are certain areas that my extended family have hunted and camped in for this time that are outside of the designated camping areas included in the plans. I would like adjacent camping areas around Forest Road 109 to be extended to include all of FR 109 loop. We have used this area without damage for 50 years and I would like to continue this use with my grand kids and their families. It is a favorite spot and I would not like to argue with a forest ranger as to whether I can camp there.	Forest Road 109 is a main route, which receives heavy use by Forest users and campers such as yourself. This route is designated in Alternative 3 and 4. Unfortunately, because much of the route goes through Threatened Species habitat many of the connecting spur roads that result in additional motorized use in this habitat are not designated to provide for species protection.
Specific Routes	I am very concerned about the closures or restrictions being recommended in the Coconino National Forest especially Forest Road 109. My family has camped and hunted this road for over 25 years. We love this area due to its wilderness atmosphere, the mountains, and wildlife. I have a 10 year old daughter who is just getting to experience the beauty and joy of camping, and	Forest Road 109 was included for designation in Alternatives 3 and 4. A dispersed camping corridor was not included for designation on this route to authorize off-road driving for RV or car camping because the route partially goes through Threatened species habitat and this route is located in an area with a substantial diffuse

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	<p>she has fallen in love with the area along Forest Road 109. She loves hiking Pine Mountain and the Bargeman Creek area. It is a crime to shut this area off to camping and hunting.</p> <p>Forest Road 109 needs to remain open to camping. A camping zone should allow camping trailers and motorized vehicles up to 250 feet from the 109 road.</p> <p>My family is very conservation oriented and always follows the rules for forest travel and keeping our campsite in better condition than how we found it. The closures or restrictions of this area would be a major loss to my families enjoyment of the forest if dispersed camping along Forest Road 109 was discontinued.</p>	<p>knapweed (an invasive species) population. Not including a dispersed camping corridor, but including designation of the route would still allow motorized access and route connectivity while minimizing impacts to Threatened species and the spread of invasive species.</p>
<p>Specific Routes</p>	<p>Forest Road 109 (The entire 109 road) needs to be included in the disturbed camping zone to allow camping with motorized vehicles, (including camping trailers) up to 300 feet from the road.</p> <p>I have been hunting and camping in the same spot off Forest Road 109 for over 25 years with my family and hunting partners and it would be a major loss to my family and hunting partners if dispersed camping along this road was discontinued.</p>	<p>Forest Road 109 was included for designation in Alternatives 3 and 4. A dispersed camping corridor was not included for designation on this route to authorize off-road driving for RV or car camping because the route partially goes through Threatened species habitat and this route is located in an area with a substantial diffuse knapweed (an invasive species) population. Not including a dispersed camping corridor, but including designation of the route would still allow motorized access and route connectivity while minimizing impacts to Threatened species and the spread of invasive species.</p>
<p>Specific Routes</p>	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>122C (West of 122 Junction)-Close and decommission.</p> <p>Severe Erosion hazard; Mexican spotted owl PAC [Protected Activity Center] and nest (TAP: 17). Road to nowhere.</p>	<p>A portion of 122C goes through an MSO PAC and this route is not designated in either alternative. The eastern portion of 122C is designated in Alternatives 3 and 4 because it is a heavily used route for recreation and access through the area. Thr route is not a severe erosion hazard and is not located on steep slopes.</p>

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Specific Routes	We [Flying M Ranch] are concerned that FR 125, FR 126 and the portion of FR 82 to Kinnikinick Lake, stay in the maintenance plan of the Forest. These roads are heavily traveled and are the only roads open to passenger cars across Anderson Mesa from Flagstaff to the FR 69. These roads are also the "farm to market" roads available to our business. We use these roads to haul livestock, ranch equipment, feed and water in dry years with large trucks. They also are the only roads in good enough shape for passenger cars, camp trailers, boats etc. and therefore need to be maintained at a minimum twice a year, with occasional rebuilding, and materials added. If more traffic is moved on to less roads and the roads deteriorate more, "driving next to the road" troubles will show up.	The Travel Management planning process is expected to help focus sparse maintenance funding by establishing a designated system of motorized roads and trails. Forest roads 125, 126, and portions of 82 near these other routes are designated in both Alternatives 3 and 4.
Specific Routes	We [National Park Service] would like to request one refinement of the road system in the final EIS. Along the southern boundary of Walnut Canyon National Monument, we would like to cooperate with the CNF [Coconino National Forest] to shorten FR-128 by approximately ½ mile south of the monument boundary to the junction with FR-9489P. We had proposed this a few years ago with the CNF Peak Ranger District's staff, and had begun planning but have not yet implemented the proposal. This would eliminate this dead end route at the Monument boundary. Additionally, a long wheelbase turn-around would need to be constructed at the junction of FRs 128 and 9489P because trucks with gooseneck trailers frequently turn around at this location.	Route 128 was fully designated in Alternatives 3 and 4 because the route provides key access from Lake Mary Road to I-40. The route is also regularly used for dispersed camping and other recreational use. Additionally, as you point out in your comment, non-designation of a portion of the road would require additional site-specific earth-clearing and/or construction, which is not included in the scope of this project. Lastly route 9489P is designated as well because it provides additional dispersed recreation opportunities, especially for camping along the rim of Walnut Canyon in one of the few areas that does not contain sensitive wildlife habitat, which was requested in public comments.
Specific Routes	We [Center for Biodiversity et al.] also specifically object to the motorization of the Broken Arrow Trail #125, which is a "hiking, bicycle, and equestrian" trail. See: http://www.fs.fed.us/r3/coconino/recreation/redrock/brokenarrow-tr.shtml .	The Broken Arrow Trail (#125) would not be motorized. Nearby routes 179F, X-40002, and X-40003 would be designated for motorized use. These routes are currently permitted for outfitter guide purposes and thus current non-permitted 4x4 use is not expected to result in

Issue	Comment	Response
		<p>additional user conflict. This route has very high recreational value for 4x4 driving and is situated on the landscape to minimize user conflict with adjacent Broken Arrow Trail #125.</p>
<p>Specific Routes</p>	<p>Many of the user-created routes (not trails) are simply "short cuts" between existing authorized roads. As stated before, these routes may have caused "considerable," but woefully unmitigated, "adverse impacts," and do not adhere to any safety, design, or engineering standards (Executive Order 11644, [section] 9, as amended). See Footnote 23.</p> <p>Providing additional routes that are "short cuts" is not an acceptable rationale under 36 CFR 212.5(b) nor the Draft FSH 7709.55, Ch. 20.02: March 9, 2007 as explained in the Proposed Action (Forest Service 2007). They do not provide the minimum necessary road system. Rather, they reward off-road vehicles users who have wantonly created them without consideration to the impacts they cause.</p> <p>Specifically, we object to the motorization of the "Broken Arrow Trail #125, which is a "hiking, bicycle, and equestrian" trail, (i.e. FS 179) and the user-created routes stemming from it (http://www.fs.fed.us/r3/coconino/recreation/red_rock/broken-arrow-tr.shtml.)</p> <p>Simply stated, we [Center for Biological Diversity et al.] oppose the authorization of any user-created routes and the creation of motorized trails outside of existing routes. The one-mile per square mile road density standard should include all routes open to motorized use.</p>	<p>The Broken Arrow Trail (#125) would not be motorized. Nearby routes 179F, X-40002, and X-40003 would be designated for motorized use. These routes are currently permitted for outfitter guide purposes and thus current non-permitted 4x4 use is not expected to result in additional user conflict. This route has very high recreational value for 4x4 driving and is situated on the landscape to minimize user conflict with adjacent Broken Arrow Trail #125.</p>
<p>Specific Routes</p>	<p>East Clear Creek Road Closure Recommendation and Risk: 137C-Close and decommission east of Buck Springs Cabin</p>	<p>This route is not designated in Alternative 3 to reflect previous closure and provide watershed protection.</p>

Issue	Comment	Response
	<p>administrative site.</p> <p>The route presents a severe erosion risk (TAP:28). Crosses Buck Springs Canyon creek with steep climb up to 161.</p>	
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>139C-Close and decommission.</p> <p>Risks include severe erosion hazards on nearly 45% of the route and impacts to Mexican spotted owl PAC [Protected Activity Center] (TAP:3). Unnecessary route that contributes to sediment directly into Barbershop Canyon creek.</p>	<p>Route is designated in both Alternatives 3 and 4. Route is outside of sensitive habitat and provides recreation opportunities. Route is on ridgetop on flat terrain and contributes minimal sediment to Barbershop Canyon. All connecting routes including 9735P, 9738V, 9733J, and 9733S are not designated.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>139G-close and decommission north of the 719 junction.</p> <p>Risk to Mexican spotted owl PAC [Protected Activity Center].</p>	<p>Route is designated in Alternatives 3 and 4. Route is well outside of MSO PACs and other sensitive habitat. Provides connectivity between 139 and 95, doesn't appear to connect to 719. Route is important for dispersed camping, hunting, and general access.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>142A-Close and decommission.</p> <p>Severe erosion hazard; Mexican Spotted owl nest and PAC [Protected Activity Center]; mule deer habitat and other resource concerns (TAP:32). Road to nowhere.</p>	<p>This route is not located in Mexican spotted owl Protected Activity Centers or near a nest core. It is located on a ridgetop and therefore not a severe erosion hazard. This route is designated in both alternatives 3 and 4 because it provides access to the mesa above West Clear Creek Wilderness where there are several dispersed camping sites.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>142C-Close and decommission.</p> <p>Mexican spotted owl nest and PAC [Protected Activity Center]; Mule deer habitat (TAP:33). Road to nowhere.</p>	<p>This route was designated in both Alternatives 3 and 4 because the route is located on a ridge top and generally outside of sensitive habitat. This route was specifically requested for designation by Arizona Department of Game and Fish because of the heavy use by dispersed campers and hunters in recent years.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p>	<p>This route is fully designated in Alternative 4 and the</p>

Issue	Comment	Response
	<p>142D-Close and decommission.</p> <p>Mexican spotted owl nest and PAC [Protected Activity Center] (TAP:33). Road to nowhere.</p>	<p>north 0.6 miles of this route is not designated in Alternative 3 to avoid MSO PAC. Route provides access to dispersed camp sites on the mesa overlooking West Clear Creek Wilderness.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>142E-Close and decommission.</p> <p>Mexican spotted owl nest (TAP:33). Road to nowhere.</p>	<p>This route is designated in Alternative 3 and 4. The route is located wholly on a mesa overlooking West Clear Creek Wilderness, and as such does not impact MSO habitat, which is located in the canyon. Route includes several dispersed camping sites along the route and at the end of the route.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>142F-Close and decommission.</p> <p>Severe erosion hazard; noxious weeds; Mexican spotted owl nest and PAC [Protected Activity Center] (TAP:33). Road to nowhere.</p>	<p>The northern 1.25 miles of this road was not designated in Alternative 3 to prevent avoid MSO PACs and prevent motorized encroachment in wilderness. Alternative 4 designates an additional portion of this route up to the edge of the mesa overlooking West Clear Creek Wilderness. Designated portion of route is on ridgetop and not a severe erosion hazard. Route provides dispersed camping and recreation opportunities.</p>
Specific Routes	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>142J-Close and decommission.</p> <p>Severe erosion hazard (TAP:33). Road to nowhere.</p>	<p>Route designated in both Alternative 3 and 4 because it provides recreation opportunity outside of sensitive wildlife habitat. Route is located on gently sloping terrain outside of drainages and is not an erosion hazard.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>145A-Admin access only to private land in section 35 and McClintock Springs restoration area.</p> <p>Decommission north of McClintock Springs junction.</p> <p>Road presents a noxious weed and severe erosion risk (TAP:33).</p>	<p>Both Alternative 3 and 4 include designation of the remainder of FR145A. Designated to provide opportunities for dispersed camping and hunting on road outside of sensitive watershed areas. A portion of the route does run parallel to 145, but designated to provide for recreational use capacity in a heavily used area. Route is on ridge top on flat terrain and does not present</p>

Issue	Comment	Response
		a severe erosion hazard. Route provides access to ridge above Dane Canyon, making it desirable location for dispersed camping and hunting access. No known invasive species populations exist within the route corridor or immediately surrounding area.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>145-Admin access only. Decommission north of McClintock Springs junction.</p> <p>Risk to Mexican spotted owl nest and northern goshawk nest and PFA [Post Family Fledgling Area]. Redundant to FS 145A and contributes of sediment load in Barbershop Canyon Creek (TAP:33). Disruption to wildlife movement between Barbershop and Dane Canyons and impedes wildlife access to water at McClintock Springs. McClintock Ridge is readily accessible by horseback or hiking less than one mile along FS trails 91 or 28.</p>	The portion of route within MSO PAC is not designated in either alternative. Both Alternatives 3 and 4 include designation of the remainder of FR145 to provide opportunities for dispersed camping and hunting on the road outside of sensitive watershed areas. A portion of the route does run parallel to 145A, but is designated to provide for recreational use capacity in a heavily used area. Comments from Arizona Game and Fish do not indicate designation of routes will disrupt wildlife movement in this area, especially because all of the routes existing in the canyons have not been designated. Routes at McClintock Spring including 9616A and 9709G were not designated to reduce potential conflicts with wildlife access to water.
Specific Routes	The Federal Government now has public monies designated for "Shovels on the Ground" projects. In Arizona, many (particularly local Sedona firms) road construction companies are idle. It would be an absolutely win/win to use these companies to grade and renew [FR 152 and Schnebley Hill Road].	Both 152 and Schnebley Hill road are designated open in both action alternatives. This planning effort focuses on route designation (what routes are to be designated for motorized use by the public). Road maintenance and improvements are a goal of the Coconino National Forest and a key part of managing the road system, but are outside the scope of this analysis.
Specific Routes	The Sedona Forest Service has for years been "user unfriendly" and has deliberately let FR 152 and Schnebley Hill Road deteriorate to the point where even with a high clearance vehicle, travel is difficult and the many trails off these roads virtually inaccessible.	The Schnebley Hill Road [152] is managed as a high-clearance vehicle road and is not designed nor managed for passenger vehicles. The Forest does maintain this road for safe conditions and to minimize sediment runoff. The Travel Management planning process is expected to help focus sparse maintenance funding by

Issue	Comment	Response
	<p>The remaining trails that are accessible are now so over-used that they are being ruined. This is extremely poor environmental planning.</p> <p>We urge you to maintain the forest roads in Coconino County. We hold the Forest Service in great contempt.</p>	<p>establishing a designated system of motorized roads and trails.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>I 53A-Close and decommission.</p> <p>Severe erosion hazard (TAP:37).</p>	<p>This route is a very popular driving, camping, and recreation route along Schnebly Hill with nearby access from I-17. A portion of the route includes a winter seasonal closure from 12/15 - 4/1, part of the Woods Seasonal Closure for wildlife. The route is maintained as a high clearance vehicle route on fairly level terrain.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>I 53-Stabilize severe erosion sections.</p> <p>Severe erosion hazard; northern goshawk PFA [Post Family Fledgling Area] (TAP:36).</p>	<p>This road provides access to several heavily visited hiking trails within a mile from Sedona and receives heavy dispersed camping use on the east side near I-17 and Clay Park. Maintenance of this road occurs on a regular schedule to ensure it is passible. A portion of this road within a mile from I-17 goes through a goshawk Post Family Fledgling area. To limit motorized use in this area a dispersed camping corridor was designated to concentrate the motor vehicle use, while several other routes in this PFA were not designated including 9460B, 9460K, 9460J, 9460Q, 9459M to create areas of the PFA undisturbed by motor vehicle use.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>161 B-Close to all but essential administrative use.</p> <p>Risk to northern goshawk PFA [Post Family Fledgling Area] and contributes to disturbance of other wildlife.</p>	<p>Route was designated based on very high dispersed recreational use. Route is on edge of goshawk PFA, but is a primary area for dispersed camping due to flat terrain and proximity to the rim. Route was specifically requested by Arizona Game and Fish as a good site for recreational use outside of sensitive big game habitat.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p>	<p>Portions of this route were removed from designation in</p>

Issue	Comment	Response
	<p>161-close to all but essential administrative use. Stabilize severe erosion sections.</p> <p>Risks include severe erosion, noxious plants, stream crossings, and risk to native fish (TAP:3 7) and contributes to disturbance of wildlife. This unnecessary route that contributes to sediment into Buck Springs Canyon.</p>	<p>Alternative 3 where the route is located in drainage areas with observed erosion. For example, the route was not designated where it is located at Buck Spring Cabin and north of 137C where the route edges toward the east side of Buck Springs Canyon. The remaining portion of the route are on gently sloping or flat terrain and the area is used for dispersed recreation and hunting.</p>
Specific Routes	<p>Road: 211A; Common Allotment Name: Yellow Jacket Draw; Description of Road Change Request: Needs to be open for water hauling.</p>	<p>This route is designated in Alternative 4, but not designated in Alternative 3. Alternative 3 does not include designation for motorized use because the route receives little use, is located in the bottom of a draw, and goes through an MSO PAC. Activities for livestock management can be included in grazing permit.</p>
Specific Routes	<p>Road: 211G; Common Allotment Name: Yellow Jacket Draw; Description of Road Change Request: Portion over to 211A needs to be left open for water hauling.</p>	<p>211G - Designated in Alternative 4, but only a small portion of this route is designated in Alternative 3. Portions of the route are not designated in Alternative 3 because the route is located in an MSO PAC. Another portion also connects to FR211A in a draw and within an MSO PAC. Activities for livestock management can be included in grazing permit. 211A - This route is designated in Alternative 4, but not designated in Alternative 3. Alternative 3 does not include designation for motorized use because the route receives little use, is located in the bottom of a draw, and goes through an MSO PAC. Activities for livestock management can be included in grazing permit.</p>
Specific Routes	<p>Road: 211K; Common Allotment Name: Lost Eden; Description of Road Change Request: Portion needs to be left open for water hauling.</p>	<p>This route is not designated in Alternative 3 or 4. Much of the route is located in the bottom of a drainage. Activities for livestock management can be included in grazing permit.</p>

Issue	Comment	Response
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>231J-Close and decommission.</p> <p>Mexican spotted owl PAC [Protected Activity Center] and risk to Red Rock-Secret Mountain Wilderness (TAP:49).</p>	<p>Portions of this route located in Wilderness and Mexican spotted owl protected activity centers were not designated. The remainder of this route was designated to allow for isolated motorized dispersed camping opportunities and motorized access for hunting, hiking and other activities. Several adjacent roads were not designated to reduce road density including, 9012H, 9017G, 9012G, 9014G, 9013G, and 6009.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>*300H-Close to all but essential administrative use.</p> <p>Risks include impacts to native fish, severe erosion, northern goshawk PFA [Post Family Fledgling Area], road/trail conflicts (TAP:57).</p>	<p>This route is designated in Alternative 4. 3.3 miles of this 4.4 mile route are not designated in Alternative 3. This is a modification made to Alternative 3 to conform with an earlier NEPA decision made to close portions of this route to decrease East Clear Creek Watershed impacts. Not designating this portion of 300H will also remove the route from goshawk PFA. Portion of route designated in Alternative 3 is not located in steep slopes.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>321A-Close and decommission north of Dane Spring trailhead and parking lot.</p> <p>Risk to Mexican spotted owl PAC [Protected Activity Area] and northern goshawk PFA [Post Family Fledgling Area]; and presents a noxious weed risk (TAP:61). Unnecessary route that contributes to sediment into Dane Canyon. Disturbance to wildlife.</p>	<p>Portions of this route in MSO PAC are not designated in Alternative 3 or 4. Portions outside of MSO PACs are designated in Alternatives 3 and 4 to provide for dispersed camping and hunting. Route is not located in goshawk PFA, nor is it a noxious weed risk as the use in this area already exists.</p>
Specific Routes	<p>The maps for Alternatives 3 and 4 show a dispersed camping corridor along Schultz Pass road [Forest Road 420] immediately adjacent to Schultz Tank. This makes no sense as Schultz Tank is a water source for wildlife (I am assuming) and has been blocked off to motorized traffic for years. Maintaining this short</p>	<p>Good point. We removed this designated motorized camping corridor adjacent to Schultz Tank based on your comment. Nearby portions of the 556 and 420 roads include designated dispersed camping corridors to provide for car camping in this area outside of sensitive</p>

Issue	Comment	Response
	corridor as closed to dispersed camping makes sense. This should be implemented with a concurrent signage strategy, as the rest of the Schultz Pass Road corridor should be left open as indicated otherwise on the maps to dispersed camping.	wildlife habitat.
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>500-Close and decommission.</p> <p>Severe erosion hazard; bald eagle nest (TAP:65).</p>	Route 500 provides hunting and recreation access for dispersed camping within hiking distance of the Verde River. The last mile of this route where it leads to Verde River access is closed. The next 2.6 miles of this route is closed 12/1 - 6/15 each year to avoid disturbance to nesting eagles. Several adjacent routes including X-28462, 9139M, 9139N, X-29011, X-29041, X-29258, X-29257, and X-29524 were not designated to reduce density and sediments to the Verde from miles of road.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>501-Close to all but essential administrative use.</p> <p>Risks include severe erosion hazard and noxious weeds; and threats to Mexican spotted owl PAC [Protected Activity Area] (TAP:510-511) and disturbance to other wildlife. Unnecessary route that contributes to sediment into Hi Fuller and East Miller Canyons.</p>	This route is designated in Alternative 4 and partially designated in Alternative 3. The northern portion of the route is not designated in Alternative 3 to avoid an MSO PAC. The southern portion of the route was designated based on information from Arizona Game and Fish Department stating that the route is a heavily used are for dispersed camping off of the main 300 road. The route is located on a ridge top and is not an erosion hazard.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>*50IA-Close to all but essential administrative use.</p> <p>Risks include severe erosion hazard and disturbance to other wildlife. Unnecessary route that contributes to sediment into Hi Fuller and East Miller Canyons.</p>	Based on your comments and others, the northern 0.56 miles of this route were removed from designation in Alternative 3 due to potential impacts to wildlife and riparian habitat from Forest users driving down into Hi Fuller Spring. This route is still designated in Alternative 4. The southern portion of the route is designated to the intersection with 9252 in both alternatives to provide for recreational access.
Specific Routes	Soil and Water, Riparian Areas and Water Quality (page 64):	Discussion of impacts from roads on Fossil Creek was

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	<p>This section states that on the CNF [Coconino National Forest] there are approximately 45 miles of road within 132 feet of a riparian stream course and it lists four creeks, but does not list Fossil Creek. We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend that this section include a discussion of the sections of Fossil Creek that are within 132 feet of Forest Road (FR) 502. We also recommend including the rationale for using 132 feet as the distance for analysis of effects of roads on streams.</p>	<p>added to the Soil and Water Specialist Report. The rationale for using 132 feet as the distance for analysis of effects of roads on streams is that the Forest Plan (Replacement Page 72) identifies that filter strips should be 2 chains (which equals 132 feet) on riparian streams.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk: 539B-Close and decommission. Mexican spotted owl PAC [Protected Activity Center] (TAP:78).</p>	<p>Route is partially located in an MSO PAC, but this route was designated because the route stays on the mesa top and would not impact owl nesting in the adjacent canyon. Route provides opportunity for isolated motorized dispersed camping opportunity and access to camping near popular back-country hiking trailheads.</p>
<p>Specific Routes</p>	<p>East Clear Creek Road Closure Recommendation and Risk: 565A-Close to all but essential administrative use and access to private property. Risks include noxious weeds and impacts to Mexican owl nests and PAC [Protected Activity Center], northern goshawk PFAs [Post Family Fledgling Areas], and disturbance to other wildlife.</p>	<p>Alternative 4 includes designation of 3.3 miles of this route, and Alternative 3 includes designation of 1.4 miles of this route. Alternative 3 does not include designation of the portion of the route in MSO PAC. Route is located next to a small population of bull thistle at Weimer Tank, but is not expected to increase this risk, since it is an existing route.</p>
<p>Specific Routes</p>	<p>East Clear Creek Road Closure Recommendation and Risk: *600-Close north of 298A junction. to all but essential administrative use. Risks include noxious weeds and severe erosion hazards; and impacts to native fish, streams and riparian areas, Mexican owl nests and PAC [Protected Activity Center] (TAP:82), and disturbance to other wildlife species.</p>	<p>Based on your comments and previous NEPA analysis completed under the East Clear Creek decision, approximately 2 miles of the road was removed from designation in Alternative 3 to reduce impacts to watershed resources. Alternative 3 now includes designation of less than a half mile of FR600 to provide access to Limestone Ranch; the remainder of the route is not designated. Alternative 4 designates 2.4 miles of 600 up to the boundary of an MSO PAC.</p>

Issue	Comment	Response
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>609-Close and decommission.</p> <p>Mexican spotted owl PAC [Protected Activity Center]; Fossil Creek wilderness impacts, mule deer habitat and other resource concerns (TAP: 83)</p>	<p>Forest road 609 is a heavily used road that connects to both State Highway 87 and 260. Approximately a mile and a half of this road includes a dispersed camping corridor. This route and the corridor are outside of nearby Mexican spotted owl habitat. This route was designated to allow motorized access while reducing road density by closing dozens of miles connecting to it, including 6209, 9387V, 9389B, 9388B, 9388S, 6207, 9387W, X-29783, X-29858, X-29934, X-29916, X-29745, X-29810, 9388Q, 6208, 9387X, X-29577, X-29745, 6196, X-29686, 6196A, and X-29687.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>625 I-Close to all but essential administrative use.</p> <p>Severe erosion hazard and mule deer habitat within the Sycamore Canyon/ Red Rock-Secret Mountain Wilderness watershed (TAP: 127).</p>	<p>There is no 625I road, but the 6251 road is not designated as it is an extremely rough road that can result in excess sedimentation if used regularly and not maintained.</p>
Specific Routes	<p>Road: 0653A; Common Allotment Name: Soldier Annex and Tremaine; Description of Road Change Request: Need to close the road between Soldier Annex and Tremaine Lakes as people are driving into the closure area now. If [you] leave parts of the road open it will only continue.</p>	<p>A portion of this road was designated to provide for motorized dispersed camping opportunities near the lake. Portions of the route that cross the outflow and traverse the adjacent open meadow were not designated.</p>
Specific Routes	<p>All of the plans include road closures but did not designate which roads. Having the road into our property closed was always what we had determined to be the most viable solution to our concerns, the adjacent ranchers and ultimately the Forest Service. Since the 680 road only provides access to our two properties and a very limited amount of traversable road along with its proximity to Clint's Well, we felt that it made the most sense to just close off that road to the general public and leave it gated for the rancher and ourselves. Because of the proximity to</p>	<p>It is clear that you are concerned about limiting public access to your property. The fact that your property is adjacent to National Forest Service lands does not provide justification for closing off this route to the public. Clearly Forest Road 680 provides a popular site for recreational use. I understand that you do not agree with this use; however, camping in RVs is and will continue to be a legitimate use of public lands just as access to private property is a legitimate use of public</p>

Issue	Comment	Response
	<p>Clint's Well it is not uncommon to have eight or ten separate camps each with a trailer and five or six quads and or motorcycles along a 1/2 mile section of road. These are not just normal campers; they are 25 feet in length and not uncommon to have 5 or 6 together in a wagon train.</p>	<p>lands. Forest Road 680 was designated because it provides for a very popular motorized dispersed camping area nearby a main highway with easy access and no sensitive wildlife habitat, cultural resources, or soil or watershed issues.</p>
<p>Specific Routes</p>	<p>We [respondent and family] have had to put up with quads that run right up to our gate and create a giant donut where they spin around and take off down the 680 road. It is not uncommon for us to have to listen to quads until one or two in the morning and the fact that we are in a little canyon and the way that noise travels down these draws at night, it is as if they are right next to you. Unfortunately in many cases these are not just regular quads or motorcycles; they are "souped up" so that they are very loud. The ranchers' gates are constantly left open so these recreationists can race up and down the roadway which leads to horses and cattle in areas where they do not belong. The damage to the meadows from recurring camping (always in the same spots) is devastating to the resource. Not to mention the constant trash pick-up that we undertake following almost every weekend.</p> <p>We have owned this property for over eighteen years and have seen this problem worsen every year. We do not expect any special treatment simply because we are land owners. We care deeply about our property and the adjacent forest and want to work with the Forest Service in a partnership scenario. We are concerned that if this road is not closed that the situation will just continue to deteriorate. Again because the entire road system is only a mile or two in length it turns into a race track. We used to be able to hunt and view game right out of our cabin but with the quads and motorcycles racing up and down the road</p>	<p>We understand your concern with unmanaged motorized use on FR680. FR680 is included as designated in the DEIS because it is a very popular route for dispersed camping. This route is located off of a main highway running through the middle of the Forest in an area outside of sensitive wildlife habitat. The Travel Management DEIS, however, will restrict use in this area by not including a camping corridor, which means that vehicles will be limited to parking alongside the main road. Additionally, many of the spur roads coming off of FR680 near your property, including X-2574, 00630B, 00680B, and 00680C are not included for designation in one or more alternatives. This should restrict the amount of use on Forest Road 680 and surrounding areas so that motorized use in the area will move toward a more manageable situation.</p>

Issue	Comment	Response
	we simply do not see the numbers of animals that we have in the past.	
Specific Routes	<p>We [respondent and family] will be lifelong owners of this property [ten acres down the 680 road east of FH3] and want to see the area restored to its original beauty and reasonable solitude. We want to be responsible partners with the Forest Service and hope that you will consider our concerns as you move forward with your plans.</p>	<p>The fact that your property is adjacent to National Forest Service lands does not provide justification for closing off this route to the public. Clearly Forest Road 680 provides a popular site for recreational use. I understand that you do not agree with this use; however, camping in RVs is and will continue to be a legitimate use of public lands just as access to private property is a legitimate use of public lands. The Travel Management DEIS, however, will restrict use in this area by not including a camping corridor, which means that vehicles will be limited to parking alongside the main road. Additionally, many of the spur roads coming off of FR680 near your property, including X-2574, 00630B, 00680B, and 00680C are not included for designation in one or more alternatives. This should restrict the amount of use on Forest Road 680 and surrounding areas so that motorized use in the area will move toward a more manageable situation.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>*719-Close to all but essential administrative use; decommission section descending into Quien Sabe Draw.</p> <p>Risks to native fish and mule deer habitat, Mexican owl PAC [Protected Activity Center] and northern goshawk PFAs [Post Family Fledgling Areas], and other wildlife. Noxious weeds pose a threat (TAP:98). Unnecessary route that contributes to sediment into Quien Sabe Draw and General Springs Canvon.</p>	<p>Route is designated in Alternatives 3 and 4. Route is a main access route on southern portion of Turkey Pen Ridge and provides access for dispersed camping and hunting. Route is not located in a MSO PAC nor in other sensitive habitat. The route crosses Quien Sabe Draw perpendicularly. Spur routes from this route that traverse up the draw including 9722W are not designated.</p>
Specific Routes	East Clear Creek Road Closure Recommendation and Risk:	Route is located outside of sensitive wildlife habitat and

Issue	Comment	Response
	<p>*719F-close to all but essential administrative use.</p> <p>Risks include severe erosion risk (TAP:98).</p>	<p>is located on Turkey Pen Ridge outside of drainage areas. Thus, the route does not present a severe erosion risk and provides for recreational access.</p>
<p>Specific Routes</p>	<p>My quality of life has been drastically affected by the increase of ATVs and dirt bikes that race up the gas line/743 Road. The noise, dust and just lack of respect for the neighbors along there doubles and triples on weekends and especially holiday weekends like Memorial Day. They are accessing the forests from the dump road instead of going to the Cinder Hills entrance which makes our holiday weekends one of noise and dust and worrying about fires. Although it is only May 17th, our neighborhood has already called in two fires near us, just north of the gas line. The first one was an overnight party fire; [ATV users] light the stump on fire for a bonfire then don't put it out all the way.</p>	<p>The portion of 743 near the Cinder Hills OHV area is not designated in Alternative 3 or 4 and thus would not be open for motorized use if either alternative is chosen.</p>
<p>Specific Routes</p>	<p>I am not sure what the reasoning is behind showing part of Pipeline Road through Fort Valley east of Schultz Pass as open, but then the rest as closed? It seems that this route should be left open along its entire length here as it is a heavily impacted corridor that provides some connectivity for motorized trail users in the Fort Valley area.</p>	<p>The majority of the pipeline road (Forest Road 743) is designated in Alternatives 3 and 4. Portions that are not designated are located adjacent to the Fort Valley Motorized Trail System and within a northern goshawk post-fledgling area. The purpose here is to provide for a single-track motorized recreation opportunity that is not dissected by other vehicle traffic to limit conflict from mixed motorized use.</p>
<p>Specific Routes</p>	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>*752-Close and decommission.</p> <p>Risks include severe erosion hazard, road and trail conflict and other resource concerns (TAP 102).</p>	<p>This route was designated in both Alternatives 3 and 4 because the route is located on a ridge top and completely outside of sensitive habitat. This route does not include a trail conflict as the route was historically a jeep trail and not a hiking trail. Route provides access to dispersed camping sites on mesa overlooking Knoll Lake. Route is entirely on flat terrain and not an erosion hazard.</p>

Issue	Comment	Response
Specific Routes	<p>We [National Park Service] are especially supportive of the closure of a segment of FR-776 and elimination of through traffic between the Cinder Hills OHV area and the Sunset Crater Volcano-Wupatki Scenic Loop Road (FR-545). Either alternative would foster future planning for camping or off-road vehicle staging areas within the OHV area to meet forest recreational user needs. This would greatly reduce inherent conflicts between park visitors at Sunset Crater Volcano National Monument and off-highway recreation users at the Cinder Hills ORV area. Furthermore, this action may slow the proliferation of new off-road routes in the area between Sunset Crater Volcano and Strawberry Crater Wilderness. This area was originally closed to cross-country travel within the 1987 CNF LRMP [Coconino National Forest Land and Resource Management Plan] and encompasses the Kana'a lava flow and other recent volcanic terrain associated with the Sunset Volcanic eruption.</p>	<p>Thanks for your input. The portion of Forest Road 776 is not designated in either Alternative 3 or 4 where it connects to Road 545 east of Sunset Crater National Monument. It appears you are in support of this designation.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>800-Close to all but essential administrative use. Stabilize severe eroding sections.</p> <p>Severe erosion hazard and other resource concerns (TAP: 107).</p>	<p>This route is a very popular driving, camping, and recreation route along near I-17 with views of the Sedona area. A portion of the route includes a winter seasonal closure from 12/15 - 4/1, part of the Woods Seasonal Closure for wildlife. The route is not within sensitive habitat for species and is very close by Interstate 17. The route was designated to provide access, connecting routes 9944, 9945, and a small piece of 800 (where it connects to I-17) were not designated to reduce road density and erosion.</p>
Specific Routes	<p>Road: 6068C and 00513; Common Allotment Name: Moqui Private Land; Description of Road Change Request: 6068C should be closed at the private land boundary at both ends of Moqui property. The roads on the south end of the private land that connect to 00513 should also be closed.</p>	<p>6068C is not designated in Alternative 3 or 4. Other routes on the south end of the private land connecting to 513 including 9032J, 9032K, 513L, X-24721, 9727Q, and 9727R are not designated as well.</p>

Issue	Comment	Response
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>6249-Closed and decommission.</p> <p>Severe erosion hazard and mule deer habitat within the Sycamore Canyon/ Red Rock-Secret Mountain Wilderness watershed (TAP: 129).</p>	<p>This route provides dispersed camping and access for hunters and firewood collection off of the adjacent main roads 538 and 539. This route is located on fairly flat terrain and within hiking distance of Sycamore Canyon Wilderness trailheads. This route is not in sensitive wildlife habitat and was designated in lieu of several other roads, including 9019G, X-13971, 539A, 6266, 6245, and 6248.</p>
Specific Routes	<p>Alternative 4 includes the 6273 road. This road is a useful "bail-out" route for those riding the Secret Trail and also provides opportunity for dispersed camping in the Schultz Tank area for those not wanting to camp right next to the heavily travelled Schultz Pass Road. Please incorporate this road into the system. I do realize that this road is routed through MSO [Mexican Spotted Owl] habitat. I would recommend the adoption of a seasonal closure to camping in the area, similar to the strategy employed in the designated camp sites along Friedlein Prairie Road to help address this wildlife concern.</p>	<p>This route is located within Mexican spotted owl and northern goshawk habitat. The route appears to directly parallel the re-routed portion of the secret trail, which is now part of the Fort Valley Motorized Trail System. This route was included in Alternative 4 for detailed analysis and consideration in the decision. It was not, however, included in Alternative 3 for consideration of the routes impacts to wildlife habitat and water quality.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>6416-Close and decommission.</p> <p>Northern goshawk PFA [Post Family Fledgling Area] (TAP: 133).</p>	<p>This route provides connectivity between 539 and 231, which is a popular hunting and motorized dispersed camping loop, within hiking distance of Red Rock Secret Mountain Wilderness trailheads. The road occurs along the western boundary of a goshawk Post family fledgling area, but is not likely to cause impacts to goshawk nests within the area.</p>
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>9011G-Close and decommission.</p> <p>Severe erosion hazard and mule deer habitat within the Sycamore Canyon/Red Rock-Secret Mountain Wilderness</p>	<p>This route provides for motorized dispersed camping off of the main 231, Woody Mountain Road. The purpose of designating this route it to provide motorized dispersed camping and hunting access opportunities away from the 231 road, which receives regular traffic and can be very dusty. Route is not located in sensitive species habitat nor is the route on particularly erodable terrain. Several</p>

Issue	Comment	Response
	watershed (TAP: 145).	other routes in the area were not designated to enhance mule deer habitat and decrease road density contributing to sedimentation, including X-13240, 9016F, 538F, X-13175, X-13019, X-13014, and X-13033.
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>9201J-Close to mechanized travel and convert Deadman Trail to non-motorized route. Stabilize steep section up Deadman Point with waterbars, checks, and outs loping.</p> <p>Severe erosion hazard (TAP 199); bifurcates Wet Beaver Wilderness and Walker Mountain IRA [Inventoried Roadless Area].</p>	We received many comments on this routes from both those who thought it should be designated for access, connectivity, and motorized recreation opportunity and from those that thought it should be closed to reduce road density and augment roadless areas to enhance wildlife habitat and dispersal. This route was designated for motorized use because it provides for a rugged motor vehicle recreation opportunity with nearby access from Interstate 17. This road is outside of roadless areas and is located on generally flat terrain. Also, many of the concerns regarding road density and wildlife habitat are still addressed by not designating several of the connecting or adjacent routes including 9201P, X-23762, 9201C, 9201A, X-23071, X-24145, and 9247.
Specific Routes	USFS Road Number: 9116B, etc; Flying M Ranch Uses: No; Flying M Ranch recommendation: Roads in the Boot and Long Lake area need to remain open. We don't want all the hunting of 5BN on just our roads. Limited access means limited harvest of elk.	Some of the routes in the Boot and Long Lakes areas were designated to provide access. The 9116B Road, which goes right between Boot and Long Lakes, was not designated to provide a core area of unmotorized habitat within the lake and wetland areas. Surrounding routes 9484F, 9117A, 9485E, and 9118F were all designated around this area to facilitate hunter access.
Specific Routes	USFS Road Number: 09117R; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: We use this road to get to Perry Lake which we hold a water right on. We need this road to remain open.	Access for livestock or water systems can be authorized through a permit. Not necessary to include designation for public access.
Specific Routes	[From ATT 34] What are the short and long-term impacts, positive and negative-taking into account whether these impacts	9201J is outside of the Walker Mountain IRA. We received many comments on this route from both those

Issue	Comment	Response
	<p>are felt at specific points-in-time or persist-of each management alternative to the CNF's [Coconino National Forest] natural and cultural resources, in particular:</p> <p>Agency-inventoried Roadless Areas: By definition, Roadless areas afford a type of quiet and primitive recreation that cannot be found near roads and serve as refuges for a host of natural and cultural resources, in particular native wildlife, vegetation, and clean water. Motorized recreation is thus generally incompatible with Roadless values and should be prohibited. Route designations and use can nonetheless have indirect or cumulative impact, and can also enable illegal motorized intrusions (e.g., Deadwood Trail FS 9201J).</p> <p>Citizen-inventoried Roadless Areas: For the same reasons as above, where the Forest Plan does not specifically prohibit the use of motorized vehicles in citizen-inventoried roadless areas, we contend that these areas, with rare exceptions, should not contain designated ORV routes.</p>	<p>who thought it should be designated for access, connectivity, and motorized recreation opportunity and from those that thought it should be closed to reduce road density and augment roadless areas to enhance wildlife habitat and dispersal. This route was designated for motorized use because it provides for a rugged motor vehicle recreation opportunity with nearby access from Interstate 17. This road is outside of roadless areas and is located on generally flat terrain. Also, many of the concerns regarding road density and wildlife habitat are still addressed by not designating several of the connecting or adjacent routes including 9201P, X-23762, 9201C, 9201A, X-23071, X-24145, and 9247. Roadless Areas were one of several criteria considered for the designation of existing roads in Inventoried Roadless Areas.</p>
<p>Specific Routes</p>	<p>Grand Canyon Wildlands Council has undertaken field surveys of many of the routes on the Coconino, photo-documenting roadbed conditions and review of the forest's GIS database. One example of our concern is the proposed reopening of the Deadwood Trail (FS 9201J) located immediately north of the Walker Mountain Roadless Area. The recent RAP [Roads Analysis] recommends the Deadwood Trail for decommissioning, not designation as open. When we [Center for Biological Diversity] expressed our particular concern about this trail recently, and received a response from the Project Leader that included the ID team decision record, it was clear, the decision was based entirely on motorized recreation and ranching interests with no consideration of the environmental consequences [Footnote 6: "From our comment analysis</p>	<p>We received many comments on this route from both those who thought it should be designated for access, connectivity, and motorized recreation opportunity and from those that thought it should be closed to reduce road density and augment roadless areas to enhance wildlife habitat and dispersal. This route was designated for motorized use because it provides for a rugged motor vehicle recreation opportunity with nearby access from Interstate 17. This road is outside of roadless areas and is located on generally flat terrain. Also, many of the concerns regarding road density and wildlife habitat are still addressed by not designating several of the connecting or adjacent routes including 9201P, X-</p>

Issue	Comment	Response
	<p>database: District is re-looking at 9201J. If reopened, it along with 618 and 214 will provide requested motorized loop riding opportunities (reference CTR memo #20). 4/12/07: District reviewed and IDT concurs. Open 9201J because one of only 2 premiere 4WD/jeep routes available in the area. It is not within IRA. Also, last mile or so of 618C (after top of hill) needs to be decom to prevent illegal priv land access and reduce vehicle impacts to river. We also had a request from a local rancher to leave this route open for general ranchactivity access" Email Aug. 17, 12:22.]. For example this is a core mountain lion habitat/dispersal zone and one such consequence may be an increase in human-lion conflicts. Such conflicts frequently result in the death of the mountain lion.</p>	<p>23762, 9201C, 9201A, X-23071, X-24145, and 9247.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk:</p> <p>9238S-Close and decommission.</p> <p>Not evaluated on TAP; field inventory in 2008; Road to nowhere; erosions problems.</p>	<p>Route is designated in Alternative 3 and 4. The north side of Wet Beaver Wilderness includes very low route density. This route was designated as one of the few to provide access for recreation in this area because it is located on flat terrain and is not an erosion hazard.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk:</p> <p>9242-Close and decommission.</p> <p>Severe erosion hazard and other resource concerns (TAP:226).</p>	<p>This route provides access and motorized dispersed camping opoprtnuity in the Cottonwood Basin, near hiking distance from the Verde River. The first mile of this 2-mile route is designated with a seasonal restriction from 12/1 - 6/15 each year to protect eagle nesting activities along the Verde River. The portion of this road that would be contributing most to erosion is not designated, which would close portions of where the route crosses the drainage and continues toward the Verde. Other routes not designated this area include 9139Y, X-29087, 9139X, 9139W, X-29185, X-29210, 9139T, 9139R, 9139S, and 9139Q.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk:</p>	<p>This route provides access and motorized dispersed</p>

Issue	Comment	Response
	<p>9244-Close and decommission.</p> <p>Severe erosion hazard (TAP:226).</p>	<p>camping opprtunities in the Cottonwood Basin, within hiking distance from the Verde River. The first mile of this route is designated with a seasonal restriction from 12/1 - 6/15 each year to protect nearby eagle habitat. The last section of this route is not designated to reduce road use near and motorized access to the Verde River.</p>
<p>Specific Routes</p>	<p>West Clear Creek Road Closure Recommendation and Risk:</p> <p>9267C-Close to all but essential administrative use.</p> <p>Mule deer habitat; road to nowhere.</p>	<p>This route was designated because it is a spur road within a mile from Highway 260, which receives very high use for access, hunting, and motorized dispersed camping. The route stays outside of nearby Mexican spotted owl protected acitivity centers. Other adjacent routes were closed to address concerns about road density and wildlife (mule deer) habitat., including 9267F, 9267D, 9267A, 9353F, 6359, 9267, 9267A, 9267S, 9370D, and X-26694.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk:</p> <p>9361Q-Close and decommission.</p> <p>Severe erosion hazard (TAP:245) affecting Fossil Creek Wilderness/W&S watershed; Mexican spotted owl PAC [Protected Activity Area] and mule deer habitat. Mexican spotted owl PAC.</p>	<p>This route was designated to provide a spur route for motorized dispersed camping opportunities easily accessible from Highway 260. A portion of this route is located in a Mexican spotted owl protected activity center (PAC), yet it is not expected to result in an impact to nesting owls due to the fact the route is completely located on a ridge-top and the nesting locations would be located in the adjacent canyons on either side. Several other routes in this area and in the PAC were not designated to address your concerns, including 9361R, 9361U, 9361M, 9383, 9384, 9387, and 9389.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk:</p> <p>9362K-Close and decommission.</p> <p>Severe erosion hazard (TAP:246) affecting Fossil Creek Wilderness/ W&S watershed.</p>	<p>This route was designated to provide a spur route for motorized dispersed camping opportunities easily accessible from Highway 260. This route is located adjacent to a Protected Activity Center, but not within the sensitive owl habitat. Several adjacent routes are not desiganted to address concerns about impacts to Fossil</p>

Issue	Comment	Response
		Creek Wilderness and impacts to water quality and soil, these routes include: 9362D, 9365K, 94-5E, 9405H, 9405G, X-27826, and 9405F.
Specific Routes	West Clear Creek Road Closure Recommendation and Risk: 9365F-close and decommission. Mexican spotted owl nest and PAC [Protected Activity Center]; mule deer habitat (TAP:248-249).	This route is located in a Mexican spotted owl protected activity center, but is located on the highlands above West Clear Creek Canyon and Wilbur Canyon, and thus would likely not impact nesting pairs. This route provides opportunity for desired motorized disperse camping opportunities close by Highway 260.
Specific Routes	Road Closure Recommendations and Risk: 9366F-Close and decommission. Severe erosion hazard (TAP:250) affecting Fossil Creek Wilderness/ W&S [Wild and Scenic] watershed.	This route was designated to provide a spur road outside of nearby MSO PAC habitat for motorized dispersed camping opportunities adjacent to Highway 260. Concerns were addressed by not designating several other routes in this area and in the PAC, including 9361R, 9361U, 9361M, 9383, 9384, 9387, and 9389.
Specific Routes	Road Closure Recommendations and Risk: 9367B-Close and decommission. Severe erosion hazard (TAP:251) affecting Fossil Creek Wilderness/ W&S [Wild and Scenic] watershed.	This route was designated to provide a spur road outside of nearby MSO PAC habitat for motorized dispersed camping opportunities adjacent to Highway 260. Concerns were addressed by not designating several other routes(and decreasing road density) in this area and in the PAC, including 9361R, 9361U, 9361M, 9383, 9384, 9387, and 9389.
Specific Routes	West Clear Creek Road Closure Recommendation and Risk: 9369C-Close to all but essential administrative use. Mexican spotted owl PAC [Protected Activity Center] (TAP:253).	This road provides access to motorized dispersed camping near West Clear Creek Wilderness, with nearby access from Lake Mary Road. Wildlife risk was addressed as this route is located outside of a nearby Mexican spotted owl PAC. Several adjacent roads are proposed closed including 9369B, 9369F, 9369E, X-26131, 9399T, 9394T, 122K, 122F, and 122H.
Specific Routes	West Clear Creek Road Closure Recommendation and Risk:	This road provides access to motorized dispersed camping near West Clear Creek Wilderness, with nearby

Issue	Comment	Response
	<p>9399S-Close to all but essential administrative use.</p> <p>Mule deer habitat (TAP:268)</p>	<p>access from Lake Mary Road. Wildlife risk was addressed as this route is located outside of a nearby Mexican spotted owl PAC. This spur road was designated in lieu of several unauthorized and old logging routes into more isolated areas For example, several routes in this area not designated include X-26143, X-26131, 9399T, 9394T, X-26083, X-26084, 9398S, X-26342, and X-26232.</p>
Specific Routes	<p>USFS Road Number: 09483D; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: During dry years we haul water with a 10 wheel truck to the tank on this road. We need this road to remain open.</p>	<p>Access for livestock or water systems can be authorized through a permit. Not necessary to include designation for public access.</p>
Specific Routes	<p>USFS Road Number: 9483H; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: We use this road to maintain fence, place salt and check stock tank for bogged animals during dry years. It requires a pickup to pull stuck animals out. We need this road to remain open.</p>	<p>A portion of this road is designated to provide connectivity to 9482G and 125. The portion of this road that goes to a small lake is not designated, but may still be used under the terms and conditions of your livestock grazing permit.</p>
Specific Routes	<p>USFS Road Number: 9483N; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: This is a road through our livestock holding traps that we use and have a sign on the gate that says "foot access only and people have been respecting it." We need this road to be closed.</p>	<p>Thanks for providing information on this, removed from designation for motorized use.</p>
Specific Routes	<p>USFS Road Number: 9485H; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: This road is our access to Mud Lake Camp where we have an employee stay in the summer months to work the permit. Only road to the camp need to remain open. The west half past the cabin needs to show as closed. It has already recovered and does not even show on the ground anymore. We need this road to remain open.</p>	<p>Provides access to facilities used by Flying M Ranch, should allow motorized access. Can include for designation due to the number of people likely accessing this route during the summer. Would be difficult to manage motorized use under permit only.</p>
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p>	<p>This route was field reviewed based on your comments and others and was removed from designation in</p>

Issue	Comment	Response
	<p>*9707F-Close and decommission.</p> <p>Risks include severe erosion threat over 58% of its length (TAP: 342) and disturbance to wildlife. Unnecessary route that contributes to sediment into Middle Leonard Canyon.</p>	<p>Alternative 3 based on the fact the route is currently closed on-the-ground and receives no use.</p>
Specific Routes	<p>Road: 09710Q; Common Allotment Name: Lost Eden; Description of Road Change Request: Portion needs to be left open for water hauling.</p>	<p>This route is not designated in Alternative 3 or 4. Much of the route is located in the bottom of a drainage. Activities for livestock management can be included in grazing permit.</p>
Specific Routes	<p>Road: 09710Y; Common Allotment Name: W. Boundary Pasture; Description of Road Change Request: The portion leading to a private road on the north side of USFS boundary needs to be open.</p>	<p>This route runs along part of the Forest boundary and connects 9710U to 9710M. 9710M appears to provide access to private land within the boundary. It is possible that 9710Y lead to additional routes that provide access to private land outside of the Coconino National Forest to the north; however, it is more desirable that this be managed administratively through a road use permit that designating a route for public use that leads to several areas of non-public lands.</p>
Specific Routes	<p>The current EIS has some roads closed which continue onto state or private land as open roads. If a real need is articulated and supporting management/maintenance provided to close such roads, then there needs to be a collaborative effort with the adjacent land owners to be consistent, or they need to remain open. For example, the Diablo-Jacks Canyon Access Management Area, encompassing three adjacent ranches, was created through a collaborative effort of the Forage Resource Study Group (an authorized Game and Fish [Arizona Game and Fish Department] Habitat Partnership group). An access plan is in place whereby certain roads are designated closed and others open. There are points of conflict in several places with the road status designation in the PA [Preferred Alternative]. One such road is 09710Y on the Forest Boundary just ~1.5 miles east of</p>	<p>We understand your previous efforts and hope to continue to work in a collaborative manner with you to continually improve management of motorized uses on the Coconino National Forest. Route 09710Y, is not designated in the EIS as a route open to motorized access because it would lead public motorized users to no other destination but to private land. Public motorized use of this route would result in unnecessary and undesirable impacts on pronghorn habitat and is in a high site density area for archeological resources. Access to private land can be more effectively addressed through an easement agreement or a special road use permit.</p>

Issue	Comment	Response
	Hwy 87, which is proposed to be closed and connects with a private road on the north side of the fence.	
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>9712T-Close and decommission.</p> <p>Risks to northern goshawk PFA [Post Family Fledgling Area] (TAP:349) and other wildlife. Unnecessary route that contributes to sediment into Leonard Canyon.</p>	Route is designated in both Alternatives 3 and 4. Route is outside of sensitive habitat and provides recreation opportunity by providing portion of motorized loop near the rim which is popular for camping and other recreational use.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk:</p> <p>*9712Y-Close and decommission.</p> <p>Road to nowhere. Risks include noxious weeds.</p>	Route is designated in both Alternatives 3 and 4. Route is outside of sensitive habitat and provides recreation opportunity by providing portion of motorized loop near the rim which is popular for camping and other recreational use. There are no known untreated noxious weeds populations at this location.
Specific Routes	Road: 09713M; Common Allotment Name: W. Boundary Pasture; Description of Road Change Request: Two roads are open coming east and dead end on closed roads. Should be open.	This road crosses the Coconino National Forest boundary and dead ends on State Lands where there is no legal right-of-way. Thus, this road is not designated.
Specific Routes	Road: 09717J; Common Allotment Name: Qualye Field; Description of Road Change Request: Camping corridor is not realistic there. 1) it is a cattle holding pasture at all times; 2) the road is on the north side of the fence. There is no room/space to camp off the road -- it is next to a bluff; and 3) there is no camping for 25-30 sections in the Red Hill area that is heavily used during elk season.	This route is not designated in Alternatives 3 or 4 and does not include a dispersed camping corridor. Route is on moderate slopes with no camping opportunities, nor does route provide any connectivity nor access to any land feature.
Specific Routes	Road: 09718H; Common Allotment Name: W. Green Howard; Description of Road Change Request: Two roads off of No. 82 need to be left open in order to haul water for livestock (and wildlife).	Route not designated in either Alternative 3 or 4. Activities for livestock management can be included in grazing permit. No need to designate for public use.

Issue	Comment	Response
Specific Routes	Road: 09720A; Common Allotment Name: Hay Lake Wetland Area; Description of Road Change Request: Not suggesting any changes, but need to remember that Bar T Bar has legal access.	We don't disagree. The purpose of designation is to illustrate routes open to public motor vehicle use. Where possible, road use permits or road easements can be used to provide legal access. Often due to the costs or time associated with these methods, designation of the road is a more viable option. Road 9720A was not designated for public motor vehicle access due to the fact it would result in motorized access in wetland areas adjacent to Hay Lake. Legal access on this road will not be affected by not designating this route.
Specific Routes	East Clear Creek Road Closure Recommendation and Risk: *9722Y-Close and decommission. Risk to Mexican spotted owl PAC [Protected Activity Center] and northern goshawk PFA [Post Family Fledgling Area] (TAP356). Unnecessary route that contributes to sediment into Yeager and East Clear Creek Canyons. Disturbance to wildlife.	The majority of this route is designated in Alternatives 3 and 4 for access and recreational opportunity. Route is located on ridge and touches the very eastern edge of an MSO PAC, which makes it unlikely to have negative effect on owl since it is on the ridge top. A portion of the route that occurs on steep slopes is not designated in either action alternative.
Specific Routes	Road: 09725F; Common Allotment Name: E. Service Pasture/Chavez Mtn.; Description of Road Change Request: When roads on either end are open and a portion in the middle is closed, it will only aggravate people on either end.	This route is not designated in Alternative 3 or 4. It connects 9729F and 9710A, but so does route 69 and thus it is redundant. Route is also located in pronghorn habitat and in a high density archaeological site area.
Specific Routes	Road: 09727C or X20384; Common Allotment Name: West side of Tremaine Lake; Description of Road Change Request: This is a 2-track now connecting 135 coming in from the west to 09727C or X20384 which comes in from the west and runs along the west side of Tremaine Lake. People cut the fence to drive in to hunt or retrieve game in the closure area. Need to close farther away to minimize that activity.	Both routes were not designated to prevent vehicle use in the wetland and/or riparian area adjacent to Tremaine Lake.
Specific Routes	Road: 09732K; Common Allotment Name: Diane's Pasture; Description of Road Change Request: A pipeline road used	Activities requiring motorized use for livestock management can be authorized under a livestock grazing

Issue	Comment	Response
	almost daily when cattle are there. Needs to be left open.	permit. This route was not designated under Alternative 3 or 4 because it is redundant with route 9710M and is located in a high site density area.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk: 9733L-Close and decommission.</p> <p>Risk to Mexican spotted owl PAC and disturbance of other wildlife (TAP: 363). Unnecessary route that contributes to sediment into General Springs Canyon.</p>	Route is designated in Alternatives 3 and 4. Route is slightly within boundary of MSO PAC, but is not expected to impact the owl since it is located on top of the slope outside of nesting area. Provides access to mesa top important for dispersed recreation and hunting.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk: *9734P-Close to all but essential administrative use. Decommission section descending into Merritt Wash.</p> <p>Risks include severe erosion hazard (TAP: 363). Unnecessary route that contributes to sediment into Merritt Canyon.</p>	This route is located on a ridgetop and is not descending into Merritt Draw. This route was designated to provide recreational use and opportunity in a heavily used dispersed camping and hunting area. Routes adjacent to this one including 9735P, 9739V, and 9731W were not designated in one or more alternatives to reduce impacts to water quality in East Clear Creek.
Specific Routes	<p>East Clear Creek Road Closure Recommendation and Risk: 9735P-Close and decommission.</p> <p>Risks include severe erosion hazard on approximately 70% of its length as it traverses Merritt Wash; also risks to native fish habitat and Whistling and Merritt Springs (TAP: 365).</p>	This route is not designated in both Alternative 3 and 4 to reduce watershed impacts to East Clear Creek.
Specific Routes	Road: 09746D; Common Allotment Name: Lost Eden; Description of Road Change Request: Needs to be open for water hauling.	Route is located in Todds Draw and through private land without known Forest Service right-of-way. Water hauling activities for livestock management can be included in grazing permit for portions of route with Forest Service jurisdiction.

Issue	Comment	Response
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>X4000-Close to motorized travel and decommission.</p> <p>Severe erosion (based on field inspection) affecting Wet Beaver Creek watershed.</p>	<p>X-40000 was reviewed and included for designation because the route provides important connectivity between the 618 road and the White Mesa area and is not located in any Threatened, Endangered, or Region 3 Sensitive species habitat. This route is approximately 1 mile from Interstate 17, making it very accessible and less important for general wildlife. This area connects to the Stoneman Lake Road (213) and receives regular ATV use and dispersed camping all season.</p>
Specific Routes	<p>We [Center for Biological Diversity] also appreciate the effort to demonstrate areas of wildlife, soil, watershed and cultural risk on the maps presented at the open houses and we have received shapefiles (except for cultural/historical resources) to incorporate into our own GIS analysis. While these files are extremely helpful, the attribute tables contain no information on the basis for the areas defined. Moreover, we have found numerous instances where routes (primarily maintenance level 2) are recommended to be open in areas of the highest wildlife value (e.g. user-created route X-4000). We field checked this so-called route on August 26th and found it drops directly down into an extremely difficult to traverse boulder-filled drainage. Such a decision seems less than supportable by CNF's [Coconino National Forest] own standards of protecting both wildlife and watersheds.</p>	<p>You are correct that in most circumstances roads located in areas with high wildlife value were not included for designation. X-40000 was reviewed and included for designation because the route provides important connectivity between the 618 road and the White Mesa area and is not located in any Threatened, Endangered, or Region 3 Sensitive species habitat. This route is approximately 1 mile from Interstate 17, making it very accessible and less important for general wildlife. This area connects to the Stoneman Lake Road (213) and receives regular ATV use and dispersed camping all season.</p>
Specific Routes	<p>USFS Road Number: X14925; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: This little piece of road connects the road from State Land to the road you left open, 00617. We need this road to remain open.</p>	<p>Access to private lands may be provided through road use permits, livestock grazing permits. Access to State Lands from Forest Service lands are provided by 617, X-14925 may be used in conjunction with a permit from the State Lands Department .</p>
Specific Routes	<p>USFS Road Number: X15473 and X15536; Flying M Ranch Uses: No; Flying M Ranch recommendation: These roads are not on our allotment but need to remain open to hunting</p>	<p>These two routes make a loop from the recently closed Kinnikinick Campground back to 82A. The X-15536 route was designated to provide access to the lake and</p>

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	<p>primarily elk. These are main hunting roads off FR 125 in GMA 5BS and would really make a pocket for elk to hide during hunting season and make it hard for AGF [Arizona Game and Fish Department] to reach target harvest. We need this road to remain open.</p>	<p>decommissioned campground; the X-15473 was not designated, because a loop near the lake may encourage undesirable traffic to elk hunters or campers.</p>
<p>Specific Routes</p>	<p>USFS Road Number: X15473 and X15536; Flying M Ranch Uses: Yes; Flying M Ranch recommendation: This is the road to Kinnikinnick Campground. Are you going to close the campground? We load our water truck at Kinnikinnick Lake and this is the road we use also. We need this road to remain open.</p>	<p>The Kinnikinnick Campground was decommissioned in the recent Pinegrove Campground Improvement and Kinnikinnick Campground Conversion Environmental Assessment. As a result both X-15473 and X-15536 are no longer necessary. Other roads providing access to facilities such as bathrooms and the boat ramp at Kinnikinnick Lake are being designated as open. Activities such as water hauling can be authorized under a livestock grazing permit.</p>
<p>Specific Routes</p>	<p>Road Closure Recommendations and Risk: X17593-Close to all but essential administrative use. Noxious weeds (TAP:460).</p>	<p>This route was requested in several comments received from the public. Specifically, this route provides recreation access and is a spur road that allow for motorized dispersed camping opportunities with nearby access from Interstate 17.</p>
<p>Specific Routes</p>	<p>Road: X18580; Common Allotment Name: Headgate or Diversion; Description of Road Change Request: We [Bar T Bar Ranch] have legal access to this headgate--it needs to be open.</p>	<p>Not designated because this route is partially in a drainage. Access for livestock or water systems can be authorized through a permit. Not necessary to include designation for public access.</p>
<p>Specific Routes</p>	<p>Road: X24221; Common Allotment Name: Limestone Tank; Description of Road Change Request: The road as far as Limestone Tank needs to remain open as we [Bar T Bar Ranch] have to haul water there.</p>	<p>Route designated in Alternative 3 for increased dispersed recreation capacity.</p>
<p>Specific Routes</p>	<p>West Clear Creek Road Closure Recommendation and Risk: X-26568-Close and decommission.</p>	<p>This route was specifically identified for recreation and hunting access by Arizona Game and Fish Department and other public comments. Like routes 9369S and 9399S, this route provides for access to the land above</p>

Issue	Comment	Response
	Severe erosion hazard and MSO [Mexican Spotted Owl] nest (TAP:496).	West Clear Creek. With only 3 miles distance from State Highway 260, this road gets regular use for recreation and motorized dispersed camping. This route is not located in sensitive wildlife habitat, but is located near a Mexican spotted owl PAC. Adjacent routes were closed to reduce road density, including X-26709, X-26708, X-26923, X-26756, X-26735, X-26856.
Specific Routes	<p>Road Closure Recommendations and Risk:</p> <p>X30228-Close and decommission.</p> <p>Road/Trail conflict and other resource concerns (TAP:507) affecting Fossil Creek Wilderness/ W&S watershed.</p>	This route was specifically identified for recreation and hunting access by Arizona Game and Fish Department and other public comments. This route is a spur road from the powerline road, which allows for dispersed camping opportunities in javelina and deer hunting areas. Route is located on flat terrain. To reduce road density, nearby routes X-29809, X-30340, X-30309, X-29313, 9235A, 9235C, and X-30030 were not designated.
Off-road travel	Alternative 3, Direct and Indirect Effects, Recreation Activities, Hunting and Game Retrieval (page 38-39): As written, we [US Fish and Wildlife Service, Arizona Ecological Field Services Office] find it difficult to fully evaluate the impacts of this proposal on listed species and their habitat. This section states that though this alternative has no provisions for MBGR [Motorized Big Game Retrieval] it will be allowed in game management units where the majority of the unit area occurs on an adjacent National Forest that allows MBGR. Therefore, this could occur where the CNF [Coconino National Forest] abuts the Williams Ranger District, Kaibab National Forest, and potentially other National Forests. In addition, this section states that the Cinder Hills OHV area would allow for MBGR. This could become a very confusing issue for the public if some areas of the CNF operated under the decision an adjoining forest makes regarding MBGR, while the other portions of the forest	We have taken your comments into account and worked closely with you and Arizona Game and Fish Department and in consideration of public comment to re-look at motorized big game retrieval on the Coconino National Forest to make it more simple and workable. The Forest has considered an option where slightly more than half of the Forest is available for motorized big game retrieval based on the Fish and Wildlife Service's comments regarding impacts from this motorized use on aquatic species in the East Clear Creek watershed and from comments by the Fish and Wildlife Service regarding the potential impacts to the Mexican spotted owl, if the entire forest was designated for this use. The Record of Decision has more information and rationale on the issue of motorized big game retrieval.

Issue	Comment	Response
	<p>could be closed to MBGR (except for the Cinder Hills OHV area). Alternative 3 seems likely to result in confusion regarding whether MBGR is allowed or not allowed in a particular game management unit on the CNF. We recommend either closing the forest to MBGR or opening it to MBGR so that the public can clearly understand the rules, implementation can be more effective, and we can better understand the impacts of implementation on natural resources, particularly listed species and their habitats.</p>	
<p>Off-road travel</p>	<p>I see no reference to cross country traveling from wood cutting permits. This would have a limited effect as to the imprint on the forest in the Munds Park area. Wood cutting of down and dead wood helps in cleaning up the forest for keeping down forest fires. I burn about 4 to 5 cords of wood a year and the cost of propane would put a hardship on me.</p>	<p>A decision for any alternative being considered in the Travel Management EIS and is not expected to prevent fuelwood collection. Fuelwood collection will still be authorized by obtaining a permit, as is currently required. Fuelwood permits are expected to clearly indicated where motorized use (including cross-country travel) is authorized for fuelwood collection activities.</p>
<p>Off-road travel</p>	<p>I see no reference to cross-country traveling for wood cutting permits. This would have a limited effect as to the imprint on the forest in the Munds Park area. Wood cutting and dead wood helps in cleaning up the forest for keeping down the forest fires.</p>	<p>A decision for any alternative being considered in the Travel Management EIS is not expected to prevent fuelwood collection. Fuelwood collection will still be authorized by obtaining a permit as is currently required. Fuelwood permits are expected to clearly indicated where motorized use (including cross-country travel) is authorized for fuelwood collection activities.</p>
<p>Off-road travel</p>	<p>My name is Steve Sivistri. Myself and some family own ten acres down the 680 road east of FH3. We have been speaking with various people at Blue Ridge RS [Ranger Station] over the years regarding our concerns on OHV use and campers near our property. I have gone through your proposals and have determined to the best of my ability that Alternative 4 would be most applicable. I believe that it is the only alternative that allows big game retrieval. I am not sure why this activity was not included in all the other alternatives as I believe that should</p>	<p>Thanks for your comments. Your concerns about big game retrieval will be considered for the decision. Adding big game retrieval to all of the alternatives does not meet the purpose of the National Environmental Policy Act (NEPA). NEPA requires that range of reasonable alternatives be considered and this has been interpreted to mean that the purpose of alternatives should be to look at a wide variety of management options.</p>

Issue	Comment	Response
	be allowed in all the other alternative plans.	
Off-road travel	<p>Game Retrieval: If the "hunter success" is now only 40-60% for many of the hunts, this proposed policy will reduce that success. Because people will not be able to either find their elk within a mile of the road, or want to hunt an antelope or deer without walking many miles, or hunt after Nov. 1st and still retrieve their game; Alternative 4 will cause more problems than it solves. As a result of poorer hunter success, Game and Fish [Arizona Game and Fish Department] will probably feel compelled to issue more tags, which translates to more people and additional impact, exactly what you don't want. For these reasons, we [Bar T Bar Ranch] believe you should consider retrieval off road with ATVs (and only ATVs) because the impact is far less than with 4-wheel drive pickups. We also believe you should allow retrieval of all big game species. We further believe that you should allow game retrieval with all hunts, not just those prior to Nov. 1st.</p> <p>A current example of where this does not work is Hay Lake, where motorized vehicular travel is not allowed. A very few hunters hunt there, as the distance to pack an elk out could very well be more than a mile. Meanwhile the elk herds are large there because they feel protected. This is not a suggestion to change the designation at Hay Lake, but rather use of an existing example.</p>	<p>The assumption that hunting success will be reduced as a result of decreased motorized access is not necessarily true. Studies show that hunter success actually increases with decreased road densities (Gratson and Whitman, 2000). This study and many others have shown that wildlife, such as elk, avoid roaded areas. Because of the current preponderance of roads with regular motorized use, elk concentrate on the Forest in the minority of areas that receive less motorized use, such as Hay Lake. It is thought that by decreasing motorized use on the Forest, elk will become more evenly distributed across the Forest, thus increasing hunter success.</p>
Off-road travel	<p>On the issue of dispersed camping, while we [Flying M Ranch] support not having people drive ¼ mile or more off the road to camp, a solid line of camp trailer, pickups, cars, tents, ATVs tied up dogs, kids playing ball and all the other activities associated with camping doesn't sound too appealing either. Several longtime use "circle drive" type campgrounds off of FR 82 are listed for closure. Why move that use that has already</p>	<p>We understand your concern with regard to not designating user-created 'circle routes' and establishing new impacts by forcing people to camp in new areas. Unfortunately, it is unrealistic to depend on person-to-person contact as you suggest. Even if the Coconino National Forest employees and volunteers made great efforts to contact most users to limit impacts, this would</p>

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	<p>disturbed the area, for at least 50 years that we know of to a whole new area. While you are trying to restore one area, and that will be hard to do, you will be messing up another. Once again more person to person contact might be a better way to keep these areas nice for the visiting public.</p>	<p>not prevent impacts that result from motorized access in areas with sensitive wildlife habitat, archeological resources, or wetlands/meadows. Many of the 'circle routes' that do not cause impacts to wildlife, water, or cultural resources can be accessed in those routes with designated camping corridors. The Coconino National Forest designated camping corridors primarily in those areas where dispersed camping is already occurring.</p>
<p>General</p>	<p>Concentrating camping as you have depicted for Alternative 4, will result in diminishing the quality of the camping experience. There will be excessive dust, noise, and traffic, being that close to the roads. Sanitation may become an issue. Allowing only 30 feet from the edge of the road is unrealistic. And some of the areas selected are not good choices.</p>	<p>None of the alternatives would eliminate camping areas; rather the alternatives would restrict the use of motor vehicles to get to some dispersed camping locations. In some places we agree that this may concentrate use, but it is highly unlikely that it would concentrate dispersed campsites to such an extent as to result in sanitation problems. The dispersed camping corridors allow for motorized use up to 300 feet off one or both sides of the road for dispersed camping. Only in areas outside of dispersed camping corridors would motorized use be restricted to 30-feet from the edge of the road. We understand that some of the areas included in the DEIS for camping corridors are not good choices and the corridors were modified in the FEIS based on public comments such as yours and input from Forest Service recreation staff and Arizona Game and Fish Department game officers.</p>
<p>General</p>	<p>(cont from cmt no.3) We are all for allowing people to utilize the forest road systems in a reasonable manner. It seems as though people do not understand how noise travels in the mountains and it would seem that some sort of noise restriction should be a component of your decision making. Standard quads that your every day person buys which we own ourselves have good muffler</p>	<p>Although noise from vehicles is a complaint we heard during public scoping, we chose to address this issue through the appropriate designation of roads and trails rather than restricting noise through requirements for certain mufflers on vehicles. For example, we accounted for impacts from noise by analyzing the potential affects from each alterantive on user-conflict. Those areas of the</p>

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	<p>systems and can be utilized most places with minimal noise output.</p>	<p>Forest to be managed for non-motorized sights and sounds (Primitive and Semi-primitive Non Motorized areas) were analyzed for each alternative to determine how route designations would impact the non-motorized management objectives for these areas. We feel this would include additional rules, restrictions, and enforcement requirements that are beyond the scope of TMR.</p>
<p>General</p>	<p>(cont from cmt no. 178) Based upon an analysis of the TAP [Travel Analysis Process] (Forest Service 2010a), augmented by extensive on-the-ground surveys over the past five years by Grand Canyon Wildlands Council, we strongly urge the Coconino National Forest to close the routes [we recommend] for watershed and resilient forest restoration, including protection and restoration of native species [in the East Clear Creek area].</p>	<p>The Coconino National Forest carefully reviewed the routes in the East Clear Creek area. Alternative 3 was further modified to not designate several routes in the East Clear Creek watershed to protect watershed resources.</p>
<p>General</p>	<p>Having lived in Arizona for 41 years we've enjoyed hiking, back-packing, biking, horseback riding, fishing, camping, ATVing and hunting in the Coconino National Forest, I have come to realize that the US Forest Service would rather lock-out those that recreate in the forest; rather than monitor and punish those few bad apples that destroy it. I believe that the majority of the infractions that occur in the forest are from those who (trying to escape the heat of Southern Arizona) don't live in the area. Take any given weekend in the summer and visit popular areas in and around Mormon and Stoneman Lake, The San Francisco Peaks, Munds Park, Fry Canyon area, or the Cinder Hills north of Flagstaff and you'll see campsites as large as 100+ people laden with OHVs tearing up hillsides, trashing camping areas, shooting up road signs and leaving camp fires burning. Rarely (if ever!) do you encounter a local Sheriff, Fish and Game officer, or Forest Service Law Enforcement Officer. The</p>	<p>I assure you that the Coconino National Forest regularly enforces all of the areas you mention. We held education and enforcement 'blitzes' at both Mormon and Stoneman Lake areas in the Summer of 2011, and have regular patrols on all parts of the San Francisco Peaks, Munds Park, Fry Canyon, and the Cinder Hills areas. Although enforcement is a constant challenge, it is not solely an issue of dealing with 'bad apples' from southern Arizona. The major reason behind the Travel Management Rule is to change from a situation of unmanaged recreation so that the increase in Forest visitors and motorized use over the past three decades can be managed within a framework to conserve valuable Forest resources while maintaining recreation opportunities.</p>

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	<p>"bad apples" that destroy our opportunities and access-have no regard for the land, vegetation or wildlife in the area...let alone the motorized vehicle laws in existence.</p>	
<p>General</p>	<p>Unauthorized routes are reducing the amount of semi-primitive non-motorized (SPNM) Recreation Opportunity Spectrum (ROS) areas available on the forest. Forest Service 2010:24. We [Center for Biological Diversity et al.] note that the ROS is an enforceable prescription in the Forest Plan. Forest Service 1987:46, as amended. Forest visitors seeking the SPNM recreational experience should not be relegated to the extremely rugged terrain of the backcountry such as is found in Ike's Backbone/Fossil Creek, Hackberry Mountain, or Deer Basin, which is protected from illegal motorized uses because of the rugged nature of the area, while front-country SPNM areas are destroyed by illegal motorized uses. Forest Service 2010:24. To continue to allow such unauthorized uses to force out front-country primitive users relegates these users to areas that may be impossible to access by the elderly or disabled.</p>	<p>We agree that the proliferation of unauthorized routes and unmanaged off-road motorized use is affecting semi-primitive non-motorized recreation opportunities and limiting SPNM experiences only to rugged backcountry areas. The ROS categories are management objectives. Both alternatives would result in substantial reduction of motorized use to SPNM areas (see Recreation Specialist Report for more detail). Thus both action alternatives would be strongly moving conditions toward Forest Plan objectives.</p>
<p>General</p>	<p>User conflicts between over-snow vehicles [OSVs] and quiet users exist in many, if not most, national forests, including the Coconino National Forest. Exempting OSVs from travel planning means these user conflicts are allowed to persist indefinitely, contrary to Executive Orders 11644 and 11989. These conflicts are largely due to the disproportionate impact OSVs have on other forest users. While many quiet recreationists do not detract from OSV users experience, the reverse is certainly not the case. In certain circumstances, just one OSV can significantly detract from those seeking the quiet and solitude of skiing or snowshoeing in winter. The noise, pollution and high speeds of OSVs not only degrades other users recreational experience, they can also displace quiet recreationists. In forests frequented by OSVs, quiet users are</p>	<p>Designation of routes for use of over-snow vehicles is specifically discussed as an exemption in the Travel Management Rule. Since the purpose of this project is to implement the Travel Management Rule, designation of routes for use by over-snow vehicles is outside of the scope of this project. This project will in no way prevent future efforts to designate routes or areas for use of over-snow vehicles.</p>

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	<p>often forced to go to areas that are usually less desirable for their recreational pursuits, or simply stop using the forest altogether as a result of the agencies lack of planning for OSV use.</p> <p>Currently OSVs are allowed in areas of Coconino National Forest that are popular and historic destinations for the non-motorized winter recreationist. These areas include Fern Mountain, Hochtafer Hills, Hart Prairie, and the San Francisco Peaks. Currently motorized use and associated user conflicts in these areas are minimal. However, in the future, motorized winter use and conflicts with non-motorized winter recreationists will undoubtedly increase. Winter Wildlands Alliance and its members encourage Coconino National Forest to proactively address this issue by including winter travel planning and designating these areas as non-motorized.</p>	
General	<p>The use of ORVs on designated routes will also generate emissions from vehicle engines. Currently, many ORVs in use run on 2-stroke engines, including off-highway motorcycles and ATVs, which do not burn fuel completely and produce significant amounts of airborne contaminants, including nitrogen oxides, carbon monoxide, pollutants that contribute to the formation of ozone, aldehydes, and extremely persistent polycyclic aromatic hydrocarbons (PAH), including the suspected human carcinogen, methyl tert-butyl ether (MTBE).</p> <p>The Forest Service must quantify all emissions from ORVs in order to fully understand their likely impact on air quality in the planning area. The Forest Service must include a comprehensive inventory of emissions generated by the vehicles traveling these routes and conduct management activities so that air quality will be equal to or better than that required by applicable federal, State, and local standards or regulations. Finally, to the extent these calculations reveal ORV use is contributing or will</p>	<p>There is no requirement for a full and comprehensive inventory of all emissions generated by vehicles traveling on routes on the Coconino National Forest. This is neither feasible, but would largely be speculative as the amount of vehicle traffic varies day-by-day and year-by-year. The Air Quality Specialist Report analyzes the potential effects to air quality in the Flagstaff area based on the change represented by the management alternatives in this EIS, which meets the requirements of NEPA.</p>

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	<p>degrade air quality in the Flagstaff area, the Forest Service must reduce the amount of ORV use allowed on the Forest and locate routes on which ORVs can travel in such a way as to minimize contributions to air quality problems.</p>	
<p>General</p>	<p>I am 44 years old and was brain damaged at birth. Riding in the forest in the Polaris Ranger and seeing all the animals and having a picnic is one of the few enjoyments I have. The other is music. We gather wood in the forest and have a picnic with our dogs and would still like to do this. My choice is Alternative 4.</p>	<p>Thank you for your input. Regardless of which alternative is chosen, the designated system of motorized roads, trails, and areas will still provide you opportunities to ride your ATV, view wildlife in the Forest, and picnic with dogs and music.</p>
<p>General</p>	<p>What you really need to do is to look at the cattlemen - why can they lease the land for pennies and keep the public off their own land. Check the flakes south of Apache Junction and see what they pay 57 cow allotment - about \$2.57 per cow per month - to the tune of \$1254.00 per year for all those sections of land and I can't ride on my own land. It is truly a crime. Why don't you check and see how many cows are out there right now...but hell no you are worried that I might ride my dirt bike out there and destroy the environment. You guys make me sick. You should be ashamed of what you are doing.</p>	<p>Outside of the scope and not related to the purpose and need of the project.</p>
<p>General</p>	<p>Wildlife. "Habitat fragmentation is the most serious threat to biological diversity and is the primary cause of the present extinction crisis," a conclusion supported by several prominent conservation biologists. Wilcox and Murphy 1983; Meffe and Carroll 1997 [Citations not provided]. Roads, both paved and primitive, constitute a major cause of North American forest habitat fragmentation. Trombulak and Frissell 2000; Strittholt and Dellasala 2001. As global warming continues, wildlife connectivity will increase in importance to best ensure the persistence, even survival, for many species. This is especially relevant for forest located along the dramatic elevational gradients along the Mogollon Rim.</p>	<p>Both action alternatives included in the DEIS are expected to substantially decrease cross-country travel and routes available for motorized use. This includes the area along the Mogollon Rim. By decreasing the amount of motorized use across the Forest, habitat fragmentation is expected to decrease from current conditions.</p>

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General	<p>I own a home at 8475 Robyn Lane in Doney Park that borders Coconino National Forest and I reside at 10800 Nighthawk Lane in Doney Park that also borders the National Forest. I have lived in Doney Park since July of 07 and have experienced first-hand the deterioration of the forests and the quality of life that I expected to have living here.</p> <p>I am saddened by the damage I see on my daily walks that involve cross-country tracks from wood-cutting, the constant driving across fragile grasslands, ATV/dirt bike damage by those that think they are in the Cinder Hills OHV area or just don't care where they are riding, campers not putting out their fires, people dumping construction material, landscape debris, in the forest.</p>	<p>We understand your concern. The Travel Management Rule and the Coconino Travel Management planning process stem from the need to address unmanaged motorized use on the Forest, which is related to many of the problems you mention. We feel that establishing a designated system of roads, trails, and areas for motorized use will improve management of Forest resources.</p>
General	<p>I worked for the U.S. Kaibab National Forest Service, bordering the Coconino FS [National Forest] for two seasons as a Forestry Technician/Fire Lookout. I worked all week long on top of Kendrick Mountain, which is a Wilderness Area. I can say that my encounter with wildlife was limited to a skunk, porcupine, elk, deer, coyote that I could hear in the distance, a few snakes, a bear that lived on the north side fo the mountain that I never saw. One Fire Prevention coworker reported seeing a bear one day while she was on patrol in the Forest.</p> <p>I know that my experiences of solitude, peace and enjoying the wild will be disrupted and greatly reduced by the howling of motorcycles and ATVs if they are given free run of our public lands.</p>	<p>Both Alternatives 3 and 4 are expected to substantially reduce the extent of motorized use by restricting off-road vehicle travel and limiting motorized use to designated routes and areas. The prohibition of motorized use in Wilderness areas, such as the Kendrick Mountain Wilderness, will not change.</p>
General	<p>Not only do dirt bike enthusiasts support the local Flagstaff economy but the state as well. Taxes on the sales of equipment a supplies go to all kinds of state services that are used for all sorts of much needed projects. Having a robust OHV helps our</p>	<p>We agree that dirt bike users support the local and state economy from purchases and spending associated with this recreation activity. The economic impact analysis considers economic contributions from motorized</p>

Issue	Comment	Response
	state and country economically.	recreationists such as yourself, and from non-motorized recreationists who also contribute to the economy.
General	<p>The AWF [Arizona Wildlife Federation] strongly supports the development, implementation and enforcement of a comprehensive Travel Management Plan on the Coconino NF [National Forest]. The AWF advocates that their recommendations be given full consideration in the planning process and strongly encourages that these recommendations be incorporated to protect the Coconino NF's valuable natural resources such as fish and wildlife populations and their important habitats.</p> <p>AWF recognizes the importance of designating a system of roads, trails, and areas for motorized vehicle use on the Coconino National Forest. The proliferation of user-created roads and trails over the last two decades has caused soil and vegetation impacts resulting in a reduction of wildlife and fisheries habitat quality. Prohibiting cross-country travel, other than within the Cinder Hills Area, will provide opportunities for public enjoyment of the Coconino National Forest while improving wildlife habitat and reducing disturbance to wildlife.</p>	Thanks for your input. Both action alternatives are expected to substantially reduce the amount of designated motorized use in sensitive wildlife and watershed areas. The protection of wildlife and watershed areas was the main driver in not designating specific routes.
General	The Coconino National Forest (CNF) LRMP [Land Resource Management Plan] directs the CNF to upgrade RIM [Reference Informative Model] Condition Classes 4-8 to Class 1. Forest Service 1987: 189, as amended [see ATT 9 for citation]. In addition, the air quality related values of Sycamore Canyon Wilderness Class 1 airshed, and all wilderness area airsheds, must be protected. Forest Service 1987: 111, as amended [see ATT 9 for citation].	The Reference Informative Model on page 189 of the Forest Plan is related to rehabilitation of developed recreation sites, which is outside of the scope of this project. Neither Alternative 3 or 4 would negatively impact air quality airsheds, such as the air quality related values of the Sycamore Canyon Wilderness Class I airshed, which are discussed in the Air Quality Specialist Report.
General	The DEIS makes clear that road densities are too high and negatively impacting threatened and endangered aquatic species in the Coconino National Forest (CNF). Forest Service 2010:73	In general, we agree with your comment that roads are the single biggest contributor to sediment, and that management of motorized use can have a major impact

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	<p>et seq. Four streams in the CNF are listed as impaired in the Arizona Water Quality Assessment from 2000: Barbershop Creek above confluence with East Clear Creek, Barbershop Creek below Merritt Draw, Oak Creek below Pine Flat, and West Clear Creek at Maxwell Trail. Forest Service 2010:73-74.</p> <p>The single Agency action that could have the greatest impact on aquatic species negatively impacted by sedimentation would be to utilize the TMP [Travel Management Plan] process as an opportunity to bring the outsized route system to a manageable size because, as is well documented in the DEIS, roads contribute more sediment to streams than any other land management action, act as barriers to migration, and the number of stream crossings reduce taxa richness. Forest Service 2010:76.</p>	<p>on reducing sediment to aquatic habitat. The Soil and Water Specialist Report endeavors to actually quantify the amount of sediment produced from the road system for comparison purposes for this very reason.</p>
General	<p>We [National Park Service] fully support the USDA Forest Service in implementing the Travel Management Rule on the CNF [Coconino National Forest]. Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments are relatively small management areas surrounded by Coconino National Forest (CNF) and other lands. The cooperation of adjacent land management agencies is essential for the National Park Service (NPS) to protect the nationally significant archeological and geological resources within the Monuments for the enjoyment of this and future generations. We are particularly aware of the proliferation of new routes and the increase in use of ATVs over the last two decades on the CNF in proximity to the boundaries of the Monuments. Forest users often utilize existing unplanned, unofficial CNF roads up to the Monuments' boundary fences. Because the Monuments have common boundaries with CNF lands, citizens are at times confused about where off-road travel is appropriate. On occasion, forest users violate area closures within the</p>	<p>Thanks for your input. We believe your specific concerns have been incorporated into Alternatives 3 and/or 4.</p>

Issue	Comment	Response
	<p>Monuments, resulting in damage to archeological sites and unique volcanic features and landscapes. We would anticipate these problems to continue under the No Action Alternative (Alternative 1).</p>	
<p>General</p>	<p>Alternatives 3 and 4 would improve the ability of the NPS [National Park Service] to provide for long-term preservation and public enjoyment of the nationally significant resources within the National Monuments [Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments]. Both Alternatives would enhance NPS visitor experience by preserving scenic viewsheds on surrounding CNF [Coconino National Forest] lands and maintaining natural quiet at the primary visitor use areas within the Monuments. They would reduce the chance of inappropriate off-road travel within Wupatki and Walnut Canyon, whether intentional or accidental, and the potential for damage to archeological sites. Terminating CNF roads farther from the monument boundaries would have the effect of increasing access time and deterring vandalism to archeological resources within the Monuments.</p>	<p>Comment is in agreement with Alternatives. No response necessary.</p>
<p>General</p>	<p>Both Alternative 3 and Alternative 4 are in keeping with interagency scoping discussions held during the late 1990's for the Flagstaff-Lake Mary Ecosystem Analysis Amendment to the CNF [Coconino National Forest] Land and Resource Management Plan (LRMP), along with the NPS [National Park Service] General Management Plans for Wupatki, Sunset Crater Volcano, and Walnut Canyon National Monuments. Again in 2008, your staff met with us [National Park Service] to review the current conditions road map and identify potential road segments that might be closed under the Travel Management Plan. The road systems proposed in Alternatives 3 and 4 of the DEIS are consistent with those identified during our scoping discussion, including the complete or partial closure of an</p>	<p>Comment in in agreement with Alternatives. No response necessary.</p>

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	<p>estimated 14 miles of redundant roads adjacent to Wupatki National Monument (FR-00787, FR-00545G, and other un-numbered roads), 18 miles adjacent to Sunset Crater National Monument (FR-00414, FR-00546, FR-00776, and other un-numbered roads), and 16 miles adjacent to Walnut Canyon National Monument (FR-09619J, FR-09619N, and other un-numbered roads).</p>	
<p>General</p>	<p>Wetlands and riparian areas are particularly susceptible to degradation from ORVs. With just 74 wetlands covering less than 0.1 % aerial extent on the Coconino National Forest and most of these wetlands having road access, these areas should be prioritized for protection. Soil and Water Specialist's Report: 11. Riparian areas make up less than 0.3% of the forest (though many riparian areas are unaccounted for in the specialist report) and approximately 45 miles of roads are within 2 chains of a riparian streamcourse. Soil and Water Specialist's Report: 12. Dispersed camping frequently occurs where forest roads intersect with riparian areas. Soil and Water Specialist's Report: 13. Unless routes through all riparian or wetland areas are high value, these routes should be closed, decommissioned and obliterated. We would recommend prioritizing the 31 wetlands that are currently classified as Functioning at Risk, and the Upper Clear Creek, Oak Creek, Walnut Creek and Beaver Creek watersheds for route closure/decommissioning/obliteration.</p>	<p>All wetlands and riparian areas were one of the primary criteria used to determine whether or not routes were included in an alternative. Those routes with low value (meaning no connectivity and not providing access to facilities, private lands, or trailheads), were not included for designation in either action alternative if they conflicted with riparian or wetland areas. In addition, all of the remaining routes in Alternatives 3 and 4 were fully analyzed in the Water and Soil Specialist Report. The analysis clearly shows that routes were substantially decreased in Upper Clear Creek, Walnut Creek, and Beaver Creek watersheds. Routes in Oak Creek Watershed were also decreased, but to a lesser extent due to the limited number of routes in this watershed compared to others.</p>
<p>General</p>	<p>Leaving ATVs alternative routes would relieve the main roads of traffic, and would provide for an improved experience using the system of roads in the forest. Allowing smaller vehicles, such as ATVs and motorcycles, to access most of the existing roads and trails would do no additional damage to the forest. Perhaps an additional category of road/trail can be established to permit use of those existing roads/trails specifically for small motorized</p>	<p>Since a majority of roads are designated for motorized use in each alternative (over 2,500 miles designated as 'all vehicles'), and those routes that are designated generally include those routes with the majority of traffic, increased traffic from holidays and weekends on a smaller designated route system is expected to be very minor. Though designation of more routes to <50 inches (designation for use by only ATVs, dirt bikes, and</p>

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	vehicles.	motorcycles) is an option under the Travel Management Rule, the Coconino National Forest chose to generally designate routes for all vehicles for the following two reasons: (1) Designation of routes for all vehicles provides more flexibility for all types of motorized recreationists; and (2) a large fraction of ATVs and UTVs currently being manufactured are wider than 50 inches in diameter and this would cause additional confusion regarding which roads can be driven by which vehicle types.
General	Every watershed listed as important for aquatic resources with the exception of Fossil Creek, have road densities above 2.0 miles/square mile, the most egregious road densities are for West Clear Creek (2.7 miles/square mile) and Upper Clear Creek (4.1 miles/square mile). Forest Service 2010:75. We [Center for Biological Diversity et al.] do not agree that the Coconino National Forest (CNF) should rely on a road density standard that indicates a watershed is no longer properly functioning (the 2.5 miles/square mile standard cited in the DEIS at page 75). Rather, we recommend the CNF should be working to reduce route densities to 1 mile/square mile to protect wildlife and habitat and watershed health.	Both action alternatives substantially reduce the road density available to motorized use, thus working toward reducing route densities (see Soil and Water Specialist Report for more detail). An alternative to analyze a route system that would result in a route density of no more than 1.0 miles/square mile was considered but eliminated from detailed study. This alternative would not meet the purpose and need, which includes designation of a system of routes and areas for motorized use that would allow for access and recreational opportunities while minimizing impacts to Forest resources. An alternative that includes a road density of less than one mile/square mile would not even support the minimum road system identified by the Coconino National Forest in the Travel Analysis Process Report and thus would not provide adequate motorized access or recreational opportunities.
	Resource Monitoring (page 48): The resource monitoring section states "In order to ensure that excessive resource damage is not being caused by motorized recreation activities, it will be necessary to monitor the effects of motor vehicle use on designated roads and trails and in the Cinder Hills OHV Area.	The Coconino National Forest is in the process of developing several implementation plans, including monitoring, for the implementation of a decision on the Travel Management EIS. The monitoring plan shall be posted on the website at the same time the Record of

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	<p>This can be conducted by forest personnel during their day-to-day travels on the CNF." We [US Fish and Wildlife Service, Arizona Ecological Field Services Office] recommend developing a more robust monitoring protocol that defines "excessive resource damage", identifies the type of data Forest Service employees will collect, who will be responsible for compiling this information, when specific areas will be visited, and how resource damage will be assessed and repaired. We also recommend that the Forest Service develop a means of communicating this information to other resource agencies (e.g. AGFD [Arizona Game and Fish Department], FWS [Fish and Wildlife Service], etc.) and the public.</p>	<p>Decision is made available. Monitoring items in the plan may be changed based on available resources and needs. Monitoring will be focused to allow for adaptive management of motorized use on the Coconino National Forest. Additionally, monitoring for motorized use is inherently related to and needs to be considered with monitoring of other Forest resources. This larger effort is being considered in Forest Plan Revision on the Coconino National Forest.</p>
<p>General</p>	<p>I am an active user of the Coconino National Forest and use the forest roads for recreation. In addition, I volunteer for cleanups and hauling out abandoned vehicles that have been pushed off the road, often landing up to one hundred feet below on a steep hill. It's not easy, but we (myself and other 4-wheelers) have been able to pull these smashed vehicles out using our personal jeeps.</p> <p>I have a highly modified vehicle that allows me to run safely with minimal impact on forest roads. I follow the "Leave no Trace" when it comes to picnicking near our vehicles. Jeeping is often a family occasion and our spouses, children frequently are along to view the scenic beauty of the forest.</p> <p>I reviewed the Draft EIS for Travel Management on the Coconino National Forest and am very disappointed with the proposed model. The closing of miles of high clearance vehicle roads, especially since about half a million acres of the Coconino are already closed to vehicles, will severely limit our ability to recreate and help care for the National Forest.</p>	<p>Thanks for your comment and concerns. Our most restrictive alternative (Alt. 3) still allows access to within 1/2 mile of approximately 80 percent of the Forest outside of Wilderness. There is a large body of scientific research showing that motorized use can have negative impacts on wildlife, watershed, soil, and other Forest resources, including the experiences of other recreational users. While we recognize that reducing areas available for motorized use on the Forest will result in limited access for some, the majority of roads to be designated under any alternative are to be designated for all vehicles, which provide ample opportunities for primitive road driving. Additionally, the Forest considered several specific routes based in input from 4x4 drivers such as the Smasher Canyon road, which is included in Alternative 4, and Lower Smasher Trail in Alternatives 3 and 4.</p>

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	<p>I am not asking that these roads be maintained, only that they remain open. Currently, with the exception of areas in the Red Rock District, vehicles were allowed to travel anywhere they wanted to on the forest. Many roads were created for timber extraction and ranching and they should remain open for public enjoyment.</p> <p>A mission statement on the Southwestern Region's web site is "Caring for the Land Serving the People." By closing many miles of roads, this TMR [Travel Management Rule] appears to be in conflict with your mission. All of these plans are basically flawed; I recommend you adopt Alternative 1 and leave the public roads open to the public.</p> <p>Once again, we are the public, and want our public lands kept open as much as possible.</p>	
<p>General</p>	<p>Every summer for as many years as I can remember, my family has traveled from the Phoenix area to Flagstaff and Belmont to visit family and enjoy the outdoors of the Coconino National Forest. Not only is this a trip we look forward to every summer, but it also provides our children with invaluable learning experiences as to what the forest provides to us who enjoy being surrounded by the trees, mountains, wildlife and trails we enjoy to ride. We have been in a state of flux as we have to continuously and tirelessly justify the use of our natural resources, by complying with many new laws that are basically money generators and add no value to our natural resource management, other than provide a means to employ those who are aggressively trying to close our public land. As I go to the polls, as I do every two and four years, I vote and express my right and opinion to empower the right representation that will provide a delicate balance of ensuring our rights are enforced and our natural resources are preserved for many generations to</p>	<p>Thanks for writing with your thoughts. The Travel Management Rule is a Federal regulation that requires each national forest to designated a system of roads, trails, and areas for motorized use. The Coconino National Forest is completing this process and considering all of the user-submitted routes to help establish a motorized route and area system that is safe, fun, and environmentally sustainable. We feel the alternatives considered in the FEIS provide a motorized system that meets this delicate balance you mention to allow for continued motorized use and access while conserving important forest resources for current and future generations.</p>

Issue	Comment	Response
	come.	
General	<p>I am an Arizona native and have enjoyed camping and Off-Highway-Vehicle (OHV) use in the Coconino National Forest for over 30 years. I now have kids of my own, and we make frequent trips up to the Mogollon Rim high country to escape the heat of Phoenix and enjoy the beautiful northern country, lakes, and forests. We always stay on trails and leave each campsite cleaner than we found it, and when we ride we practice low-impact OHV use.</p> <p>I recognize that a few irresponsible riders can cause damage, but the vast majority of OHV riders simply use the trail and road system to enjoy the vast national forests that Arizona has to offer. Without OHVs much of this land is unreachable. The simple fact is that "tree-hugger" organizations like the Sierra Club finance efforts to keep the public off public land. They finance legal efforts to close areas for OHV use and use ridiculous logic like the "riding in the mountains kills fish in the creeks."</p> <p>I strongly oppose any new laws that restrict or minimize the use of OHV's in the national forest. Over the past decade, I've watched as many of my family's favorite riding areas have been shut down. Please do whatever you can to keep these places open. The National Forests are there for everyone to enjoy and should remain open forever.</p>	<p>Based on your description of staying on motorized roads and trails during your trips to the Forest, it is unlikely your recreational experience will be changed by any decision made under the Travel Mangement planning process. Thank you for enjoying and protecting our National Forest.</p>
General	<p>In the DEIS, scenic quality is clearly described as negatively impacted by cross-country travel because ORVs leave tracks on the ground or completely denude an area of vegetation, and these effects can last for years. Forest Service 2010:25. And while the DEIS states that ORV use has made it difficult to meet LRMP [Land and Resource Management Plan] objectives for</p>	<p>The purpose of the Environmental Impact Statement is to disclose the impacts of the alternatives. Both action alternatives are expected to decrease cross-country travel and decrease the amount of routes open to motorized use across the Forest. As a result, the overall impacts to scenic quality throughout the Forest are expected to be</p>

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	<p>scenic quality in "some areas," these areas are not described in the DEIS or in the Recreation Specialist report. The description of such areas as "ponderosa pine forest north of the Mogollon Rim involves a significant amount of land. Forest Service 2010:25. The public cannot determine which areas of the Forest are failing (or nearly failing) to meet LRMP objectives for scenic quality, nor which areas are being rehabilitated through the TMP [Travel Management Planning] process and which areas are being further degraded.</p>	<p>beneficial. Specific areas that are not meeting scenic quality objectives are not a focus of the study, the impact of the alternatives and how they will affect overall scenic quality is the focus of the study. The FEIS includes more detail on which specific areas would be impacted or benefited from each alternative.</p>
<p>General</p>	<p>My family and I use off-highway vehicles (OHV) for access and recreation on National Forests and other public lands. Only a few months ago we enjoyed a camping/riding trip just outside Flagstaff. The ability to enjoy our family hobby in the natural beauty of the area was amazing. I was particularly impressed that there was a park which allowed families with like interests to be around each other. Areas like these foster a sense of community and shared responsibility for nature. It allows the OHV community to work together toward responsible use, and to self police those who would choose a less responsible approach.</p>	<p>Thanks for your input. The Coconino National Forest Travel Management EIS includes alternatives to designate a system of roads, trails, and areas for motorized use across the forest. There are many areas such as you describe throughout the Flagstaff area, and many of these will continue to be accessible through motorized use. Non-motorized activities such as camping will not be restricted in any way by this project.</p>
<p>General</p>	<p>The DEIS presents three alternatives for public review, including the "no action" alternative. Alternative 1 is the no action alternative, Alternative 3 is the modified proposed action and Alternative 4 proposes cross-country motorized uses in addition to the route system proposed and analyzed in Alternative 3. As noted in the summary of the DEIS, both action alternatives would designate more than 3,000 miles of roads and trails for motorized uses, including 64 miles of user created routes. Forest Service 2010: iii. In fact, there is very little difference between the two action alternatives, as both Alternative 3 and 4 would:</p>	<p>Based on the hundreds of comments received on the DEIS, Alternatives 3 and 4 were slightly modified. These modifications had the effect of increasing differences and resulted in a broader range of alternatives to be considered in the EIS. Specifically, the Peaks Loop (Challenger Trail) was added to Alternative 4 to include detailed study of a long-distance (approximately 50 miles) and looped motorized trail in forested vegetation. In addition, Alternative 4 includes approximately 376 miles of additional roads for designation and includes motorized dispersed game retrieval on approximately 1.5 million acres more than in</p>

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	<ul style="list-style-type: none"> -Designate over 3,000 miles of motorized routes (3,280 for Alternative 3 and 3,507 for Alternative 4, a difference of just over 6%); -Add 64 miles of unauthorized routes; -Designate over 600 miles of corridor for motorized dispersed camping; -Include at least 25 miles of motorized trail (25 miles for Alternative 3 and 29 miles for Alternative 4, a difference of less than 10%); -Include a provision for MBGR [Motorized Big Game Retrieval] dependent on the decision made in the Kaibab National Forest's Travel Management Plan; and, -Include a provision for cross-country motorized use of the Cinder Pit OHV area (13,700 acres). 	<p>Alternative 3. Additionally, Alternative 1 (current condition) was fully analyzed providing for a broad range of alternatives to allow consideration of those issues you identify.</p>

Appendix 1. Common Acronyms and Abbreviations

ATV – All-Terrain Vehicle
AZGFD – Arizona Game and Fish Department
BMP – Best Management Practice
CEQ – Council on Environmental Quality
CFR – Code of Federal Regulations
CNF – Coconino National Forest
CWA – Clean Water Act
DEIS – Draft Environmental Impact Statement
EIS – Environmental Impact Statement
EPA – Environmental Protection Agency
FEIS – Final Environmental Impact Statement
FS – Forest Service
FSH – Forest Service Handbook
FSM – Forest Service Manual
FWS – Fish and Wildlife Service
GIS – Geographic Information System
GMA – game management unit
GPS – Global Positioning System
IDT – Interdisciplinary Team
LRMP – Land and Resource Management Plan (Forest Plan)
MBGR – Motorized Big Game Retrieval
MIS – Management Indicator Species
MSO – Mexican Spotted Owl
MVUM – Motor Vehicle Use Map
NEPA – National Environmental Policy Act
NFMA – National Forest Management Act
NFS – National Forest System
NHPA – National Historic Preservation Act
NVUM – National Visitor Use Monitoring

ORV – Off-road Vehicle
OHV – Off-highway Vehicle
PA – Proposed Action
PAC – Protected Activity Center
PFA - Post Family Fledgling Area (for northern goshawk)
R3 – Region 3 (Southwestern Region) of the Forest Service
ROS – Recreation Opportunity Spectrum
RV – Recreational Vehicle
SHPO – State Historic Preservation Office
SIO – Scenic Integrity Objectives
TMR – Travel Management Rule
TAP – Travel Analysis Process
USDA – United States Department of Agriculture
USDI – United States Department of the Interior
UTV – Utility-Terrain Vehicle