

Response to Comments

on the

Gunnison Travel Interim Restrictions Environmental Assessment



April 2001



Letter No.	Sender	Date Received
1	Dan and Diane Haberman, Gunnison, CO	11/27/00
2	Art Hertel, Delta, CO	12/13/00
3	W.J. Rueger, Paonia, CO	12/12/00
4	USFWS (Allan Pfister), Grand Junction, CO	12/21/00
5	Jack Mincher, Windsor, CO	01/15/01
6	Mrs. Evelyn Horn, Eckert, CO	01/17/01
7	Darla DeRuiiter, Gunnison, CO	01/09/01
8	Roger Cesario, Crested Butte, CO	01/08/01
9	Randy Russell, Colorado Springs, CO	01/12/01
10	Neil Nostrand, Paonia, CO	01/13/01
11	Bill Hamann (CMC), Grand Junction, CO	01/13/01
12	Rhonda Bates, Montrose, CO	01/06/01
13	John and Mary Trammell, Grand Junction, CO	01/13/01
14	Barbara Schmerter, Montrose, CO	01/14/01
15	Patricia & Wilson Groome, Hotchkiss, CO	01/19/01
16	Thea Necker-Wachter, Denver, CO	01/02/01
17	Sara Sabin, Bismarck, ND	01/19/01
18	Claire Moore, Paonia, CO	01/21/01
19	David and Debra Repps, Mt. Ayr, IA	01/16/01
20	Herman Brand, Arvada, CO (same letter as #5)	01/19/01
21	Lora Davis & Steven Moore, Paonia, CO	01/20/01
22	Duplicate – Deleted	
23	HCCA, WSERC, WCF, Crested Butte & Paonia, CO	01/26/01
24	John Humphries, Crested Butte, CO	01/26/01
25	Ryan Conrad, Gunnison, CO	01/24/01
26	John Monarch, Monarch & Associates, Cedaredge, CO	01/26/01
27	Carol Pierce, Paonia, CO	01/26/01
28	Paul Millermon, Paonia, CO	01/26/01
29	Lea Rolfsen, Paonia, CO	01/26/01
30	Cecil Murray & David Rose, Crested Butte, CO	01/26/01
31	Gunnison County Trails Commission	01/26/01
32	W.S. Bennett, Gunnison, CO	01/23/01
33	Robin & Gretchen Nicholoff, Paonia, CO	01/26/01
34	J. Che'Davies, Austin, CO	01/26/01
35	Sam Brown, Paonia, CO	01/26/01
36	Tara Miller, Paonia, CO	01/26/01

Letter No.	Sender	Date Received
37	Sam Vasicko (Thunder Mtn. Wheelers), Paonia, CO	01/26/01
38	Gail Reagan, Rifle, CO	01/25/01
39	Duplicate of 23	
40	Pat Stucker, Parker, CO	01/25/01
41	Reg Cridler, Hotchkiss, CO	01/25/01
42	Gunnison Cty Stockgrowers Assn, Almont, CO	01/25/01
43	Burt Guerrieri, Gunnison, CO	01/25/01
44	Larry Gillenwater, Paonia, CO	01/23/01
45	Skip Edwards, Crawford, CO	01/25/01
46	Roy Duncan, Gunnison, CO	01/24/01
47	Larry Sanders, Paonia, CO	01/23/01
48	Gene Kraning, Longmont, CO	01/23/01
49	David Brich, Hotchkiss, CO	01/24/01
50	Maureen Hall, Crested Butte, CO	01/20/01
51	Jennifer Seidenberg, Gunnison, CO	01/26/01
52	American Lands Alliance, et al., Boulder, CO	01/26/01
53	Thunder Mountain Wheelers, Delta, CO	01/03/01
54	COHVCO, Denver, CO	01/26/01
55	Bart Miller, Boulder, CO	01/26/01
56	Richard Armstrong, Larkspur, CO	01/26/01
57	Linda Lindsey, Paonia, CO	01/26/01
58	JoAnn Moon, Palisade, CO	01/26/01
59	Richard Wahl, Boulder, CO	01/26/01
60	Rocky Mountain Recreation Initiative, Boulder, CO	01/26/01
61	LaMont Nigus, Stilwell, KS	01/29/01
62	Ron Mitchell, Edwards, CO	01/29/01
63	Norma, Rosella, & Eddie Pierce, Paonia, CO	01/26/01
64	Kirby Kline, Montrose, CO	11/30/00
65	Nancy Ruehle & Mary Anne Tarr, Gunnison, CO	01/23 01
66	Steve Wolcott, Paonia, CO	01/26/01
67	Eric Triplett	01/30/01
68	Steve Millermon, Grand Junction, CO	01/26/01
69	Michael Cockrell, Frisco, CO	02/08/01
70	John Paul, Cortez, CO	02/09/01
71	Lee Ridrink, Cortez, CO	02/12/01

Issue No. and Description by Category	Letter Nos.
COMPLIANCE/ENFORCEMENT	
<p>A1. How will the agencies ensure compliance? Need to enforce current road closures and travel management needs. Even with new regulations, without enforcement, nothing will be accomplished.</p> <p>Response: The agencies have had, and will continue to have, a law enforcement presence in the field. Enforcement should be easier under the proposed action because if people are traveling off roads or trails they could be issued a citation. In the past because off-route travel was allowed, we could only issue a citation if resource damage was occurring (which generally was not caused by one pass of a motorized vehicle off a road).</p>	27, 39, 42
<p>A2. Education holds more hope than law enforcement for controlling the situation.</p> <p>Response: The Forest will use good signing, education, and enforcement tools to gain compliance, and follow-up with a strong enforcement program to help provide continuity and compliance. We plan to continue education efforts with the Tread Lightly and Leave No Trace programs currently offered by both the agencies and some user groups. We will be developing a brochure explaining the new restrictions and post it or something similar on agency web sites. We are also looking at other ways to get the word out to folks including notification in hunting regulations, use of photographs in offices, and continued efforts with local user groups. Our implementation plan calls for making the new restrictions available in a number of different formats, but there will always be people who don't pick up brochures, don't read hunting regulations, don't look for information on the web, or don't read bulletin boards.</p>	26
<p>A3. Communicate restrictions when purchase of ATV/OHV or hunting license is made. Out-of-state hunter education is critical.</p> <p>Response: We agree. Unfortunately, we won't have a decision in time for publication in this year's hunting regulations, but we will work with local vendors who sell hunting licenses, ATVs, and mountain bikes to help us get out the word on the new restrictions. We will also continue field contact by District personnel during heavy use periods (such as hunter patrols).</p>	1, 10, 26
<p>A4. Need to increase the number of agency personnel with citation authority.</p> <p>Response: A substantial increase in law enforcement personnel or employees with law enforcement capability is not anticipated in the foreseeable future. However, we would focus enforcement efforts in problem areas. It is reasonable to assume that peer pressure would continue with educational programs and citizen assistance to law enforcement. This proposal would make it clearer to cite a violation for off-route travel.</p>	33
<p>A5. Need clear distinction between current "yellow" travel-restricted areas and the new "yellow" travel-restricted areas (ex: Mill Creek, where motorized use is by permit only). More intensive signing, different</p>	43

<p>shades of yellow on maps.</p> <p>Response: We agree. The analysis area in the EA only includes those lands where open, or unrestricted travel, is occurring. These are mostly colored green on the current Visitor Map, but in some cases it does include areas that are colored yellow. Refer to the analysis area map. There is a need for clarity on the ground as to the different “shades” of yellow. Signing holds the most promise for differentiating between the types of yellow areas. The agencies are not likely to produce a new map until route-by-route planning has occurred. In the interim, we will look at adding either an insert or a sticker to the current map explaining the new restrictions and how they pertain to varying areas on the map.</p>	
<p>A6. Adequate signing and mapping is an immediate priority. Also education. Without a comprehensive and accurate official map and signage in the field, ORV users who choose to ignore the law and will have an excuse to continue blazing new routes. Law-abiding ORV users will not be able to tell whether they are traveling on legally or illegally constructed routes.</p> <p>Response: Also, please see Responses A1, A2, A4, E2, and J1.</p>	45, 52
<p>A7. Because the proposed rule is vague, the Forest Service will find it unenforceable. The solution is this:</p> <ul style="list-style-type: none"> • Post on-the-ground the routes which meet the EA definition; • Do not allow travel on routes that are not posted; and • Include these requirements in the Decision Notice. <p>Response: The main objective of our proposal is to eliminate motorized and mechanized travel off of roads and trails. We recognize that the definition of “existing” routes is fuzzy to some, but we cannot close routes without looking at the bigger picture to see how other resources are affected, or without doing any public involvement. This Environmental Assessment did not look at the need to retain or close any routes. It only looked at the effects of off-route travel. The next step in travel management is to conduct a route-by-route analysis using the new roads analysis process, which includes public involvement.</p>	47
<p>A8. Include in the Decision Notice: That a Supervisor’s Order will be written so as to implement the decision;</p> <ul style="list-style-type: none"> • That the Gunnison Basin Area Visitor Map will be updated to include the requirements of the decision; • That a brochure will be published explaining what constitutes and established route; • That a public education program will be implemented; • That you will supervise the preparation of a sign plan showing where signs will be posted and what they will say; • That you will supervise the implementation of this plan and the subsequent maintenance of postings; • That you will require “fair, consistent, and progressive enforcement” by agency personnel. <p>Response: We have included many of these items in our Decision Notice and</p>	47

<p>implementation plan. We do not foresee that we will produce an updated visitor map in the near future. We will provide either an insert or sticker in existing visitor maps that explain the changes. We will also produce a brochure, as explained in response A2. We do plan to implement some signing in our implementation plan; however, we will not sign routes as open or closed because of this decision. Rather, signing may be placed to inform GTAA users of the new restrictions. When we find new routes being created (after January 12, 2001) we will sign them as closed. Our enforcement strategy will include education/prevention. Law Enforcement Officers will have discretion to deal with willful or repeat offenders.</p>	
<p>A9. Who has the final authority to say if a road or trail is recognizable and has been routinely traveled? The EA also omits any form of dispute resolution process. If there is a dispute, Law Enforcement should be prohibited from writing any tickets until the dispute is settled.</p> <p>Response: We anticipate that we will find routes not currently on our inventories that fit the definition of established routes. We will work with folks when they report that they are aware of a route that is not included in the respective agency inventory. We will look at each route individually to make the determination of when it was created. The EA did not include a dispute resolution process. Law enforcement personnel will exercise their enforcement discretion in the field depending upon the circumstances and evidence found on the ground.</p>	53
GAME RETRIEVAL	
<p>B1. Address only problem areas when restricting ATV game retrieval.</p> <p>Response: The purpose and need of this proposal is to eliminate cross-country, off-route travel. Restricting ATV game retrieval in only some areas does not meet this need. Off-route game retrieval will no longer be allowed except in special circumstances (i.e., disabled hunters) when a permit has been issued.</p>	9
<p>B2. It would completely undermine this proposal if there were exceptions made for game retrieval and am therefore very much against those exceptions. No motorized/mechanized travel off route should be allowed for the purpose of retrieving down game.</p> <p>Response: The proposed action has only one exception to the game retrieval policy – that is for disabled hunters, who have received permission from the appropriate agency, to hunt and retrieve game off existing roads and trails. We did receive a comment that suggested we continue to allow the use of non-motorized game carts for game retrieval. We agree, and plan to include this in the decision.</p>	43, 61, 65
<p>B3. I feel obtaining a campsite and retrieving downed game via vehicle should have no restrictions as long as there is no environmental impact.</p> <p>Response: Camping will still be allowed within 300 feet of existing roads and trails as long as there is no environmental impact. See also response B1.</p>	46
HERITAGE RESOURCES	
<p>C1. The EA completely ignores the fact that recreationists visit the GTAA to view historic sites. TMW asserts that humans on foot do more damage to historic sites than motorized vehicles. This section of the EA should be</p>	53

<p>revised placing blame where blame lies. The EA also ignores the issue of the National Historic Preservation Act in regards to numerous trails and roads that fall under the Act's protection.</p> <p>Response: The EA was silent on Forest/BLM users visiting historic sites because the proposed action does not propose closing any routes. A road or trail providing access to a historic site will remain open under this proposal. The EA states that heritage resources are extremely fragile and can be adversely affected by a variety of factors, including natural erosion, livestock, and human activity. And again, because no routes are being closed under this proposal, the issue of roads and trails being protected is outside the scope of this analysis.</p>	
LOCAL ECONOMIES	
<p>D1. The EA cites increased Colorado OHV registration each year since 1990 when the program began. The EA then infers this registration increase to more OHV use. No adjustments were made to the EAs calculations for increased compliance with the OHV registration program. The State has indicated that compliance has improved significantly.</p> <p>Response: If figures were available, it would have been more useful to cite the number of ATVs made, sold, and owned in the United States within the past decade. We could have stated that in 1983, when we last did travel management there were no ATVs being used in the GTAA, but now they are commonplace. The EA does state that the increase of OHV registrations in the State of Colorado shows a trend in OHV use. Just the fact that the State requires registration of this type of vehicle shows a trend as well.</p> <p>We agree with the State that indications show an increase of OHV registration compliance. It is the observation of agency field personnel that compliance of OHV registration has increased annually since the mandatory registration for OHVs was implemented by the State.</p>	53
MAPS	
<p>E1. Should produce a map showing classified system routes and another map or overlay showing non-classified routes.</p> <p>Response: It was not necessary to produce such a map for this proposal because we are not looking at making route-by-route decisions; our proposed action restricts travel to existing, established routes, regardless of how they were created. See also response J1.</p>	27, 39
<p>E2. Purpose of map is unclear. Is it supposed to delineate all routes open to motorized travel? Is it supposed to delineate all existing routes open to any mode of transportation? The map is wrong in numerous places (1000 Acre Flats). Some routes originate on private lands and are closed to ANY access. Will result in increased trespass and extra hardship for private landowners. You need to update your map. Include trails where access has been illegally denied by private interests (especially on the Crested Butte side of Hwy. 135).</p> <p>Response: The map included with the EA was intended to show what routes we currently have in our inventory. It was not intended to show just motorized routes. The map is by no means the official map of the routes within the GTAA. Each respective agency and local office has their</p>	9, 33, 41

<p>transportation inventories, and in most cases it is shown on a 1:24,000 scale. These inventories are 90-95% accurate. It would be impossible for the agencies to ever produce a map that is 100% accurate. Though it varies every year, there is occasionally the need to build new routes, some routes are closed or decommissioned, or private landowners decide to close off access. It is not possible for us to print a new map every time one of these events occurs. Just because a landowner has blocked access to a trail doesn't mean the trail no longer exists or couldn't be accessed from another direction. A landowner may choose to post his or her property closed to prevent trespass.</p>	
<p>E3. Who will determine the accuracy of maps or existing trails? Is there an aberration committee? Will agencies allow OHV groups to identify trails not included on the map? The list of "existing" and "established" routes should remain open to additional future designations as suggested by USFS or BLM personnel and members of the public.</p> <p>Response: Since the map was not intended to show all routes, or all legal routes to travel on, we will not be soliciting comments on the map in the interest of reprinting it. We will be publishing a brochure that provides information about the new restrictions, and we have modified the definition of "existing, established" slightly and hope that it is now more of a stand-alone definition. The next step in travel management is to conduct a route-by-route analysis of all routes, including user-created routes. This step will include a lot of public involvement. See also responses to A9, E2, and J1.</p>	26, 37, 54
<p>E4. Current Forest map shows vast amount of existing wilderness and travel-restricted (yellow) areas showing ample opportunity for recreationists who prefer nonmotorized travel.</p> <p>Response: Travel-restricted areas are not off-limits to motorized travel; they are areas where motorized travel is restricted to roads and trails, or areas where there are seasonal closures on certain roads and trails. The proposed action is not about providing more Wilderness or about limiting motorized access – it is about eliminating off-route travel to prevent further resource degradation.</p>	44
<p>E5. The EA does not respond to the issue of protecting past investments (i.e., roads obliterated by FS, State, or cooperators should not be shown on map). In the Decision Notice, exclude roads and trails that have been blocked, ripped, seeded or otherwise obliterated from the definition of "existing, established routes," and remove these roads from those portrayed on the map attached to the EA.</p> <p>Response: See responses to E2 and E3.</p>	47
MONITORING	
<p>F1. What measures will be put in place to monitor high-use areas?</p> <p>Response: Monitoring will be the responsibility of field-going employees. If they spot a new route or an area where users are clearly disregarding the new restrictions, they will notify law enforcement and the appropriate agency travel management coordinator. If field-going personnel or the public suspects a new route we will check our inventory (dated Jan. 12, 2001) – if it is determined that the route was created after January 12, 2001, it will be posted as closed, or possibly closed by some other means.</p>	39

<p>F2. How will agencies know when a new route has been created?</p> <p>Response: See response to F1 and A9.</p>	39
<p>F3. Do the agencies have a list of routes they will monitor?</p> <p>Response: No.</p>	39
<p>F4. Need a monitoring plan as part of the final decision as well as a commitment of resources necessary to implement the plan.</p> <p>Response: Our goal is to get motorized and mechanized users to travel on existing roads and trails until route-by-route planning occurs. It will take some time to get compliance on this. If we see someone traveling off-route, we will to inform them of the new restrictions. If we determine a route was created (after 1/12/01) we will post the route as closed. As explained in response J1, in most cases, we cannot close existing routes without public involvement and an environmental analysis.</p>	39
<p>F5. OHV users should be self-policing – act as ambassadors and thereby minimize impacts.</p> <p>Response: Self-policing is a good prevention tool. The cooperation and participation of GTAA users to make the new restrictions known will help in our effort to leave these lands in a healthy condition for future generations. See also responses A2 and A4.</p>	26
<p>F6. Unless the FS has a plan, AND FUNDING, to monitor impacts there should be no motorized use. To discourage user-created trails, those trails should be permanently blocked off. Enforcement could be simplified by confiscating the vehicles of violators.</p> <p>Response: See response F4. If a user becomes a repeat offender then it will be appropriate to issue a citation and give the violator a mandatory court appearance or arresting them.</p>	58
PROCESS/ANALYSIS	
<p>G1. Evaluate ecological effects of the present network of trails. Use a “landscape-level approach” instead of “chunks” as proposed.</p> <p>Response: Route-by-route planning is the next step in the process. Your comment will be taken under consideration when we get to that step.</p>	18, 21, 27, 30, 57, 58, 62
<p>G2. The EA is biased against OHVs, ATVs, and mountain bikes. You should include damage by horses and cattle.</p> <p>The EA caters to the preferences of non-motorized users at the expense of motorized users. The EA fails to document a single, specific instance of resource impacts caused by off-route motorized use. Decision should be stayed while a new EA (or EIS) is prepared to more even-handedly analyze the effects of the current management direction and the proposed alternatives.</p> <p>Response: Our overall commitment is to manage all uses in a way that provides opportunities for all those using the public lands in the GTTA. The recent increase in recreation use in general, and the increases in the use of motorized recreation vehicles in particular, are threatening the sustainability of the very natural resources and recreation values that all users appreciate, and</p>	9, 54

<p>that we are charged to manage. The EA addresses off-route wheeled vehicles, and a change in area designations from open seasonally or yearlong to limited/restricted yearlong. The EA addresses the environmental consequences of this change in area designations.</p> <p>Photos 2, 9, 12, 13, and 15 provide evidence of resource damage and this is just a small sample. Other resource impacts such as the spread of noxious weeds, soil erosion, damage to cultural sites, user conflicts, and the disruption of hunter experiences are documented in letters from users. The agencies are concerned that continued unrestricted, off-route or cross-country travel has the potential to increase these impacts. Issues involving other uses on or off roads and trails, such as horseback riding and hiking, along with motorized and mechanized uses, will be addressed at the local, site-specific planning level, and are beyond the scope and intent of this EA.</p>	
<p>G3. Pg. 70-73 – Lifestyles – Must take into account other recreation users (hikers, horsemen) who use motorized trails.</p> <p>Response: Please see the response to G2.</p>	41
<p>G4. Pg. 26 – Riparian Areas – No mention of overuse by wildlife. Gunnison County Stockgrowers Association believes that long-term and permanent damage in riparian areas is most often associated with off-route vehicle use, rather than overgrazing.</p> <p>Response: There are many reasons for impacts to riparian areas, including grazing from domestic animals and wildlife, road and trail construction, recreation use including camping and off-route travel, and even natural causes. It is our hope that this proposed action would reduce the impacts caused by vehicular use in and adjacent to riparian areas.</p>	42
<p>G5. Since EAs are required for construction of projects on public land why is it acceptable to allow the public to arbitrarily construct roads and trails on public lands?</p> <p>Response: On Forest Service lands, constructing, placing or maintaining any kind of road or trail is prohibited without a special-use permit. In areas in the GTTA that are designated “open” or “limited seasonally” to motorized or non-motorized, wheeled cross-country travel, the creation of trails through repeated use is generally not considered criminal or willful unless construction or maintenance activities are occurring.</p> <p>For the BLM, in “limited seasonally” or “open” areas that allow motorized or non-motorized, wheeled cross-country travel, the creation of roads or trails through repeated use is considered casual use. Casual use means activities involving practices that do not ordinarily cause any appreciable disturbance or damage to the public lands. However, to construct or maintain a road or trail on public land requires a right-of-way or temporary use permit. Under the proposed action, we are addressing this disparity by limiting off-route, wheeled travel and preventing the creation of unauthorized new routes.</p>	45
<p>G6. I recall when firewood permits were first issued years ago that they were to fund opening of trails to burned and downed areas of forest. What happened to that? I feel firewood gathering should be allowed as long as it doesn’t damage the environment.</p> <p>Response: We do not recall that funds derived from the sale of firewood</p>	46

<p>permits were used to maintain or provide road access to firewood areas. If that was the case at one time, it is not now. The proposed action does allow firewood gathering up to 300 feet off of an established road or trail. To allow off-route use anywhere does not meet the intent of the Purpose and Need in the EA.</p>	
<p>G7. Unlike you state in the EA, increases in motorized use have been steady and predictable for quite some time. The EA seems to indicate that this need has suddenly become more urgent, such that complete policy reversals are warranted. The EA fails to disclose any factual basis for the proposed change in management, and is therefore inadequate.</p> <p>Response: Increases in OHV use have been steady on a statewide level. In the GTAA observations by our field staff indicate that some portions of the basin are receiving significantly more vehicle use now than 10 or 20 years ago. Our transportation inventories show an increase in newly created routes. OHV impacts are not just a matter of numbers. Recent development of vehicles such as ATVs, mountain bikes, and vehicles like Humvees are enabling visitors to access areas that were not anticipated when we did travel planning 18 years ago. There have also been changes in the ways that people are using vehicles on public lands, which are resulting in increased resource impacts. We are receiving more complaints from the general public about OHV impacts. These changes are not so dramatic from one day to the next, but over time they have incrementally increased impacts to the point where we feel the proposed action is justified and necessary.</p>	54
<p>G8. It is inappropriate to reverse long-standing travel-management policy based on reports of resource damage from forest users, who are in all probability actually complaining about user conflict, rather than resource damage. The determination of resource impacts requires expert opinion. Members of the general public are not qualified to determine whether and to what extent real resource damage is occurring.</p> <p>In Alt. 1, the phrase "provided that resource damage does not occur" should be eliminated. Layman's opinions of "damage" vary with every individual and cannot be enforced.</p> <p>Response: Agency personnel have observed and documented the resource damages referred to in the EA, in addition to reports received from the public. User conflicts do sometimes occur, and are documented. The agencies are in the position of managing user conflict and making decisions regarding resource damage, and one way of doing this is restricting or prohibiting off-road travel.</p>	54, 64
<p>G9. Give consideration to those whose health or age does not allow them to recreate in a physical manner, and give them as much access as possible. Other than one statement on pg. 11 and again on pg. 35, the EA entirely fails to consider the special access needs of the elderly and disabled. It may be impossible for a disabled citizen to locate the District Ranger during a weekend visit to the forest, and also difficult for them to specify which "restricted areas" that he wishes to visit. The decision should therefore be stayed until this analysis is completed.</p> <p>Response: The proposed action does not restrict or limit access to lands in the GTAA; it says that once you have accessed the GTAA, off-route wheeled travel is restricted to existing, established routes. The agencies feel that the</p>	46, 54

<p>requirement in the proposed action that exceptions be made for vehicular access, with permission, because of disabilities is prudent and necessary. It is an issue primarily during hunting season for disabled hunters who need to hunt from their vehicle or retrieve game with their vehicle. Seeking written permission would require a little more planning on the part of the disabled user. However, having a written document available to show other users present would be an advantage for all concerned.</p>	
<p>G10. The EA also fails to consider the Mining Law of 1872. The EA should assess and review the nature and extent of mining claims, including those unpatented claims that may be patented at some future date. The EA must disclose how the provision for access and accommodation of these valid existing rights will be provided for and the economic and environmental effects that will flow from any limits placed on such access by this decision.</p> <p>Response: Development and use of mining claims as permitted in Plans of Operation, including access that has been approved, is consistent with the EA. None of the alternatives affect the use of existing roads and trails. Claimants would still enjoy their valid existing rights and could still prospect by OHV as long as they refrain from driving vehicles cross-country. Cross-country travel by motorized or non-motorized wheeled vehicles on lands designated limited/restricted would only be allowed after receiving permission/approval from the authorized officer, unless permitted in a Plan of Operations.</p>	54
<p>G11. The EA does not fully disclose the applicable Forest Plan direction, nor does it proceed to apply this direction to the proposed decision. The EA proposes to reverse long-standing travel management policy on over 1.5 million acres of the 2.2 million acre analysis area, and is therefore a significant change to the Forest Plan. The decision, therefore, should be stayed pending the preparation of an EIS.</p> <p>Response: Direction applicable to travel management is summarized in the analysis record, or may be reviewed in the Plan itself. The proposed restrictions are not inconsistent with the Forest Plan, and amount to a small modification of Plan objectives. There is no substantial effect on the long-term relationship between goods and services from the planning area (the GMUG National Forest) and there is no significant change to the Forest Plan. No amendment is called for. NEPA significance determines whether to prepare an EIS or an EA. NFMA significance, or the significance of a Forest Plan amendment is determined using a different set of criteria, none of which are triggered by the proposed action in this EA.</p>	54
<p>G12. Where the EA claims a lack of sufficient funding for such things as monitoring, education, and maintenance, such a concern is overstated because it ignores the ready availability of volunteers. The decision should be stayed until the Forest Service and BLM have fully accounted for this incredible resource represented by the willingness of user groups and their members to volunteer their efforts towards more efficient and fair management of the area.</p> <p>Response: The agencies make use of volunteers in a number of ways, including monitoring and maintenance projects. We will certainly keep this in mind when implementing the decisions the agencies will make. However, the recent increase in recreation use in general, and the increases in motorized recreation vehicle use</p>	54

<p>in particular, are threatening the sustainability of the very natural resources and recreation values that all users appreciate, and that we are charged to manage for all these users.</p>	
<p>G13. The EA summarily concludes, without citation to factual data of any sort, that encroachment into wilderness by motorized vehicles is occurring at places other than signed portals. This concern addresses an unproven need, and is therefore fabricated and irrelevant to the analysis. This concern can be completely addressed through additional education, signage, and law enforcement.</p> <p>Response: Forest Service personnel, as well as the public, have observed and reported intrusion into Wilderness through direct observation or tracks and other evidence. We believe the proposed action will discourage such occurrences.</p>	54
<p>G14. The EA claims conflict with the Regional Guide. The Regional Guide states, in relevant part, “[o]n all lands outside of developed travelways, motorized use with wheeled vehicles will be restricted unless such use is specifically allowed and so designated.” Because off-route use of motorized vehicles is “specifically allowed and so designated” by the Gunnison Basin Area Visitor Map and by the Forest Plan itself, existing direction does not conflict with the Regional Guide. The decision should be stayed while this section is removed from the EA, or the “No Action” alternative should be chosen.</p> <p>Response: Thank you for your comment.</p>	54
<p>G15. Because the current landscape health of the BLM lands in question is at least partially unknown (pg. 13), it is premature at this time for the EA to conclude that current travel management direction is inconsistent with BLM Standards and Guidelines. This conflict is therefore fabricated and this section of the EA should be removed in its entirety.</p> <p>Response: The BLM feels that the proposed action will prevent the potential for resource damage, and subsequently, land health damage, in areas where land health is unknown and possibly at risk. The BLM and FS management of public lands is based on FLPMA and NFMA, along with other applicable laws and regulations, including the land health standards within the affected BLM RMPs. Maintaining land health is encompassed within all the mandates the agencies must operate within, such as Executive Orders 11644 and 11989 that deal with OHV management.</p>	54
<p>G16. I consider the 30 days allowed for public appeal to be unreasonably short and very unfair.</p> <p>Response: The appeal period for the Forest Service decision will be 45 days as prescribed in regulation at 36 CFR 215. The BLM has a 30-day protest period.</p>	61
<p>G17. Alt. 3 is the best proposal, but need to find other language for “provided that resource damage does not occur.”</p> <p>Response: We appreciate your comment and understand that opinions on what constitutes resource damage can vary greatly, but it does give us something to measure or document, thereby providing a basis for decision-making.</p>	64
<p>G18. You should keep your options open and say that road closures may be part of the Proposed Action. We are here now because we didn’t</p>	64

<p>broaden options years ago.</p> <p>Response: The BLM or the FS has the authority, at any time, to close roads, trails or areas, following set procedures, once unacceptable resource damage is occurring.</p>	
RECREATION	
<p>H1. No need to create more dispersed camping sites. Delineate routes to existing sites.</p> <p>Response: This EA does not propose to create more dispersed camping sites. If a road or trail accesses a dispersed site, that route would remain open under this proposal, and the campsite would remain accessible by a wheeled vehicle, as well as foot and horse travel. The proposed action does allow wheeled vehicle use to take place 300 feet off of established routes for forest products gathering and camping, if that use does not result in resource damage. We do not expect to see an increase in dispersed camping sites in the GTAA. We do not propose to sign every open route.</p>	26
<p>H2. There were varying comments on the 100 foot or 300 foot allowance off route for wheeled vehicle user to camp, picnic and/or gather firewood. Some people want the agencies to mark every route that accesses a campsite. Some people think 100 feet off route is reasonable while others do not.</p> <p>Response: The proposed action does allow for wheeled vehicles to travel off route for 300 feet to camp, picnic, and gather firewood as long as that use does not result in resource damage. The 300-foot allowance will make this Forest and BLM policy consistent with the remainder of the GMUG and other Forests within Colorado.</p>	7, 9, 11, 14, 20, 31, 33, 61, 65
ROADS AND TRAILS/ACCESS	
<p>J1. The law requires that route-by-route analysis should occur before hundreds of miles of potentially environmentally damaging routes are added to the travel system.</p> <p>Response: This response addresses user-created routes on Forest Service lands only since the BLM does not have “system” routes.</p> <p>On January 12, 2001 the “Final Rule on Administration of the Forest Development Transportation System (36 CFR, Part 212) and Associated Policy” were published in the Federal Register. This direction changed the way the Forest Service manages roads.</p> <p>In the past, a travel route had to be officially within our “system” to qualify for congressionally appropriated funding to manage that route. Adding existing routes to the system was an administrative procedure done at the line officer’s discretion; it did not require public involvement or NEPA analysis. Having a road or trail in the system confers no “special status” to the route regarding future planning and management. The Green to Yellow Proposed Action does not suggest adding or removing any routes to the “system” or changing the existing status of “classified” or “unclassified” roads.</p> <p>There are two areas in particular in the new road management direction that</p>	52, 55, 58, 60, 62

<p>affect our environmental assessment.</p> <p>One, some terminology has changed. All Forest Service “system” roads are now “classified” roads. Roads not currently in the system are called “unclassified.” These designations are essentially preliminary until further analysis and decision.</p> <p><i>Classified roads</i> are defined as roads wholly or partially within or adjacent to National Forest System lands that are determined to be needed for long-term motor vehicle access, including State roads, county roads, privately owned roads, National Forest System roads, and other roads authorized by the Forest Service.</p> <p><i>Unclassified roads</i> are defined as roads on National Forest System lands that are not managed as a part of the Forest transportation system, such as unplanned roads, abandoned travelways, and off-road vehicle tracks that have not been designated and managed as a trail; and those roads that were once under permit or other authorization and were not decommissioned upon the termination of the authorization.</p> <p>Two, the new January 12th direction requires us to evaluate the effects of all roads, both classified and unclassified, through a roads analysis process (RAP). However, a roads analysis process is not a decision document. The route-by-route roads analysis process would result, at a minimum, in the following:</p> <ol style="list-style-type: none"> 1) Identification of needed and unneeded roads (and trails). 2) Identification of road-associated environmental and public safety risks. 3) Identification of site-specific priorities and opportunities for road improvements and decommissioning. 4) Identification of areas of special sensitivity, unique resource values, or both. 5) Any other specific information that may be needed to support project-level decisions. <p>The need for a road or trail will be determined based on resource and public issues, not on whether it is classified or unclassified.</p> <p>Opportunities identified in a route-by-route roads analysis process would be carried forward into transportation planning through the NEPA process where a decision on whether to continue use, restrict use, or close or decommission a route will be made. Public involvement will occur in both the roads analysis process and the NEPA process.</p>	
<p>J2. I'm against any regulations that would limit the use of existing roads and trails. Roads that have given us access for years and years should be left open.</p> <p>Response: The proposed action does not restrict or limit access to lands in the GTAA; it says that once you have accessed the GTAA, off-route wheeled travel is restricted to existing, established routes. The proposed action does not open or close any routes. The purpose and need as defined in the EA is to address the issue of off-route travel of wheeled vehicles.</p>	<p>5, 12, 17, 20, 28, 61, 63, 67, 68</p>

<p>J3. Maintain all nonmotorized routes for nonmotorized uses. Need to provide for quiet and solitude in the backcountry outside of designated Wilderness.</p> <p>Response: Designating the mode of travel on routes would be determined through site-specific planning at the local level, with public involvement. This is a programmatic document addressing the issue of off-route travel of wheeled vehicles. The Forest Plan and the BLM Resource Management Plan define land area prescriptions i.e., what uses will occur on certain lands. Future revisions of these documents will continue to take into account “backcountry” needs. However, this consideration is outside the scope of this proposed action.</p>	<p>5, 12, 17, 20, 28, 57, 60, 62, 65</p>
<p>J4. The definition of “existing or established routes” leaves too much wiggle room. Travel should be limited to designated routes and you should use a positive signing strategy. Areas should be closed to cross-country travel. Need to close roads and trails to improve hunting experience.</p> <p>Response: We have modified the definition of an established route slightly from the EA to the Decision Notice. Established routes will be defined as roads and trails that 1) exist on-the-ground as of January 12, 2001 as portrayed in respective agency inventories or 2) are easily recognizable on-the-ground as a route, and have been traveled routinely by users as of January 12, 2001. Any routes created after January 12, 2001 without specific agency authorization will be closed to motorized and mechanized use.</p> <p>Designating routes, rather than allowing use of established routes, would have been a form of route-by-route travel management planning. This proposal is only addressing the issue of off-route travel by wheeled vehicles.</p> <p>Analysis to determine future management of roads on Forest Service lands will be accomplished through the Roads Analysis Policy and/or project-level analysis. See response J1.</p>	<p>8, 14, 15, 18, 21, 23, 32, 33, 34, 35, 36, 48, 49, 57, 62, 66</p>
<p>J5. BLM can use 43 CFR 8341.1(f)(4); 43 CFR 8341.2(a) and 43 CFR 342.1 to close roads/trails causing damage. Forest Service must have similar regulations. You should limit travel to designated routes.</p> <p>Response: Under Forest Service regulation 36 CFR 261.10 it is prohibited to construct, place or maintain any kind of road or trail, without a special-use authorization, contract, or approved operating plan. Under CFR 295.3 an area or trail can be closed for up to one year without public participation to protect the resources and/or to provide for public safety. Limiting travel to “designated” routes requires public participation and appropriate NEPA analysis.</p>	<p>45, 58, 59, 60, 62</p>
<p>J6. All user-created routes in RARE II areas should be closed. Do not allow roads or trails in RARE II areas or WSAs beyond those which existed and were approved at the time of designation.</p> <p>Response: Inventoried Roadless (or RARE II) Areas (IRA) are located on National Forest System lands. Current forest plan management direction does not prohibit motorized use, or the creation of new routes, in IRAs.</p> <p>Inventoried Wilderness Study Areas (WSAs) are located on BLM lands in the GTAA. Current BLM management direction prohibits motorized and mechanized use in WSAs, except in special circumstances; however, if foot or horse use has created routes, these routes could still be open for foot and</p>	<p>35, 45, 57, 60, 62, 71</p>

<p>horse travel under this proposal. The closure of user-created routes in either IRAs or WSAs, or elsewhere, would only occur after route-by-route travel planning with public participation has taken place.</p>	
<p>J7. We believe that the Forest Service and BLM should include in the interim restrictions language expressly prohibiting motorized recreation in inventoried roadless areas and legislatively and administratively proposed wilderness.</p> <p>Response: See response to J6. Making a travel management decision other than what is defined in the Purpose and Need in the EA (see pages 9-11) would go beyond the scope of this document.</p>	52, 55, 66
<p>J8. We support the adoption of a “closed-unless-posted-open” policy. Many other Forests in Colorado are taking this approach so it would provide consistency between Forests. It would hopefully decrease unauthorized use on closed routes.</p> <p>Response: The purpose of this EA is to restrict motorized and mechanized travel to existing, established routes. It is a programmatic decision document and is not designed to deal with site-specific choices of which roads or trails should or should not be open to various types of users. The “closed unless posted open” approach deals with the designation of roads and trails as closed; and is best addressed at the local level through site-specific planning. Route-by-route travel planning will be the next step in travel planning for the GTAA.</p>	33, 39, 52, 55, 57, 60, 62, 66
<p>J9. Set a trail density threshold so areas with too many trails can have some closed (for wildlife protection).</p> <p>Response: This type of analysis would take place during the route-by-route travel planning, which will occur at a later date.</p>	8
<p>J10. District Rangers need latitude to close trails at their discretion for areas of high trail density or where trails are forcing wildlife on to private land.</p> <p>Response: Closing routes were not a part of the proposed action or decision. Trails densities and private land issues will be looked at in future route-by-route travel planning that includes public involvement.</p>	8
<p>J11. Add more mountain bike and OHV trails. Reopen trails closed illegally by private property owners.</p> <p>Response: This proposal does not open or close any routes. The mode of travel on trails and the need for additional or fewer trails would be addressed in route-by-route travel management analysis. This type of analysis will take place through site-specific planning at the local level, with public involvement.</p>	9
<p>J12. The determination of designated routes process must be open to the public and include all user groups. Illegal, user-created routes should not be included in the list of designated routes.</p> <p>Response: This proposal does not designate routes, but rather, allows continued use on routes where use was routinely occurring prior to January 12, 2001. The definition of an established route will change slightly from the EA to the Decision Notice. See response J4.</p> <p>Determining future management of routes, whether classified or unclassified,</p>	11, 30, 38

<p>will be done through the Roads Analysis Process and/or site-specific planning at the local level, with public involvement. See also response J1.</p>	
<p>J13. The legitimization of hundreds of miles of illegally created routes without any environmental analysis, engineering analysis, or formal public comment, is unacceptable and plainly inconsistent with federal regulations (36 CFR 261.10(a) and part 295). It sends the wrong message to the public if the Forest Service endorses continued use of these routes. Why is your agency rewarding those creating these illegal routes? Why are you creating an expectation the illegal routes will never be closed? Prohibit travel on all user-created routes pending analysis of their impacts.</p> <p>Response: A portion of this concern is answered in response to comment J1. The proposed action does not suggest adding or removing any routes to the “system” or changing the existing status of “classified” or “unclassified” roads, nor does it legitimize routes as permanent routes. These decisions will be made in the more specific route-by-route analysis. In the interim, wheeled-vehicle travel use is prevented from traveling cross-country, which preserves the status quo, and prevents new routes from being created. This is a matter of sequenced decision-making.</p> <p>It is our intention, with the route-specific planning which will follow, to examine each route and determine the appropriateness of its location and use. Some user-created routes are in appropriate places and serve legitimate purposes. Others have been created in inappropriate locations or may be redundant in terms of function.</p> <p>We are committed to working with the users of these lands to make choices about the necessity of routes and the types of use appropriate to each route. This process will include much public involvement and an environmental analysis. Absent these detailed examinations, it is our choice not to close all “user-created routes” at this time. We prefer instead an orderly examination of routes followed by implementation that the public can understand. This is a first step, an interim action, until we can complete the route-by-route analysis.</p>	<p>15, 21, 27, 30, 35, 36, 38, 39, 40, 45, 49, 52, 55, 57, 58, 60,</p>
<p>J14. Suggest posting the “existing” user-established trails as “closed pending further analysis.” This would curtail any further environmental damage and does not lead to the user expectation that trails will remain open indefinitely. Agencies also need to set a specific deadline for their environmental analyses of routes.</p> <p>Response: See responses J1 and J8.</p>	<p>60</p>
<p>J15. We’re disappointed the Forest Service didn’t use the road and trail data provided by user groups like WSERC and High Country Citizens Alliance.</p> <p>Response: The Forest Service did use this data. Routes located by WSERC and HCCA can be found on the respective agency inventories. However, any recommendations to keep a route open or closed were not used, because that decision is beyond the scope of this proposal. Many other Forest users provided information on routes that are delineated on the current travel inventories.</p>	<p>39, 33</p>
<p>J16. Lily Ponds, Splains Gulch, and the Black Mesa adjacent to Black Canyon of the Gunnison National Park are among the many areas on the GMUG that suffer because of ORV use. Illegally constructed routes in</p>	<p>55, 58</p>

<p>these areas should be closed immediately to ORVs.</p> <p>Response: This proposal is a first step in travel management planning. This proposal does not include route closures. The agencies will be looking at all routes through a Roads Analysis Process (see discussion in Decision Notice) and a route-by-route analysis.</p>	
<p>J17. Would having loop trails reduce problems with off-trail use?</p> <p>Response: Loop trails may or may not help reduce problems with off-trail use. In areas where loop trails are provided, off-route wheeled use still occurs.</p>	26
<p>J18. 300 ft. off designated routes for camping and firewood gathering is ok as long as it's restricted to specific, approved locations that are well marked.</p> <p>Response: In the foreseeable future it is not likely that we would mark specific off-road areas for camping and firewood gathering. Also see response H2.</p>	11, 14, 45
<p>J19. Will there be training sessions when future travel management processes occur to help in classifying roads and trails?</p> <p>Response: Forest personnel are attending training on the new Roads Analysis Policy. Determining the long-term use of routes will include public involvement. We will most definitely provide information and training to the public to help us with the process. Also see Response J1.</p>	26
<p>J20. Could some trails be rerouted to reduce impacts on habitat, thereby sustaining current trail networks?</p> <p>Response: Yes, this is a possibility, but the location of routes is outside the scope of this analysis.</p>	26
<p>J21. The roads and trails shown on the map appear to be good, but some feel there have been trails omitted during mapping. Given the fact that there was not a survey conducted throughout the area then one must assume this is possible. Will the agencies allow OHV groups to identify trails they know of that are not included and incorporate these on the final map?</p> <p>Response: We feel that our inventories are 90-95% accurate. The inventories are located in the respective agency offices, and are located on 1:24,000 scale maps. The agencies will not use the map that accompanied the EA for any purposes, other than this EA. It will not be used as a visitor map.</p> <p>If a route is located on the ground that appears to not be included in the current inventory, anyone can inform the respective agency of that. Someone from that office will make a determination if that route was created prior to January 12, 2001. If it was, it will be delineated. If it is determined that the route was created after January 12, 2001, it will be closed to wheeled use. Also see Responses E2 and J1.</p>	26
<p>J22. Pg. 18 – Access – Access for cattle permittees should continue at current/historic levels. Needed for fencing, water improvements, stock trail management, salt distribution, etc. Work with permittees for suggestions on travel management. Make changes only at individual allotment level.</p> <p>If any latitude in restrictions is allowed, it should be for cattle operators</p>	10, 41

<p>during dry months to facilitate good stewardship.</p> <p>Response: Under all of the alternatives, off-route wheeled vehicle use could be conducted according to the terms of an approved permit or other authorization. In addition, motorized wheeled cross-country travel would be allowed to properly administer a federal lease or permit, unless specifically prohibited in the lease or permit. It is safe to say, however, that all approved off-route wheeled use will be scrutinized more closely by both the agencies and the public, since off-route wheeled travel will be prohibited by the non-permitted public.</p>	
<p>J23. Pg. 70-73 – In the eyes of the Forest Service travel-planning means only motorized use. They fail to take into account that hikers and horse riders travel more often on motorized trails than on trails specifically designed for their uses. FS has failed to acknowledge that the public likes traveling on motorized trails because they are better maintained and better marked due to the efforts of volunteer motorized organizations. The FS is managing the wrong user groups.</p> <p>Response: We like to call our trails “shared use trails.” Foot and horse users share wilderness trails. Foot, horse, bike, and motorcycle users, as well as skiers, and sometimes snowmobilers share non-wilderness, motorized, single-track trails. Many users using varying modes of travel benefit from the existence and maintenance of that trail.</p> <p>However, this proposal does not focus on route-by-route travel decisions on trails, nor does it make a distinction on what users are using what trails. It does, however, restrict use of a trail to the type of use/mode of travel consistent with established use. (Example: ATVs are restricted from travel on single-track trails).</p>	53
<p>J24. Although the terms “existing” and “established” appear definitive on their face, COHVCO is concerned that their definitions may evolve in the future such that roads that may once have been considered “established” no longer qualify as such. A more comprehensive written description is needed.</p> <p>Response: See Response J1. Roads are now given the definition of either Classified or Non-Classified. Definitions are found in response to comment J1. Their future management is also addressed in the response to J1.</p>	54
<p>J25. COHVCO expects that the FS and BLM will undertake and complete the necessary inventories as soon as possible. We suggest that final decision in this matter should be deferred until these inventories have been completed.</p> <p>Response: We feel that our transportation inventories are 90-95% inclusive of all routes that exist on the ground in the GTAA. We expect that between our field-going personnel and people who use the lands within the GTAA, we will be finding additional routes that we may have missed when doing our inventories. We will make the determination if the newly located route was created before or after January 12, 2001. If it was formed prior to that date, we will delineate that route on our inventory. If it was created after 1/12/01, we will post it, or by other means, close that route to motorized and mechanized travel. We will proceed with a decision on this proposal of restricting off-route wheeled travel.</p>	54

<p>J26. The FS and BLM must inventory and account for all pre-existing rights-of-way, especially those reserved under RS 2477. The EA reflects a complete lack of such considerations, and the decision should therefore be stayed until this analysis is completed.</p> <p>Response: The GTAA includes lands in Gunnison, Hinsdale, Delta, Montrose, and Saguache Counties. All counties were personally notified about this proposal, and received the EA and associated maps and letters. This EA and proposal does not include road or route closures, therefore any rights under RS2477 will not be affected by the decision, but they will be looked at in future route-by-route planning.</p>	54
<p>J27. Jeeps and ATVs should use the same roads and trails. They should not be allowed on single-track trails. The route uses should be the same during the hunting season as any other time of the year.</p> <p>Response: The proposed action does define use of routes by stating, "use of routes is restricted to the type of use/mode of travel consistent with established use." (Example: ATVs or wider vehicles are restricted from travel on established single-track trails). Hunting seasons will not have any affect on whether a route is deemed "established" and therefore open to use.</p>	61, 68
WILDLIFE	
<p>K1. Eliminating or reducing human activity addresses only part of the problem. Need good management practices to create the seral stages needed to benefit the greatest number of species.</p> <p>Response: We agree. Opportunities and needs for creating a diversity of seral stages across the Forest are addressed at the watershed and project scale. The Forest Service will continue to improve wildlife habitat on a site-specific basis.</p>	26
<p>K2. Pg. 45 – Forest Fragmentation – Needs more detailed study when it comes to roads...less fragmentation has a greater effect on wildlife than roads.</p> <p>Response: Fragmentation as presented in the EA (page 45) is defined as a change in landscape structure that typically includes smaller patch sizes, greater distances between patches, more edge habitat, and less interior habitat. Roads contribute to fragmentation by dissecting previous large patches into smaller ones, and creating edge habitat in patches along both sides of the road, potentially at the expense of interior habitat. The type of vegetation and seral condition these "patches" are composed of also greatly influences their use by wildlife species, particularly songbirds. However, late seral vegetative conditions do not necessarily represent less fragmentation. For example, a small, isolated forest patch even if in a mature late seral condition will show low nest success for certain neotropical migrants because of parasitism and predation that occurs most frequently near the edge of the forest.</p>	41
<p>K3. Pg. 46, para. 3 – Elk go where they want to go. Many herds are growing, some at very high rates even with increases in hunter activity.</p> <p>Response: Efforts to develop criteria to manage security areas on National Forests were described in the Hillis paradigm (Hillis et al. 1991). The criteria identifies size (250 acres), shape (nonlinear), and distance from open roads (over 0.5 mile) for security areas as well as how much of the area (over 30%)</p>	26

<p>should be dedicated to security. These criteria are applied to allow elk to remain in a specific area while under stress from hunting. During the hunting seasons elk would not function very well in areas where there is no cover. The importance of cover depends on its abundance and continuity in the landscape. The significance of cover, both vegetative composition and size needs to be tailored to the specific geographic area of concern. The size criteria (250 acres) are appropriate as a general guide.</p> <p>Within the GTAA, elk populations have steadily declined or stabilized in the last 10 years (see response K7).</p>	
<p>K4. Pg. 49, para. 3 – Does the Yarmoloy study prove that the use of existing roads and trails affect deer enough to affect them at the population level? Was reproduction compared between this and a control group(s)? Were other factors involved leading to poor reproduction?</p> <p>Response: The Yarmoloy study concluded that deer that were harassed (followed with an ATV) suffered significant disruptions in their biology. Yarmoloy et al. 1988, chose to experiment with a few individuals and study them in detail. The reliability of the experiment is of individual responses; however, coupled with the published works of others on responses of deer to harassment it is likely that the affect would be seen at the population level. Reproduction was compared between deer that were captured and handled by helicopter and net gun, deer that were habituated to potentially harassing stimuli (passes by an ATV), and deer that were subject to experimental harassment (followed by an ATV). There were no other factors discussed leading to poor reproduction.</p> <p>The study is included in the EA discussion of cumulative effects to wildlife to make the point that off-route travel allows for the increased likelihood of deer being pursued by ATVs (especially during the hunting seasons). Negative behavioral and reproductive changes will occur in response to this activity.</p>	26
<p>K5. Pg. 51, para. 1 – Agrees that habitat effectiveness is affected by off-route travel. However, habitat effectiveness is also affected when there is a lack of good habitat management.</p> <p>Response: We agree. Management of special habitat features such as wet sites, riparian habitat, movement corridors, and cover is considered when evaluating habitat effectiveness.</p>	26
<p>K6. Pg. 56, para. 3 – It is questionable how much fidelity sage grouse have to certain sites. Better to say they have fidelity to a general area and will move within that area. Need good habitat management - not just control over human activities.</p> <p>Response: Comment noted, thank you.</p>	26
<p>K7. Wildlife studies you quote are outdated or incomplete. Why does the DOW say we have more elk than ever before?</p> <p>Response: The Big Game Hunting in Western Colorado publication published annually and distributed by the Colorado Division of Wildlife (CDOW) displays statistics on elk populations by game management units and geographic areas. In review of these publications and discussion with CDOW biologist (phone conversation with Don Masden, 3/16/01) elk populations in game management units within the GTAA have been steadily declining since 1990. The elk population number published in 1999 for the Gunnison Basin game</p>	37

<p>management units showed a significant increase from 1998. This increase is a reflection of CDOW refining their model to include more recent biological information. The increase in number is not a reflection of an increase in actual numbers of elk. The decline in elk numbers over the last ten years primarily reflects increased hunter harvest.</p>	
<p>K8. Pg. 45-46 – The EA fails to provide any parameters on the studies regarding “forest fragmentation.” What class of roads and trails were used? Paved highways? Level 1 graveled roads? Hiking trails?</p> <p>Response: The Reed et al. 1996 study assigned all roads in the study area a width of 10 meters (equivalent to a 2 lane road). The Askin et al. 1994 publication reviewed open corridors of varying widths (roads, powerlines, and nature trails). The conclusion of these studies showed that both roads and narrow open corridors (trails 2 meters wide) have a negative effect on songbirds. Studies done of bird densities along nature trails showed edge species such as brown-headed cowbirds, which are brood parasites more common than in the control transects.</p>	53
<p>K9. Pg. 46 – There is nothing to substantiate the claim that “Vehicle traffic on and off roads has been linked with high rates of establishment and spread of noxious weeds in wildlife habitat.” TMW would assert that more noxious weeds have been established and spread on the NF and BLM lands by horses than by any other transmission method including cattle.</p> <p>Pg. 46 – Noxious Weeds – It’s a stretch to put heavy blame of noxious weed establishment on motorized traffic. A more likely villain is horse and hunter camp establishment.</p> <p>Response: Anytime bare soil is exposed and seed is transported by whatever means (vehicles, horse, foot, animal impacts (beaver, cattle, elk/deer)) there is risk of spreading noxious weeds. However, it is very evident that weeds proliferate along road corridors. Vehicles provide surface areas that seed readily clings to and tires on vehicles act as seeders as they travel. Larger arterial roads have served as conduits bringing in noxious weeds to the less roaded areas. In addition, maintenance of roads by blading exposes soil on a regular basis perpetuating the spread of weeds. In general, vehicles travel longer distances, have more surface area to transport seed and depending on the type of vehicle tire expose the ground surface.</p> <p>The GMUG has established and enforces a policy on the use of weed-free hay to prevent the spread of noxious weeds by horses and livestock.</p>	41, 53
<p>K10. Pg. 48 – TMW finds it ironic that roads and trails that are closed to the public but open for administrative or permitted use apparently don’t cause “forest fragmentation” since it was not discussed in Section E or the issue was conveniently ignored by the EA’s author. Can wildlife differentiate between administrative roads or public roads?</p> <p>Response: No, wildlife cannot differentiate between administrative roads and public roads. The fragmentation issue comes into play when new roads and trails are created and used where there once were no roads or trails. Generally, permitted uses on the Forest do not allow the administrative user to create additional roads and trails wherever they see fit to do so. The administrative user is limited to a route(s) for administrative purposes only, which allows the Forest Service to control the magnitude and duration of use.</p>	53

<p>K11. The EA contains no facts regarding population numbers or trends therein. Since no habitat modeling was done for this analysis, the conclusion that habitat effectiveness is “substantially affected” by off-route travel in this area is entirely unsubstantiated and should be removed from the EA. Decision should be stayed until habitat modeling can be done and until population numbers for relevant species are revealed and evaluated in the EA.</p> <p>Response: The conclusion that off-route travel reduces habitat effectiveness is made in the context of the broad analysis area (GTAA) and is substantiated by published research such as Christensen et al. 1993 and several models, the most well known being Lyon, 1983. This model shows as miles of open road per section increase, elk use potential decreases thus decreasing habitat effectiveness. Please refer to page 51 of the EA for discussion on habitat modeling.</p> <p>The broader analysis conducted for the interim travel restriction relied on cited documents more than other sources to explain impacts on wildlife from vehicles and human intrusion. Analysis of relevant species population numbers and trends will be part of the many factors we consider when route-by-route planning is addressed for a particular area.</p>	54
MISCELLANEOUS	
<p>L1. Pg. 15, item 1, add the words “ecological integrity.”</p> <p>Response: The concerns expressed in the paragraph adequately describe the impacts and embrace “ecological integrity.”</p>	7
<p>L2. It’s confusing as to what BLM lands a person can use what’s allowed and where.</p> <p>Response: We appreciate and regret the confusion mentioned in this comment. The intent of both agencies is to follow through with information and education to minimize such confusion. Please see the response to A1 and A8 where we provide information on our map update and a new brochure. We feel the proposed action would help eliminate confusion because all motorized and mechanized travel would be restricted to existing, established routes.</p>	9
<p>L3. Visit hunting camps before season opens.</p> <p>Response: Both agencies visit hunting camps, often with Colorado Division of Wildlife conservation officers, before big game seasons open. The frequency and coverage is limited, however, because of the size of the units administered by BLM and the FS.</p>	10
<p>L4. The sale of non-motorized carriers for game retrieval could help the local economy.</p> <p>Response: Thank you for the comment.</p>	10
<p>L5. Why am I just hearing about this proposal now?</p> <p>Response: We regret that the commenter only found about the EA on the last day of the public comment period. We will include the name and address in future mailings for this proposal. Please see the Public Involvement section of the Decision Notice.</p>	28, 68

