APPENDIX A – RESPONSE TO PUBLIC COMMENTS

The Draft EIS for the Bridger-Teton National Forest (BTNF) North Zone OHV Route Designation Project was released for public review on June 12, 2008 and the Notice of Availability was published in the Federal Register on June 20, 2008 followed by a legal notice published in the Casper Star Tribune on June 28, 2008. Public review of the Draft EIS generated 216 comments; 197 from individuals, 11 from non-governmental organizations, 3 from local businesses, and 5 from federal and state agencies. All written comments received on the Draft EIS were entered into a spreadsheet for tracking. This letter log (tracking document) identifies the number given to each letter and specifies where responses to comments can be found. This tracking document can be found at the end of this appendix.

Public comments received on the Draft EIS were analyzed using a process called content analysis. In this process, each written comment is given a unique identifier (letter ID#). Each letter is then read and each comment within the letter is coded, first by which member of the interdisciplinary planning team is responsible for preparing the response, then by a code which identifies the specific topic category. The content analysis process makes no attempt to treat comments as votes. In a vote, the number of people for or against an action is all that matters. In the content analysis process, the Forest Service is seeking to learn specifically how to improve the environmental analysis as the Final EIS is prepared and glean further information to help inform the decision. The content analysis process helps ensure that every concern is identified and responded to. The results of this process are documented in this "Response to Public Comments" section of the Final EIS. This document includes a summary of public comments; it is not intended to replace comments in their original form. The actual comments themselves are part of the project record and are available for public review.

The Response to Public Comments is structured around the following twelve topics:

1. Motorized Recreation
2. Non-motorized Recreation
3. Soils, Water Quality, and Plants
4. Wildlife
5. Special Areas
6. Cultural Resources
7. The NEPA and Decision Process
8. Management, Enforcement, and Maintenance
9. Alternative Preference Statements
10. Route and Area Specific Suggestions
11. General Comments
12. Comments outside the Project Scope

1. Motorized Recreation

COMMENT: Specific language in the DEIS is very subjective and biased.
The lead sentence "There is limited need for purely motorized recreational riding," is contradictory to the statement in the paragraph above it in respect to the BTNF survey which found 'driving for pleasure' to be a 'top recreational activity' since OHV riding is just that – driving for pleasure to view scenery and wildlife.
Letter: 113
Response: This paragraph is the FEIS has been clarified. The most popular activities according to the National Visitor Use Monitoring (NVUM) survey were viewing natural features such as scenery, flowers, etc on national forest system lands (50.7%) and viewing wildlife, birds, fish, etc on national forest system lands (46.5%). Many forms of travel were/are used to view scenery and wildlife. The visitor's means of transportation to engage in these activities included all possible forms of travel (over snow, air, water, and land). The NVUM survey form distinguished between "driving for pleasure" and motorized use off road and on motorized trails. The interviewers utilized a visitor use questionnaire containing the following motorized options:

- Driving for Pleasure on roads (paved, gravel or dirt)
- Riding on motorized trails (non-snow)
- Riding in designated off-road vehicles areas (non-snow)
- Other motorized activities (enduro events, games, plane, etc.)

According to the Bridger-Teton National Forest NVUM survey, 15.4 % of the visitors surveyed indicated they participated in "driving for pleasure on roads" and 3.9% indicated driving for pleasure on roads was their primary activity. Six percent of forest visitors indicated they participated in off-highway vehicle travel (4-wheelers, dirt bikes, ATVs, etc.) and two percent of all forest visitors surveyed indicated that off-highway vehicle travel was their primary activity during their BTNF visit.

Regardless of the primary objective for OHV use, relatively few forest visitors are participating in off-highway vehicle travel on motorized trails. It is this low historic and current use of purely motorized recreational riding on motorized trails relative to other recreational activities on the BTNF.

COMMENT: DEIS failed to answer the following OHV niche related questions:

- "What kind of OHV use is occurring on the B-T now?"
- "Has your draft proposal taken that use into consideration?"
- "Does the draft plan account for future OHV use?"

Letter: 3
Response: Existing and potential OHV activities could be subdivided into several categories including hill climbs, trials, motocross, and family riding to name just a few. The scope and objectives of this project limits current and future OHV use to activities utilizing designated trails. For analysis purposes, two general categories of OHV activities were identified in the analysis to represent all of the kinds of OHV use on the Forest (recreational riders and hunters).

Recreational riders prefer and would concentrate on the most desirable trail systems, those systems containing loops, spurs, connectors and a variety of opportunities. Furthermore, recreational rider preferences were further broken down into the difficulty of a given trail system to address the different type of OHV experiences required by the various kinds of OHV use. *Hunting based OHV users* are typically less interested in loop systems. They typically desire maximum access into remote areas during the fall season.

Subdividing OHV opportunities into such categories provided an indication of the variety and quantity of opportunities available in each alternative. A combination of adequate sustainable route mileage and route diversification of motorized opportunities would most likely accommodate the most current and future types of trail-based OHV use. Off trail, OHV uses requiring specialized settings such as motocross courses, trials off trail and hill climbs were outside the scope of this analysis and were not considered.

COMMENT: Concern about specific aspects of the project need.
"Outfitter-guide services and safety concerns related to multiple use of trails (motorized and non-motorized) should not be a driving reason to eliminate unrestricted motorized access."
Letter: 113
Response: The driving need to eliminate unrestricted motorized access is based on the National Forest Travel Management Rule (36 CFR Part 212). This rule prohibits unrestricted wheeled motorized travel and requires roads and trails open to motor vehicle use to be designated for such use. In addition to the national rule, the analysis indicates five compelling reasons why there is a need to create a designated system for public motorized use and eliminate areas of unrestricted use. One of the needs is to reduce conflicts between public motorized and non-motorized use and between motorized use and special uses (outfitter/guide activity, etc.). This particular need is not a driving reason to eliminate any one trail or any system of trails from a particular area. This particular need drives all action alternatives to move from an unmanaged, unrestricted motorized travel system within the project areas to a designated system of routes for the motorized recreation community that best serves the motorized interests while minimizing conflicts with other uses on the Forest. Designated routes and seasonal restrictions were used in all action alternatives to accommodate all Forest activities, including motorized use.

COMMENT: The DEIS indicator for the management of the motorized system indicates that alternative D would represent the most difficult scenario to manage.
"The DEIS states, "A complex OHV system including multiple seasonal closures, differing vehicle type restrictions on a single route, numerous trailheads, and dead-end trails is prone to misunderstanding by both managers and users. Forest visitors would be more likely to make honest mistakes when trying to navigate a complex OHV system. Likewise, enforcement, interpretation, and signing a very complex system are more difficult for forest managers, maintenance crews, and field patrollers." It is therefore curious that Alternative D has been designated as the preferred action since it is the most complex of all proposed action alternatives."
Letter: 113
Response: Numerous indicators were used to compare and contrast the alternatives. No one indicator or issue determined the preferred alternative. The analysis stated that the difference in complexity, the number of signs, gates, or barriers required to implement the action alternatives is insignificant. It is difficult to predict which alternative would ultimately prove to be the least

or most complex. All action alternatives would require significant effort to successfully implement education, enforcement, maintenance, rehabilitation, and monitoring tasks. However, compared with the current travel plan, all action alternatives offer an OHV route system that would be mapped and signed, would be more enforceable, and would have a far greater number of routes maintained annually.

This comment did result in modifications to the initial preferred alternative to improve enforceability and reduce system complexity. This included eliminating one category of seasonal restrictions and making seasons within a particular area more consistent where possible.

COMMENT: The DEIS should address regional and destination OHV needs.
"The ending sentence in this section [Travel Analysis Page 18], "thus, the designated OHV route system should consider opportunities for motorized trail riding that serve local populations needs, but not regional or destination needs" is off-base and does not represent the 'need' situation accurately." The northern portions of the project area are host to world-class motorized trails in the winter season and have the potential to serve regional and destination needs during the summer season."
Letter: 113
Response: This sentence was clarified in the FEIS. Forest visitor surveys have indicated that forest visitor's *primary* reason for visiting the BTNF during the summer is to hike or walk (13%), view natural features such as scenery, flowers, etc on national forest system lands (10%), hunt (9.4%), and bicycling, (8%). Two percent of forest visitors surveyed chose off-highway vehicle travel (4-wheelers, dirt bikes, etc) as their primary activity on the BTNF.

Off road, motorized trail use and the associated Forest's summer motorized trail system is not a primary reason most visitors come to the BTNF. According to surveys, including a recent study entitled *Study of Preferences and Values on the Bridger Teton National* Forest that was completed for the Forest Plan, the attributes that draw visitors to the BTNF are the Forest's natural features and resources. Forest Plan standards and guidelines were designed to preserve these popular BTNF attributes. Many of the forest standards and guidelines such as motorized routes/sq mile density standards are not compatible with the creation of a robust world class motorized trail system that would draw a significant number of visitors from outside the local area. Thus the BTNF worked within the constraints of the forest plan to provide a quality trial/road system to meet existing and foreseeable future motorized trail needs with an emphasis on the desires of the local population of motorized trail users.

COMMENT: The DEIS does not accurately define the local OHV visitor.
"The discussion beginning with the second paragraph [Page 50] about local visitor profiles is flawed since it inappropriately minimizes the importance of riding opportunities in the project area by citing only Teton County ORV registration statistics. This is far too narrow of a perspective to be accurate. An accurate profile of 'local' OHV visitors must rather include recreationists from the four counties in and directly adjacent to the project area (Teton, Sublette, Lincoln, and Freemont Counties) versus only those from Teton County; these are the true 'local visitors' who desire to recreate on motorized trails within this planning area."
Letter: 113
Response: The DEIS acknowledges the fact that ORV registration statistics are not the best indicator of local trends for the following reasons:

- ORV sticker sales are a relatively new program (First year – 2002). As with any program, compliance and related sales figures increase as forest visitors learn about the program.
- Additionally, ORV sales are not specific for a particular area in Wyoming. Thus a motorist could purchase an ORV sticker in Lincoln County, but spend a significant amount of time riding in Teton County.
- Despite education outreach and law enforcement efforts to gain ORV sticker compliance on public lands, an unknown percent of unlicensed OHV users are recreating on public lands without purchasing a State of Wyoming ORV sticker.

Likewise utilizing the 4 county areas as the "local visitor" does change the numbers but not the potential flaws or the accuracy of the statistics due to the reasons stated above. Thus, the FEIS was edited to acknowledge the flaws associated with utilizing ORV registration sales as an indicator of the local ORV community until the ORV registration statistics stabilize over the course of the program. ORV registration statistics were removed from the analysis and data from a more recent study (following paragraph) were utilized.

A recent study entitled *Study of Preferences and Values on the Bridger Teton National Forest*, Commissioned by the State of Wyoming, Governor's Office, authored by Jessica M. Clement, Ph.D., Antony S. Cheng, Ph.D. of the Department of Forest, Rangeland and Watershed Stewardship in Fort Collins, CO was conducted as part of the Forest Plan Revision process. Use preferences by the four county areas were as follows:

Travel Preferences on the BT National Forest

Modes of Travel (% favor):	Whole Sample	Fremont	Lincoln	Park	Sublette	Teton
Non-Motorized Rec.	87	84	83	90	93	92
ATV Recreation	42	49	50	38	41	26
Four wheel drive	33	39	30	33	28	27
Over snow motor rec.	56	58	68	54	63	42
Horse packing	83	85	79	88	90	77

COMMENT: The National Visitor Use Monitoring (NVUM) process is flawed
The NVUM survey discussion on page 51 highlights that 45% of BTNF visitors were from towns adjacent to the forest, and that 34.2% of forest visitors were from Jackson (these Jackson numbers seem to be higher that what would be expected and suggest flawed sampling methods).
Letter: 113
Response: The Bridger - Teton National Forest participated in the National Visitor Use Monitoring (NVUM) project from October 2001 through September 2002. Recreation surveys were accomplished using Forest Service employees, both permanent and seasonal staff on each district. Some of the heaviest use areas of the forest were affected by road construction (resulting in relatively low use figures for those days) but otherwise there were no unusual weather or other events.
A total of 2,793 visitors were contacted on the forest during the sample year. Of these, about eight percent refused to be interviewed. Of the 2,578 people who agreed to be interviewed, about 23 percent were not recreating, including three percent who just stopped to use a restroom,

eight percent were working, seven percent were just passing through, and five percent had some other reason to be there. About 77 percent of those interviewed said their primary purpose on the forest was recreation and 89 percent of them were exiting for the last time. Of the visitors leaving the forest agreeing to be interviewed, about 68 percent were last exiting recreation visitors (the target interview population).

These statistics include the error rate and associated confidence intervals at the 80 percent confidence level. The confidence level provides a specified level of certainty for a confidence interval defining a range of values around the estimate. The error rate is expressed as a percent of the estimate and can be used to obtain the upper and lower bounds of the confidence interval. An 80 percent confidence level is very acceptable for social science applications at a broad national or forest scale.

The survey used zip codes to obtain residency results. Jackson zip codes are 83001 and 83002. "Adjacent towns" and Jackson percentages were defined as follows:

Zip Code	Town	Frequency	Percent
83001	Jackson	286.0	21.2
83002	Jackson	176.0	13.0
83014	Wilson	65.0	4.8
83025	Teton Village	24.0	1.8
83110	Afton	21.0	1.6
83011	Kelly	13.0	1.0
82941	Pinedale	10.0	0.7
83012	Moose	10.0	0.7
83128	Alpine	8.0	0.6
TOTAL			45.4

NVUM methodology and analysis is explained in detail in the research paper entitled: Forest Service National Visitor Use Monitoring Process: Research Method Documentation; English, Kocis, Zarnoch, and Arnold; Southern Research Station; May 2002 (http://www.fs.fed.us/recreation/programs/nvum).

COMMENT: Motorized use on the BTNF should be limited. "Some motorized vehicle use should be allowed for handicap access, but overall we should use natural, non-motorized ways to enjoy the public lands that belong to all of us." "We believe that the Bridger-Teton National Forest (BTNF) should focus on the presence of incomparable numbers and variety of wildlife. The BTNF is renowned for its wildlife habitat and should not become a motorized recreation playground.
Letters: 61, 95
Response: Motorized use on forest roads and trails is a valid use of National Forest Lands. Thus the BTNF is tasked with balancing motorized opportunities with other recreational activities while sustaining natural resources. The project's objectives clearly define this challenge.

- Designate roads and motorized trails to meet identified public access needs, improve the quality of the road and motorized trail system, and reduce conflicts.

- Reduce resource impacts.
- Improve the ability to maintain routes and enforce travel regulations.

COMMENT: A game retrieval exemption for motorized travel should be authorized and clearly defined.
"OHVs are appropriate for retrieving game taken during hunting season. A provision that address retrieval of game is needed. Both hunting regulations and the OHV [plan] should make it clear what off trail travel is acceptable under the new regulations. OHV travel for game retrieval should be allowed only in sage brush and rocky areas and specifically state that no crossing of riparian areas (wet lands) be allowed."
Letters: 17, 88
Response: The National Travel Management Rule states that exceptions for game retrieval should be used sparingly. Allowing a motorized travel exemption for game retrieval was one of the alternatives considered but eliminated from detailed study. Legally tagged game can be retrieved using non-motorized means, hiring an outfitter, or via open designated motorized routes. Interdisciplinary team discussions concluded that there is no consistent or enforceable means to assure that an exemption for game retrieval will not result in user conflicts and unacceptable resource impacts. Additionally, not including an exemption for motorized travel for game retrieval is consistent with restrictions in effect for adjacent federal lands. In particular, the bison hunt which occurred on the National Elk Refuge in 2007 and 2008 did not permit motorized travel off designated roads for game retrieval and this restriction did not prevent hunters from taking advantage of the opportunity to harvest bison. Refer to Chapter 1 – Project Scope – and Chapter 2 – Alternatives Considered but Eliminated – for further information.

COMMENT: Proposed mileage of motorized routes in the Gros Ventre is not adequate.
"As a rule, ATV's travel 15 to 70 miles during a recreation outing." Motorcycle trail riders typically travel 25 to 100 miles in an excursion. With the entire Gros Ventre trail system combined it hardly meets the mileage on the low end of the scale. The loops you included in the lower Gros Ventre would discourage riders from traveling off trail if visitors are only spending less than a day there. "There are very few areas surrounding Jackson Hole that allow enjoyment using off highway vehicles and taking more trails and access away is inexcusable…now we are dealing with more potential restriction." [Not enough miles]"
Letter: 3, 73
Response: The BTNF niche places an emphasis on backcountry recreation, wild lands, wildlife and healthy watersheds. The objectives of this project included designating a sustainable motorized system that meet identified motorized needs while sustaining these Forest attributes. Forest plan standards and guidelines were designed specifically to protect these resources. Many of these standards and guidelines are not compatible with a robust OHV trail system in the Gros Ventre. Over 60 % of the Gros Ventre and Shadow mountain project area is designated Desired Future Condition (DFC) 12 in the Forest Plan. DFC 12 is managed for high-quality wildlife habitat and escape cover, big-game hunting opportunities, and dispersed recreation activities. Management of the area requires a limited amount of open roads for public access and some commodity removal. The road standard is to limit road density to an average open road density of 0.25 mile per square mile. Additionally, an average of no more than 1 mile of motorized trail per square mile of area should be attained in areas designated DFC 12.

COMMENT: Concern the lack of quality trail components will lead to off route travel.
"When designated routes fail to satisfy riders; off route travel is likely to occur. The result will be more user created routes that have the potential for resource damage, user-conflicts and will remain a poor recreation experience." "Does your proposal for the Gros Ventre include these [components of a quality trail system – adequate experience, looped trails, trail diversity, support facilities]?"
Letter: 3
Response: Given the motorized route limitations associated with Forest Plan standards and guidelines within DFC 12, we focused not only on the quantity of trails but also on the quality of the system. Indicators such as mileage of motorized trail associated with loop systems and range of trail difficulty were incorporated into the analysis to get at a measure of the quality of a proposed trail system. Support facilities were not discussed but the concept of support facilities was brought to our attention in the comments to the DEIS and support facilities, such as Togwotee Lodge, were incorporated into the final decision.

COMMENT: Opposition to any net loss in off highway roads, routes and trails in the B-T as compared to existing condition.
"There are very few areas surrounding Jackson Hole that allow enjoyment using off highway vehicles and taking more trails and access away is inexcusable." Don't take away more trails or further restrict OHV access in the Bridger-Teton National Forest. "Keep existing "open" OHV trails open and create additional trail opportunities." By keeping open trails open and hopefully opening up new trails, our ability to enjoy nature in the way we enjoy it best will be preserved." Additional routes than proposed would benefit fire fighting efforts, logging and thinning activities, while still providing increased recreational opportunities to a growing number of forest users. **"**Tens of thousands of acres that once provided challenging trails and cross-country travel for motorcycles are being closed. There should be an expectation from these enthusiasts that the forest service make a strong effort to recompense for these lost opportunities. There should be consideration the motorcycle enthusiasts have been riding on rugged trails across forest lands long before the invention of the mountain bike or Willy's jeep." Re-open and establish more roads, routes, and trails to enhance motorized access and provide more "looped circuits" and less dead ends.
Letters: 14**,** 73, 118, 99, 97
Response: The Forest Service is tasked with balancing motorized opportunities with other recreational activities while sustaining natural resources. The Forest Plan provides motorized route planning management standards in the form of Desired Future Condition (DFC) prescriptions. DFCs 10 and 2B are the management areas most compatible with motorized use. DFC 10 and 2B contain a standard of an average of no more than 1 mile of trail per square mile. Of the 281,136 acres considered in this analysis only 14% or 39,918 acres fall within DFCs 10 and 2B. The remaining 86% of the analysis area is designated as DFCs containing much more restrictive motorized route density standards. Non-system, user-created routes that have evolved within unrestricted areas over time have resulted in net mileage that exceeds Forest Plan standards in specific areas. Given the motorized route limitations associated with Forest Plan standards and guidelines within DFC 12, we focused not only on the quantity of trails but also on the quality of the system. We encourage reviewers to judge the results of this planning process based on site-specifics and substance rather than on summary statistics. The distribution and location of routes across the landscape is more important and meaningful than simple mileages.

COMMENT: Consider eliminating spur and parallel routes
"I would also like to see some spur routes removed (I prefer to see loops only)." Have the negative impacts of multiple short spur roads and trails, their location and use, been evaluated? "Eliminate parallel roads and trails."
Letter: 72, 110
Response: The cost-benefit aspects of each spur and parallel route were considered in the analysis of each resource area analyzed in the DEIS & FEIS. Extensive route density studies and models were utilized to determine possible effects to wildlife. At the same time the end point (destination) of each spur and/or parallel routes were considered. Additionally, potential enforcement and monitoring obstacles were incorporated into the decision process to retain or eliminate potential spur and/or parallel routes.

2. Non-Motorized Recreation

COMMENT: Concern that motorized recreation disrupts and displaces enjoyment of others who come to the forest seeking quiet. Included in most comments was mention of BT's unique attributes of wildlife habitat, wild areas.
Letters: 26, 41, 42, 43, 44, 45, 46, 47, 48, 49, 51, 52, 54, 57, 63, 75, 78, 79, 84, 85, 86, 94, 95, 98, 100, 106, 111, 119
Response: Displacement of non-motorized recreation use and effects such as noise are being considered as part of OHV route selection.
Through forest planning and recreation planning the BTNF has for many years articulated the 'niche' it fills in the outdoor recreation scene—with an emphasis on backcountry recreation, wild lands, wildlife and healthy watersheds. The Forest Service recognizes the intrinsic and spiritual value of public wild lands and the unique position the BTNF is in to help provide for quiet, remoteness, and other attributes that invite reflection. This Forest 'niche' remains the context within which a sustainable system of trails and roads was identified and will be managed. Although the forest niche emphasizes primitive backcountry, this does not mean it is the only thing that matters—so do ski areas, the Snake River corridor, developed campgrounds, resorts, and opportunities for some roads and motorized trails. Routes considered in this analysis are already in use; some of them (those that meet the purpose and need) may be included in the system in order to provide motorized recreation opportunities as well as non-motorized recreation.
All action alternatives reduce the acreage affected and mileage of motorized trails in backcountry areas, limiting use to specific routes that are sustainable, enforceable, and compatible with other resources.

COMMENT: Concern about displacement of big game and reduction of non-motorized hunting opportunities.
Letters: 81, 88, 103, 111
Response: All action alternatives reduce the acreage affected and mileage of motorized trails in backcountry areas, limiting use to specific routes that are sustainable, enforceable, and compatible with other resources. Specific changes that were designed, by location and/or open season, to enhance non-motorized hunting opportunities include: closure of the routes in the Coal Mine/Uhl Draw area, closure of several user-created two-tracks between Shadow Mountain and

Carpenter Draw, closure of the route on the ridge between South Fork Ditch Creek and Turpin Creek, seasonal restrictions on the Horsetail Creek and Munger Mountain trails, and closure of the Cottonwood Creek road (south of Mosquito Creek) below the forest boundary.

COMMENT: Disagree with indicators used to measure effects and the analysis on non-motorized recreation settings.
"Indicator #1 (miles of non-motorized trails) —this measurement seems to lack any credible meaning or validity since, isn't essentially 100% of all trails on the BTNF open to non-motorized recreational uses? Additionally, Indicator #2 (% of project area that meets physical setting criteria for primitive or semi-primitive non-motorized setting) is also a nebulous and somewhat useless indicator since the project is switching management from what's been referred to as 'grey areas' where motorized travel has been unrestricted to designated travel routes." "Regarding Direct and Indirect Effects—"…motorized use can only occur in the few motorized zones which exist across the Forest, so why would any increases in multiple use areas really 'erode' the non-motorized setting?"
Letter: 113
Response: Although all trails within the BTNF are open to non-motorized use, it does not mean that all trails are within an environment that contains the attributes associated with a quality semi-primitive non-motorized opportunity. These two indicators were used compare the effects of the five alternatives with respect to the issue raised by the public that the proposal may affect the quality of the setting for non-motorized recreation users; they are not intended to imply allowable or prohibited uses. The Forest Service uses the Recreation Opportunity Spectrum (ROS) to assist with planning and management recreation resources. The ROS framework recognizes that there are physical, managerial, and social attributes that combine to influence the type of opportunity available. Physical setting attributes include how modified or developed the area is and its remoteness; managerial attributes include the types of uses occurring and management presence; social attributes include evidence of other people, degree of interaction with other people, and degree of self-reliance required. Physical, managerial, and social attributes are combined to describe a spectrum of six broad recreation opportunities ranging from urban to primitive environments. Appendix D in the FEIS provides a description of the ROS framework.

3. Soils, Water Quality, and Plants

COMMENT: Approximately 106 miles of motorized routes are within unstable or marginally unstable landtypes. EPA recommends that the Final EIS identify unstable areas of highest erosion potential and identify mitigation practices or re-vegetation of disturbed routes that could be implemented to minimize impact of sediment load on streams, wetlands, and aquatic resources.
Letter: 219
Response: The slope instability referenced by the indicator referenced by the EPA is the potential for mass failure, rather than surface erosion. Routes can be safely located on unstable and marginally unstable slopes with proper design. The key factors to consider are to avoid increasing the potential delivery of water to and concentration on naturally unstable slopes; avoiding the undercutting or overburdening of steep slopes; and minimizing the potential for and cost from catastrophic channel crossing failures. Within the project areas, stream crossings are

typically bridged or forded, or pass through culverts of adequate size to handle flood flows and debris. Similarly, most roads and especially the trails within the project areas do not have large cut and fill slopes. Therefore, the biggest concern is to avoid rerouting, delivering, and concentrating water on unstable slopes. This element, which is an important component of route sustainability, can be achieved through proper location and cross drainage of the route surface and was a key consideration while the Interdisciplinary Team was designating the existing routes.

No new construction is proposed. Much of the 106 miles is on maintained roads. It is standard procedure to fix or rehabilitate any route that is causing impacts to streams, wetlands, or aquatic resources. Thus, needed mitigations are mostly in place or are being planned on existing routes that are part of the long-term transportation system. Unauthorized routes were not added to the system if they could not be managed sustainably and will be reclaimed once the travel plan is implemented.

COMMENT: The North Fork of Spread Creek is a Clean Water Act 303(d) listed water body threatening cold water fish and aquatic life. The cause of water quality threat for this one mile reach is habitat degradation caused by non-point sources of pollution. It is not clear from the Hydrology section on page 151 whether or not increased erosion of soils, stream banks or riparian areas (for this stream section or others) is likely to result from more frequent or changed use of new designated routes in the Forest thereby causing further impacts to water bodies. It is also not clear whether this stream or others may be further impacted due to designation of routes not already in the Forest Plan system. It is for this reason that final route designations by District Rangers must utilize a set of environmental and resource criteria in the final decision making process. Please describe anticipated impacts on North Fork of Spread Creek. In addition, please summarize the Wyoming Best Management Practices that would be used to control non-point source discharges.
Letter: 219
Response: The North Fork of Spread Creek is not listed as a threatened water body in the most recent (2008) Wyoming Department of Environmental Quality 305(b) report. The report (available at http://deq.state.wy.us/wqd/watershed/index.asp) states that "The North Fork of Spread Creek was listed on the [2006] 303(d) List due to habitat degradation. A watershed improvement project, sponsored by the Bridger-Teton National Forest, has rehabilitated the stream channel and improved the stream's ability to support aquatic life. Assessment by DEQ indicates this stream is now meeting its aquatic life uses, and it has been delisted from the 303(d) List." This updated information will be either added to the FEIS or provided in an addendum. Detailed information on potential sediment delivery to streams and other water bodies, by alternative, is provided in the Hydrology specialist report, which is in the project file. Wyoming Best Management Practices (BMPs) for roads are included in the Wyoming Forestry Best Management Practices; a booklet describing those practices can be found at http://slf-web.state.wy.us/forestry/bmp2.aspx. The Forest Service uses BMPs as mandatory minimum measures for protecting watershed resources, generally exceeding them. Use of BMPs, as described in practices found in FSH 2509.22, is required under the Memorandum of Understanding between the Forest Service and the State of Wyoming as part of the Forest's responsibility as the Designated Water Quality Management Agency on National Forest System (NFS) lands."

The proposed designated trails contained in each alternative would not further impact the North Fork of Spread Creek or other streams in the project areas for no new trail construction (ground-disturbing activities) is being proposed in any of the alternatives. Elimination of cross-country travel in these areas, including adjacent to streams, will greatly improve the potential for erosion issues. All proposed routes currently exist. Upon designation, the Forest will regularly address route erosion issues as they arise on a priority basis.

COMMENT: All motorized routes should be authorized only in terrain that will not degrade with use. Routes should not negatively impact habitat nor cause soil damage or erosion and should not adversely affect streams and other waters.
Letter: 95
Response: The prohibition of unrestricted motorized cross-country travel in the action alternatives is consistent with reducing soil and water resource impacts. The Alternatives Considered in Detail section of the DEIS and FEIS describes site-specific changes to the existing condition, for each alternative, that reduce soil and water impacts of roads and trails. Table 5 of the DEIS and FEIS summarizes the relative impacts of the alternatives on soils. The Soils and Hydrology specialist reports provides more information on impacts to soil and water resources.

COMMENT: ORV trails should meet the same test as foot trails and roads: a stable surface, good drainage, and no sediment production. We urge you to close any other routes that involve fording streams, those that pass within 100 feet of any stream, and those on erodible, unstable soils. This will help protect the fisheries, as well as habitat for the American Dipper.
Letter: 21
Response: The ability to sustain a route long-term, which includes preventing erosion, was a major determination is whether or not a route was designated as open. As described in the Hydrology specialist report, Wyoming Best Management Practices, and Forest Plan Standards and Guidelines, are used to reduce impacts to soil and water resources from roads and trails. Upon designation, the Forest will regularly address route erosion issues as they arise on a priority basis. Erosion-prone route sections will be improved or relocated over time to reduce impacts.

COMMENT: "I have witnessed the degradation of areas with unregulated motorized traffic and am concerned with the 'new' enjoyment of taking important marsh areas that are headwaters for streams and turning them into mud bogs that emulate the motorized arena events in cities."
Letter: 68
Response: Elimination of cross-country motorized travel and the designation of motorized routes which meet project objectives and comply with applicable policy, standards and guidelines associated with motorized route designation will not result in this type of motorized use. None of the action alternatives contain opportunities for "mudding" in streams, wetlands, or bogs.

4. Wildlife

COMMENT: Motorized impacts to threatened and endangered species.
The DEIS needs a discussion & summary of findings
Letter: 219
Response: Potential impacts to threatened and endangered species that are present or have potential habitat within the assessment areas are disclosed in the "Wildlife Technical Report"

and "Biological Assessment" found in the Project Record. In addition we have included a brief summary of finding in the FEIS.

COMMENT: Eliminate/minimize motorized traffic to protect gray wolf and its habitat
BTNF is critical habitat for range expansion & self-sustaining population; Protect as much wolf habitat as possible to maintain high wolf survival rates which facilitates dispersal and genetic interchange among the 3 northern Rockies and sustainable sub-populations
Letters: 119, 151
Response: Wolves and their prey base have been able to expand and thrive with current motorized access and regulations which includes unrestricted off road motorized travel within the project areas. In 2004, the wolf population outside Yellowstone National Park increased 23% from 82 wolves in 2003 to 101 wolves in 2004. In 2005, the wolf population increased 33% from 101 wolves in 2004 to 134 wolves in 2005. The number of wolves increased 31% in 2006 to >175 wolves. The wolf population in WY increased 7% to 188 wolves in 2007 (Jimenez, M.D., et al. 2008). Three new packs (Pinnacle Peak, Antelope and Dog Creek) formed as recently as the winter of 2007-2008 are now using the Upper and Lower Gros Ventre, Hoback Basin and Munger Mountain/ Fall Creek/Mosquito Creek areas.

Reducing all motorized off-road travel under all action alternatives, implementing more seasonal motorized closures and closing more miles of motorized trails/roads than presently open to motorized travel should contribute to higher wolf survival and dispersal of animals in the assessment areas. Modified alternative D would have a low level of human influence on all six wolf packs because of the large acreage of secure habitat and low open motorized route densities within the pack territories. Secure habitat and open motorized route density calculations are disclosed in the "Wildlife Technical Report" and "Biological Assessment" found in the Project Record.

COMMENT: Alt. D opens Skull Cr. Road to all motorized access that could impact wolf habitat in the meadow area
Alt. D opens Skull Cr. Road to all vehicles from July through November. The meadows area provides important habitat for wolves that den in GTNP
Letter: 64
Response: A modified alternative D was developed to respond to public comments. Most visitors come to the area for the scenery and ability to see wildlife. Thus some roads such as Skull Creek Road were converted to motorized trails to provide quality scenic "touring" opportunities. Modified alternative D will restrict motorized use of the Skull Creek road to ATV traffic only during the same seasonal period (July 1 thru Nov 30). Modified alternative D would have a low level of human influence on a rendezvous site for this wolf pack (Buffalo Pack) because of the large acreage of secure habitat and low open motorized route densities within the pack territory. Secure habitat and open motorized route density calculations are disclosed in the "Wildlife Technical Report" and "Biological Assessment" found in the Project Record.

In general, wolves are tolerant of human activity and may travel on roads (Thurber et al. 1994, Thiel et al. 1998, Mech et al 1998). Wolves may be displaced from natal den or rendezvous sites, although no reduction in pup survival has been documented (Carbyn 1974, Ballard et al. 1987). Wolves accustomed to human activity may habituate and do not move pups long distances from natal dens in response to human disturbance (Jimenez 1995, Thiel et al. 1998).

The potential for gray wolf mortality, displacement from preferred sites and/or behavioral/physiological responses would be reduced from the present threat that exists under the current Big Piney, Buffalo and Jackson Ranger Districts travel management plans. Modified Alternative D would provide some measure of benefit to wolves and their habitat by virtue of designating motorized travel routes and prohibiting all off-road motorized travel.

COMMENT: Motorized routes could provide greater access to backcountry in the State gray wolf predator zone
Increased motorized routes to predator zone could result in greater take of wolves in the zone
Letter: 119
Response: ESA protection for the NRM gray wolf population was reinstated July 18, 2008. All wolves in Wyoming are again protected by ESA making the predator area null and void. Also, wolf habitat security and effectiveness were analyzed for each action alternative as part of this decision making process. Modified Alternative D would provide some measure of benefit to wolves and their habitat by virtue of designating motorized travel routes and prohibiting all off-road motorized travel. This designated route system would have a low level of human influence on all six wolf packs because of the large acreage of secure habitat and low open motorized route densities within the pack territories. The designation of routes in modified alternative D would provide an increased acreage (approximately 95,000 acres compared to current conditions) of non-motorized habitat for wolves which would result in a decrease in motorized access within the former predator zones.

COMMENT: Manage recreational activities to maintain lynx habitat and connectivity to comply with NRLMD
Agency should choose an alternative (B) that would be more protective of the species
Letter: 95
Response: Direction for evaluating federal actions relative to lynx and their habitat is provided in the Northern Rockies Lynx Management Direction (NRLMD) Record of Decision (2007) which was amended to the Forest Plan.

All action alternatives would benefit lynx and their habitat by virtue of designating motorized travel routes and prohibiting all off-road motorized travel. Although, the alternatives do vary in the total miles and location of designated routes, their season and type of use and the total miles and location of routes closed to motorized access, designated motorized route densities for all action alternatives within LAUs and TMAs aren't considered high for lynx habitat based on thresholds published in the literature (Ruediger et al. 2000, Menakis et al. 1996 and Hann et al. 1997).

Lynx mortality from vehicle strikes are unlikely, and to date none have been documented on National Forest System lands, given the relatively slow speeds at which vehicles travel on these roads and generally low traffic volumes (USDA Forest Service 2007). Preliminary information suggests that lynx neither prefer nor avoid forest roads (McKelvey et al. 2000, Ruggiero et al. 2000, USDI FWS 2000a, p. 39) except at high traffic volumes (Apps 2000). Lynx will hunt along less traveled roads where vegetation provides good snowshoe hare habitat and travel down old roads <50 feet wide with good cover along both edges (Koehler and Brittell 1990) and cross openings <100 meters (approximately 300 feet) in width (Koehler and Aubry 1994). The LCAS (Ruediger et al. 2000) said there was no compelling evidence to suggest managing road densities

was necessary to conserve lynx. The UDSI Fish and Wildlife Service Remand Notice (2003) found no information demonstrating that forest roads negatively impact lynx (Roe et al. 2001) and, therefore do not consider forest roads to be a threat to lynx.

COMMENT: Consultation with the FWS is required for lynx
There is no mention in DEIS of consultation with FWS regarding potential circumstances (increase in traffic and disturbance along designated routes) that "may adversely affect" lynx.
Letter: 95
Response: Informal consultation with the FWS on a "no effect" determination for the preferred alternative (D) was completed at a Level 1 Team meeting on June 27, 2008. The Team agreed with a "no effect" determination for Alt. D. A Biological Assessment (in the Project Record) on Canada lynx documents a "no effect determination" on lynx from a modified Alternative D which has fewer miles and a lower density of motorized roads and trails, fewer loop and link routes and more seasonally restrictive motorized travel than the preferred Alt. D.

COMMENT: Adverse impacts to sage grouse from motorized access
Describe mitigation for motorized disturbance to lek and breeding habitats from concentrating travel on designated routes. Assure sage grouse habitats are protected before authorizing motorized routes. Even Alt. B, with fewest miles of motorized routes, "poses a significant threat to grouse and their habitat"
Letter: 219, 95
Response: Two-track roads and suitable off-road areas presently open to motorized travel that now impact breeding/nesting grouse around the immediate vicinity of occupied leks and within the nest buffer area will be closed to all motorized travel under all action alternatives.
Also, the preferred Alt. D was modified (modified alternative D) to lengthen the spring seasonal motorized travel closure on the Upper Gros Ventre road system and spurs above Slate Creek from May 1 to June 1. Grouse display and breeding activity around leks is over by June 1.

COMMENT: Eliminate motorized traffic to protect grizzly bear and its habitat
BTNF is critical habitat for range expansion & self-sustaining population
Letter: 151
Response: Eliminating motorized traffic does not meet the "Purpose and Need" of the proposed action. Motorized use on forest roads and trails is a valid use of National Forest Lands. Thus the BTNF is tasked with balancing motorized opportunities with other recreational activities while sustaining natural resources. All action alternatives would benefit grizzly bears and their habitat by virtue of designating motorized travel routes and prohibiting all off-road motorized travel. Although, the alternatives do vary in the total miles and location of designated routes, their season and type of use and the total miles and location of routes closed to motorized access.

COMMENT: Significant (TES/MIS) species/critical areas should not be impacted by motorized activity
Grizzly bear, sage grouse, peregrine falcon behavior and their critical habitats (ie. migration routes) should not be impacted/displaced as a result of project
Letters: 90, 95
Response: This project is only addressing existing routes with existing motorized use. No new route construction is being proposed. Potential impacts of the action alternatives on wildlife/habitats are disclosed in the Wildlife Technical Report and BA/BE in the Project Record

and summarized in the FEIS. Elimination of all motorized off-road travel, year around and seasonal road closures, and restrictions on type of vehicles are design features of all action alternatives proposed to reduce impacts to wildlife and their habitats. Modified alternative D was created in response to public comments, including Wyoming Game and Fish, to further reduce motorized road and trail miles, expand seasonal travel restrictions and place more restrictions on vehicle types authorized on designated roads and trails to improve habitat effectiveness and security for wildlife.

COMMENT: Effects of open motorized route densities/use on grizzly bear behavior and secure habitat

Open motorized densities under the Action Alternatives drop below the 2003 secure habitat baseline of 85% in the Hoback Bear Analysis Unit (BAU).

Letter: 119

Response: Although the amount of secure habitat available to bears under all the action alternatives is below the 2003 baseline, all action alternatives do improve upon the current amount (from 58% to 74%) of secure habitat for bears in the Hoback BAU. Greater than 70% secure habitat is indicative of a low level of human influence on bears and their occupied habitat. Closure of the N. Fork Fisherman Creek trail to all motorized travel under the new modified alternative D will further increase the amount of secure habitat for bears in the Hoback BAU moving it closer to the 2003 baseline.

COMMENT: Effects of open motorized route densities/use on grizzly bear mortality and human injury

Motorized hunting opportunities in the Buffalo/Spread Cr. Bear Management Unit (BMU) will no doubt lead to increased bear/human conflict, and resultant bear losses and human injury

Letter: 119

Response: Regulated motorized travel (designated routes, seasons, and vehicle type) and elimination of all off-road travel under all the action alternatives increase the amount of secure habitat for bears in the Buffalo/Spread Creek BMU subunit 2 over the existing situation and 1998 baseline, and concomitantly should reduce the potential number of bear/human encounters, bear mortality and human injury. Bears will have more escape cover secure from close proximity (greater than 500 meters) to motorized routes because there are fewer miles of open motorized routes with more restrictive seasonal closure periods (including closures during big game hunting seasons) and vehicle type restrictions.

COMMENT: Inaccurate/flawed assumptions and speculative statements regarding potential effects of designating motorized routes within grizzly bear, sage grouse, pronghorn migration, and peregrine falcon habitat.

Restricting motorized travel to designated routes doesn't necessarily increase the frequency and volume of traffic on these routes nor would it decrease habitat loss in off-road areas presently open to motorized travel. Documentation shows foot travel in sensitive wildlife areas can cause greater impacts than vehicles. It is speculative and baseless to infer that designation of motorized routes in all action alternatives poses a cumulative threat to bear displacement from preferred habitats/sites, and increases vulnerability to mortality because all routes already exist.

Letter: 113

Response: The action alternatives would result in fewer number and mileage of motorized routes compared to the existing system of motorized routes and unrestricted off road opportunities.

Assuming the amount of motorized use is constant in each alternative scenario, the concentration of motorized use (vehicles/route) would be greater for a system with fewer number and mileage of motorized routes. Thus the action alternatives would theoretically result in a higher concentration (frequency and volume) of motorized traffic than the existing condition. This may result in an increased occurrence of motorized disturbance along routes that previously may have received less frequent and lower traffic volumes.

The most recent research on elk (Wisdom et al. 2005) found that "elk movement rates and flight response were higher during ATV riding than hiking". One pass/day by any of 4 off-road vehicles increased movement rates and flight response of elk.

A relative comparison of the amount of secure habitat available to bears in 1998 and 2003 (baseline conditions), currently and under implementation of each of the action alternatives in both BMUs and BAUs in the DEIS shows that the action alternatives improve upon secure habitat values for bears, but do not eliminate the potential threat that a designated motorized route system would have on bear habitat selection, movements and vulnerability to mortality relative to the disturbance/conflict from human presence associated with motorized access. Grizzly bears tend to avoid areas used by motorized vehicles (Archibald et al. 1987; McClelland and Shackleton 1988, 1989; Kasworm and Manley 1989, 1990; Mace et al. 1996, 1999; Mattson et al 1987; Wieglus et al. 2002). Grizzly bears also experience chronic, negative interactions with humans, and motorized roads and trails are a key facilitator of such interactions (Mattson et al. 1992, Thiel 1985). Repeated, negative interactions with humans increase mortality and often cause high-quality habitats near roads to function as population sinks (Mattson et al. 1996)

COMMENT: Sensitivity of grizzly bears and other wildlife species - elk, moose, deer - to human presence
Impacts of unregulated motorized noise, habitat degradation, and road proximity to animals
Letters: 66, 68
Response: All action alternatives regulate motorized travel through the designation of a motorized road/trail system and elimination of all off-route motorized travel. The designated route system will reduce spatial extent of noise, habitat degradation and exposure of wildlife to disturbance associated with proximity to motorized roads and trails. A comparison of the impacts of unregulated (Alt. A) and regulated (all action alternatives) motorized travel on/off-road and associated human activity on grizzly bears and other wildlife species are disclosed in the FEIS, and the "Wildlife Technical Report", "Biological Assessment" and "Biological Evaluation" in the Project Record. The initial preferred Alt. D was modified in response to public comments to further reduce potential impacts to wildlife from a designated motorized route system.

COMMENT: Apply seasonal trail closures to protect species and habitats where permanent closures are not in place
Implement seasonal closures for parturition areas, grizzly bear habitat, pronghorn migration, sage grouse breeding thru brood rearing seasons, and hunting season security, especially on Munger Mountain
Letter: 95
Response: Seasonal and year around motorized trail closures under Alts B, C, and D provide secure elk parturition area in spring and secure escape habitat in fall during hunting season on Munger Mountain. A new modified alternative D increases secure habitat during parturition and

hunting season by closing an eastern section of motorized trail from Munger summit to Ross plateau year around. Additional year around and seasonal trail closures in the Gros Ventre and route closures in the Blackrock/Togwotee area under a modified alternative D developed in response to public comments will increase secure habitat during bighorn sheep and elk parturition, pronghorn migration, sage grouse breeding, big game hunting season and for grizzly bear.

COMMENT: Poaching
Unsupervised and unlimited motorized travel exposes wildlife to poaching
Letter: 61
Response: All action alternatives would implement regulated and enforceable motorized travel through a designated road and trail system and elimination of off-road motorized travel which should help reduce the vulnerability of wildlife to poaching. A relative comparison of the impacts of current and alternative proposed motorized travel on/off-road and associated human activity (including illegal take) on several wildlife species is disclosed in the DEIS and FEIS, and the "Wildlife Technical Report", "Biological Assessment" and "Biological Evaluation" in the Project Record.

COMMENT: Alt. D Wallace Draw motorized routes perpetuate potential illegal use of Park lands in a "Wildlife Closure Area" and are a source of disturbance to very high wildlife values in the area
Two Wallace Draw loop routes adjacent to the Park boundary allow OHV access under Alt. D to Park lands from July thru November which will perpetuate the problematic poaching in the Park, particularly during the Park elk reduction program
Letter: 64
Response: A new modified alternative D developed in response to public comment closes both loop routes in the Wallace Draw area. All that remains is a fragment of the non-loop system open to all motorized vehicles from July 1 through November 30 that accesses a dispersed campsite. That portion of the northern most loop in the Uhl/Coal Mine Draw area connecting to GTNP two-track routes will be closed to all motorized travel.

COMMENT: Science findings lacking in analysis. Incorporate current peer-reviewed research into FEIS and implement best management practices.
Alt.B ignores scientific findings on impacts of motorized use on wildlife populations
A critical best science FEIS assessment of impacts of motorized travel on wildlife/habitats and full implementation of best management practices to reduce road densities, eliminate loops, interior trails, parallel roads/trails and links with the Upper Green River
Letters: 215, 90, 95, 119
Response: The most recent science known regarding the impacts of motorized travel on/off-road and associated human activity on wildlife species and their habitats are disclosed in the alternative effects analysis in the DEIS and FEIS, and the "Wildlife Technical Report", "Biological Assessment" and "Biological Evaluation" in the Project Record. Peer review from WGFD, USFWS, and EPA are also in the project file. Implementation of various year round and seasonal road/trail closures (including loops/interior trails, parallel roads/trails, links), elimination of all motorized off-road travel and restrictions on type of vehicle travel to protect critical/key habitats/sites for wildlife are management practices that would occur under all action alternatives. A new modified alternative D developed in response to public comment would

implement more restrictive road and trail management actions to further reduce potential impacts on wildlife and their habitat. No motorized links with the Upper Green River basin are proposed under any of the action alternatives.

COMMENT: Disagree with unsubstantiated statement regarding amount of wildlife disturbance from motorized recreation
Disagree that motorized recreation has potential to cause more disturbance to wildlife than other forms of recreation such as foot travel because vehicles cover more area
Letter: 113
Response: All forms of recreation have the potential to disturb wildlife. Wisdom et al. (2004 and 2005) and Wisdom (2007) discuss preliminary findings from a controlled experimental study evaluating the effects of ATVs, mountain bikes, hiking, and horseback riding on elk and mule deer. Their initial results indicate that elk exhibited much higher rates of movement (or greater displacement) and probability of flight response from ATVs and mountain bikes compared to horses and hikers. Motorized vehicles have the capability to cover more area in any given time span than non-motorized means of travel (including mountain bikes) across terrain accessible to both. Thereby, motorized vehicles potentially encroach on the secure space of more wildlife and can be a greater source of disturbance than the more limited wildlife contact non-motorized travel would have during the same time span.

COMMENT: ORV routes adversely impact wildlife habitat
Too many ORV routes fragment blocks of wildlife habitat
Letter: 21, 50
Response: Implementation of any of the action alternatives would prohibit the future development of user created OHV routes across accessible terrain and all action alternatives would designate a managed trail and road system for OHVs and place greater seasonal restrictions on OHV access to routes presently open to OHV traffic. The combination of these two actions would reduce fragmentation of year around and seasonally crucial wildlife habitat and improve connectivity among habitat patches.

COMMENT: BTNF should focus on incomparable numbers and variety of wildlife
BTNF renowned for wildlife and should not become a motorized recreational playground
Letter: 95
Response: As documented in the DEIS and FEIS, potential effects to wildlife and their habitat is a management focus for changes in motorized travel management. However, motorized recreation is a valid use of NFS lands as clearly stated in the National Travel Management Rule.

COMMENT: Adverse impact of high roads/trails densities (loops/parallel and redundant trail connectors) and ORVs on elk habitat effectiveness and security
Too many roads/ORV trails and motorized loops around Mt. Leidy, Munger Mountain, Spread Creek, Gros Ventre and Jack Creek scare elk from preferred habitats, need to barricade many roads to reduce fragmentation, restore wildlife values, and maintain 100% elk security and not compromise agency initiated rehabilitation of plant communities
Letters: 81, 110, 95
Response: The adverse impacts of open motorized roads and trails, including loop, connector and parallel routes, under each action alternative on elk habitat effectiveness and habitat security around Munger Mountain, Mt. Leidy highlands, Gros Ventre and Jack Creek are disclosed in the

FEIS and "Wildlife Technical Report" in the Project Record. Maintaining 100% elk habitat security in these areas would not meet the "Purpose and Need" of the proposed action. However, a new modified alternative D was developed in response to public comments received on the DEIS which reduces the total miles of open motorized roads/trails, links and loops, increases miles of seasonal route closures and lengthens seasonal closures, and places greater restrictions on vehicle types authorized on roads and trails than preferred Alt. D to help increase elk habitat effectiveness and security and reduce fragmentation in the locations referenced above and where investment in habitat enhancement management actions have been implemented and are planned in the near future .

COMMENT: Density of all motorized routes in DFC 10/12 should not exceed recommended thresholds for elk habitat effectiveness (HE) and security (HS) to meet intent of Forest Plan standards and guidelines for road densities

The combined effects of motorized trails and roads under all the Action Alternatives do not meet the 70% and 50% HE benchmarks in DFC 12/10, respectively, in all MAs, nor the 30% secure habitat benchmark in all MAs during hunting season, which could exacerbate low bull ratios in the Gros Ventre.

Letters: 117, 120, 95

Response: The Forest Plan standards and guidelines for DFC HE values are based on open road densities aggregated by Management Area (MA) weighted for factors such as road type and management and hiding cover adjacent to open roads. Modified alternative D meets habitat effectiveness (HE) Forest Standards based on road density as calculated using the Forest Plan process.

The wildlife analysis used a more recent model to determine HE percentages rather than rely on the early 1980's open road density model (Lyon, 1983) as used in the Forest Plan. The HE analysis in the DEIS and FEIS is based on recent science using a distance-band model to calculate potential effects of open motorized roads/trails on elk habitat use patterns within an area. The 70% and 50% HE benchmarks for DFC 12/10, respectively, are recommendations by Christensen et al. (1993:2-3). It was recommended that habitat effectiveness should be 70% or greater for areas intended to benefit elk summer habitat and retain high use. Likewise, habitat effectiveness should be 50% or greater in areas where elk are one of the primary resource considerations. These HE figures were used as a reference to measure and compare the action alternatives relative to one another and these benchmarks.

The Forest Plan standard for habitat security (HS) is not quantified. Hellis et al. (1991:40) recommends guidelines to manage elk habitat to limit elk vulnerability during hunting season. They defined secure areas as non-linear blocks of hiding cover > 250 acres in size and > 0.5 miles from and open road. They recommended these secure areas comprise >30% of an analysis area. This 30% benchmark for Habitat Security (HS) was also utilized as an indicator to compare the potential effects to big-game security in each action alternative.

The existing condition (Alternative A) includes off-road travel and unauthorized routes, all of which could not be mapped, measured, and fully incorporated into the HE and HS models. Utilizing only the known, mapped system routes for alternative A in HE and HS calculations does not truly represent the difference in HE and HS between the existing condition and the action alternatives. However, the use of various year round and seasonal road/trail closures

(including loops/interior trails, parallel roads/trails, links), elimination of all motorized off-road travel and restrictions of type of vehicle travel in the action alternatives has a measurable benefit to both HE and HS relative to the existing condition. For example, Alternatives B, modified D and E showed increases of 148, 119 and 119 percent for HE, respectively, over the current condition for the number of 6th field watershed areas intended to benefit elk summer habitat and retain high use (>70%). The median values for HE for all 6th field watershed areas intended to benefit elk summer habitat and retain high use (>70%) for Alternatives B, modified D and E also increased 34, 26 and 23 percent, respectively, over the current condition.

The initial preferred Alternative D was modified in response to public comment on the DEIS. Modified alternative D increases habitat security in the Gros Ventre with 3 key motorized trail closures and 1 motorized trail loop seasonal restriction during the hunting season to help address low bull/cow ratios in the Gros Ventre. Additional motorized trail and route closures on Munger Mountain and the Blackrock area also will enhance habitat security in these areas.

COMMENT: Effects of motorized travel on pronghorn migration
Protect pronghorn migration route from as much motorized use and human disturbance as possible during spring and fall movements. Reduce pronghorn stress from motorized trails in the Gros Ventre in May & November thru closure of trails open to vehicles 50" or less
Letter: 50,119
Response: All action alternatives reduce motorized route density and cross-country travel with in the pronghorn migration corridor. Preferred Alt. D was changed to modified alternative D in response to public comment on the DEIS to help improve habitat security in the Gros Ventre along the pronghorn migration corridor. The upper Gros Ventre road and its spurs (above the Slate Creek road) spring opening date was moved back 31 days from May 1 to June 1 to help maintain secure habitat along the migration corridor during the peak of migration in spring (May) when migration occurs over a more limited time period than the more prolonged fall migration period. An additional motorized year round trail closure part of an extended loop in the Lower Gros Ventre also will improve security during spring and fall migration. Also, a year round motorized trail closure in the Sunday Peak area will help improve security during fall migration along Bacon Ridge.

COMMENT: Questions reason for referencing a 2005 letter to Chief of Forest Service from Western Assoc. of Fish & Wildlife Agencies in DEIS
Are any habitats alluded to in the letter threatened by unregulated and illegal use of OHVs in the project area?
Letter: 113
Response: The letter was not specifically referencing the Bridger-Teton National Forest. However, there has been a proliferation of unauthorized trails within the unrestricted motorized travel areas on the Forest. This proliferation of un-managed routes is resulting in increasing adverse impacts on wildlife habitats as disclosed in the DEIS, FEIS and specialist reports in the Project Record, thus the letter is consider relevant to this project.

5. Special Areas

COMMENT: Concern about motorized routes within Wilderness Study Areas.
Specific areas of concern include Taylor Mountain road, Cottonwood Creek, Fall Creek, Porcupine Creek and North Fork Fisherman Creek.
Letters: 10, 12, 15, 18, 20, 21, 22, 23, 24, 27, 28, 31, 35, 48, 56, 58, 60, 65, 66, 68, 70, 71, 72, 74, 76, 77, 80, 81, 82, 83, 85, 86, 89, 90, 94, 95, 102, 104, 105, 108, 109, 110, 112, 119, 121-214, 215, 216, 218
Response: The only motorized routes within WSAs that are included in the proposed action are those for which there is evidence of use prior to 1984, when the Wyoming Wilderness Act was enacted. Alternative D was modified to eliminate all motorized routes within the Palisades WSA. The only motorized routes to be retained within the Shoal Creek WSA are (1) a short section of the road into Shoal Creek from Riling Draw, constructed in 1978 and now serving as the trailhead for upper Shoal Creek; (2) a road from private land into the Shoal Creek drainage that was in existence prior to 1984 and for which there are private use rights; (3) the Jack Creek road, which has been in existence for many years prior to 1984 and which gives access to the Jack Creek trailhead.
Motorized routes within WSAs to be closed include the Taylor Mountain road (Palisades WSA), and the logging spur east of upper Shoal Creek, the user-built ATV trail between Jack Creek and upper Dell Creek (Porcupine Creek), and the North Fork Fisherman Creek Lake trail.
Cottonwood Creek Road, frequently mentioned in comment relating to the Palisades WSA is not within the Wilderness Study Area. It is planned to remain partly open to vehicles with the upper half closed. North Fork Fisherman Creek road, also mentioned in some comments relating to the Shoal Creek WSA, is not within the WSA.

COMMENT: Concern about the effects of motorized routes within roadless areas.
Specific areas of concern mentioned include Munger Mountain, Raspberry Ridge, and the Mt. Leidy Highlands although many comments referred to roadless areas in general.
Letters: 10, 12, 15, 18, 20, 21, 22, 24, 27, 28, 31, 35, 48, 53, 56, 58, 60, 65, 66, 67, 68, 70, 71, 74, 76, 77, 80, 81, 82, 83, 86, 87, 89, 90, 94, 95, 102, 104, 105, 108, 109, 110, 112, 119, 121-214, 215, 216, 218
Response: All action alternatives reduce the acreage affected and mileage of motorized trails in backcountry areas, limiting use to specific routes that are sustainable, enforceable, and compatible with other resources. So the effect on the character of roadless areas will be to reduce the current and potential influence of motorized use. Modifications made to Alt D would reduce mileage of OHV routes within inventoried roadless areas by approximately 12 miles. There is no legal restriction on managing for motorized trails within roadless areas, and the trails being proposed are already in existence, so no change would take place on the ground.
It must be noted that there is a difference between inventoried roadless areas pertinent to the RARE-II study/roadless area protection rule of 2001 and areas within the forest that may have few to no roads—in many places these areas coincide but the legal requirement to consider effects on roadless areas applies only to the inventoried areas. Munger Mountain is an inventoried roadless area. Raspberry Ridge is a remnant of the pre-1984 Gros Ventre Roadless Area (much of which became the Gros Ventre Wilderness or Shoal Creek Wilderness Study Area in 1984); it contains existing open roads. The Mt. Leidy Highlands are partially within the Spread Creek-Gros Ventre River Roadless Area.

COMMENT: Concern about the legality of allowing motorized use in WSAs, roadless areas or wild/scenic river corridors.
Letters: 63, 90, 95, 104, 108, 119
Response: The 1984 Wyoming Wilderness Act directs the FS to "maintain their [the study areas'] presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System." It also provides the following direction:

(1) with respect to oil and gas exploration and development activities, the Palisades Wilderness Study Area shall be administered under reasonable conditions to protect the environment according to the laws and regulations generally applicable to non-wilderness lands within the National Forest System;

(2) subject to valid existing rights, the Palisades Wilderness Study Area as designated by this Act is hereby withdrawn from all forms of appropriation under the mining laws;

(3) the provisions of section 308 of the Interior Department Appropriations Act for fiscal year 1984 (Public Law 98-146) or similar provisions which may hereafter be enacted concerning oil and gas leasing, exploration and development in further planning or wilderness study areas shall not apply to the Palisades Wilderness Study Area; and

(4) within the Palisades, High Lakes and Shoal Creek Wilderness Study Areas, snowmobiling shall continue to be allowed in the same manner and degree as was occurring prior to the date of enactment of this Act.

The Forest Service has been managing the wilderness study areas in accordance with this law and agency direction. The Forest Service cannot construct new roads in these areas and is not proposing to add motorized trails in the WSAs but allowing existing motorized use on designated routes to continue is not specifically prohibited (nor is it specifically allowed— the WWA is silent on the issue).
Similar to WSAs, inventoried roadless areas are managed under Forest Service manual direction. The Forest Service cannot construct or add new roads in IRAs but allowing existing motorized use on designated system routes to continue is allowed. If, under forest plan revision or some other large-scale environmental study, the Forest Service recommends any of the IRAs for future wilderness designation, the management of those IRAs would change.
The Wild and Scenic Rivers Act does not provide direction on whether motorized use is allowed in the corridor. Rivers that are eligible as Wild Rivers do not have roads in the corridor but Scenic and Recreational River candidates may have roads and motorized trails, as well as motorized use of the river.

COMMENT: Concern with OHV routes that are adjacent to Grand Teton National Park.
"Off-road travel should be eliminated from routes that enter Grand Teton National Park. This would reduce illegal trespass."
Letter: 77**,** 80**,** 121-214
Response: This concern was discussed by the interdisciplinary planning team and with Grand Teton National Park officials. Of greatest concern was the ATV loop trail proposed in Uhl draw. The final decision eliminated this route due to trespass and resource concerns. Routes that lead to the park boundary on the south end of Shadow Mountain were also closed.

COMMENT: Concern about motorized routes that approach Grand Teton National Park, both from a trespass standpoint and that of noise from motorized uses near the park boundary.
Letters: 22, 24, 27, 28, 31, 48, 60, 66, 67, 68, 70, 74, 76, 77, 83, 85, 95, 112, 119, 218
Response: The Forest Service recognizes the increasing problems with illegal travel within the national park. The following open areas will be restricted in the modified alternative D:

- Uhl Draw, Wallace Draw, Enyon Draw, some roads in the Diamond L Ranch area.
- User-created routes between the lower Shadow Mountain road and the Hunter Ranch—the first spur on the right near lower end of Shadow Mtn road will be kept open as far as good campsites and closed beyond.
- Unrestricted cross-country motorized travel will be eliminated along the entire Park boundary.

COMMENT: Routes exist on the Forest which allow illegal access to the Grand Teton National Park. These routes need to be closed.
"Definitely, any trails that come into Grand Teton National Park should be closed. There should be no trails that lead up to the boundary of the park where illegal trespass would be likely."
"Alternative D does not go far enough to address our concerns with regard to higher concentrations of OHV use on Forest Service designated trails adjacent to the park."
"…primarily interested in areas where OHV (4WD vehicles, ATVs, motorcycles, and mountain biking) activities on the forest are adjacent to the park boundary, as these activities either conflict with park resource management goals and/or there are different rules on park lands."
"Due to limited staff, the Wallace Draw area is difficult for park rangers to patrol throughout the year, and in particular, during the park's elk reduction program. In the past, wildlife poaching has been problematic in this area. Alternative D does not go far enough to address our concerns with regard to higher concentrations of OHV use on Forest Service designated trails adjacent to the park."
Letters: 60, 64, 65, 66, 67, 68, 70, 71, 74, 76, 83, 85, 136, 137, 160
Response: This issue will be addressed in the ROD through the elimination of the "gray areas" on the travel map which currently allow for off-route motorized travel by wheeled vehicles. In addition, the route system in the Uhl Draw area has been modified to respond to the significant number of substantive comments we have received and should resolve this concern. The Bridger-Teton National Forest looks forward to working with the Park to ensure that this issue is addressed, and the combined efforts by both the Forest and the Park (within the Park boundaries) should effectively resolve this matter.

COMMENT: Disagree with indicators used to measure effects on Wilderness.
"The analysis measure of miles of motorized routes within ¼ mile of wilderness, is inappropriate since the Wyoming Wilderness Act expressly allows non-wilderness activities directly adjacent to the boundary of Wilderness."
Letter: 113
Response: We reworded parts of the EIS to clarify that we are only talking about effects analysis, not 'buffers' around wilderness. This indicator was used only to measure differences among alternatives in a way that is quantifiable and mappable. Noise inside the wilderness and the potential for trespass into the wilderness were two issues that were raised by the public that this indicator is intended to address. While non-wilderness activities are allowed directly adjacent to the wilderness, there is also the need to consider effects of those activities.

COMMENT: Disagree with indicators used to measure effects on inventoried roadless areas.
"The analysis measure of acres of non-motorized setting within inventoried roadless areas is inappropriate given that motorized trails are permissible in IRAs."
Letter: 113

Response: This indicator was used to measure the differences among alternatives in a way that is quantifiable and mappable. It is meant to address the public issue of effects of motorized routes on IRAs.

COMMENT: Removing routes in IRAs would unnecessarily restrict public access.
"Removing all system routes would unnecessarily restrict public access thus would compromise the ability to meet the project purpose and need. Despite these facts, there is inordinate emphasis placed upon decreasing motorized uses in IRAs."
Letter: 113
Response: This was an alternative considered but not further analyzed, for the reasons cited in this comment.

6. Cultural Resources

COMMENT: Could mitigation measures include rerouting a proposed motorized route to avoid impacts to a significant site?
"Since routes have the potential to affect two or three significant cultural sites, there will need to be further consultation with SHPO (State Historic Preservation Officer) to develop appropriate mitigation measures if the routes are included in the final decision. If necessary, can 'mitigation' authorize the construction of reroutes?"
Letter: 113
Response: Technically, mitigation measures are developed when a significant site cannot be avoided and there is potential for adverse affects to the site. Rerouting a motorized route to avoid a significant site would technically mean that site is being avoided and mitigation would not be necessary.
The scope of the travel plan project does not allow for construction of new routes. Any reroute plans would be considered a new undertaking that would require a separate NEPA document and going back to the beginning of the consultation process with SHPO and appropriate tribal governments to determine whether or not the reroute has potential to adversely affect significant cultural sites.

COMMENT: Cultural resources need to be protected and not impacted by motorized routes.
"Cultural resources are a legacy for further generations and their security should not be compromised by the impact of motorized routes."
Letter: 95
Response: All federal agencies, including the Forest Service, abide by certain laws and regulations to protect cultural resources. A review of historic documents and cultural records plus subsequent survey of proposed routes was conducted in accordance with Section 106 of the National Historic Preservation Act, and 36 CFR 800 "Protection of Historic Properties." In addition, consultation with tribes was conducted to identify traditional cultural resources that may not be identified during archeological survey. Motorized routes that had potential to adversely affect significant cultural resource sites were dropped from the project and are not included in the final decision.

7. The NEPA and Decision-Making Process

COMMENT: The NEPA analysis is not sufficient with respect to effects on water quality and wildlife.
"A more complete analysis of natural resource impacts results from new motorized designations of existing routes not currently in the transportation system should be included. These resource impacts should be identified, evaluated, and disclosed in this document."
Letter: 219
Response: Specific environmental concerns identified in this letter relate to soils, water quality, and wildlife. Responses to these specific concerns are addressed under these topic areas in this document. In general, the combination of the environmental analysis presented in the FEIS, the information presented in the response to comments, and summary information found in the Biological Evaluation/Biological Assessment provide adequate analysis to inform the decision about which routes to include in the designated OHV route system.

COMMENT: The formatting and typographical errors throughout the DEIS unnecessarily add more confusion to an already complex analysis discussion.
"The project need section on pages 9-14 references five compelling reasons why there is a need to create a designated system for public motorized use… but there are only four reasons listed. Then starting on page 65 to the end of the document, Figure and Table numbers are mostly not of sync with what is referenced by the narrative. These errors make the document very hard to follow at times and unnecessarily add confusion to an already complex analysis discussion."
Letter: 113
Response: We apologize for these errors. This reaffirms the reality that as many times as an interdisciplinary team reviews a complex document, errors will be missed. These errors have been corrected in the FEIS. Thank you for bringing them to our attention.

COMMENT: The DEIS under-emphasizes enhancing OHV opportunities.
"The DEIS seems to be written with a goal of limiting motorized opportunities versus having a goal of enhancing the currently limited motorized recreational opportunities to the greatest extent possible. There has been an over-emphasis on protecting and expanding the already abundant non-motorized recreation opportunities … to the point it has skewed the objectivity and focus of the project's analysis. Far too many of the issues and indicators used to develop the analysis focus on protection and enhancement of the area's special resources and non-motorized recreation opportunities. Opportunities for non-motorized recreation shouldn't be the intent or need for this project. Likewise, efforts to improve the roadless characteristics of areas should not drive or misplace the need to provide a viable motorized trail system."
Letter: 113
Response: It was not the intent of the EIS to unnecessarily limit motorized opportunities. However, the EIS does recognize that motorized opportunities will be more limited in the northern portion of the Bridger-Teton National Forest compared with other National Forests and BLM public lands due to the history of the area, the Forest niche, and current Forest Plan direction which places emphasis on wildlife habitat and wildland protection. The issues and indicators used in the analysis were derived directly from the 1300 public comments received during the scoping effort for the proposed OHV route system, many of which raised concerns about the effect of OHV route designation on special areas such as Wilderness Study Areas and roadless areas. Opportunities for non-motorized recreation were not the intent or need for this

particular project; the intent and need for the project is focused on improving management of public summer motorized use by designating roads and motorized trails in areas of the Forest where motorized use is currently not restricted to designated routes. However it is important to recognize that the process of designating OHV routes does have an indirect effect on opportunities for non-motorized recreation. The National Travel Management Rule contains specific criteria for the designation of motor vehicle routes. One of the criteria states, that "*in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands.*" It is within this context that the effects on non-motorized opportunities were analyzed in this EIS.

COMMENT: The DEIS alternatives fall short in respect to meeting public needs for having a good range of motorized recreational trail opportunities available. A wider range of possible OHV routes should have been considered in the alternatives.

"The DEIS analysis is too self-limiting and does not go as far as it could toward enhancing motorized travel opportunities… While we appreciate the opportunity we've had for input, we don't believe the project goes as far as it could toward enhancing motorized travel opportunities in the project area. We believe changes are needed to provide fewer restrictions as well as more comprehensive OHV travel options in the project area. All of the action alternatives would have to be deemed as "improving quality and reducing impacts" [project objective #1] compared to current conditions. The motorized travel routes proposed for the alternative are essentially all the same routes with different combinations of various seasonal closures. Thus, the analysis is very self-limiting with potential routes pre-determined versus considering a range of different routes which could potentially be designated open. If the forest won't take a more big-picture approach to considering a range of diverse OHV opportunities…then it needs to make a commitment to address unmet OHV needs soon, over the next few years."

Letter: 113

Response: The rationale for focusing the OHV route designation project on only those areas of the Bridger-Teton National Forest that currently allow unrestricted motorized use (i.e. the grey areas on current travel map) rather than considering potential routes throughout the three ranger districts is described in the section on project scope in Chapter 1 of the EIS. The narrow scope is necessary to focus on the most urgent problem (areas where summer motorized use is not currently restricted to designated roads and trails) and allow this project to be completed in a timely manner. Furthermore, some aspects of Forest Plan Revision are occurring concurrent with this project. Given the broad implications of designating motor vehicle routes on natural resources and the spectrum of available recreation opportunities, consideration of routes across a multi-district landscape needs to be guided by the direction resulting from Forest Plan Revision. The decision to limit the scope of this analysis is supported by Forest Service agency guidance that states that it is critical that the agency move quickly to complete designation, involving a broad spectrum of interest groups so that the motor vehicle use map can be published and issues with unmanaged motorized use can be addressed. This guidance further states that in order to expedite designation and avoid process gridlock, route designation should be guided by a number of considerations including (a) tightly focused processes, analyses and decisions, (b) avoiding unnecessary inventory, and (c) not reconsidering decisions made prior to the new travel management rule.

Within the unrestricted motorized use areas (grey areas), a reasonable range of motorized trails was considered. Alternative B contains the fewest number of motorized trails offering 33.5 miles, whereas Alternative E contains the greatest number of motorized trails offering 139 miles. All routes that exist on the ground do not have to be considered for inclusion in the Forest transportation system. The National Travel Management Rule requires Forests to conduct a travel analysis that includes an initial screening of non-system, user-created routes that could be candidates for inclusion in the Forest transportation system. A summary of the travel analysis conducted for this project can be found in Chapter 1 of the EIS. In 2003 and 2004, the Bridger-Teton National Forest spent considerable effort inventorying and cataloguing potential motorized routes in those areas where many new routes had developed. Where such routes help contribute to a quality motorized loop system, they were included in the range of alternatives considered. Where such routes violate current Forest Plan direction, are located in particularly important wildlife habitats (e.g. sage grouse lek areas), or are very eroded and cannot be economically reconstructed and maintained given available resources, they were not included in the range of alternatives considered.

The Forest Service does acknowledge that this project to designate routes within the current unrestricted motorized use areas is only the first step. The National Travel Management Rule requires the motor vehicle use map to be updated annually. The decisions made as part of this project do not foreclose the opportunity to consider future connections between motorized routes or construction of routes. Undoubtedly, as this designated route system is implemented and recreation use continues to grow and evolve, problems and opportunities will emerge. With continued involvement from a broad group of partners, problems and opportunities can be prioritized and addressed within available funding.

COMMENT: The use of the word "essential" in project objective #1 is a subjective disqualifier.
"The first project objective is to (1) designate roads and motorized trails to meet essential public needs, improve the quality of the system, and reduce conflicts. We are concerned that the use of the word "essential" is intended to be a subjective disqualifier by the agency."
Letter: 113
Response: The use of the word "essential" was chosen to recognize that opportunities for motorized recreation use will be more limited in the northern portion of the Bridger-Teton National Forest compared to other National Forests and BLM public lands due to the area's history, values, and current Forest Plan direction. However, we acknowledge that the word "essential" may have connotations beyond what was intended. This project objective has been edited in the FEIS changing the word "essential" to "identified public needs".

COMMENT: The lack of consideration for possible construction of new routes is self-limiting and counterproductive to accomplishing the project objectives.
"The DEIS specifically prescribes that "no construction of new routes is proposed." This self-limiting prescription is counterproductive to accomplishing the objective of improving enforcement of travel regulations, as well as to providing a quality system that meets public needs for enhanced loop trails".
Letter: 113
Response: The level of analysis required to support adequate site-specific consideration of the effects of constructing a new route is considerably greater that the level of analysis necessary to

support adding a route to the Forest Transportation system that already exists. By focusing the analysis on existing routes, no new ground disturbing activities are proposed thus simplifying the effects analysis, particularly for cultural resources, soils and water quality. As noted earlier, the narrow scope for this project is necessary to focus on the most urgent problem (areas where summer motorized use is not currently restricted to designated roads and trails) and allow this project to be completed in a timely manner. The decisions made as part of this project do not foreclose the opportunity to consider construction of route segments to create a viable loop opportunity in the future.

COMMENT: The DEIS contains errors with respect to Wyoming State Law regarding off-road vehicles.
"The references to the Wyoming ORV statute refer to "Statute 311-101(k)" which should be 31-1-101(k). Additionally, this section refers to Type 1 and Type 2 ORVs but fails to mention Type 3 ORVs. The document also does not make it clear that Wyoming state law does not recognize the term OHV; rather Wyoming law regulates off-road recreational vehicles (ORVs), a term that is co-mingled in the definition without specific explanation."
Letter: 113
Response: We apologize for this error. It has been corrected in the FEIS. Thank you for bringing this to our attention.

COMMENT: A comparison of the initial proposal two years ago with the latest motorized use proposal indicates that the net result is exactly the same.
"We have examined the maps that were presented in the initial proposal for motorized use at the beginning of this planning process. We have carefully compared them with the recently released map of your latest motorized use proposal. Two years of public participation and planning and the net result is exactly what was proposed at the very beginning."
Letter: 3
Response: The maps for an initial proposal were presented in October 2007 with a proposed action released in January 2007. This proposed action map from January is what you were reviewing. The Draft EIS contains five alternative proposed designated OHV route systems, each with its own map. There are clear differences among these five alternatives. We understand that the confusion regarding maps was due to inability to access the create website for the Bridger-Teton National Forest. We apologize for the problem and thank you for bringing this to our attention immediately so we could make sure you had access to the correct information and others did not have the same problem.

COMMENT: The Draft EIS does not indicate what criteria will inform the District Ranger decision-making process about public motorized use.
"The document indicates that these decisions [about public motorized use] will be made within the context of the BTNF Plan but does not indicate what criteria, particularly environmental criteria or indicators, will inform this decision-making. Criteria for consideration could include: slope, distance to special areas, existing conditions, stream bank and channel conditions, erosion and scour, nesting areas, areas of known endangered or sensitive species, wetlands".
Letter: 219
Response: In making decisions about the designated OHV route system, the responsible official must incorporate information from a variety of sources. There is no simple set of criteria that can be applied to generate a yes/no answer for each route. In general, decisions are informed by the

environmental effects analysis that disclose resource and social trade-offs among the different alternatives, by public comment received during the planning process, and by management direction contained in the Forest Plan. More specifically, decisions about OHV routes are informed by asking whether or not the route contributes to the project purpose. This OHV project includes three objectives which are used to inform decisions (1) Designate routes to meet identified public access needs, improve the quality of the road and motorized trail system, and reduce conflicts, (2) Reduce resource impacts, and (3) Improve the ability to maintain routes and enforce regulations. General and specific screening criteria for route designation established under the National Travel Management Rule are also used to determine which routes should be considered for potential inclusion in the Forest Transportation system and which routes should be designated (refer to CFR 212.55). This rule states that "*in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (1) Damage to soil, watershed, vegetation, and other forest resources; (2) Harassment of wildlife and significant disruption of wildlife habitats; (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. In addition, the responsible official shall consider: (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors*." The Record of Decision for this project will contain the decision each District Ranger is making about OHV routes along with his rationale for making that decision. The Record of Decision, rather than the EIS, is the best place to understand clearly how decision-makers weighed and incorporated available information to inform their decisions.

COMMENT: Public comments are not read – only counted as for or against.
"I don't believe the National Forest people even read these letters – only count them for or against".
Letter: 107
Response: Throughout this process, the Forest Service has put considerable emphasis on involving interested citizens, organizations, and agencies in a meaningful way. Every single public comment, whether from public open houses, workshops, field tours, phone, email, or letter has been read and used to inform the decisions being made in this process. The project record and Final EIS include tracking documents that show how written comments were used to inform the development of issues, alternatives, and the overall environmental analysis. The National Environmental Policy Act (NEPA) specifically notes that the disposition of public comments is not a voting process. Rather, the Forest Service looks for substantive issues and information contained in comments. Public land decisions are typically complex involving a myriad of diverse interests, resource values, and laws. Such decisions are not conducive to simple "for or against" thinking.

COMMENT: A meeting between Wyoming State Trails program staff and the planning team would be helpful for this process.
"It would be helpful for this process if the planning team could meet with Trails Program staff prior to completion of your final analysis, so we request you facilitate such a meeting when it's appropriate within your final revision timeline."
Letter: 113

Response: As a cooperating agency, the Forest Service has agreed to invite the State to work closely with the interdisciplinary team throughout the environmental analysis process. In accordance with this agreement, a meeting was held with both with Wyoming State Trails program staff and with Wyoming Game and Fish personnel prior to release of the Final EIS and Record of Decision.

COMMENT: National Forest personnel should control what roads and trails get designated and managed, not public users.
"The National Forest is the manager and designator of trails, not entrepreneur public users who decide to create their own roads…"
Letter: 71
Response: The Forest Service does have the ultimate authority for determining which routes will be added to the Forest Transportation System and managed over time and we accept that responsibility. In any situation where cross-country travel is allowed, new routes typically develop, whether the mode of travel is by motor vehicles, horses, mountain bikes, or foot. Per the National Travel Management Rule, cross-country motor vehicle use will no longer be allowed. Thus, the challenge is to determine which routes serve key public access needs, do not create unacceptable resource impacts, and can be managed and maintained over time. Routes that met these criteria were considered for inclusion in the Forest Transportation System. Once the motor vehicle use map is published showing designated motorized routes, other routes which might exist on the ground would not be available to motorized use and many will be physically closed.

8. Management, Enforcement, and Maintenance

COMMENT: Concerns related to funding for implementation.
"I hope the forest can find funds to work on closing trails, install signage, and implement an educational campaign." **"**The document fails to mention that the majority of implementation funds would come from the Wyoming State Trails Program and other volunteer partners, not the Forest Service."
Letters: 72, 113
Response: Funding and volunteer assistance would come from a variety of sources, including appropriated Forest funds, the Wyoming State Trails Program and various grants.

COMMENT: Concerns associated with route identification on the ground.
"I would suggest that open or closed trails are clearly marked accordingly."
Letter: 14
Response: Guidance for signing is found in EM-7100-15, *Sign and Poster Guidelines for the Forest Service* (2005). Designated routes would be signed with appropriate route markers or guide signs corresponding with the route identification shown on the motor vehicle use map. Signs and kiosks will complement and reinforce the motor vehicle use map. Additional signing would be utilized to:

- Reinforce designations with route markers, guide signs, and reassurance markers
- Reinforce designations by vehicle class and time of year, as appropriate
- Reinforce the prohibition regarding motor vehicle use off the designated system.
- Inform visitors about a motor vehicle use map

- Inform visitors about authorized motor vehicle use taking place off the designated system (e.g., use of temporary roads by contractors, permit tee use in a range allotment)
- Inform visitors about orders related to short-term or emergency restrictions, restrictions to over-snow vehicles, or restrictions to non-motorized uses not covered by the travel management rule (e.g., restrictions on bicycle or stock use on a trail).
- Communicate traffic restrictions (e.g., bridge weight limits, speed limits) not covered by the travel management rule.

COMMENT: Concern about the difficulty of enforcing a motorized trail system, including field presence, signing, and effective closures.
Letters: 59, 68, 72, 84, 88, 103, 104, 106, 115
Response: The Forest Service recognizes the difficulty in effectively implementing the travel plan. Designing routes to encourage motorized vehicles to stay on them is one way we are addressing this issue; we are also actively pursuing outside funding to help with route improvements, effective closures, and field patrols. Education will be critical. It is important to recognize that the new travel plan will be inherently easier to enforce due to its use of mapped route designation rather than signing. The fact that closures are enforced as a general order rather than special order will make it easier for violation notices to be upheld in court. Thus, the limited enforcement resources we have will be more effective.

COMMENT: Fines need to be increased as part of this travel plan.
"Please consider increasing penalties for illegal access and noncompliant use – use the money directly for illegal impact mitigation or better yet require the individual involved to personally repair, revegetate and rejuvenate an area in excess of that which he or she so callously destroyed."
Letter: 115
Response: According to the National Forest Travel Management Rule (36 CFR Part 212), fines for traveling off a designated route will increase once the new motorized route system is implemented and the associated motor vehicle use map is printed. Additional, Forest Service law enforcement officers can issue a mandatory court appearance instead of the scheduled fine in an attempt to collect funds to rehabilitate any resource damage. In this case, the Forest Service would recommend an amount to the court to compensate damages.

Further penalties and increased fine schedules for law and regulation violations, such as illegal access, are set by the US Courts or by Congress in legislation creating the law. The Forest Service only has the authority to recommend changes to the collateral forfeiture schedule for misdemeanor violations. Actions of the US Court system and Congress are outside the scope of this forest planning process.

COMMENT: Labeling a trail or a network of trails as an "off highway vehicle area" or an "OHV trail system" could give the impression that these areas are dedicated to their activities.
Letter: 21
Response: Bridger-Teton National Forest travel maps, websites, and other publications currently state that non-motorized uses are allowed on routes that are open to motorized use. Through this project, we will be restricting motorized use by wheeled vehicles to designated

routes. "Areas" as the author references above, will no longer be open to motorized use by wheeled vehicles.

COMMENT: People will still violate closures despite being ticketed, even with routes being closed.
"Over the many years I've hunted Bacon Ridge adjacent to Union Pass Road, I've seen more violations than I can count. Many of the roads have been closed, yet people still violate despite being ticketed. A lot of these folks' attitude is "I don't care, let them catch me." I've no respect for these lazy people who have no respect for our wild lands and have destroyed the peace and tranquility of many beautiful places."
"Talking about rules or new rules assumes that the ATV users will obey them. That assumes way too much. I would like to see some enforcement."
"I think the key to the plan is one that addresses needs and consequently receives support and general compliance."
Letters: 59, 88, 103
Response: It is the intention of the Forest to provide resources for patrolling the route system and enforcing the Record of Decision to the fullest extent that funding allows. We are aware that the hunting season will still present unique challenges and we will continue to assess how we can improve coverage during this period. While the Forest has a finite level of resources to implement this, the ability to enforce the provisions of the travel plan has been factored into this decision. In addition, while it falls to the discretion of Forest Protection Officers to issue warnings or citations, the amount of the fines themselves associated with a citation is not something which the Forest can increase. Having a designated route system in place that is enjoyable to ride and satisfies the needs of motorized users in places that are appropriate for their use should result in greater compliance by motorized recreationists with the travel plan.

COMMENT: Routes need to be signed, users properly educated, and Forest resources need to be allocated to enforcement in order to ensure compliance with the travel plan.
It (the DEIS) states that, 'There should be little difficulty for the public to understand where they may ride since all routes shown on the map will be signed numbered routes on the ground." It goes on to say that, "This clarity should also help reduce potential conflicts with non-motorized visitors since the map will clarify specifically where motorized use is and is not allowed." Who will sign routes on the ground since the Travel Rule doesn't require this and Forest Service funding challenges for OHV management are likely to continue? We believe on-the-ground signing is critical to compliance, so this is a key issue for which there must be an affirmative answer."
"Travel maps and portal signage should be readily available to knock out mere confusion on approved routes." "We are concerned about the forest Service's enforcement resources, no matter which alternative is selected…especially regarding seasonal closures rather than permanent closures."
Letters: 90, 110, 113, 114, 117, 119, 136, 137
Response: It is our intention, as stated in the EIS, that all routes shown on the map will be signed numbered routes on the ground. Though not required by the Travel Management Rule, FS directives do require a route marker with route number and posting of appropriate uses. Implementation will take place over time. The fact that a more sustainable route system will be the end result of the decision means that the Forest will be better able to provide a route system through adequate signage, enforcement, and maintenance.

In addition, as part of the measures the Forest is taking to be in compliance with the national travel management rule, a free Motor Vehicle Use Map will be developed, published and made available to the public. The Wyoming State Trails program also publishes free maps of our route system, showing which routes are enrolled in the program and open to motorized recreationists. This map is revised each year and is available at all Bridger-Teton National Forest offices and visitor centers. The Forest plans to continue to work with partners such as the Wyoming State Trails program and Wyoming Game & Fish to ensure that the travel plan is adequately enforced. As part of implementation of the travel plan, Forest visitors themselves will also be valued partners with the Forest in monitoring whether fellow recreationists comply with the travel plan.

COMMENT: Implementation of the travel plan must include effective closures which do not allow motorized recreationists to ride on routes which are closed to motorized use.
"Routes and trails that will be closed must be well done in the field in order to be effective"
Letter: 110
Response: Some site-specific closure options have been considered by the interdisciplinary team while in the field, and feasible, effective closure points were often taken into account in determining where an open motorized route will terminate. The most appropriate, cost-effective and effective method of closure will be identified during the implementation phase of this project. Funding options and concurrent project activities in the immediate area may present additional closure options. Clearly identifying the open routes is equally important. The Forest intends to eliminate confusion and the possibility of off designated route travel through clearly marking open routes and rehabilitating closed routes/areas.

COMMENT: An OHV coordinator position should be established to ensure plan implementation.
"EPA agrees with the FS that a dedicated OHV coordinator position should be established in order to successfully implement education, enforcement, maintenance, rehabilitation, and monitoring/evaluation of tasks."
Letter: 219
Response: Comment noted. This has been identified in the EIS.

COMMENT: OHV use must be diligently monitored, patrolled, and enforced
"Forest Protection Officers must diligently monitor the system in order to appropriately manage it to protect Forest resources. The public also needs the ability to ask questions of forest personnel and report unlawful use. At key trailhead kiosks, the type of information needed, who to contact, and means of reporting unlawful use should be explained. License plates for OHVs should be similar size to automobiles so critical information can be observed. We encourage the BTNF to explore possible partnerships to inspect and report back on different segments of the new system. Data from these efforts can be used by officials to adjust annual iterations of the new maps and focus on areas of documented problems. The presence of USFS personnel in the field and the issuance of tickets with substantial fines that will deter further illegal use will be the key to success of this plan."
Letter: 95
Response: The B-T has one of the most active patrol and enforcement programs in the nation (based on # of citations issued). Most field personnel are qualified as Forest Protection Officers (FPOs). As FPOs, many of our field personnel can issue violations, warnings, and complete daily monitoring logs. However, we agree that implementation of this project will require an

increased effort. An implementation plan will build upon and seek additional partnerships. The proposed OHV coordinator position identified in the DEIS and FEIS would promote partnerships and volunteer efforts. We will use info from all sources, including information provided by the public, to adapt and improve our management of motorized use over time.
The state of Wyoming does not require license plates for all ORVs. However, the street legal vehicle trailering OHVs are required to have license plates. A description of the vehicle involved in a violation is often sufficient if reported to a Ranger District or dispatch in timely manner.

9. Alternative Preference Statements

COMMENT: **Support for Alternative A.**
"As a disabled veteran, I support the NO ACTION (A) alternative so that these areas remain as is."
Letter: 6
Response: Thank you for your comment. Alternative A (No Action alternative) was addressed and analyzed in the DEIS but to meet the requirements of the National Travel Management Rule, all motor vehicle use must occur only on designated routes, thus some change must occur compared to the current situation.

COMMENT: **Support for Alternative B.**
"Alternative B lower road densities, ensures greater level of secure habitat for wildlife and recognizes world-class wildlife resources on B-T Forest. This alternative is best for grizzly bears because it reduces motorized use in and out of PCA, as well as superior values for elk habitat effectiveness and security, elk calving and other wildlife species."
Letters: 5, 10, 12, 15, 17, 18, 20, 21, 22, 24, 27, 28, 31, 35, 40, 48, 215, 216, 217, 218, 58, 60, 63, 65, 66, 67, 68, 70, 71, 72, 74, 76, 77, 78, 79, 80, 82, 83, 85, 86, 87, 89, 90, 91*93 94, 101, 102, 104, 105, 107, 108, 110, 112, 113, 114, 117, 119, 120,121-214,
219, 220
Response: Thank you for your comment.

COMMENT: Support Alternative B or C.
Letters: 7, 53
Response: Thank you for your comment.

COMMENT: Support Alternative B or D.
Letters: 32, 33, 34, 36, 37, 38, 39, 41, 42, 43, 44, 45, 46, 47, 49, 51, 52, 54, 75, 53
Response: Thank you for your comment.

COMMENT: **Support for Alternative D.**
Alternative D maintains pronghorn migration corridor in Gros Ventre and closes trails during calving season.
Letters: 1, 2, 4, 50
Response: Thank you for your comment.

COMMENT: Support Alternative E.
Letters: 9, 19, 30, 96
Response: Thank you for your comment.

10. Route and Area Specific Suggestions

SUPPORT FOR DELETION OF OR CLOSING OF AN INDIVIDUAL ROAD OR TRAIL

COMMENT: OHV use impacting the Atherton Creek area.
"Regarding the OHV user made trail up Atherton Creek; five years ago there was no motorized use up this slope. Today, one can drive a full-size truck up there. It is a tragic devastation of the public land, which you must stop!"
Letters: 78
Response: This route and others that link to it in the Atherton Creek area will be closed to motorized use to protect wildlife habitat and impacts to soil and water.

COMMENT: Against OHV use being allowed in the Granite Creek area. .
"The most important reason to not allow off-road vehicle use in the Granite Creek area is in the interest of safety regarding roads (blind curves, narrow passages, and summer traffic), wildlife, residents, campers, and OHV drivers them selves. Off-road vehicles will never be compatible with wildlife and ecosystems in this forest. Where is the logic?"
Letters: 106
Response: This project has identified where OHV use will be appropriate and to what extent regarding other forest users, wildlife, and resources. OHV recreation will be limited to designated routes within the Granite Creek area reflecting a net decrease as compared to the current use area now available for this activity.

COMMENT: OHV use has negatively impacted area in Upper Gros Ventre.
"I don't believe any special consideration be given to OHV users nor any roads constructed for them. The established OHV trail which runs from Big Cow Creek in the Upper Gros Ventre to below the Darwin Ranch, has been rendered into a muddy erosion prone rut by OHV use."
Letter: 59
Response: This project has identified where OHV use will be appropriate and to what extent regarding other forest users, wildlife, and resources. The project will designate motorized routes, with specific use seasons, in locations that will minimize user conflicts and adverse effects on wildlife and resources. The OHV route between Big Cow Creek to below the Darwin Ranch (the "R" Trail—winter snowmobile route) will be closed south of the Big Cow Creek area to all summer motorized use.

COMMENT: Designate more motor-free area adjacent to Gros Ventre Wilderness.
"At a minimum there should be a motor vehicle free buffer around wilderness areas. As a hunter, it is clear that the noise from OHVs pressures animals, negatively impacts the hunt and the experience to persons in the backcountry."
Letters: 88
Response: Creating a motor-free buffer zone to further protect non-motorized areas (wilderness) is outside the scope of this project. The project will designate motorized routes, with specific use seasons, in locations that will minimize user conflicts and adverse effects on wildlife and resources.

COMMENT: Close the Cottonwood Creek and Taylor Mountain roads.
"The Palisades and Shoal Creek Wilderness Study Areas require protection. Please close the Cottonwood Creek and Taylor Mountain roads in these WSA's."
Letter: 31
Response: The Cottonwood road will be shortened with the upper portion permanently closed to enhance enforcement objectives at the Forest District and WSA boundaries. The Taylor Mountain road will be permanently closed to protect impacts to soil and water and wildlife habitat.

COMMENT: Close the northwest trails on Munger Mountain to motorized use.
"Make the motorized loop on Munger Mountain one single loop and close the trails to the NW of the main trail."
Letter: 50
Response: The large loop as well as the smaller loops in the NW area will remain open as single-track motorcycle routes with a seasonal restriction (open July 1-September 9), to protect wildlife calving, migration, and fair chase hunting opportunities. The east spur will be permanently closed to motorized use to provide secure habitat on the eastern portion of Munger Mountain.

COMMENT: Close the road network east of Coal Mine and Uhl Draws.
"We urge you to permanently close the loops in the Wallace, Coal Mine, Uhl, and Enyon Draw areas due to high wildlife values in adjacent park lands."
Letter: 64, 90,120
Response: The recommendation to close the proposed 50 inch or less routes (Routes 30166 and 30162), southeast of Wallace Draw and east of Coal Mine and Uhl Draws has been accepted to assure consistent management with Grand Teton National Park and avoid illegal entry from the Forest onto Park lands. Additionally, the loop east of Enyon Draw and in the vicinity of the Diamond L Ranch (Route 30182), will be replaced by a single spur with a turn-around east of the Grand Teton National Park boundary.

COMMENT: Close road network south of Turpin Meadows Lodge.
"All associated loops and spurs adjacent to Route 30050, between Highway 26 and Turpin Meadows should be closed.
Letter: 90
Response: All loops/spurs east of route 30050, between Highway 26 and Turpin Meadows will be closed with accept ion of Route 30064. Route 30064, south of Turpin Meadows Lodge will remain open (July 1-Nov 30), with the east endpoint moved west to second fence. The closure of these loops and spurs is to protect impacts to soil and water.

COMMENT: Close roads in Blackrock/Togwotee areas.
"Close route between Buffalo Valley Road and Burro Hill. Close Route east of Wallace Draw and Route 30100, north of Baldy Mountain. Close loop north of Squaw Basin on Route 30010 and terminate 30010 as shown in Alternative D. Close Route 30140. Terminate ATV trail from Sage Flats below summit. Close road west of route 30100 and south of Nation Creek. Close parallel route next to route 30250."
Letter: 90, 95, 120
Response: Route 30069A terminating atop Burro Hill will remain with a seasonal restriction (open July 1-Nov 30).The loop north of Squaw Basin will be closed and route 30010 will

terminate as shown in Alternative D. Route 30140 will remain open (July 1-Nov 30), with a seasonal closure supported by Wyoming Game & Fish Department. Parallel road adjacent to Route 30182 will be closed. Route in Sage Flats area will remain as a full-size vehicle road and terminate at cabin site. Route 30234 (south of Nation Creek) will remain open to full-size vehicles with a seasonal restriction (open July 1-Nov 30). Route parallel (south) of route 30250 will remain open to full-size vehicles with a seasonal restriction (open July 1-Nov 30). Above route closures and seasonal restrictions will protect wildlife habitat and remaining open roads will allow for public access to dispersed camping and recreation.

COMMENT: Close motorized trails and road spurs in the Gros Ventre Corridor.
"In the Gros Ventre/Shadow Mountain areas, remove ATV trail at Carmichael Fork. Close the proposed ATV route between Haystack Fork and Gunsight Bridge. Close all spur routes on the Gunsight Pass Road. Close entire area east of the Dew Place Ranch site, across the Gros Ventre River including Bacon Creek area."
Letter: 95
Response: The ATV trail along Carmicheal Fork and between Haystack Creek and Dallas Lake area will remain open. Additionally, the Road between the Dallas Lake area and the Gunsight Bridge will remain open. However, these routes have seasonal closures to protect wildlife migrations and calving areas. The proposed route from the vicinity of Bacon Creek to Sunday Peak will be closed for resource protection.

COMMENT: Close the motorized access into the South fork of Ditch Creek.
"I remain concerned and am opposed to having the proposed ATV route into the South Fork of Ditch Creek."
Letter: 114
Response: The proposed ATV route into the South Fork of Ditch Creek will be permanently closed to motorized use to improve manageability, wildlife habitat and resource protection.

COMMENT: Close the Taylor Mountain road.
"The Final EIS should close the Taylor Mountain Road to improve the wilderness characteristics of the Palisades WSA. Also, there should be no motorized access into the Shoal Creek WSA. The routes along Porcupine and North Fork Fisherman Creeks should be closed to motorized use."
Letter: 102**,** 119
Response: The Taylor Mountain Road and the proposed routes along Porcupine and North Fork Fisherman Creeks will all be permanently closed to motorized use to reduce impacts to soil and water.

COMMENT: **Ditch Creek/Shadow Mountain area road closure requests**.
"Close upper portion of the Ditch Creek road (as shown in Alternative B). Close motorized access in the area east of Lost Creek Ranch."
Letter: 120
Response: *Ditch Creek area*—Ditch Creek road will have a seasonal restriction beyond the FS information kiosk (open July 1st-November 30th) to protect impacts to soil and water. *Shadow Mountain area*—the road network east of Lost Creek Ranch will be changed to an ATV trail system that will be self-contained allowing seasonal family riding beginning June 1st through

November 30th. This trail system will be separate from the ranch location and will not include popular horse riding trails in the adjacent area north of Shadow Mountain.

COMMENT: **Gros Ventre route closure requests.**
"Close single-track motorcycle routes in the Red Hills/Lavender Hills areas. Open route along West Fork of Horsetail Creek to 50" or less. Close the eastern portion (1/3) of the Slate Creek motorized loop on September 10th through end of the season. Close the motorized route between Haystack Creek and Dallas Lake. Close the Bacon Ridge and Bacon Creek areas to motorized use."
Letter: 120
Response: *Gros Ventre*—The WF and EF of Horsetail Creek loop will remain as a single-track motorcycle route with a seasonal restriction (open July 1-September 9) to provide a motorcycle loop experience in the Gros Ventre Corridor. The connector route between Horsetail Creek and the Slate Creek areas will be permanently closed to OHV use to protect wildlife habitat improvement objectives. The eastern section of the Slate Creek loop south of Bearpaw Fork and along Haystack Creek (1/3 of loop) will close seasonally on September 9 through the rest of the hunt season to improve fair chase hunting opportunities. The spurs off of the Slate Creek loop: including Carmicheal, Dallas, and Bearpaw Forks will remain open to motorized use for access to dispersed hunting camps. OHV route between Haystack Creek and Dallas Lake will remain open with a seasonal restriction (open July 1-November 30) to protect wildlife habitat. The Bacon Ridge/Sunday Peak area will be permanently closed to motorized use for resource protection. The Bacon Creek area will be open to full-size vehicles to a point east of the Gros Ventre River to the dispersed campsites on the northern portion of Bacon Ridge, west of the Bacon Creek crossing. An OHV route (50 inch or less) will be available along Bacon Creek with a seasonal restriction (open July 1-November 30), heading south to a point just north of where Bang and Bacon Creeks join.

COMMENT: **Snake River Range/Fall Creek area route closure requests.**
"Keep the Cottonwood /Mill Creeks loop and the Marshall/Adams Creeks spurs closed until July 1st. Close Munger Mountain area to motorized use as in Alternative B. Second choice would be to have only the single-track motorcycle loops in the NW corner available between July 1 and September 9. Third choice would be to close the eastern spur to Highway 89, and open only one single-track motorcycle route on Munger Mountain with a single access along Fall Creek road."
Letter: 120
Response: *Mosquito Creek*—the proposed OHV loop from Cottonwood to Mill Creek will be eliminated as it would involve new trail construction. The Mosquito Creek road and all secondary routes will have a seasonal restriction (open June 1-November 30) to protect impacts to soil and water. *Munger Mountain*—The east spur that ends near Highway 89 will be permanently closed to motorized use to protect secure habitat. All other routes as shown on Alternative D will be maintained as single-track motorcycle only with a seasonal restriction (open July 1-September 9) to provide improved fair chase hunting opportunities. There will be a single trailhead for OHV recreation along the Fall Creek road, south of Red Top Meadows that will allow a trailhead location on Forest land.

COMMENT: **Hoback Basin area route closure requests.**
"Have only one seasonal motorized route in the JennyCreek/Raspberry Ridge areas. Close the loop in the Sandrock Creek area and the spurs off of the main route in the NF Slide/NF Fisherman Creeks areas."
Letter: 120
Response*: Hoback Basin/Granite Creek*—OHV routes in the Jenny Creek/Raspberry Ridge area will be retained as in Alternative D with the road termination (south end of Raspberry Ridge) moved south before steep unsustainable hill in location of old burn. Road loop connection between Sour Moose Creek and North Fork road will be retained as in Alternative D.

SUPPORT FOR ADDING AN INDIVIDUAL ROAD OR TRAIL

COMMENT: Location preference for motorized trailhead kiosk in Munger Mountain area.
"In alternative D, I would like in the Munger Mountain area to keep the riding access from the kiosk to the north of Red Top, I understand that residents in Red Top would not prefer to have the increased traffic through there subdivision, as I access the area from Wilson and would have to drive through."
Letter: 2
Response: The parking area where the current kiosk is located (north of Red Top) is managed by Teton County and the BTNF has no jurisdiction over improvements or management of this site. The alternative kiosk/motorized trailhead location (south of Red Top, along the Fall Creek road), was chosen because it is on Forest providing the ability of the BTNF to effectively improve and manage the location enabling necessary motorized trailhead facilities, as needed.

COMMENT: Connect routes 4090 and 4092 for motorcycle use.
"I would love to see a connection between Routes 4090 and 4092 to allow more riding opportunities and spread users over a wider area."
Letter: 2
Response: Due to wildlife security concerns, there will not be a connection between the single-track motorcycle loop in the Horsetail Creek area, east to the Slate Creek area. Further Route 4090 is located in a non-motorized managed location and was not included do to wildlife security objectives.

COMMENT: Add connection between Blackrock area and Gros Ventre.
"We suggest connecting the Gros Ventre and the Togwotee Lodge areas and limiting the connector to single-track motorcycle use." "I would love to see connection between the Blackrock area and the Gros Ventre; again this would spread the users out over a wider area. It is important to work toward connecting the Gros Ventre and Blackrock/Togwotee areas to enhance long-term OHV recreation opportunities in the northern portion of the forest."
Letter: 3, 2, 113
Response: Due to past Forest management decisions, the area between the Gros Ventre corridor and the Blackrock/Togwotee areas is not available to motorized recreation. Additionally, the area where the connector would be located is outside the project area. The Background section found in Chapter 1 of the FEIS provides more information.

COMMENT: Add an ATV connector between Togwotee Lodge and Flagstaff road.
"Add short connector using snowmobile route from new parking area/underpass to Flagstaff road to provide ATV access to and from the Togwotee Lodge services."
Letter: 113
Response: A location for an ATV connector has been determined and construction is being completed by Wyoming Department of Transportation (WDOT), as part of the 26/287 highway reconstruction project. This will facilitate additional OHV safety, accessing services, and contribute to the quality of the OHV route system.

COMMENT: Close the Ditch Creek drainage to OHV use.
"Please close the Ditch Creek drainage to OHV use, except on the main road up the drainage. Close the side trail at the SF Ditch Creek during elk hunting season."
Letter: 91
Response: Ditch Creek road will have a seasonal restriction beyond the FS information kiosk (open July 1st-November 30th) to protect impacts to soil and water. The proposed ATV route into the South Fork of Ditch Creek will be permanently closed to motorized use to protect wildlife security.

COMMENT: Preference for the motorcycle loop system proposed in Alternative D
"In alternative D Munger mountain should be motorcycle only. "Over the past few years the proliferation of ATV use has really caused problems with trail degradation and destruction of fauna." Preference for the interior loops already in existence: "the one large loop seen in other plans would cause that ride to become a speedway."
Letter: 2
Response: Thank you for your comment. We recognize that a variety of trails options within a trail system is more desirable.

SUPPORT FOR SEASONAL MODIFICATION OF AN INDIVIDUAL ROAD OR TRAIL

COMMENT: Locate OHV routes away from state and private land. Make one OHV trailhead for Munger Mountain.
"OHV routes in the Munger Mountain area should be located at least one half mile from adjacent state and private land to minimize trespass to the north. Additionally, there should be only one trail entrance with a register to facilitate enforcement and management."
Letter: 101
Response: Routes from Poison Creek to Tuscany Ridge will be closed since a connector loop cannot be made without crossing onto State land. The single –track motorcycle route from Squaw Creek to summit of Munger Mountain is currently in a sustainable location with a boundary fence, in place, that helps prevent trespass. Additionally, implementation of signing/trail marking should reduce trespass potential. A single trailhead for OHV use on Munger Mountain will be located on Forest Service land, south of Red Top meadows, along the south Fall Creek road (FS 31000). The new location will enhance enforcement and trailhead management objectives.

COMMENT: Add road gates on Shadow Mountain.
"I suggest additional gates in the Shadow Mountain area on dead-end roads that can be closed seasonally from year to year."

Letter: 1
Response: Gates will be added to roads along with seasonal restrictions (roads open May 1-November 30 but motorized trails will not open until June 1). Temporary barriers will be utilized for spring/fall closures when needed on main roads to protect road surfaces and insure public safety.

COMMENT: Open Slate Creek OHV loop June 1.
"Would like to see the designated OHV loop (Slate Creek) opened by June 1 instead of July 1.
Letter: 4
Response: The Slate Creek OHV route is located in critical elk calving habitat, and to be consistent with Forest Plan cannot open prior to July 1. In addition, the ford across the Gros Ventre River is not safely passable until early season water levels drop. The water level where safe passage can be made occurs approximately July 1 in most years.

COMMENT: End all OHV travel on October 31.
"Stop all OHV travel on or before October 31. Motorized access is not necessary after ninety percent of the hunt season is concluded."
Letter: 7
Response: All motorized travel is subject to a seasonal restriction. Since the summer Travel Plan continues through November 30th, some routes, when not conflicting with wildlife or other resources considerations will be open through this date.

COMMENT: OHV use should be allowed July and August only for Taylor and Munger Mountain areas.
"If the Taylor Mountain road remains open for motorized use, it should be open only during the months of July and August to protect elk habitat. If the routes in the Munger Mountain area are available to motorcycle use, they should be open only during the months of July and August to protect critical elk habitat and fall hunting opportunities".
Letter: 101
Response: The Taylor Mountain road will be permanently closed to motorized use. The large loop, as well as the smaller loops in the NW area of Munger Mountain will remain open as single-track motorcycle routes with a seasonal restriction (open July 1-September 9). Additionally, the east spur will be permanently closed to motorized use. All of the above decisions will assist in the increase of elk habitat effectiveness and resource protection.

COMMENT: OHV travel should begin on July 1 to protect wildlife.
"In general, a July 1 opening date for roads and trails protects wildlife better than earlier dates and should be incorporated into any plan."
Letter: 110, 117
Response: Seasonal restrictions for all OHV system routes will be utilized and will vary according to wildlife habitat security needs and resource conditions. All OHV routes located within critical elk parturition areas will have a seasonal opening date of July 1.

COMMENT: OHV routes should have only two seasons of allowed use.
"In all project areas primary travel routes should be open to motorized use May 1-November 30, while all other categories of secondary travel routes and trails should be open to motorized use

June 1-November 30 to maximize OHV recreation opportunities while providing consistency for public education and enforcement purposes."
Letter: 113
Response: While the above dates would greatly simplify the OHV system for the public, it does not take into account Forest management responsibilities and protection of wildlife migration and parturition (birthing) objectives. Seasonal restrictions on designated OHV routes have been proposed where necessary to protect forest and wildlife resources. The number of individual seasonal designations created is the lowest number necessary to achieve Forest Plan requirements.

11. General Comments

COMMENT: Concern about damage to soil, vegetation, scenery, trails and roads, wildlife habitat and other resources from OHV use.
Letters: 11,13, 17, 29, 41, 42, 43, 44, 45, 46, 47, 48, 49, 51, 52, 54, 55, 56, 57, 59, 62, 63, 65, 66, 68, 69, 74, 75, 78, 94, 98, 100, 103, 106, 115, 215, 218
Response: Prohibiting unrestricted motorized use is a critical component towards reducing impacts on soil, vegetation, scenery, wildlife and other resources. To meet the purpose and need for this project, routes being designated for motorized travel are those with the least potential for damage to the basic resources of watershed, soil, and vegetation cover. The location of trails and roads were also designed to reduce the scenic intrusions. Wildlife habitat was considered in the development of the system as well, reflected in seasonal restrictions, location of open routes, and size/connectivity of motor-free areas.

COMMENT: ATVs are a privilege, not a right.
Letter: 130
Response: You are correct. All recreation uses on public lands are a privilege, not a right. As such, the privilege of use carries the obligation to practice responsible use and courtesy towards other users.

COMMENT: I want this land to be there for my two 1 year old great-grandsons.
Letter: 121
Response: Our mission is public service and stewardship of the National Forest to leave a legacy for future generations. With continued public support and involvement, the land will be retained in public ownership benefiting both our society as well as individuals who choose to visit.

COMMENT: Closure of abused ORV routes can help foster a more diversified tourism industry.
"A potential argument against closing harmful ORV routes is that the local economy depends on ORV fans. On the contrary, we believe that closure of abused ORV routes can help foster a more diversified tourism industry. More emphasis on watchable wildlife, fishing, and heritage tourism will prove to be more valuable and more sustainable than continued dependence on a single activity that is vulnerable to rising gasoline prices."
Letter: 21
Response: While ORV use certainly contributes to the local economy, most visibly through the presence of local businesses that sell, repair, or rent ORVs, the overall economy of Jackson Hole

is not dependent on ORV use. Thus the argument that closing some motorized routes will hurt the economy has not been made during this planning process. The economy of Jackson Hole has changed significantly since the late 1980s, shifting from one largely driven by tourism to one driven more by investment income and professional services followed by tourism, real estate and construction (JH Almanac – Charture Institute). Detailed information regarding the economics of the tourism sector is not available, but with two national parks, two ski resorts, a large outfitting industry, major rivers for rafting and fishing, numerous art galleries and museums, and abundant wildlife viewing activities, it is safe to say that the tourism sector is already quite diversified.

12. Comments Outside the Project Scope

COMMENT: Concern that the BTNF has too much roadless area or 'de facto wilderness.'
"There is no reasonable justification for any more roadless areas and de facto wilderness areas in this national forest."
Letter: 99
Response: Thank you for your comment. This project is not proposing any additional roadless or wilderness areas.

COMMENT: **"Areas that have the most sensitivity should be set aside either by Wilderness Acts or by protective regulation of activities to protect what is unique and wild."**
Letter: 68
Response: This project is focused solely on determining which roads and trails within the current unrestricted motorized use areas should be designated for motor vehicle use; it is not focused on whether or not areas should be designated as Wilderness. The issue of recommendations for additional Wilderness will be addressed during revision of the Forest Plan.

COMMENT: Remove broken bridges in North Fork Fall Creek area.
"I think the three broken bridges in the first mile of the trail west of the barricade, at the end of the NF Fall Creek road should be removed entirely."
Letter: 81
Response: Transportation infrastructure such as road bridges will be addressed during the implementation phase of the OHV Designated Route system.

COMMENT: Sign issue in the WSA.
"A faint trail starting a mile west of the barricade on the North Fork of Fall Creek leads to a ridge about 2.5 miles east of Taylor Mountain, and about a mile south of the North Fork of Elk Creek. The last half mile of trail that climbs steeply onto an unnamed ridge is 6.4 miles due north of Observation Peak. There is a USFS sign posted on a tree about 200 yards east of the trailhead that steers hikers and riders in the wrong direction; this sign needs to be moved to the trail junction."
Letter: 81
Response: This issue is outside of the area for this project, however proper signing for all routes is an on-going process and this comment has been forwarded to our backcountry trails staff.

COMMENT: Trails within the WSA should be excluded from motorized use.
"The wilderness qualities of this area are indisputable. I believe this area would not be appropriate for OHV use at all due to its primitive qualities. Dog Creek and Coburn Creek trails— "I have hiked both of these trails to the base of Observation Peak and found that both are totally inappropriate for motorized vehicles, as they are very challenging above 7600 ft and on slopes that are too steep or narrow for motorized travel, and the wilderness qualities of solitude plus the opportunities for primitive recreation and foot-based hunting are excellent. ORV use on either of these trails would damage the stream beds, scare the elk out, and cause serious erosion on the steeper sections."
Letter: 81
Response: Motorized use is not currently allowed on these trails and no new motorized routes have been proposed on trails within the Palisades Wilderness Study Area as part of this project.

COMMENT: Exclude the Black Canyon trail from the WSA.
"Black Canyon trail – "I've hiked this trail and find it to [be] so heavily used by downhill mountain bikers every summer that it should be excluded from the Palisades WSA, though everything south of it should be kept in the WSA (and designated permanent Wilderness)."
Letter: 81
Response: This project is not focused on whether or not the Palisades area should be designated as Wilderness or whether the boundary of the WSA should be modified. This issue will be addressed during revision of the Forest Plan.

COMMENT: Alternative D will set a precedent to allow or encourage winter motorized use.
"Alternative D will set a precedent for allowing or encouraging winter motorized use in roadless areas and WSAs, when a presumed winter travel (or recreation) plan is undertaken in the future."
Letter: 108
Response: Winter motorized use is outside the scope of this project which is focused on addressing public summer motorized use in areas where motorized use is currently unrestricted. There is nothing to suggest that the OHV route system designated for summer public motor vehicle use will set a precedent for updating the winter travel plan. The issues and geographic areas of concern are quite different between the summer and winter, particularly in relation to crucial wildlife habitat. If one compares the current summer and winter travel plan, there are clear differences between what is open versus closed to motorized use between the two seasons. For example, there are many situations where an area is open to motorized use during the summer but closed to all human activity during the winter (e.g. portions of Munger Mountain, the Horsetail Creek drainage north of the Gros Ventre road). Conversely, there are examples where an area is closed to motorized use during the summer but open to winter motorized use on designated trails (e.g. the Mount Leidy Highlands) or throughout the area (e.g. the Palisades/Snake River Range).

COMMENT: Keep all snowmobiles out of Yellowstone Park.
Letter: 145
Response: This comment is outside the scope of this project which is limited to portions of the Bridger-Teton National Forest. The Forest Service does not have jurisdiction over Yellowstone National Park which is located north of the project area.

COMMENT: We would like to start the process for applying for a permit to run guided ATV tours.

"JHAR would like to start the process on applying for a permit to run guided ATV tours. We feel that with the change in route designations it would be imperative to work together with the Forest Service to educate our customers and the public on proper use of this special area. In providing guided ATV tours we would be able to promote, educate, and better regulate the restrictions in the Gros Ventre and possible other areas."

Letter: 4

Response: Consideration of issuing a special use permit for guided ATV tours is outside the scope of this project. Consideration of guided ATV tours is more appropriately addressed during implementation of the designated OHV route system. However, per established National Forest policy and regulations regarding special use permit administration, we always accept proposals for proposed outfitted or guided activities and will thoroughly review the proposal. You are welcome to submit a proposal and talk with our special use administrators to fully understand the proposal, environmental review, and cost recovery processes.

Letter Log
Off-Highway Vehicle Route Designation Project

Letter #	Name	Affiliation	Comment Topic Code
1	Halpin, Mike	Individual	9,10
2	VanGelder, Bill	Individual	9,10
3	Riggins, JR	Motorized Rec Council of Wyoming	1,7,10
4	Walters, Dave	JH Adventure Rentals	9,10,12
5	Quigley, Howard	Craighead Beringia South	9
6	Henry, Doug	Individual	9
7	Roth, Rick	Individual	9,10
8	Western, Sally	Individual	
9	Chapman, Sean	Individual	9
10	Ysebaert, John	Individual	5,9
11	Garvey, Lydia	Individual	11
12	Mesling, Chena	Individual	5,9
13	Erickson, Bill	Individual	11
14	Akin, Kelly	Individual	1,8
15	Wuerthner, George	Individual	5,9
16	Blank		
17	Pucel, Phil	Individual	1,9,11
18	Evans, Dinda	Individual	5,9
19	Parkin, Darren&Amber	Individual	9
20	Patterson, Cynthia	Individual	5,9
21	Schwarz, Kurt	Howard County Bird Club	3,4,5,8,9,11
22	Remington, David	Individual	5,9
23	Sechrist, Shelley	Individual	5
24	Smith, Alicia	Individual	5,9
25	Blank		
26	Wilson, Monty	Individual	2
27	Donovan, John	Individual	5,9
28	Alvarez, David	Individual	5,9
29	Weitzel, D & Adkins, J	Individual	11
30	Chapman, John	Individual	9
31	Roesch, Dwight	Individual	5,9,10
32	Harris, Chuck	Individual	9
33	Hutchinson, Ned	Individual	9
34	Erickson, Bill	Individual	9
35	Harkness, Carol	Individual	5,9
36	Zupsan, Valarie	Individual	9
37	Gabriel, Karen	Individual	9
38	Galbraith, William	Individual	9
39	Klene, Richard	Individual	9
40	Boynton, Beverly	Individual	9
41	McClellan, Terry	Individual	2,9,11
42	Shipek, David	Individual	2,9,11
43	Sherman, John	Individual	2,9,11

44	Russell, Kathy	Individual	2,9,11
45	Watts, Christie	Individual	2,9,11
46	Wulbrecht, Sally	Individual	2,9,11
47	Allen, Daniel	Individual	2,9,11
48	Grace, George	Individual	2,5,9,11
49	Conners, Patrick	Individual	2,9,11
50	Shill, Cathy	Individual	4,9,10
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52	Daly, Matthew	Individual	2,9,11
53	Gardner, Linnea	Individual	5,9
54	Woodard, Jeff	Individual	2,9,11
55	Jones, Melanja	Individual	11
56	Klene, Mary Lou	Individual	5,11
57	Baker, Sara	Individual	2,11
58	Kunstel, Marcia	Individual	5,9
59	Yenko, Steve	Individual	8,11
60	Bishop, Andrew	Individual	4,5,9
61	Swope, Linda	Individual	1
62	Bauer, Joe	Individual	11
63	Woodard, Dr. Bruce	Individual	2,5,9,11
64	Stewart, Robert	Grand Teton Natl. Park	4,5,10
65	Carson, Andrew	Individual	5,9,11
66	Dray, Patricia	Individual	4,5,9,11
67	Tennican, Michael	Individual	5,9
68	Hargreaves, Diane	Individual	3,4,5,8,9,11,12
69	Logan, Tyson	Individual	11
70	Olson, Sherry	Individual	5,9
71	Kessler, Stephanie	The Wilderness Society	5,9
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73	Fabian, John	Individual	1
74	Sides, Jon	Individual	5,9,11
75	Sides, Susan	Individual	2,11
76	Robson, Mary	Individual	5,9
77	Kronenberger, Don	Individual	5,9
78	Caesar, Bette	Individual	2,9,10,11
79	Morrison, Mary Lou	Individual	2,9
80	Hittel, Earline	Individual	5,9
81	Sinclair, Benj	Teton Science Schools	2,4,5,10,12
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83	Weiderman, Brain	Individual	5,9
84	Racich, Jim	Individual	2,8
85	Scanlin, Thomas	Individual	2,5,9
86	Turiano, Thomas	Individual	2,5,9
87	Malm, Melissa	Individual	5,9,10
88	Offutt, Tucker	Individual	1,2,8,10
89	Sobey, Doug	Individual	5,9
90	Sobey, Pegi	Individual	4,5,8,910
91	Watson, Roger	Individual	9,10
92	Blank		

93	Moran, Chris	Individual	9
94	Fustos, Gail	Individual	2,5,9,11
95	Lasley, Dorsey, McGee	JHCA, GYC, WOC	1,2,3.4,5,6,8,10
96	Fishback, Robert	Individual	9
97	Riggins, JR	Motorized Rec Council of Wyoming	1
98	Trapp, Cammy	Individual	2,11
99	Lemm, Doug	Individual	1,12
100	No Name	Individual	2,11
101	Resor, Bill	Snake River Ranch, LLC	9,10
102	Prayzich, Elise	Individual	5,9,10
103	Borre',Gene	Western Wyoming Outfitters	2,8,10,11
104	No Name	Individual	5,8,9
105	Ladd, Berthe	Individual	5,9
106	Smith, Suzie	Jackpine Summer Homes	2,8,10,11
107	Bonney, Lorraine	Individual	7,9
108	Ryder, Steve	Winter Wildlands Alliance	5,9,12
109	Coburn, Broughton	Individual	5
110	McNeill, Page	Individual	1,4,5,8,9,10
111	Stevens, Bruce	Individual	2
112	Wilson, Cynthia Norcross	Individual	5,9
113	Hill, Brad	Wyoming State Trails Program	1,2,,4,5,6,7,8,9,10
114	Caesar, Robert	Individual	8,9,10
115	Griffith, Gregory	Individual	8,11
116	Blank		
117	Dewey, Cole, Kilpatrick, Brimeyer	JIHI Group	4,8,9,10
118	Parkin, Craig	Individual	1
119	Stein, Melanie	Sierra Club	2,4,5,8,9,10
120	Emmerich, John	Wyoming Game and Fish Dept	4,9,10
121	Brant, Arlene	Sierra Club, individual	5,9,11
122	Lillegraven, Jason	Sierra Club, individual	5,9
123	Peterson, Nancy	Sierra Club, individual	5,9
124	Squlls, B. Mae	Sierra Club, individual	5,9
125	Mottonen, Lois	Sierra Club, individual	5,9
126	Steinmeier, Karla	Sierra Club, individual	5,9
127	Redizer-Blackburn, Susan	Sierra Club, individual	5,9
128	Nicol, Fred & Alice	Sierra Club, individual	5,9
129	Cecil, Dee & Paulson, Gary	Sierra Club, individual	5,9
130	Schwitian, Kim	Sierra Club, individual	5,9,11
131	Johnston, Holly	Sierra Club, individual	5,9
132	Wicks, Mark	Sierra Club, individual	5,9
133	Caves, Janizes	Sierra Club, individual	5,9
134	Crank, Rick	Sierra Club, individual	5,9
135	Lene, Phyllis	Sierra Club, individual	5,9
136	Angel, Donna	Sierra Club, individual	5,8,9
137	Larra, Susan	Sierra Club, individual	5,8,9
138	Murray, Ester	Sierra Club, individual	5,9
139	Noble, Anna Marei	Sierra Club, individual	5,9
140	Glover, Karen	Sierra Club, individual	5,9

141	Kalkwarf, Kimberly	Sierra Club, individual	5,9
142	Ziemond, Helmut	Sierra Club, individual	5,9
143	Wooley, Barbara	Sierra Club, individual	5,9
144	Brecht, Dan	Sierra Club, individual	5,9
145	Barrett, Justin	Sierra Club, individual	5,9,12
146	Leonard, Mary	Sierra Club, individual	5,9
147	Ward, Bertha	Sierra Club, individual	5,9
148	Morris,Maxine	Sierra Club, individual	5,9
149	Dray, Patricia	Sierra Club, individual	5,9
150	Placzkeowski, Pauline	Sierra Club, individual	5,9
151	Neal, Chuck	Sierra Club, individual	4,5,9
152	O'Neil, Donald	Sierra Club, individual	5,9
153	Johnson, Robert	Sierra Club, individual	5,9
154	Gillette, Claudia	Sierra Club, individual	5,9
155	Dugan, Phyllis	Sierra Club, individual	5,9
156	Verna, Diane	Sierra Club, individual	5,9
157	Prebish, Greg & Kim	Sierra Club, individual	5,9
158	McIntyre, Julie	Sierra Club, individual	5,9
159	Sommers, Myra	Sierra Club, individual	5,9
160	Ashear, Victor & Janet	Sierra Club, individual	5,9
161	Ford Sheppard, Sue	Sierra Club, individual	5,9
162	Wallen, Amber	Sierra Club, individual	5,9
163	Day, Lisa	Sierra Club, individual	5,9
164	Weltzien, O. Alan	Sierra Club, individual	5,9
165	Jesaitis, Al	Sierra Club, individual	5,9
166	Despain, Laran	Sierra Club, individual	5,9
167	Sanford, R.A.	Sierra Club, individual	5,9
168	Reddicks, Marian	Sierra Club, individual	5,9
169	Harnagel, Floyd	Sierra Club, individual	5,9
170	Giurgevich, John	Sierra Club, individual	5,9
171	Bateman, Kenna	Sierra Club, individual	5,9
172	Nicholls, Lisa	Sierra Club, individual	5,9
173	Weber, William	Sierra Club, individual	5,9
174	Reck, Margie	Sierra Club, individual	5,9
175	Lee, Richard	Sierra Club, individual	5,9
176	Allgier, Patricia	Sierra Club, individual	5,9
177	Johnson, Matthew	Sierra Club, individual	5,9
178	Dominick, David Dewitt	Sierra Club, individual	5,9
179	Martin, Marilynn	Sierra Club, individual	5,9
180	Staley, Airica	Sierra Club, individual	5,9
181	Hammer, Janice	Sierra Club, individual	5,9
182	Arnould, Eric	Sierra Club, individual	5,9
183	Whitt, Hugh	Sierra Club, individual	5,9
184	Krug, Antyre	Sierra Club, individual	5,9
185	Granfre, Andria	Sierra Club, individual	5,9
186	Mueller, Julie	Sierra Club, individual	5,9
187	Flynn, Shannon	Sierra Club, individual	5,9
188	English, Kelli	Sierra Club, individual	5,9
189	Trefonas, Elizabeth	Sierra Club, individual	5,9

190	Walter, Barbara	Sierra Club, individual	5,9
191	Koedt, Inger	Sierra Club, individual	5,9
192	Centrella, Cathi	Sierra Club, individual	5,9
193	Svendsen, Carolyn	Sierra Club, individual	5,9
194	Lavin, Patricia	Sierra Club, individual	5,9
195	Applhans, A.D.	Sierra Club, individual	5,9
196	Katsma, Carolyn	Sierra Club, individual	5,9
197	Levy, Remy	Sierra Club, individual	5,9
198	Kehr, Catherine	Sierra Club, individual	5,9
199	Young, Linda	Sierra Club, individual	5,9
200	Haight, Robert	Sierra Club, individual	5,9
201	Westerberg, Richard	Sierra Club, individual	5,9
202	Gorsuch, Royce	Sierra Club, individual	5,9
203	Heeren, Lynn PHD	Sierra Club, individual	5,9
204	Sanders, Elsie	Sierra Club, individual	5,9
205	Pallak, Pamela	Sierra Club, individual	5,9
206	Audier, Frances	Sierra Club, individual	5,9
207	Hoffman, Darrel	Sierra Club, individual	5,9
208	Laffin, Neal	Sierra Club, individual	5,9
209	Bitner, Albert	Sierra Club, individual	5,9
210	Knecht, Dieter	Sierra Club, individual	5,9
211	Urasky, Lesley	Sierra Club, individual	5,9
212	Aserlind, Margot	Sierra Club, individual	5,9
213	Gutkoski, Joe	Sierra Club, individual	5,9
214	Amunoson, Larry	Sierra Club, individual	5,9
215	Dudinyak, Linda	Individual	4,5,9,11
216	Helm, Janet	Individual	5,9
217	Robinett, Jane	Individual	9
218	Heminger, Daniel	Individual	5,9,11
219	Svoboda, Larry	US Environmental Protection Agency	3,4,7,8
220	Young Tim	Friends of Pathways	9

APPENDIX B: USABLE OHV TERRAIN

Simply counting the linear miles of designated roads and motorized trails within unrestricted motorized travel areas would not present an accurate picture of where motorists can travel. Many user created trails have been created and are being created each season in these unrestricted areas. The task of collecting GPS data on all user-created trails among all unrestricted areas is not possible given the dynamic nature of the unrestricted areas and the rate at which user-created routes are being created.

A model called OHV usable terrain was utilized to quantify, in acres, OHV usable terrain off designated roads and motorized trails within unrestricted areas. A separate model utilizing similar criteria was used to define acres of OHV usable terrain for alternatives that do not contain unrestricted travel areas. In both models, physical attributes that are not compatible with OHVs were identified and incorporated into a GIS query to identify those remaining areas that are accessible by OHVs.

Usable Acres: Alternative A Model

Part 1: Identifies terrain that would not likely be used by OHVs. They include the following:

- Areas containing slopes greater than 35 %
- Areas containing bodies of water
- Private and other ownership lands
- Areas classified as the following map units AND that contain a % cover greater than 40%. This data was obtained from the Bridger-Teton Vegetation Layer (2007):
    - Willow
    - Cottonwood
    - Aspen
    - Aspen/Conifer Mix
    - Limber Pine
    - Douglas Fir Mix
    - Lodgepole Pine Mix
    - Spruce/Alpine Fir Mix
    - White Bark Pine
    - White Bark Pine Mix

The remaining areas do not have attributes that would prevent OHV travel. However, some of the polygons (Areas) remaining may be *surrounded* by areas with the above attributes. An example of this may be a flat usable area surrounded by cliffs or a usable island surrounded by water. Therefore only those usable acre polygons that are bisected by a designated route were utilized in the model.

Part 2: Part one eliminated areas containing condition attributes that are not compatible with OHV travel, however, designated roads and motorized trails have been engineered to overcome adverse condition attributes. For example, roads have switchbacks to get up steep slopes, bridges to cross rivers and may pass through a stand of thick vegetation. Therefore those

designated routes outside of usable terrain were included in the total acreage of usable terrain. designated routes outside of usable terrain were calculated using the following formulas:

- Acreage of remaining roads: Linear feet of road X 16 feet = sq feet
- Acreage of remaining motorized Motorcycle trails:
  Motorcycle - Linear Ft of trail X 3 feet (FS Tread Width Parameters for Motorcycle class 3 trail) = sq feet
  ATV - Linear Ft of trail X 5 feet (FS Tread Width Parameters for ATV class 3 trail) = sq feet
- Road sq ft + Trail Sq ft = Total Sq feet
- Total Sq feet X $2.29568411 \times 10^{-5}$ = Acres

Total useable acres for alternative A were calculated by adding Parts 1 and 2 together. The resulting map of usable acres was field checked by overlaying 229 miles of user-created routes that were gathered during the summers of 2005-2007 with a GPS. 72% of the 229 miles of user-created trails were inside the OHV usable terrain polygons.

Usable Acres: Action Alternatives Model

The action alternatives do not propose unrestricted travel areas. Motorized travel is restricted to designated routes. In order to compare the action alternatives with alternative A the same units of measure (acres) had to be utilized. Therefore the miles of designated routes had to be converted to acres. Additionally, all action alternatives would include authorization to travel 300 feet from a designated road to access a dispersed campsite. Therefore all designated roads technically have a 600 foot corridor. Motorized trails do not have a buffer to access dispersed camping areas.

In order to be consistent with Alternative A's usable acre model the action alternative model utilized the same OHV usable terrain criteria. The action alternative model can also be broken down into two parts:

Part 1: All "usable terrain" acres within 600 feet of a designated road were calculated. Usable Terrain was determined with the same criteria as used in part 1 Alternative A's OHV usable terrain model.

Part 2: Identical to Alternative A OHV Usable terrain model.

APPENDIX C: CUMULATIVE EFFECTS

Activities to be considered in Cumulative Effects

What are the "past, present, and reasonably foreseeable future activities"?

On-going activities:

- Dispersed recreation use – camping, hunting, mountain biking, hiking, horse riding, outfitting, etc
- Changing population – increase in recreation numbers; change in what people want from the Forest
- Firewood gathering / cutting
- Livestock grazing on allotments (Munger, Hoback, Granite, Gros Ventre)
- Wildlife research
- Management activities – e.g. road and trail maintenance, patrols, signing, special use administration (rec and non-rec), noxious weed treatment

Projects:

- Efforts to secure public access (W. Dell Creek, East side Munger, bottom of Phillips Canyon)
- Fuel projects – Lower Gros Ventre Habitat Enhancement Project; Randolf Mountain; Buffalo Valley veg treatment; Hoback Junction Fuels Reduction
- Proposed gold mine – Cottonwood Creek in GV
- Togwotee Highway reconstruction
- Hoback Highway projects (bridge replacement; landslide repair)
- LVPL Pipeline – Hoback Canyon
- Proposed development of Trails End Ranch (South Fork Fall Creek); other land use changes from ranches to resorts; Proposed developments at Teton Village (SRA) and in south Jackson – e.g. Scherr-Thoss
- Oil and gas exploration – Hoback Basin; Green River Basin
- GTNP Transportation Plan
- CTNF Big Hole and Snake River subsection travel plan

APPENDIX D: RECREATION OPPORTUNITY SPECTRUM

Summary of the Recreation Opportunity Spectrum, adapted from USDA Forest Service, Recreation Planning Technical Guide, 2005.

ROS CLASS	SETTING TYPE	SETTING DESCRIPTION
PRIMITIVE	PHYSICAL	Remote, unmodified, natural area of at least 5,000 acres
	MANAGERIAL	Few signs, few rangers, no motorized travel
	SOCIAL	Very high probability of solitude; closeness to nature; self-reliance; little evidence of people
SEMI-PRIMITIVE NON-MOTORIZED	PHYSICAL	Predominately natural; rustic improvements to protect resources. 2,500 + acres
	MANAGERIAL	Minimum signing, some encounters with rangers. Motorized travel prohibited
	SOCIAL	High probability of solitude, closeness to nature; some evidence of others
SEMI-PRIMITIVE MOTORIZED	PHYSICAL	Predominately natural; rustic improvements to protect resources. 2,500 + acres
	MANAGERIAL	Minimum on-site controls with some restrictions; motorized off-highway vehicles allowed
	SOCIAL	Moderate probability of solitude; motorized use noticeable
ROADED NATURAL	PHYSICAL	Natural with nodes and corridors of development and rustic, small-scale resorts
	MANAGERIAL	obvious signs of on-site management (information and regulations)
	SOCIAL	Moderate evidence of human sights and sounds; concentration of users at campsites
RURAL	PHYSICAL	Landscapes with natural appearing backdrop. Ranches, farms, moderately developed resorts
	MANAGERIAL	Obvious signing (regulation and information), motorized and mechanized travel common
	SOCIAL	High interaction among users is common.
URBAN	PHYSICAL	Site modifications and facilities. Developed resorts and complexes.
	MANAGERIAL	Intensive on-site management, obvious signs and staffing, education and law enforcement.
	SOCIAL	Opportunity to be with others - high degree of interaction with people.