

CHAPTER 7

Response to Comments on the Millville Peak/Logan Peak Road Relocation Draft Environmental Impact Statement

This chapter provides the Forest Service response to comments received on the Draft Environmental Impact Statement (DEIS) and gives a reference to additional information in the FEIS (where provided). This chapter also provides copies of letters received from other government agencies as required by forest Service Handbook 1909.15 Chapter 20.

The DEIS for the Millville Peak/Logan Peak Road Relocation project was released for public review on July 9, 2007. A Notice of Availability was posted in the Federal Register on July 20, 2007. A legal notice was placed in the Salt Lake Tribune on July 24, 2007. Copies were sent to interested parties identified during the scoping process and to local, state and federal agencies. The DEIS was also available on the Forest website.

Thirty six letters were received during the comment period, which ended on September 5, 2007. All letters were reviewed and summarized by the interdisciplinary team members. All summarized comments are included in this chapter for public review. Individual letters are on file in the project record, at the Logan Ranger District.

Public responses on the Millville Peak/Logan Peak Road Relocation project are documented and analyzed using a process called content analysis. This is a systematic process of compiling and categorizing all public viewpoints and concerns submitted on a project. Content analysis is intended to help the interdisciplinary team clarify or adjust the Final Environmental Impact Statement (FEIS). Information from letters, emails, and faxes are all included in this analysis.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to analysis documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Every comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated and the analysis team attempts to capture all relevant public concerns in the analysis process.

In the content analysis process, each response is assigned a unique number. This number allows analysts to link specific comments to original responses. All respondents' names and addresses are entered into a project-specific spreadsheet, enabling creation of a complete list of all respondents.

Analysts read the response and identify stand-alone comments within each letter. Next, each comment is entered into the project spreadsheet. The spreadsheet tracks all input and allows analysts to identify public concerns and to analyze the relationships among them. While simple statements of opinion without a rationale are captured in the process and entered in the project spreadsheet, it is the strength of each rationale as a complete argument that provides the interdisciplinary team a comment to consider. Responses are then written and additional information is added to the FEIS, as needed to address the comments.

Although the list of comments attempts to capture the full range of public issues and concerns, it should be used with caution. Respondents are self-selected; therefore their comments do not necessarily represent the sentiments of the public as a whole. However, these reports do attempt to provide fair representation of the wide range of views submitted. In considering these views, there is no attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process. The comment summaries are not intended to replace the need for interdisciplinary team members and decision-makers to directly review all responses and comments. The content analysis process allows a systematic review of all public responses by subject area.

Agencies have a responsibility under the National Environmental Policy act (NEPA) to first “assess and consider comments both individually and collectively” and then to “respond... stating its response in the final statement.” The content analysis process used by the U.S. Forest Service, described in the previous section, considers comments received “individually and collectively” and equally, not weighting them by the number received or by organizational affiliation or other status of the respondent. Comment statements created from public input form the basic summary of public comment and were the primary focus of our interdisciplinary team in considering comments.

The NEPA requires that after we consider comments, we formally respond to comments. CEQ regulations at 40 CFR 1503.4 provide five possible responses:

1. Modify alternatives including the proposed action.
2. Develop and evaluate alternatives not previously given serious consideration by the agency.
3. Supplement, improve, or modify its analyses.
4. Make factual corrections.
5. Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

DEIS comments and Forest Service responses are provided in the following table. Letters from other federal agencies are also included.

Letter #		Name	Comment	Response
1	a	Miller - BRWC	The project area map shows RT #20020 Waterfall Rd as open; this gross error should be remedied; this route is not on the Travel Plan.	That is correct; FR 20020 is not on the Logan District Travel Plan. It was inadvertently included on the DEIS Project Area Map in Appendix A and has been removed. It was not shown on the DEIS alternative maps and was not part of the analysis of alternatives.
1	b	Miller - BRWC	BRWC supports Alt B amended to include minor improvements for erosion on routes 20042, 200168, 200126, and 20022. This alternative falls in compliance with the Critical Infrastructure Information Act of 2002 that seeks to facilitate protection of critical infrastructure, reducing the nation's vulnerability to terrorism.	Thank you for your comment regarding Alternative B. Safety of the communication site is also addressed in Alternative A which would authorize the construction of a fence around the site if the State so desired (FEIS, Section 2.4.1).
1	c	Miller - BRWC	The DEIS dismisses the issue of vandalism at the communications site stating that the protection of the facility is the direct responsibility of the State of Utah. Alternative B (Close Road) tenuously addresses this issue but evades the specific vandalism/terrorism concern.	The communications site is the responsibility of the State of Utah; vandalism is addressed in Alternative A which would authorize construction of a fence around the site if the State so desired (FEIS, Section 2.4.1).
1	d	Miller - BRWC	The scope of the EIS must take into account the State of Utah's plan to protect and secure the facility in accordance with the CII Act. The State must confer with Homeland Security and prepare a plan. Until then it is out of compliance with the CII Act.	Protection and security are addressed in Alternative A which would authorize construction of a fence around the site if the State so desired (FEIS, Section 2.4.1). The State's conference with Homeland Security is beyond the scope of this project.
2	a	State of Utah Public Lands Policy Coordination	The Utah Division of Parks and Recreation prefers Alternative A. This access road is an important destination in the Shoshone Trail system and we want segments referenced in Alt A to remain open.	Thank you for your comment. Millville Peak and Logan Peak roads (20168 and 20042, respectively) would be relocated but would remain open under Alternative A, the proposed action (FEIS, Sections 2.4.1 and 2.9).

Letter #		Name	Comment	Response
2	b	State of Utah Public Lands Policy Coordination	We support the FS's need to relocate these routes.	Thank you for your comment.
2	c	State of Utah Public Lands Policy Coordination	Alt A best supports public access to Logan Peak, Millville Peak, Upper Providence Canyon, Inspiration Point, and Top of Spring Hollow, all of which have high scenic and recreational value to trail users.	That is correct, Alternative A, the proposed action, maintains motorized access to these areas (FEIS, Sections 2.4.1 and 2.9).
2	d	State of Utah Public Lands Policy Coordination	Alt B does not provide public access to vistas and scenic overlooks and would shut off access to the Shoshone trail system from communities of Providence and Millville.	Under Alternative B, access would be for administrative use only; the roads would be closed to public access (FEIS, Sections 2.4.2 and 3.3.6.2).
2	e	State of Utah Public Lands Policy Coordination	Due to the rough terrain, remoteness, and historical use, it would be difficult to maintain this area for administrative use only; it would invite unwanted illegal trails in the area.	That may be correct; whereas decommissioned roads under Alternative A would be closed with rock barriers, scarified, and native seeded, administratively closed roads under Alternative C would be gated only (to allow for administrative use). Mitigation measures under Alternative A such as rock barriers, debris, scarifying, and seeding would prohibit motorized travel on these decommissioned routes (FEIS, Section 2.5).
3	a	Bryson	There are very few legal 4x4 roads available in all of northern Utah. I'm afraid these proposals would affect the ability to go all the way to Logan Peak.	Motorized access is addressed in Alternative A, the proposed action, which would maintain access to Logan Peak (FEIS, Section 2.4.1, 3.3.6.1, and Appendix E Maps).

Letter #		Name	Comment	Response
3	b	Bryson	I'd vote for an alternative that would keep the 4x4 road open in Providence Canyon even if it had to be re-routed a little.	Alternative A, the proposed action, would maintain access in Providence Canyon and Upper Providence Canyon, connecting to the rerouted portion of Millville Peak Road (FEIS, Section 2.4.1, 3.3.6.1, and Appendix E Maps).
3	c	Bryson	It seems the more places I go the more is closed to 4x4 use. The routes are either changed to ATV routes or totally closed down.	Under Alternative A, the 1 mile-long Top of Spring Hollow Road (20126) would be changed from "high clearance vehicle" to ATV use because of the steepness of the connector trail (FEIS Sections 2.4.1 and 3.3.6.1). All other routes shown on the map would remain open to motorized use including "high clearance" vehicles (FEIS, Appendix E, Alternative A Map).
4	a	Steen	I think you should leave the area open to ATVs. Some restrictions on 4x4's and SUV's are needed when roads are wet. ATVs get blamed for some of the damage caused by larger vehicles.	Under Alternative A, the proposed action, all routes shown on the Alternative A Map would remain open to motorized use including ATV's (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
4	b	Steen	Address the specific problems; don't blame everyone for a few peoples violations; ATVs involved in flagrant violations should be confiscated; but, no blanket closures.	Thank you for your comment.
5	a	Burton	I think the roads should remain open and untouched. Many people enjoy the roads because of the way they are.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map). The relocation of the roads is necessary to move the road off the power cable and to correct resource damage resulting from steep and improperly located old roads (FEIS, Section 1.3).

Letter #		Name	Comment	Response
6	a	Shurtleff	Please don't close the Millville area; all the best areas are being closed down.	Under Alternative A (proposed action), all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
7	a	Jensen	I am concerned with the potential close of Providence and Millville canyons to 4x4's; it is a fun ride with spectacular views.	Under Alternative A (proposed action), all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
7	b	Jensen	The State needs to find a permanent solution; they need to fix the problem caused by locating the cable on a public access road; do not punish the riders by closing these public roads.	Alternative A provides a potential solution by relocating the affected roads off the power cable and maintaining motorized access for the public (FEIS, Sections 2.4.1, 3.3.6.1 and Appendix E, Alternative A Map).
8	a	Dowsett	Since there is no way to relocate the cable, Alternative A would be the best choice; but I don't want to lose access to this beautiful ride and hopefully the action won't compromise the experience.	Alternative A (proposed action) would relocate the affected roads off the power cable while maintaining motorized access for the public (FEIS, Sections 2.4.1, 3.3.6.1 and Appendix E, Alternative A Map).
8	b	Dowsett	Closing the road is a poor solution because it will affect recreational users; keeping the trail systems open to 4x4s while keeping the road safe seems fair enough.	Thank you for your comment.
9	a	Dattage	You have closed enough of our lands already; leave Providence & Millville alone. You have laws in place about going off established roads and trails, just go enforce them.	Thank you for your comment.

Letter #		Name	Comment	Response
10	a	Wallentine	We would like to request that you keep this area open to jeep access; it is some of the most spectacular scenery in the west.	Under Alternative A, the 1 mile-long Top of Spring Hollow Road (20126) would be changed from "high clearance vehicle" to ATV; under the sub-alternative A.1, it would remain open to all high clearance vehicles (FEIS Sections 2.4.1 and 3.3.6.1). All other routes shown on the map would remain open to motorized use including "high clearance" vehicles (FEIS, Appendix E, Alternative A Map).
11	a	Ward	Please do not shut down another 4x4 area; the Providence-Millville canyon areas have been a favorite of my family for generations.	Under Alternative A, the 1 mile-long Top of Spring Hollow Road (20126) would be changed from "high clearance vehicle" to ATV; under the sub-alternative A.1, it would remain open to all high clearance vehicles (FEIS Sections 2.4.1 and 3.3.6.1). All other routes shown on the map would remain open to motorized use including "high clearance" vehicles (FEIS, Appendix E, Alternative A Map).
12	a	David	I do not like either alternative, but the proposed alternative is better than closing the whole area. We drive the area by jeep very often.	Thank you for your comment.
12	b	David	The State should take care of the cable and relocate it or fix the road and cover it.	The State and the Forest Service are cooperating in this project. The poorly located roads are causing resource damage and causing the power cable to become increasingly exposed; the road can no longer be maintained in its current location nor can the power cable be successfully covered for any length of time, due to erosion (FEIS, Sections 1.3 and 3.6.3).
12	c	David	The road has not had adequate maintenance for years; people have to drive around deep mud holes and trees in the roads.	That is correct, as noted in the FEIS, Section 3.6 Soil and Water.

Letter #		Name	Comment	Response
12	d	David	I don't see the need to build new roads that won't be maintained anyway; the better the road the more people will travel it and the more erosion.	Although the comment may be somewhat speculative, the analysis indicates erosion and sedimentation would be reduced by relocating the roads off steep slopes and out of drainage bottoms (FEIS, Section 3.6 Soil and Water).
13	a	Weaver	While it is laudable to replace an unsustainable road with a sustainable one (under Alternative A), I urge you to keep road 20126 open to full-sized vehicles.	A sub-alternative was added to the proposed action to address the issue of 4x4 access on the Top Spring Hollow Road 20126 (FEIS Section 2.4.1.1).
14	a	Cook	I have used Millville and Providence Canyon roads for many years and it seems the access is becoming more and more restricted by closing more and more roads. No need to maintain the old jeep roads, just keep them open so we have access..	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
15	a	US Dept of Interior	The USDI has reviewed the DEIS and has no comments.	Thank you.
16	a	Raehl	I would ask that you please look at any alternative that will maintain access by 4x4 recreation vehicles in this area; many of us are concerned about environmental damage and have volunteered time with projects in this and other areas and would continue to do so.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
17	a	No Name	You keep closing all these areas that have been open for many years; don't close any more.	Thank you for your comment.

Letter #		Name	Comment	Response
18	a	Ott	Many of the roads that would be closed by alternatives A or B have been used for many years; I recommend that no roads or trails be closed to access.	Alternative C, the no action alternative, would not close any roads. However, the poorly located roads would continue to erode and produce sediment, increasingly exposing the high voltage power cable (FEIS, Sections 1.3 and 3.6). Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
19	a	Leipheimer	I think this area should be left open as it is; do not close anymore area.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
20	a	Klabenesh	I oppose any and all road closures.	Thank you for your comment.
21	a	Stevens	High clearance 4x4 recreation is an important and legitimate use of appropriate public lands. I understand the need for relocation and support Alternative A.	Thank you for you comment.
21	b	Stevens	However, why can't FR 20126 be maintained as a "difficult rated" 4x4 route instead of "ATV only"? I'm sure local clubs would help maintain the route.	A sub-alternative was added to the proposed action to address the issue of 4x4 access on the Top Spring Hollow Road 20126 (FEIS Section 2.4.1.1).
22	a	Evans	We have enough wilderness in Utah; we do not need to close any more roads & trails to 4x4's & ATV's.	Thank you for your comment.
23	a	Alderman	I am opposed to closing 4x4 access in Millville/Providence canyons; I would prefer you enforce laws and allow local 4x4 groups to patrol for offenders. Please do not close this area to 4x4 use.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
24	a	Fowers	I have used this area for many years; I strongly object to closing any public areas to 4x4's or ATV's. Public lands are for public use.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).

Letter #		Name	Comment	Response
25	a	Harrison	It is very important to my family to have access to these areas; I support Alternative C; Alternative A would be my next choice. Our jeep club would volunteer to help.	Alternative C, the no action alternative, would not close any roads. However, the poorly located roads would continue to erode and produce sediment, increasingly exposing the high voltage power cable (FEIS, Sections 1.3 and 3.6). Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
26	a	Duersch	I absolutely want to keep access open to Mount Logan and Inspiration Point.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
26	b	Duersch	I can see some benefit in Alternative A, but I prefer Alternative C "do Nothing"; perhaps route the road different, but keep access to the peaks.	Alternative C, the no action alternative, would not close any roads. However, the poorly located roads would continue to erode and produce sediment, increasingly exposing the high voltage power cable (FEIS, Sections 1.3 and 3.6). Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
26	c	Duersch	Alternative A would close 4x4 access to Inspiration Point; it should be possible to design the re-connecting road to remain open to 4x4's and UTV's.	A sub-alternative was added to the proposed action to address the issue of 4x4 access on the Top Spring Hollow Road 20126 (FEIS Section 2.4.1.1).
26	d	Duersch	Alternative B is unacceptable; I am disappointed in the trend towards closing more roads.	Thank you for your comment.
27	a	Heiner	Stop closing our backcountry; we should not be restricted in our access to enjoy the great outdoors.	Thank you for your comment.

Letter #		Name	Comment	Response
28	a	Lockhart	I propose that no action be taken; access to our public lands is what everyone needs to use and enjoy them.	Alternative C, the no action alternative, would not close any roads. However, the poorly located roads would continue to erode and produce sediment, increasingly exposing the high voltage power cable (FEIS, Sections 1.3 and 3.6). Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
28	b	Lockhart	OHV use is a valid form of recreation on our public lands; use the term OHV not ORV because we do not want to go off roads; don't close the roads.	Thank you for your comment.
29	a	Turner	I am a member of a jeep club and participate in work projects on the WCNF; as a regular trail user I prefer Alternative C; knowing this doesn't meet the DEIS requirement, then Alternative A is the best option. Please consider a modification to keep FR 126 open to 4x4's.	Alternative C, the no action alternative, would not close any roads. However, the poorly located roads would continue to erode and produce sediment, increasingly exposing the high voltage power cable (FEIS, Sections 1.3 and 3.6). Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
30	a	Hawkes	I encourage you to find a solution that works and keeps routes open to 4x4 and motorcycle traffic.	Thank you for your comment.
31	a	UEC	We would like to see all decommissioned roads ripped and seeded with native (not exotic) plant seed only.	Mitigation measures designed to effectively close old roads, included in all action alternatives, include drainage, scarifying, contouring, and native-seeding all decommissioned roads (FEIS, Section 2.5, Aquatics and Soil and Water).

Letter #		Name	Comment	Response
31	b	UEC	The DEIS says that 1/4 mile of new ATV trail will be constructed to connect to FR 126; UEC discourages creating new ATV trails which can lead to additional illegal and unauthorized motorized use of the forest.	The 1/4 mile connector trail is necessary to provide access to the Top of Spring Hollow Road which is an open route on the Logan District Travel Plan. It is somewhat speculative to predict that new ATV routes may lead to unauthorized use.
31	c	UEC	UEC would like to see details of the planned monitoring of effectiveness of mitigation measures used to close old roads.	Monitoring information was added at Section 2.5.1.
31	d	UEC	The DEIS adequately addressed the potential effects of the project on, for example, the lynx, as required by the Best Available Science standard; however, the analysis is wanting in regard to the snowshoe hare.	Additional information has been added to the FEIS to clarify the determination of effects for the snowshoe hare. (FEIS, Section 3.8.6.2).
31	e	UEC	The WCNF revised its Forest Plan pursuant to the 1982 regulations and should follow the direction for MIS at 36 CFR 219.19.	The analysis follows the Revised Forest Plan (2003) which provides direction for monitoring of identified MIS species.
32	a	Marshall	I am very opposed to the closing of these roads; Providence Canyon is one of the only technical jeep trails left.	Thank you for your comment.
32	b	Marshall	I was up there last weekend and did not see any cable exposed; just bury it deeper and leave the road open.	Photos were added to the FEIS to illustrate the steep, rocky, poorly drained roads and the exposed portions of the cable. The poorly located roads will continue to erode and produce sediment, increasing the exposure of the high voltage power cable (FEIS, Sections 1.3 and 3.6).
32	c	Marshall	Closing more roads will just lead to more congestion in the areas that are left.	Thank you for your comment.

Letter #		Name	Comment	Response
33	a	Borg	The proposed action looks good except FR 20126 should be kept open to 4x4's and Utility Type Vehicles (UTVs) because they would lose access to Inspiration Point; an alternative connecting route is attached.	A sub-alternative was added to the proposed action to address the issue of 4x4 access on the Top Spring Hollow Road 20126 (FEIS Section 2.4.1.1).
33	b	Borg	Alternative B, close roads, is unacceptable because it would eliminate access to most of the forest accessed from Providence and Millville canyons.	Thank you for your comment.
33	c	Borg	The elk patch analysis used a constant set-back on a flat projection of the project area and gives a false impression of the impact on elk habitat; adjustments in future elk patch analysis should be made to compensate for discontinuous terrain and densely wooded areas that provide considerable disturbance buffers.	As stated in the FEIS, Wisdom, et al (2004) found that recreational activities have a substantial effect on elk behavior. Although it would be appropriate to adjust the effect on elk behavior based on terrain features (such as dense forest cover or hilly terrain) these adjustment factors have not been developed and would likely be difficult to determine due to considerable variation in the natural environment. However, the model (miles of and distance from roads/activity) was consistently applied to all alternatives, and therefore, displays the relative effect on elk between alternatives (FEIS, Section 3.8.6.1).
33	d	Borg	Past road closures have considerably reduced motorized recreation opportunities and access on the Logan RD. Closures have also affected single track motorcycle use and opportunities; given the extensive closures on the Logan RD, any additional loss has a significant effect on motorized trail opportunities.	Clarifying language has been added to FEIS, Section 3.3.7, acknowledging decommissioning of roads/trails not open under the District Travel Plan. Decisions regarding the amount and mix of motorized opportunities on the District are beyond the scope of this analysis. Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use, and under Alternative A.1, Road 20126 would remain a high clearance vehicle road.

Letter #		Name	Comment	Response
34	a	Kruitbosch	Please preserve access for OHVs (including motorcycles and ATV's); I feel that Alternative A would enable the best combination of responsible management and access to those who want to enjoy the beauty and challenge of this great area.	Under Alternative A (proposed action) all routes shown on the Alternative A Map would remain open to motorized use (FEIS, Section 2.4.1 and Appendix E, Alternative A Map).
35	a	EPA	There are no mitigation measures that directly address whether, how, or to what degree the power cable could be completely rehabilitated/covered to eliminate the risk; a full engineering analysis of the possibility of covering the cable should be included in the EIS.	Clarifying language regarding the poorly located existing roads, history on attempts to maintain the existing roads, engineering reports on attempted road repairs, and photos were added to FEIS, Sections 1.2.1 and 1.3. Mitigation measures were added to FEIS, Section 2.5 to substantiate effective closure of the old road and complete covering of the power cable to prevent future exposure leading to public safety issues.

Letter #		Name	Comment	Response
35	b	EPA	We are concerned about the proposed application of the "exceptions" provisions of prohibition of road construction under the 2001 Roadless Rule. We could not find documentation identifying resultant impacts to natural resources including water quality, wildlife, and native vegetation; more information is needed to support the conclusion that "irreparable resource damage" has occurred.	Irreparable resource damage is documented in the FEIS, Section 2.4.1 (page 2-4) "these sections are being decommissioned and relocated upslope out of the stream channel to improve degraded resources conditions resulting from poor road locations". Further documentation is provided in the FEIS, Section 2.5 (page 2-7, Soil and Water) "to avoid wet areas, move FR 168 from saddle between Mill Hollow and Providence Canyon to intersection with FR 042 out of the bottom of the drainage". Additional information is provided in the FEIS, Section 3.6.3 (page 3-350 "poor watershed health conditions exist in the upper Providence watershed due to poor road location and conditions of road network" and page 3-36 "poor watershed conditions (eroded slopes and gullies) exist at many locations that will be rendered obsolete by construction of the new route." Photos were added to FEIS, Sections 1.2.1 and 3.6 to illustrate the poorly located roads and irreparable resource conditions.
35	c	EPA	We are concerned that the impacts of new road construction and resultant loss of acres to these roadless areas could be significant; if mitigation is not successful impacts to watersheds and roadless areas will be increased by this project".	Mitigation measures were added to the FEIS, Section 2.5 to make certain the decommissioned roads would be effectively closed and the cable completely covered. A monitoring section was added to the FEIS, Section 2.5.1 to monitor effectiveness of mitigation measures. Pertaining to effects on roadless areas, clarifying information was added to the FEIS, Section 3.4 to emphasize the negligible effect on the three roadless areas. Of the total 31,500 acres in the three adjacent roadless areas, there would be a total of 87 acres affected by the road relocation under Alternative A (the proposed action).

Letter #		Name	Comment	Response
35	d	EPA	The DEIS states there are 8 locations where the new roads will intersect existing roads; decommissioning at these points should include effective barrier placement to preclude future use of the road.	Mitigation measures were added to the FEIS, Section 2.5 to substantiate effective closure of the old roads to prevent any use in the future.
36	a	Mason	I want to ask you to keep all roads and trails open.	Thank you for your comment.