

Recreation Residence
Response to Comments

Appendix B. Response to Comments

Letter #		Name	Comment	Response
1	a	J. Rangesan-Birch Glen	Impacts of rec residence sites are small in comparison to the Forest as a whole.	Yes. As indicated in the EA, only 36.73 acres are encumbered by the rec residence sites.
1	b	J. Rangesan-Birch Glen	Most resource impacts occurred in the development stage of tract instigation and there have been minimal impacts since that time.	There has been no generic documentation indicating improvements that have occurred since tract inception, only tract specific or cabin specific improvements have been recorded.
1	c	J. Rangesan-Birch Glen	Birch Glen Cabin 3 has a long history of compliance with the Forest Service.	Agree. There have only been minor compliance issues noted in past records concerning Birch Glen 3.
1	d	J. Rangesan-Birch Glen	There is a contradiction between the PEA and direction given from Cache County Fire as it relates to clearing issues.	This has been clarified in Chapter 1, issue 2
1	e	J. Rangesan-Birch Glen	Gravel or bark mulch are inappropriate for surfacing.	EA states that washed or crushed rock or bark are appropriate. This is keeping in line with the natural setting that is sought for the rec residence community.
1	f	J. Rangesan-Birch Glen	Limits of trimming to 7 ft further compromise the fire safety of Birch Glen 3	Exception 1 noted in Appendix D footnote can be applied in some instances.
1	g	J. Rangesan-Birch Glen	The FS should adopt the "Living With Fire" Guidelines even though some of these areas are riparian.	This has been clarified in Chapter 1, issue 2
1	h	J. Rangesan-Birch Glen	Residents are concerned that naturally downed trees in and along the river will cause flooding issues.	Although the EA recommends keeping downed trees greater than 5" in diameter, if trees are deemed hazardous they can be removed per Rec Residence Guide. Also see * footnote in Appendix D
1	i	J. Rangesan-Birch Glen	Scenic views will be eliminated if vegetation management practices itemized in PEA are implemented.	Riparian vegetation will reestablish along the river corridor, but the regrowth should not significantly alter the view of the river.
1	j	J. Rangesan-Birch Glen	Removal of berms will cause ground disturbance and flooding issues	This item addressed in Chapter 3, section 3.2, Proposed Action
1	k	J. Rangesan-Birch Glen	Time period for sandbag allowance is too short.	Traditionally, all high flood waters have usually dispersed prior to July in any given year. Exceptions to this may be noted in individual operation plans.
1	l	J. Rangesan-Birch Glen	Minimal gain of additional riparian areas does not offset maximum benefits of recreational opportunities at rec residence sites.	Thank you for your comment.

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2	a	J. Rangesan-Birch Glen	Letter announcing issuance of PEA should have indicated changes that would affect permittees, changes which had not been previously been indicated to cabin owners.	FS chose to issue generic letters and allow constituents to access the PEA via a web site location, to have the PEA mailed to them, or to pick up the PEA at the local district office.
2	b	J. Rangesan-Birch Glen	Timing for issuance of the PEA was poor.	Notice taken.
2	c	J. Rangesan-Birch Glen	Several issues addressed in the PEA are of concern to interested parties.	Thank you for your comment.
2	d	J. Rangesan-Birch Glen	Requirements addressed in the PEA will require compliance with the National Historic Preservation Act.	This has been recognized and is addressed in section 3.7.2 of the PEA.
3	a	B. Humberstone, Birch Glen	Berm removal may have negative effects on resources.	This item addressed in Chapter 3, section 3.2, Proposed Action
3	b	B. Humberstone, Birch Glen	Berm or sandbag removal is responsibility of individuals, not "tract" as a whole.	This item clarified in Chapter 3, section 3.2.2.
3	c	B.Humberstone, Birch Glen	PEA states that drainage alterations would be corrected in the future and should not preclude permit reissuance.	Nothing in EA states that permits will not be issued until drainage issues are addressed.
3	d	B. Humberstone, Birch Glen	Changes to the river have not had a negative impact on wildlife.	If rec residence areas were discontinued, an increase in wildlife numbers would most likely not be detectable (Sec. 3.1.3)
3	e	B. Humberstone, Birch Glen	Berms & culverts are providing a good channel drainage.	This item addressed in Chapter 3, section 3.2
3	f	B. Humberstone, Birch Glen	FS and Health Department have different regulations regarding vault placement.	FS has coordinated and will continue to coordinate with Health Department on requirements for county-related issues such as water/waste disposal systems.
3	g	B.Humberstone, Birch Glen	Birch Glen track road lengths may be reversed in PEA	Mileage clarified in tract table, Chapter 1, Table 1.1
4	a	L. Poulsen & M.Rudick, Birch Glen	Flooding is of primary concern.	Previous measures taken by the FS in conjunction with permittees have helped resolve flooding issues.
4	b	L. Poulsen & M.Rudick, Birch Glen	There is a contradiction between the PEA and direction given from Cache County Fire as it relates to clearing issues.	This has been clarified in Chapter 1, issue 2

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4	c	L. Poulsen & M.Rudick, Birch Glen	Can we be in compliance given the new direction that was issued in the PEA?	Permittees will be notified in annual inspection letters on any non-compliance issues.
5	a	R. Narayanan, Birch Glen	Direction in PEA runs counter to direction found in "Living with Fire" program which delineates different restrictions on mowing, trimming, etc.	This has been clarified in Chapter 1, issue 2
5	b	R. Narayanan, Birch Glen	Likelihood of flooding will increase if berms are eliminated and if downed trees/branches are allowed to stay in the river.	This item addressed in Chapter 3, section 3.2
5	c	R. Narayanan, Birch Glen	There will be a significant cost to cabin owners to repair flood damage or remove berms.	This item addressed in Chapter 3, section 3.2
5	d	R. Narayanan, Birch Glen	There will be a cost to owners in removing fire pit.	Amenities such as these can be conditionally approved on permit. If they are destroyed, they will not be rebuilt in same location.
5	e	R. Narayanan, Birch Glen	There will be a loss of recreational and wildlife viewing on the lot if no trimming is allowed. Safety will be an issue.	Exception noted in footnote of Appendix D
5	f	R. Narayanan, Birch Glen	Property values will decrease because the opportunity spectrum will be decreased.	Property valuation outside the scope of this EA.
6	a	M.Houston, Birch Glen	Existing berms were placed there to curtail flood damage and were placed under the direction or blessing of the Forest Service.	This item addressed in Chapter 3, section 3.2
6	b	M.Houston, Birch Glen	Measures have been taken to eradicate noxious weeds, but other vegetation has been left intact.	Excellent. This is what the EA recommends.
6	c	M.Houston, Birch Glen	Reconsider the request to remove the berms.	This item addressed in Chapter 3, section 3.2
7	a	UEC	UEC appreciates being involved in review process.	Thank you for your comment.
7	b	UEC	FS needs to add an alternative that addresses Fire Wise principles.	Addressed in Chapter 1, Issues Dismissed, item 2. "In this particular area, the fire hazard of recreation residences is fairly low due to the riparian vegetation and proximity to water." The Wasatch-Cache Recreation Residence Administrative Guide states that structures will meet the recommendations of defensible space and Firewise guidelines.
7	c	UEC	FS needs to account for short and long-term consequences of future actions such as removal of cabins from sites.	FS is advised and has addressed removal in each resource section of Chapter 3

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7	d	UEC	Permits for roads, water systems, & utilities should not be folded into new permits.	Permits for these amenities will be held by the association, and will be separate from individual cabin owner permits.
7	e	UEC	Chapter 3 does not disclose the extent of impacts rec residences have had on MIS species.	Our responsibility at the projet level is to determine the project's effects on MIS population trends. MIS population trends are monitored according the Forest Plan requirements. See section 3.1.1 of EA for MIS effects.
7	f	UEC	Choosing goshawk as an indicator species may be erroneous because none of the indicators exist.	MIS species are determined on a Forest-wide basis at the direction of the Forest Plan. Each species may or may not be present within any project area. Each alternative for every Forest project is examined with respect to impacts that may occur to each MIS.
7	g	UEC	The "no action" alternative would have more detrimental short term effects than disclosed, but more beneficial long term effects than disclosed.	Short and long term effects have been analyzed in EA.
7	h	UEC	The FS should impose intelligent Fire Wise codes or standards to these areas.	Multiple fire prevention requirements are outlined in the Rec Residence Administrative Guide, as well as other documentation provided to permittees.
7	i	UEC	The EA should also consider addressing items such as economics and wildfire urban interface issues.	Lease rates do not affect the decision to continue or not continue the rec residence tracts. Wildfire interface issues have been addressed in the Rec Residence Guidebook.
7	j	UEC	Include a waiver in permit of USFS responsibility or obligation to log, cut trees, mulch brush, spray herbicides or do prescribed burning in recreation residence areas as a form of fire preventative nature.	Permits and the Rec Residence Guide list requirements for permittee responsibility in relation to fire prevention. Fire prevention measures are also provided in supplemental "fire wise" documentation. Major fuel hazard reduction programs would require additional environmental analysis.
7	k	UEC	Research has shown that fire hazards can be most effectively reduced by focusing on reducing structure ignitability and fuels in the immediate surroundings.	Agree. Efforts are being taken through the Rec Residence Guide to reduce structure ignitability and to reduce fuels in non-riparian areas.
7	l	UEC	FS needs to incorporate research and recommendations found in research documents and at fire wise websites.	The Logan Ranger district has freely shared with permittees documents such as "Firewise landscaping for Utah", "Birch Glen and Beirdneau Fire Plan," "Living with Fire" brochure, etc.

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7	m	UEC	FS should evaluate the ignitability of each recreation residence with fire wise principles.	Recreation residences are inspected annually to ensure they are practicing firewise principles, i.e., spark arrestors in chimneys, no wires in trees, follow recommended clearance allowances, etc.
7	n	UEC	FS should evaluate the landscape immediately surrounding each structure for ignitability.	This evaluation is part of the annual inspection. Permittees are advised to use firewise landscaping.
7	o	UEC	Amend permits to transfer obligation to maintain fire wise principles.	This has already been done and is included in the Wasatch-Cache Recreation Residence Administrative Guide. If there is a conflict between Firewise principles and a particular resource management function, then the Authorized Officer will discuss the situation with the resource specialists in order to mitigate any potential conflicts, and will recommend to the District Ranger the best management practices.
7	p	UEC	Reassess market value of these permits and adjust lease rates.	Appraisals are done on a 10-year cycle for all recreation residence tracts. Land is appraised as limited recreation use with the improvements such as roads and utilities inventoried per direction specific to the Cabin Users Fee Fairness Act (CUFFA). Permittees are given appraisal results and are given options to have a second appraisal done at the permittee's cost, a peer review at the permittee's cost or to accept the amount. This process, which is part of CUFFA has been accepted by both the Forest Service and the permittees.
7	q	UEC	Re-evaluate the appropriateness of continuing or terminating permits.	National direction is to continue recreation residence tracts that are consistent with the Forest plan.
7	r	UEC	Some recreation residences appear to be out of compliance with local ordinances, especially in riparian areas.	Permits require compliance with state, county, and local regulations. See section 1.2 Background (paragraph 4).
7	s	UEC	FS should encourage denial of renewal of diversion systems.	The 2003 Wasatch-Cache Forest Plan Standard S5 provides direction for the determination of permit renewal for diversions that may affect aquatic resources. Water diversions must have valid water rights or agreement with water right holders and be on approved permitted systems.

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7	t	UEC	FS should use the Forest Plan for implementing and approving this proposed action, as the 2005 NFMA regulations are illegal.	Forest Plan will be followed before implementing the proposed action.
7	u	UEC	How will implementation of the proposed project affect TES/MIS in the area?	TES and MIS have been analyzed in the EA (Chapter 3, sec 3.3.2 and sec 3.1.1)
7	v	UEC	Only native plantings should be allowed.	This requirement is stipulated in the Rec Residence Guidelines.
7	w	UEC	Project area should be surveyed for TES plants/habitat.	TES plants/habitat were surveyed prior to EA (see section 3.3.2)
7	x	UEC	FS should take measures to ensure the proposed action does not impact wildlife, aquatic species or birds and their associated habitats.	These measures have been outlined in the EA and in the Rec Residence Guidelines.