

Response to Comments

Motorized Travel Management Environmental Assessment

Cleveland National Forest
USDA-Forest Service, Pacific Southwest Region
Riverside and San Diego Counties, CA

The comment period for the environmental assessment ended August 15, 2008. Comment letters, written forms, and emails were received from the public. A few emails with identical or near-identical wording were received from different sources as described in the prelude to comments 12.1 and 13.1. Public comments are outlined below, followed by the Forest Service responses.

1 – California Association of 4 Wheel Drive Clubs (CA4WDC), July 23, 2008 letter

Comment 1.1: CA4WDC does object to the continued use of the term “unauthorized routes” as it is prejudicial and skews the discussion about routes of travel used for recreation purposes. It is understood that many routes within the Forest may not have been planned or are located in inappropriate areas. However, that does not make them “unauthorized routes” absent specific documentation showing them to be in violation of previous land management plans.

Response 1.1: The term “unauthorized route” has standard usage throughout Region 5 of the Forest Service and refers to routes that are not explicitly included in a national forest’s transportation system. For consistency across the Forest Service, we will continue to use the term.

Comment 1.2: CA4WDC is concerned about the meaning of one paragraph presented to the public explaining the differences between Alternative 2 and Alternative 3.... That paragraph is quoted below:

- 1. Prohibit cross-country wheeled motorized vehicle travel by the public off designated National Forest System roads, trails, and areas, except as allowed by permit or other authorization in the Corral Canyon and Wildomar OHV areas.*

One way to read the above paragraph indicates that the Forest travel management applies only to the Corral Canyon and Wildomar OHV areas.

Response 1.2: Currently, cross-country wheeled motorized travel by the public is allowed only in the Corral Canyon and Wildomar OHV areas, roughly 2,160 acres in sum, and is prohibited on the remainder of the Cleveland NF. The project proposes to reduce the total area open to cross-country OHV use to either 2.2 or 15.0 acres if one of the action alternatives is selected, or to keep the total area open to cross-country OHV use at 2,160 acres if the no action alternative is selected. No matter which alternative is selected, however, cross-country OHV use on the remainder of the national forest would still be prohibited.

Comment 1.3: In general, CA4WDC is supportive of Alternative 3 as providing for a recreation opportunity balanced by resource concerns.... The addition of the loop trails within the Corral Canyon OHV area are a rational effort to provide for the growing demand for motorized recreation opportunity in a manner that is consistent with the Forest Land and Resource Planning documents and within parameters of other controlling laws, rules, and regulations.

Response 1.3: Thank you for your comment.

2 – Center for Biological Diversity and The Wilderness Society, August 13, 2008 letter

Comment 2.1: Alternative 3 includes several route additions and authorizations that are likely to result in significant impacts. These include:

Upper Santa Ysabel: 0.03 miles of road addition for access to dispersed recreation sites would affect a Riparian Conservation Area and oak woodland habitat; instead of opening this road and increasing impacts to the Riparian Conservation Area and oak woodland, the user-created route should be permanently closed, decommissioned, obliterated and vehicle barriers installed.

Deer Park: 0.02 miles of road addition for access to dispersed recreation sites would affect a Riparian Conservation Area and oak woodland habitat; instead of opening this road and increasing impacts to the Riparian Conservation Area and oak woodland, the user-created route should be permanently closed, decommissioned, obliterated and vehicle barriers installed.

High Point Site: 0.14 miles of road addition for access to dispersed recreation sites would increase fire hazard; instead of opening this road and increasing fire risk, the Palomar Divide Road and High Point Road should be permanently reclassified for administrative use only and gates and vehicle barriers installed.

Deer Flats/Knob Hill Sites: 0.10 miles of road addition for access to dispersed recreation sites would increase fire hazard; instead of opening this road and increasing fire risk, the Palomar Divide Road and High Point Road should be permanently reclassified for administrative use only and gates and vehicle barriers installed.

Corral SDTR: addition of 12.8 acres of open area in Corral Canyon OHV area containing rocky outcrop habitat for three Regional Forester sensitive reptile species—San Diego mountain kingsnake, coastal rosy boa, and San Diego ringneck snake.

Response 2.1: With regard to the Upper Santa Ysabel comment, the 0.03 miles of proposed road addition have been removed from Alternative 3 but may be considered for addition to the Cleveland NF transportation system at a future date. With regard to the Deer Park comment, the 0.02 miles of proposed road addition have been removed from Alternative 3 but may be considered for addition to the Cleveland NF transportation system at a future date. With regard to the High Point and Deer Flats/Knob Hill site comments, National Forest System roads are subject to temporary closures or restrictions due to elevated fire danger levels, so these roads may be closed during such times.

With regard to the Corral SDTR comment, no additional acres of open area in the Corral Canyon OHV area are proposed under any alternative. Under Alternative 3, the total area open to cross-country vehicle

use in the Corral Canyon OHV area would be reduced from approximately 1,800 acres to 14.8 acres. Included in the 14.8 acres are several sites, totaling 12.8 acres, that are currently used for motorcycle and bike trial riding, and would remain open to such activities. The remainder of the Corral Canyon OHV area would be closed to cross-country travel off designated National Forest System roads and trails. Please see section 3.3 of the environmental assessment for a full discussion of the species mentioned in the comment.

Comment 2.2: “Although the impacts of Alternative 3 are reduced in comparison to Alternative 2, and Alternative 3 incorporates additional mitigation in the form of new barriers and inspection and increased effectiveness of barriers already in place, the EA does not demonstrate that all the impacts of Alternative 3 are reduced below the level at which an EIS must be prepared. Accordingly, Alternative 3 should be modified to exclude the route additions/authorizations described above [see Comment 2.1] or an EIS must be prepared.”

Response 2.2: The segments in Alternative 3 (as described in the environmental assessment that was released for public comment in July 2008) that intersected riparian conservation areas were removed from Alternative 3 in the environmental assessment released in conjunction with the decision notice and finding of no significant impact in November 2008. No road segments in the selected alternative intersect riparian conservation areas or arroyo toad habitat. See Response 2.1.

Comment 2.3: “NEPA requires that an EA must evaluate a reasonable range of alternatives to the agency’s proposed action, to allow decision-makers and the public to evaluate different ways of accomplishing an agency goal.” ... The EA evaluates only three alternatives, including Alternative 1, the no action alternative. Inclusion of only one alternative to the proposed action (in addition to the mandatory no action alternative), when the Forest Service had ample documentation to evaluate and alternative involving closure of existing designated routes and unauthorized/undetermined routes, fails to meet NEPA’s requirement that the agency take a hard look at the environmental consequences of the proposed action.

Response 2.3: The environmental assessment identifies the scope of action for the project in section 1.1.3. In summary, the environmental assessment states that “[p]revious decisions concerning road construction, reconstruction, closures, decommissioning, trail construction, type of use, and seasonal restrictions for motorized use are outside the scope of this proposal.” Further, the environmental assessment states that through travel analysis, the Cleveland NF “identifies discrete projects, prioritizes them, and builds them into the future program of work. Only those projects within the capability of the Cleveland NF are brought forward by the responsible official and carried forward in accordance with the purpose and need for action.”

The purpose and need for the project was not to analyze the entire transportation system and determine whether any existing designated routes should be closed, it was to analyze potential regulation of motorized vehicle travel by the public in the Corral Canyon and Wildomar OHV areas, and to analyze potential limited changes and additions to the transportation system in order to provide wheeled motorized access for dispersed recreation activities (see section 1.2 in the environmental assessment).

With regard to the range of alternatives, the Council on Environmental Quality notes that the range of alternatives includes “all reasonable alternatives which must be rigorously explored and objectively

evaluated, as well as those other alternatives, which are eliminated from detailed study with a brief discussion of the reasons for eliminating them.” The travel management environmental assessment analyzed three alternatives in detail and one alternative that was considered but eliminated from detailed analysis (see Chapter 2 of the environmental assessment).

Alternative 3 was developed in response to public scoping on the proposed action (Alternative 2). Alternative 3 incorporated many of the recommendations provided by the Center for Biological Diversity and other members of the public. As cited above, the reasonable range of alternatives—including the proposed action and the no action alternative—must evaluate different ways of meeting an *agency* goal, which in this case is reflected in the purpose and need for the project. The Forest Service is under no obligation to analyze all potential alternatives.

Comment 2.4: The EA does not adequately describe or disclose the significance of the general impacts to plants and wildlife associated with the proposed action, much less distinguish between the effects of Alternative 2 and Alternative 3. For example, for “Action Category 2: Construction of new motorized trails,” the EA merely states that “[n]et adverse effects of direct vegetation and plant habitat loss would be long-term but small in scale” and “[t]his activity will result in a loss of habitat and an increase in long-term wildlife effects associated with the presence of a road. Since the amount of this activity being proposed is small, the effects are relatively minor.” EA at p. 3-14.

As an initial matter, this discussion does not evaluate whether the proposed action’s general plant and wildlife impacts may be *significant*, as required by NEPA. 40 C.F.R. 1502.3 (EIS required for major federal actions significantly affecting the quality of the human environment); 40 C.F.R. 1508.9(a) (EA is used to determine whether to prepare an EIS or a finding of no significant impact); 40 C.F.R. 1508.27 (significance criteria). An effect may be “small in scale” or “relatively minor” yet still result in a potentially significant direct, indirect, or cumulative impact. *See Neighbors of Cuddy Mt. v. United States Forest Serv.*, 137 F.3d 1372, 1380 (9th Cir. 1998) (“General statements about ‘possible’ effects and ‘some risk’ do not constitute a ‘hard look’ absent a justification regarding why more definitive information could not be provided.”) The EA thus provides insufficient guidance as to whether these impacts are significant or whether an EIS must be prepared.

Response 2.4: General effects on plants and wildlife are not significant. NEPA requires a finding of significant or non-significant effects based on the context of effects (in this case, small scale effects on a small number of acres, relative to a large project area) and the intensity of effects with regard to 10 factors: Adverse effects associated with “beneficial projects”; effects on public health or safety; unique characteristics of the geographic area (e.g., historic resources, park lands, prime farmland, wetlands, wild and scenic rivers, ecologically critical areas); degree of controversy; degree of highly uncertain effects or unique or unknown risks; precedent-setting effects; cumulative effects; adverse effects on scientific, cultural, or historical resources; adverse effects on endangered or threatened species or designated critical habitat (pursuant to the Endangered Species Act); and violations of federal, state, or local environmental law. None of these 10 factors is applicable to the effects on general plants and wildlife. See responses 2.1 and 2.2.

Comment 2.5: [T]he EA does not distinguish between the general plant and wildlife impacts of Alternative 2 and Alternative 3, despite the fact that Alternative 2 will allow authorization of approximately 3.2 miles of new motorized trails, user created-trails, and user-created access roads that would not be authorized under Alternative 3. The routes that would be created under Alternative 2 but

not under Alternative 3 are also generally located in the most sensitive areas, including Riparian Conservation Areas, oak woodland, and habitats for sensitive, threatened, and endangered species. EA at pp. 2-3 – 2.6. Nonetheless, the EA fails to compare the alternatives or evaluate the context of the impacts as required by NEPA. 40 C.F.R. 1508.27. If (as the EA subsequently acknowledges at p. 3-21), the proposed action will have a significant environmental effect, an EIS must be prepared.

Alternative 3 also includes mitigation measures that would provide for new barriers and inspection and increased effectiveness of barriers already in place to limit motorized access and reduce unauthorized use. The inclusion of these mitigation measures indicates that there are significant, unmitigated impacts associated with Alternative 2.

Response 2.5: See comparison tables in sections 2.2 and 3.3 of the environmental assessment. Alternative 3 does not include barriers to mitigate effects; it does describe reinforcing existing barriers to implement prior NEPA decisions.

Comment 2.6: The EA speculates that there will be benefits from the addition and designation of user-created motorized trails and dispersed recreation access roads. EA at pp. 3-14, 3-15. As the EA acknowledges, however, use of these routes “would presumably increase relative to existing levels of unauthorized travel.” EA at pp. 3-14, 3-15. There is no basis for concluding that the benefits of authorization and designation of the user-created routes outweigh the impacts. Indeed, the EA does reach such a conclusion.

In the case of the addition of open motorized use areas in existing open areas, however, the EA *does* conclude that the impacts of increased use, including potential increased off-route use, “would likely be offset by improved management of the system.” EA at 3-15. No evidence supports this conclusion, nor is there any explanation as to how the additional open motorized use areas would improve management of the system.

Response 2.6: Section 3.3.6.3 of the environmental assessment has been modified to remove the wording described above with regard to user-created trails and new roads. In addition, the wording in reference to the open area modifications has been changed to recognize the net beneficial effect on areas that will be closed to motor vehicle use.

Comment 2.7: The EA states that “[i]n general the effects to sensitive wildlife species from motorized vehicle use on roads, trails and cross country were described in the previous section on General Wildlife and Plants.” EA at p. 3-16. As discussed above, however, the EA does not adequately describe or disclose the significance of the proposed action’s general impacts to plants and wildlife, nor does it distinguish between the effects of Alternative 2 and Alternative 3. This deficiency also applies to the EA’s discussion of sensitive wildlife species.

Response 2.7: See Response 2.4 regarding general effects on plants and wildlife. Analysis of project effects on sensitive species is provided in the biological evaluation and summarized in the environmental assessment. See sections 2.2 and 3.3 of the environmental assessment for a comparison of alternatives and a discussion of biological resources.

Comment 2.8: The EA concludes that, although the large-blotched ensatina salamander has potential habitat in the project area, the majority of routes considered in the proposed action are in drier, more open habitats, so there should be little effect on this species.... The EA thus fails to disclose potential impacts to the large-blotched ensatina salamander, and fails to disclose the relative impacts of Alternative 2 versus Alternative 3.... As the EA also indicates that potential habitat for the large-blotched ensatina salamander may be affected, the EA must fully assess and disclose potential impacts to this species, and if impacts remain after mitigation, an EIS must be prepared....

[T]he EA's discussion of the proposed action's impacts to the two-striped garter snake is inadequate.... [T]he EA must fully assess and disclose potential impacts to this species, and if impacts remain after mitigation, an EIS must be prepared....

The EA notes that other sensitive reptiles are found in the project area and may also be affected, including the California legless lizard, San Diego horned lizard, coastal rosy boa, San Diego ringneck snake, and San Diego mountain kingsnake.... [T]he EA is silent as to the proposed action's effects on these species....

The EA is silent as to the relative effects of Alternative 2 and Alternative 3 on sensitive reptiles, despite the fact that Alternative 3 would open 12.8 acres of rock outcrops to motorized use in the Corral Canyon OHV area. These rocky areas are prime habitat for the San Diego mountain kingsnake and also provide habitat for the coastal rosy boa and San Diego ringneck snake. The EA must disclose and evaluate the relative impacts of the alternatives on sensitive reptile species, and if significant impacts remain after mitigation, an EIS must be prepared.

The EA states that "[s]ensitive wildlife species affected by the action alternatives would experience neutral or very minor effects. Selection of alternatives 2 or 3 is not expected to contribute to cumulative effects on those species." EA at p. 3-19. The EA, however, provides insufficient information and analysis to conclude that sensitive wildlife species would experience neutral or very minor effects. On the contrary, Alternative 2 would affect Riparian Conservation Areas and oak woodland habitat with the potential to cause more than minor impacts on sensitive species. Alternative 3 would avoid most, but not all, of these impacts. Moreover, the EA fails to conduct any cumulative impacts analysis to determine whether impacts to sensitive species – even minor impacts – may be significant. 40 C.F.R. 1508.7 ("Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.")

Response 2.8: Effects on the large-blotched ensatina salamander, the two-striped garter snake, sensitive reptiles, and sensitive wildlife species are analyzed in the biological evaluation. The environmental assessment summarizes these analyses. Effects on sensitive species do not necessarily trigger preparation of an environmental impact statement. See sections 2.2 and 3.3 of the environmental assessment for alternative comparison tables and/or discussions of these species. Cumulative effects to wildlife are discussed for each category in section 3.3 of the environmental assessment.

Comment 2.9: The EA acknowledges that Alternative 2 would add 1.07 miles of new roads in occupied habitat for the arroyo toad, a species listed as endangered under the Endangered Species Act, and that arroyo toads would be adversely affected by this alternative. EA at p. 3-21. The EA's discussion of MIS further recognizes that Alternative 2 will result in direct and cumulative impacts to arroyo toad habitat, and alter forest-wide trends for the species and its habitat. EA at p. 3-27. No measures are provided to mitigate or avoid this impact. Accordingly, Alternative 2 will result in a significant, unmitigated impact, and an EIS must be prepared if Alternative 2 is selected.

Response 2.9: Effects of Alternative 2 on arroyo toads are analyzed in the biological assessment. The environmental assessment presents a summary of this analysis. If Alternative 2 had been selected for implementation, consultation with U.S. Fish and Wildlife Service would have been required and mitigation measures or modification of the proposed action would have occurred.

Comment 2.10: The EA states that "the current rule applicable to project decisions is the 2004 Interpretative Rule, which states 'Projects implementing land management plans ... must be developed considering the best available science in accordance with § 219.36(a) ... and must be consistent with the provisions of the governing plan.' ... The 1982 regulations are currently the only applicable regulations not developed in violation of law, and the EA should rely on these regulations, as well as the Cleveland National Forest LRMP.

Response 2.10: The 2004 Interpretive Rule no longer applies. The wording has been changed in the relevant documents.

Comment 2.11: In addition to the arroyo toad impacts noted above, the EA indicates that Alternative 2 would add approximately 2.0 miles of new roads and trail in song sparrow habitat, the MIS for riparian habitat, and would adversely affect riparian habitat in these areas. EA at p. 3-28. The EA incorrectly states, however, that Alternative 3 would avoid riparian habitat. While Alternative 3 would avoid most of the riparian areas affected by Alternative 2, it still includes the Deer Park and Upper Santa Ysabel road additions in Riparian Conservation Areas. The EA also states that Alternative 3 would impact 0.58 acres of riparian area in the Cottonwood Creek watershed. Accordingly, Alternative 3 may also result direct, indirect, and/or cumulative impacts to the song sparrow's riparian habitat, and must be disclosed and analyzed in the EA.

Response 2.11: Alternative 3 would avoid impacts on riparian areas (see responses 2.1 and 2.2 above). Effects on song sparrow are analyzed in the MIS report and are summarized in section 3.3 of the environmental assessment.

Comment 2.12: Constructing a new route in riparian and aquatic habitat may have a significant effect on both federally-listed species and MIS, as indicated by the acknowledged significant impact on arroyo toads. If the proposed action will result in such an impact, specific, effective mitigation measures must be implemented or an EIS prepared.

Response 2.12: No new route construction is proposed in riparian areas or aquatic habitat as part of any alternative analyzed in the environmental assessment (see Chapter 2 of the environmental assessment). The selected alternative, which removes routes that lie within riparian conservation areas and that may

impact arroyo toad habitat, would have no significant impact on the human environment and therefore would not require preparation of an environmental impact statement (40 CFR 1508.13).

Comment 2.13: The EA discusses the relative visual impacts of Alternative 2 and Alternative 3, but omits any specific discussion of Alternative 3's proposed opening to motorized use of 12.8 acres in the Corral Canyon OHV area containing extensive rock outcrops.... The visual impact to unique landforms, such as the rock outcrops that would be opened to motorized use under Alternative 3, must be disclosed and analyzed in the EA.

Response 2.13: The entirety of the Corral Canyon OHV area, including the 12.8 acres of rock outcrops mentioned above, is currently open to motorized use. The 12.8 acres in question are currently used by OHV recreationists for motorcycle and bike trial riding, which has been an ongoing use of the area. Little visual evidence of recreational impacts exists on the outcrops. Because the use of the 12.8 acres will remain the same as it currently is, visual impacts to the area are not expected to change. See section 3.6 of the environmental assessment for a discussion of landscape aesthetics.

Comment 2.14: The EA asserts that the Cleveland National Forest "was in compliance with the [Memorandum of Intent with the California Off-Highway Motor Vehicle Recreation Commission] and the Travel Management Rule at their inception because of prior transportation analysis contained in the LMP, because the prohibitions contained in Forest Order No. 88-02-1 were already in effect, and because of the roads analysis process that was performed in association with the forest plan revision process." EA at p. 1-3. Although the Forest did include a road analysis process as part of the 2005 LRMP update, it has not performed a travel analysis as required by the Travel Management Rule. The Forest Service's Route Designation Guidebook directs Forests to consider the elimination of unneeded roads and trails as well as route additions.... No such analysis has been performed as part of the current travel management planning process.

Response 2.14: The purpose and need of the project are described in detail in section 1.2 of the environmental assessment. In particular, the purpose and need cited the Travel Management Rule (36 CFR 212) which provides guidance for producing a motor vehicle use map that will identify the roads, trails, and areas on the Cleveland National Forest on which motorized vehicle use is allowed. In addition, the scope of the project is discussed in detail in section 1.1.3 of the environmental assessment, including a recognition that scoping for the project resulted in many suggestions for improving the transportation system through reconstruction, decommissioning, road and trail closures, and restoration projects, and that these suggestions may be considered in future travel management analyses. See also Response 2.3.

Comment 2.15: The EA indicates that the proposed action will require the preparation of an EIS.... In addition, the Forest should complete a full travel analysis prior to any decision, including an analysis of decommissioning roads and existing designated routes and trails inconsistent with the Travel Management Rule and the Forest Service's Route Designation Guidebook.

Response 2.15: Via the decision notice and finding of no significant impact, the responsible official selected Alternative 3 for implementation. The selected alternative, which removes routes that lie within

arroyo toad habitat and riparian conservation areas, would have no significant impact on the human environment and therefore would not require preparation of an environmental impact statement (40 CFR 1508.13). An analysis of decommissioning roads and existing designated routes and trails is beyond the scope of the action and the purpose and need of the project (see sections 1.1.3 and 1.2 of the environmental assessment, respectively).

3 – Center for Biological Diversity, March 14, 2008 letter

Note: The Center for Biological Diversity incorporated by reference its March 14, 2008 letter when it provided comments on the environmental assessment in its August 13, 2008 letter. Most of the substance in the March 14 letter was addressed in the comments provided in the August 13 letter. For completeness, these comments are addressed below.

Comment 3.1: Eliminate proposed routes in riparian areas and endangered species habitat....

Response 3.1: Alternative 3 contains no proposed additions to the transportation system that would intersect riparian conservation areas or habitat for the arroyo toad. See alternative descriptions in Chapter 2 of the environmental assessment, in particular the alternative comparisons found in section 2.2, for further discussion.

Comment 3.2: Identify existing designated routes for closure... Conduct a thorough travel analysis....

Response 3.2: See responses 2.3 and 2.14 above.

Comment 3.3: Expand screening criteria to protect riparian areas and federally listed or Forest Sensitive species.... At the very least the screening criteria should be expanded to exclude routes from riparian conservation areas and habitat for any federally listed species or forest sensitive species and should be applied to not just the proposed action but also to all existing designated routes.

Response 3.3: Alternative 3 contains no proposed additions to the transportation system that would intersect riparian conservation areas or habitat for the arroyo toad. See alternative descriptions in Chapter 2 of the environmental assessment, in particular the alternative comparisons found in section 2.2, for further discussion. In addition, see section 3.3 of the environmental assessment for a discussion of sensitive species, as well as the wildlife biologist's report for the project.

Comment 3.4: NEPA documents for the proposed action should include measures such as vehicle barriers and obliteration to block use and rehabilitate existing unauthorized routes from the Corral Canyon OHV area into the Hauser Wilderness.

Response 3.4: Past NEPA decisions decommissioned 67 segments of unauthorized routes totaling approximately 14.3 miles on the Descanso Ranger District. These routes intersected the existing OHV system. Included in this total are routes that intruded into the Hauser Wilderness Area. See section 1.1.2 of the environmental assessment for further discussion of travel management on the Cleveland NF.

Comment 3.5: Protect large diameter trees and snags -- The Forest Service unilaterally removes dead standing trees from near all roads and many trails irrespective of road use or snag stability based on evidence of recent cutting of large diameter snags throughout the Laguna Mountains and particularly along Pine Creek and Thing Valley roads. This blanket policy eliminates some of the most important wildlife habitat on the Cleveland National Forest; such a detrimental policy must not be applied to new routes through woodlands.

Response 3.5: The Cleveland NF has no "blanket policy" for removal of large diameter trees. The Cleveland NF has the right and the responsibility to remove any hazard trees when such trees pose a risk to, for example, recreationists who use campgrounds or picnic areas on Forest Service land. No large diameter tree removal is part of any of the alternatives in this project.

4 – Center for Biological Diversity, September 10, 2007 letter

Note: The Center for Biological Diversity incorporated by reference its September 10, 2007 letter when it provided scoping comments in its March 14, 2008 letter and when it provided comments on the environmental assessment in its August 12, 2008 letter. Most of the substance in the September 10 was addressed in the comments provided in the August 13 letter. For completeness, these comments are addressed below.

Comment 4.1: Do not add illegal, renegade routes.... Instead, we urge the CNF to focus on identifying both illegal and system routes for closure and restoration while simultaneously stepping up enforcement on designated routes and trails.... Thus, we recommend that the CNF not consider new route additions except in extremely limited, compelling circumstances.... It is our opinion that the CNF must also consider closures and/or changes to the existing system as within the scope of any projects or proposed actions to route designation.

Response 4.1: See responses 2.3 and 2.14 above.

Comment 4.2: Install Vehicle Barriers to Protect Designated Wilderness.

Response 4.2: See Response 3.4 above.

Comment 4.3: Limit Public Motorized Vehicle Access to Reduce the Risk of Wildfire....

Response 4.3: National Forest System roads are subject to temporary closures or restrictions due to elevated fire danger levels based on, among other factors, meteorological conditions. NFS roads may be closed to entry by motorized vehicles during such times, reducing fire danger.

5 – Sandra M. Weaver, July 20, 2008 letter

Comment 5.1: Although I recognize that off-roading is a popular sport, I firmly believe that as much natural forest should be preserved as possible. Therefore, I am very much opposed to increasing any areas that have off-road vehicle use in any of our national forests.

Response 5.1: No alternative analyzed in the environmental assessment would increase areas in the Cleveland NF that are open to off-road vehicle use (see section 2.2 of the environmental assessment). Alternative 1 would maintain the number of acres open to OHV use on the Cleveland NF at 2,160. Alternative 2 would reduce the number of acres open to OHV use from 2,160 to 2.2. Alternative 3 would reduce the number of acres open to OHV use from 2,160 to 15.

6 – Rick Moore, July 2008, written comment form

Comment 6.1: I think Alternative #3 makes the most sense. However I would prefer to keep Corral Canyon and Wildomar as open areas.

Response 6.1: Thank you for your comment. The Cleveland NF analyzed the no action alternative (Alternative 1) in the environmental assessment, which would have kept the Corral Canyon and Wildomar OHV areas open in their entirety.

7 – Laurence, Christopher, and Matthew Chapman, August 6, 2008, email

Comment 7.1: We are a family of off-road vehicle enthusiasts who enjoy riding a variety of areas including the Corral Canyon OHV area. Of the alternatives on your website we feel that Alternative 3 has the best balance to suit the needs of recreation and the environment in this area.

Response 7.1: Thank you for your comment. (Note: A number of emails with identical wording were received.)

8 – Allied Climbers of San Diego, August 5, 2008, letter

Comment 8.1: The Allied Climbers of San Diego (ACSD) support Alternative 3 as defined in the Cleveland National Forest Travel Management Environmental Assessment.

Response 8.1: Thank you for your comment.

9 – Helen Woodfield, July 24, 2008, email

Comment 9.1: I am OPPOSED to any further road or trail access in Cleveland NF. With ever-increasing development in San Diego, we need the NF preserved as it is. I support maintaining Cleveland NF in the

existing condition.... I OPPOSE any plan to increase road and motorized trail access and any increase in the size of OHV open areas in Cleveland NF.

Response 9.1: Other than new routes proposed for construction in the Corral Canyon OHV area, routes to be added to the Cleveland NF transportation system are currently in existence. Many of these routes will provide access to dispersed recreation sites. Routes that were proposed for inclusion in the transportation system under the proposed action, but were determined to have potential effects on endangered species habitat or riparian conservation areas, were removed from analysis, either under Alternative 3 as discussed in the environmental assessment, or under the selected alternative as discussed in the decision notice.

For a discussion of OHV open areas on the Cleveland NF, please see Response 5.1 above.

10 – Marcia Marlow, August 11, 2008, email

Comment 10.1: I urge you to improve and adopt Alternative 3 which will limit the number of new roads and motorized trails in the Cleveland National Forest.

Response 10.1: Thank you for your comment. As discussed in the decision notice, Alternative 3 was modified and selected for implementation.

11 – Barbara Booth and Christopher Murphy, August 12, 2008, FAX

Comment 11.1: [The Oak Grove Truck Trail] has historically been closed to public access for good reasons and we strongly recommend USFS continue this practice based on Forest Rules and the imperatives of Public Safety, Law Enforcement and Environmental Sensitivity.

Response 11.1: Thank you for bringing the Oak Grove Truck Trail to our attention. The route was inadvertently added to the project for analysis due to a mapping query error in the analysis process. We have removed it from the project.

During the comment period on the environmental assessment, approximately 216 electronic comments were received. Approximately 130 comments contained a message either identical or similar to this:

Comment 12.1: The Corral Canyon OHV area is important to me and I support the effort to create additional opportunities to enjoy this OHV area. My friends and family have many happy memories from this area. I am an off-road vehicle enthusiast who enjoys the Corral Canyon OHV area. I have reviewed the three alternatives presented on your website and feel that Alternative 3 has the best balance to suit the needs of recreation and the environment in this area.

Response 12.1: Thank you for your comment.

Approximately 68 comments contained a message either identical or similar this:

Comment 13.1: I urge you to improve and adopt Alternative 3 which will limit the number of new roads and motorized trails in the Cleveland National Forest.

I am pleased that Alternative 3 will prevent new illegal off-road vehicle routes from being legalized in sensitive forest areas, such as along streams and where there are threatened and endangered species. It is also great that the Forest Service is committed to developing a plan for closing down existing illegal routes.

Please improve Alternative 3 by not approving any new routes that were illegally created by irresponsible users. Also please analyze the entire road system (not just new trails and roads) to identify motorized threats to our mountains.

Response 13.1: Thank you for your comment.