

Response to Comments

Motorized Travel Management Environmental Assessment

San Bernardino National Forest
USDA Forest Service, Pacific Southwest Region
San Bernardino and Riverside Counties, CA

The comment period for the environmental assessment began on October 14, 2008 and ended on November 13, 2008. Comments that were postmarked or otherwise received during this time are included below, followed by Forest Service responses. Dates below indicate when a mailed letter was postmarked, when an email was received, or when a hand-delivered letter was received.

1 - Todd Schamberger, October 17, 2008

Comment 1.1: It appears that north end of 3W12 will dead end. If true, will likely lead to creation of unauthorized routes as users attempt to get to 3N34.

Response 1.1: 3W12 will connect to 3N34 without a dead end.

2 – Andrew Lynn, October 21, 2008

Comment 2.1: Alternative 3 is the best option for my family to recreate on SBNF.

Response 2.1: Comment noted.

3 - Brunelle Family, October 22, 2008

Comment 3.1: Thank you for keeping our trails open. We would like to know if any new motorcycle trails will be opening in the future?

Response 3.1: No new motorcycle trails are planned in this project. While it is always possible for new motorcycle trails to be proposed and analyzed in separate projects in the future, none are anticipated at this time.

4- Devin Carter, October 20, 2008

Comment 4.1: Please maintain as many existing OHV routes and additional routes as possible in SBNF.

Response 4.1: Comment noted.

5 – Vincent Barbarino, October 22, 2008 form letter

The same form letter was sent by Commenters 8-12 (Joseph Barbarino, Robert Gates, Vincent Arellano, Alex Knudsen, and Z. Jason Lucky), so their responses are included here as well.

Comment 5.1 (and 8.1, 9.1, 10.1, 11.1 and 12.1): Alternative 3 is the best option for continued OHV recreation. Making more roads legal to use by non street legal vehicles will make it better for completing trail loops. 3W12 and 3W13 need to remain open - the noise concern should be a law enforcement issue.

Response 5.1: Thank you for your comment.

6 – John Henderson, October 23, 2008

Comment 6.1: We live 100 yards from intersection of 2N96 and 3W12. Noise and dust from motorcycles on 3W12 affects our health and property value.

Response 6.1: Alternatives 1 and 4 include actions which would address these concerns.

7 – Wally Wirick, UCLA UniCamp, October 28, 2008

Comment 7.1: We have no issue with closure of 1N04A. However, we have a 32K gallon water storage tank located about 150 yards just outside 1N04A servicing our USFS Special Use Permitted organized camp facility. What will happen to the access to this water storage tank as a result of this action? How will we gain access should the tank need service or improvement?

Response 7.1: The Forest will provide the camp access to the water tank.

8 – 12: See Comment/Response 5.1

13 – Taylor Farnum, Lahontan Regional Water Board, November 13, 2008

Comment 13.1: Recommend that all permanent watercourse crossings be built to accommodate a 100 year storm event, instead of a 50 year event.

Response 13.1: The Forest Land Management Plan standard is to accommodate a 50 year storm event. However, for the watercourse crossings affected by changes in this project, we will review them on a case by case basis and accommodate a 100 year storm event, if feasible.

Comment 13.2: The monitoring plan needs to clearly state that implementation and effectiveness monitoring for water quality and erosion will occur on all routes where management actions such as route maintenance, decommissioning and restoration will occur. Request that restored routes and chronic sources of sediment be monitored annually (instead of every 5 years) until the problem has been treated.

Response 13.2: The monitoring plan will be changed to reflect the following. The Forest will identify all decommissioned or restoration routes with moderate to high erosion risk and chronic sediment concerns, and it will monitor these routes at least every 2-years within the first six (6) years following decommissioning or restoration. If after 3 reviews the road bed shows no signs of OHV use, is stabilized, revegetated, and moving towards reduced erosion and improved soil and water function, no further bi-annual monitoring would be needed. If however there is sign of OHV use or the road bed is not moving towards improved soil and water function, the route would continue to be monitored every two years. Actions would be taken to restrict continued use of the route and improve soil and water function. On all other closed, rehabilitated and stabilized routes (without moderate to high erosion risk), the Forest will survey the route every 5-10 years using the Route Soil Loss Monitoring Protocol.

Comment 13.3: Encourage removal of roads from sensitive areas and therefore supports alternatives that include decommissioning and routing roads a minimum of 150 feet from perennial streams or 303(d) listed waterbodies and tributaries.

Response 13.3: Route effects are based on the assumption that State of California and Region 5 BMPs are applied and that maintenance occurs annually on all designated routes. If a route can't be maintained in a manner that would prevent damage to the stream or sedimentation, then re-routing or decommissioning/restoration would be considered. The Watershed Specialist Report, Full Text, Appendix A, Table 3 displays the named stream and route interactions and identifies concerns and actions.

Comment 13.4: Table 43 on page 135 lists the mileage of analyzed non-highway legal routes that are proposed for designation in this EA. Please provide information on the total mileage of roads currently designated within in the San Bernardino National Forest Transportation System (NFTS) that fall within 150 feet of perennial streams and intermittent streams. For routes falling within 150 feet of the perennial stream please provide the distance from the perennial stream as well as the slope of the surrounding terrain.

Response 13.4: The watershed section of the EA acknowledges stream/route interactions and sensitivity based on proximity of the route to the stream and local topography. Buffers are applied along with mitigations and BMPs as well as visitor controls at stream crossings to minimize route effects to the stream channel. These buffers are applied to intermittent channels as well as perennial streams. This EA does not analyze the entire designated FS trail route system, only routes which would change from the existing designation.

Comment 13.5: Due to the increased chance of erosion and delivery the Water Board supports alternatives that reduce road mileage on severe erosion acres (Table 41, page 134).

Response 13.5: Numbers alone do not tell the entire story since maintenance, route slope, route location, and use need to be factored in. The entire forest has elevated risk of erosion based on inherent landscape features, e.g., geology, soil type, climatic conditions, vegetation types, and steep slopes. All alternatives address the erosion concern. While Table 41 depicts Alternative 3 as having the fewest routes in the severe erosion class; Alternative 3 included 14.4 and 16.8 fewer miles for review than Alternatives 1 or 4, respectively (Watershed Specialist Report, Full Text, Appendix B).

14 – Joan Taylor, Sierra Club, Taquitz Group, November 13, 2008

Comment 14.1: The Tahquitz Group would like to comment that since we do not see the Dunn Road on map #9, we assume Dunn Road is an unclassified, closed route. Use and/or maintenance of the Dunn Road would have potential direct, indirect or cumulative effects on the primary constituent elements of habitat essential for the survival and recovery of the Peninsular Ranges population of Desert Bighorn. If for some reason the Dunn Road were proposed to be opened or kept open by this Travel Management Plan, then the Forest needs to prepare an EIS to address potentially significant impacts of motorized travel on the Dunn Road to this endangered species.

Response 14.1: The "Dunn Road" has never been a part of the National Forest Transportation System and no proposals regarding it are included in this EA. This unauthorized route is primarily on BLM land, but one mile of the route is on NFS land. It is gated to prevent illegal use.

15 – Bill Dart, Off Road Business Association, November 13, 2008

Comment 15.1: We encourage use of the term "sound" instead of "noise" in the EA.

Response 15.1: We agree that the term "sound" is more neutral and will edit the EA accordingly.

Comment 15.2: We appreciate elimination of proposal to widen 2W01.

Response 15.2: Thank you for your comment.

Comment 15.3: Under all alternatives, the eastern and western portions of the SBNF OHV system offer few loop opportunities.

Response 15.3: There are numerous loop opportunities in the central portion of the Mountaintop district and the proposed action creates several new loop opportunities there. On the eastern

portion of the district, the proposed action designates an extensive loop opportunity that would be lost if no action were taken. On the western portion of the system in the Front Country district, loop opportunities are being addressed through a separate project - the Baldy Mesa Trails Project - which is discussed in this EA under cumulative effects.

Comment 15.4: No alternative offers good access from the desert communities.

Response 15.4: All alternatives offer four new connections to the BLM non-highway legal system on the northern border of the forest.

Comment 15.5: All alternatives restrict possibility of future cross-forest OHV trail.

Response 15.5: Comment noted. Achieving a cross-forest trail for non-highway legal vehicles was not part of the purpose and need of this project.

Comment 15.6: We appreciate inclusion of 3N53 in Alternative 3 while recognizing safety concerns of SBNF.

Response 15.6: Thank you for your comment.

Comment 15.7: We adamantly oppose removal of non-highway legal use from 2N59 from 2N45 east to Hwy 18 because it is a critical route for a cross forest trail and we are concerned about SBNF ability to enforce compliance.

Response 15.7: Comment noted. Achieving a cross-forest OHV trail was not part of the purpose and need of this project. The Forest is already managing these routes along the "4,000 foot road" as highway legal only without compliance problems.

Comment 15.8: We support closure of those sections of 3W12 and 3W13 south of 2N75 and 2N25. Recommend Alt. 3 be revised to include these closures.

Response 15.8: Thank you for your comment.

Comment 15.9: We adamantly support retaining 3N10, the John Bull Trail, as a non-highway legal route. 3N10 provides a critical and high quality link for a future cross-forest trail.

Response 15.9: Comment noted. Achieving a cross-forest trail for non-highway legal vehicles was not part of the purpose and need of this project.

16 – John Buse, Center for Biological Diversity, November 13, 2008

Comment 16.1: Existing route designations should be reviewed and reconsidered in light of additional species listings and critical habitat designations that have occurred since the 1989 Forest Plan route designations.

Response 16.1: The Travel Management Rule does not require the Forest to review its entire transportation system. Continuing use of the existing transportation system is not a new decision. Consultation is required only on the scope of this project, which only addresses limited changes to the transportation system. Furthermore, there have been six consultations with US Fish and Wildlife Service since 1989 that have addressed the SBNF transportation system as well as several ongoing consultations:

Peninsular Bighorn Sheep: BO Issued February 24, 2000. This consultation addressed Palm Canyon Drive (aka Dunn Road), the only road on the SBNF known to affect this species. This unauthorized road was gated to avoid effects.

Riparian Obligates: BO 1-6-99-F-21 issued March 23, 2000. This consultation addressed Elliott Ranch Road and the associated Arroyo Toad population at Little Horsethief Creek. At the time of this consultation, this was the only road on the SBNF known to affect occupied or critical habitat for listed riparian obligate species. The road was gated and has been maintained for administrative use only.

Carbonate Plants: BO 1-6-99-F-26 issued February 5, 2001. This consultation addressed system roads and unclassified routes throughout the range of the five listed carbonate plants on the SBNF. Measures to avoid and minimize impacts to carbonate plant habitat resulting from the use and maintenance of system roads included system road closure and decommissioning and a commitment to restore unclassified routes in carbonate habitat (which is included as a part of the subject SBNF Travel Management Project). These measures remain in effect until this consultation is replaced by the pending Mountaintop Plants Ongoing Effects consultation, planned for completion in 2009.

Pebble Plains: BO 1-6-99-F-25 issued February 14, 2001. This consultation addressed system roads and unclassified routes throughout the range of pebble plain habitat on the SBNF. Measures to avoid and minimize impacts to pebble plains resulting from the use and maintenance of system roads included system road closure and decommissioning, installation of signs and barriers along roads, a commitment to restore unclassified routes in pebble plain habitat (which is included as a part of the subject SBNF Travel Management Project), and added patrols. These measures remain in effect until this consultation is replaced by the pending Mountaintop Plants Ongoing Effects consultation, planned for completion in 2009.

LRMP Programmatic: BO 1-6-00-F-773.2 issued February 27, 2001. This consultation addressed ongoing effects under the existing LRMPs to every listed species known to occur and also those with potential to occur on the SBNF (along with the other three southern California National Forests), and their critical habitat. This consultation also incorporated a Biological Assessment regarding site specific effects to the listed meadow plants of the San Bernardino Mountains. System roads in occupied, critical and modeled habitat for listed species were analyzed programmatically (i.e., not site-specific) and multiple conservation measures and management direction were added as amendments to the 1989 SBNF Forest Plan.

LMP Revision: BO 1-6-5-F-773.9 issued September 15, 2005. This consultation addressed the effects of forest management under the revised Land Management Plans to every listed species known to occur and also those with potential to occur on the SBNF (along with the other three southern California National Forests), and their designated and proposed critical habitat. Conference opinions for thread-leaf brodiaea and southwestern willow flycatcher rendered under this consultation were adopted as biological opinions on June 9, 2006. All system roads in occupied, critical and suitable habitat for listed species were analyzed programmatically (i.e., not site-specific). A consultation agreement is in place to complete site specific consultations to address any ongoing effects under the revised LMP. Pending consultations on Riparian Obligates and Mountaintop Plants (and associated critical habitats) are expected to be complete in 2009. These consultations will address recently designated critical habitat for mountain yellow legged frogs, meadow plants, carbonate plants, and pebble plain plants not yet systematically covered under consultation. Until these consultations are complete, the avoidance and minimization measures (including those pertaining to motorized travel management) under the site specific consultations on these groups of species remain in effect.

Comment 16.2: We strongly support deletion of proposed widening of 2W01, but the EA does not consider decommissioning it, as we recommended in scoping.

Response 16.2: Support noted for not widening 2W01. The project did consider decommissioning 2W01, but not in detail because it would not meet Purpose and Need #1 of providing quality non-highway legal motorized recreation opportunity as supported by the Forest Plan (EA p. 4). 2W01 is the only 20" wide motorcycle trail on the Forest, so decommissioning the route would leave those users with no other such opportunity on the Forest. The Forest completed consultation with USFWS on the 2W01 crossing of Deep Creek (1-6-96-I-154) and it is in the process of being implemented.

Comment 16.3: The Baldy Mesa Recreation Trails project is closely related to the proposed action and should be evaluated as part of the proposed action to avoid improper piecemealing.

Response 16.3: The Baldy Mesa Recreation Trails project is considered in Cumulative Effects Analyses for each resource. The Travel Management Rule does not require the Forest to analyze all possible actions at the same time in the same project.

Comment 16.4: Omission of any analysis of environmental effects of staging areas is improper piecemealing.

Response 16.4: Existing, designated staging areas are part of the forest transportation system and part of the baseline under existing conditions. The potential designation of additional staging areas are considered as reasonably foreseeable future actions in the Cumulative Effects Analysis for each resource since no decision has been made about whether to proceed with their designation. The Travel Management Rule does not require the Forest to analyze all possible actions at the same time in the same project.

Comment 16.5: While the EA's review of past fire incidents associated with off-road vehicle use in the forest (p.99), the EA must also consider the potential fire risk associated with motorized vehicle use and access. Fire risk should also be considered in light of recent studies indicating that chaparral subject to burning may experience type conversion.

Response 16.5: The review of past fire incidents in the EA summarized on p. 99 considered highway legal as well as non-highway legal vehicles and the one incident cited involved a highway legal vehicle.

Comment 16.6: The EA improperly concludes that Management Indicator Species (MIS) will not be affected by addition of non-highway legal vehicles to existing roads. The EA assumes, but provides no evidence, that future use will be similar to existing use levels. This assumption must be supported by evidence indicating that, in practice, use levels do not significantly increase when non-highway legal uses are added to existing roads and unclassified routes are opened. If this evidence does not exist, or there is substantial evidence to the contrary, the full range of potential impacts to special status species and MIS must be disclosed, evaluated, and mitigated. If these impacts cannot be fully mitigated or avoided, a full EIS must be prepared. The EA's discussion of cumulative impacts to special status species and MIS is also deficient. In several instances, the EA simply concludes, without basis, that the proposed action will not contribute to cumulative impacts to biological resources. For example, after acknowledging that the proposed action could result in increased traffic, noise, and other disturbance, the EA concludes that the project will not add significantly to the cumulative effects to mule deer (pp.81-83). The cumulative impact analysis should be expanded to provide evidence to support this conclusion or an EIS must be prepared.

Response 16.6: The biological analysis in the EA does acknowledge that, generally speaking, adding unauthorized routes to the system has a negative effect on mule deer, a management indicator species (MIS) (EA p. 82). However, the full context of the analysis must be considered. 7.9 miles of the 8.2 miles of unauthorized route being added to the NFTS for non-highway legal use is parallel within a few yards distance from an existing system route and already receives substantial use, so it is reasonable to assume that adding it to the system will not attract significant additional use and have little effect on mule deer (EA p. 82). Furthermore, the proposed action restores 74 miles of unauthorized routes. The decommissioning of roads will benefit mule deer (EA p. 82). Although 50 miles of NFTS are being designated for non-highway legal vehicle use ("mixed use"), it is important to note that 26.1 of these miles have already been managed this way since 1989 and are only being changed from a temporary designation to a permanent designation so there is no change in on-the-ground use or impacts to MIS on those 26.1 miles. It is also important to note that 24.9 miles of non-highway legal use is being removed. So there is no net increase of actual on-the-ground "mixed use" designations on existing NFTS, and thus it is reasonable to assume that there will not be any significant increase in non-highway legal traffic and conclude that there will not be any significant impacts on mule deer. The biological analysis concludes "The proposed project is expected to move the habitat in the project area toward the desired conditions for this species by improving the road and trail system on the Forest while rehabbing and decommissioning a significant amount of roads and trails. In the long-term, developing a logical user supported transportation system should benefit

deer. Short-term impacts would be expected to result from some temporary disturbance and designation of some routes as open to non-highway legal use, but are not expected to alter population trends when combined with the benefits of removing non-highway legal use from some areas, rehabilitating unclassified routes, making some routes administrative use only and decommissioning existing routes of travel . This project will be neutral or positive relative to the desired condition for deer and deer habitat on the SBNF and in the Southern Province." (EA p. 83)

Opening existing roads and unauthorized routes to non-highway legal use will have a minor impact on mule deer. Our biologists have noted that that mule deer show the greatest response to OHV use when it is random and unmanaged. Mule deer on the San Bernardino National Forest seem to avoid roads and motorized trails during the day. This is probably due to the amount of hunting that takes place from roads. However, roads and even OHV trails are utilized at night for movement, especially in dense shrub habitats and areas of steep topography. If the unauthorized routes and roads proposed for designation for non-highway legal vehicle use were used very little, and represented incursions into areas with little vehicle use, that would be a much more significant. With the limited amount of area proposed for designation and the fact that they are all routinely used by vehicles at this point, the impacts to mule deer and mountain lion on a Forest-wide or herd basis are very minimal. Any impacts are far outweighed by the huge benefits to MIS from closing and restoring unauthorized routes.

What determines the impacts to deer is not the fact that there will be a lot of new use or little new use. What makes the impacts minor is that there is very little amount of the Forest that will have newly designated non-highway legal use, and these areas are generally already used by vehicles. Deer avoid areas with vehicle use during daylight hours even if it is only a few vehicles. Volume of vehicles has less effect than having vehicles going through deer habitat in general. Opening up new areas to non-highway use would have a much more substantial impact on deer. The areas proposed for allowing non-highway legal vehicles are already impacted by motorized vehicle use.

Since the adverse impacts to MIS will be relatively minor as discussed above and the benefits of closing and rehabilitation far outweigh any adverse impacts, the contribution of this project to cumulative impacts will be minor. Any increase in traffic, sound and other disturbance will be almost entirely in areas already impacted by vehicles and will occur in such a small portion of the Forest that it will have very minor cumulative effect. Having a well defined, managed system with closure and restoration of unauthorized routes will improve the situation for deer and other MIS.

17 – Bruce Whitcher, California Off-Road Vehicle Association, November 13, 2008

Comment 17.1: We support retaining 2W01 for motorcycle use only since it is one of the few remaining opportunities of this type.

Response 17.1: Comment noted.

Comment 17.2: Where heritage is cited as a concern, the relative value of the site is not discussed.

Response 17.2: The Archaeological Reconnaissance Report, prepared as part of this project, evaluates the significance of each historic property. However, by law, the Forest is not allowed to disclose details about these sites to the public.

Comment 17.3: The EA has little to substantiate significant effects to soils and watershed from the proposed action or any other alternatives.

Response 17.3: With some exceptions, the existing designated NFTS routes are located such that soil and water resource desired conditions are met; these exceptions are noted in the EA and Watershed Specialist Report, Full Text, including the appendices. Closing, decommissioning, and restoring routes that are not designated as part of the travel system provides positive effects for watershed resources. Route changes proposed in the EA, alternatives 1, 3, and 4, would not significantly effect watershed resources; the effects of NFTS routes on the landscape, soil, and water resources are well documented. The greatest disturbance occurs when the route is constructed or first used. Minimizing NFTS route effects to soil and water resources occurs with the implementation, monitoring, and adaptive management of mitigations, BMPs, and route maintenance, as well as the enforcement of the cross-country travel prohibition and implementation of Tread Lightly ethics and responsible OHV recreation.

Comment 17.4: Noise is cited as a reason for closing routes within ½ mile of private land, campgrounds and non-motorized areas. Actual evidence of noise as an issue is lacking in the EA making this issue subjective and a matter of conjecture, therefore this reason for restricting use should be removed from discussion of routes such as 3W12, 3W13, 2N95 and 2N96 unless there is documentation of sound related citations in these areas.

Response 17.4: This comment relates to the discussion of Indicator Measure # 2 in the Recreation section of the EA (EA pp.110-111). Sound is not cited as a reason for closing all routes within 1/2 mile of private land, campgrounds and non-motorized areas, nor is there a proposal to do so. Rather, measuring the mileage of route changes within 1/2 mile of private land (Table 29) and within 1/2 mile of a campground or non-motorized trail (Table 30) was used as an indicator of "the potential for an increase in background sound adjacent to the road or trail being used" (EA p.110). The analysis concludes that under all alternatives, more unauthorized and authorized routes would be removed or have their access changed to administrative use only than unauthorized routes added or new construction allowed near populated areas and popular recreation locations (EA p. 111).

Comment 17.5: Routes 3N53 and 3N22 are cited as having safety issues, 3N53 because it parallels the railroad tracks and 3N22 because it encourages crossing of HWY 138. This section of the EA, page 138, does not cite a specific accident history for these routes, unlike other routes under consideration. These two routes are important for access from desert communities and should be retained given the lack of documented safety issues. Regarding road crossings we request that SBNF install a properly signed and located OHV crossing at HWY 138 and other

highway crossing points instead of closing the route. OHV's are permitted to cross highways under the CVC.

Response 17.5: Additional safety analysis regarding the proposals for 3N53 and 3N22 has been added to the EA. The crossing of 3N22 at Hwy 138 is not safe because the sight distance is hampered by the vertical separation between the approaching OHV trail and the State Highway. OHV riders, unaware of their proximity to a State Highway, could very easily drive onto the highway travel way and collide with highway traffic. While it is legal for OHV traffic to cross a State Highway, the crossing needs to be at an appropriate location where highway traffic and OHV traffic have safe approaches and an opportunity to observe the oncoming cross traffic. 3N53 leads riders to this highway crossing as well, via a connection across non-forest land and a connection with 3N22. 3N53 is also deemed unsafe for non-highway legal vehicles because it allows riders, including children, to ride in close proximity to moving trains. Portions of 3N53 are immediately adjoining the ballast of the railroad track. Furthermore, 3N53 requires riders to cross railroad tracks in order to reach the highway crossing, and this increases the risk of a collision between a train and an OHV rider.

Comment 17.6: 3N24 and 3N21 should be retained because it will leave a lack of loop systems and be difficult to manage.

Response 17.6: No changes are proposed to 3N21 or 3N24 in this project.

Comment 17.7: The 2N17X, 2N36, and 2N33 trails provide a good loop system. Maps need to indicate that there is a legal parking area on the northeast corner of the system from where enthusiasts can access these loops.

Response 17.7: Comment noted. The parking area that is mentioned is on State land in the Silverwood Recreation Area.

Comment 17.8: A link must be identified and developed from X2W47 south and around the western edge of Silverwood Lake to connect with 2N59. This is needed for cross-forest trail.

Response 17.8: Developing a cross-forest trail for non-highway legal vehicles was not part of the purpose and need for this project.

Comment 17.9: 2N59 must be retained as part of the Forest System for development of a cross-country trail. We are also concerned with the ability of the Forest to enforce compliance given the use of the road by local residents.

Response 17.9: Developing a cross-forest trail for non-highway legal vehicles was not part of the purpose and need for this project. 2N59 has not been signed or managed for non-highway legal vehicle use, so the Forest does not anticipate a compliance issue by removing the designation.

Comment 17.10: We request 2N30 and 2N40 continue to be open to non highway legal vehicles as in Alternative 3. The trails provide opportunity for foothill communities and due to the remote

location from the rest of the Forest System and close proximity to residential areas will be difficult to enforce.

Response 17.10: Comment noted.

Comment 17.11: 2N61YB: As stated in the Errata, this trail follows a wilderness corridor and is classified as Back Country Motorized Use Restricted (BCMUR). Although it would take a Forest Plan amendment to change vehicle class this route should remain open to non-highway legal vehicles as this is allowed as a specific exception. This should be allowed under a system that would make permits readily available from local ranger stations. Such a system is used successfully on the Ojai Ranger District of Los Padres NF.

Response 17.11: A Forest Plan amendment, which is outside the scope of this project, would be required to allow unrestricted motorized use on 2N61YB. Special use permits are still an option for restricted use and would have to be requested and approved through the Mountaintop Ranger District.

Comment 17.12: 3W24 and 3W13 closed sections to 3N34F: Closure of these two short route sections is acceptable given the trail revisions that replace the closed route sections and continue to allow access from both trails to 3N34F.

Response 17.12: Comment noted.

Comment 17.13: Route 3N11 offers a small loop and interesting terrain. It is included in Alternative 3. We support retention of 3N11.

Response 17.13: This one mile route is in designated carbonate habitat and the endangered plant Cushenbury Oxytheca is present in the roadbed and suffers chronic disturbance from vehicle use. Decommissioning this route is extremely important for the conservation of this species (EA p. 49).

Comment 17.14: We strongly support the continued designation of the Crab Flats campground as a staging area. The area is a popular campground and staging area and provides good access to the Forest System.

Response 17.14: Although Crab Flats does not have a designated staging area for non-highway legal vehicles and there is no proposal in this EA to designate one, it is possible that this could be considered and analyzed as a future project and is discussed under cumulative effects.

Comment 17.15: We support and appreciate the designation of 3N16 as open to non highway licensed vehicles. Designation of this route greatly expands the loop opportunities for Green Sticker vehicles.

Response 17.15: Comment noted.

Comment 17.16: We support closure of those sections of 3W12 and 3W13 south of 2N75 and 2N25. Recommend Alternative 3 be revised to include these closures. We support construction of an access connector to Forest Service North Shore Work Center and construction of connector between 3W12 and 3W13 if related sections of this trail are to remain in use.

Response 17.16: Comment noted.

Comment 17.17: With regret we will support the permanent closure of 3N98 and 3N99 to OHVs to protect the riparian resources of Coxy Creek.

Response 17.17: Comment noted. Rational for the permanent closure is provided in the EA, page 135.

Comment 17.18: We support the closure of 2N96. The trail is a small spur that provides no connections with other trails and does not contribute to the overall value of the Forest System.

Response 17.18: Comment noted.

Comment 17.19: 3N84 (from 3N16/3N56) east to 3N89, continuing east to 3N83, continuing east to 3N10: We request designation of these routes to protect a corridor for a cross-Forest-wide OHV trail. The proposed route has been included in planning discussions and been an on-going high priority trail goal by the OHV community for over ten years.

Response 17.19: Developing a cross-forest trail for non-highway legal vehicles was not part of the purpose and need for this project.

Comment 17.20: We strongly encourage the official designation of 3N10, the John Bull Trail, as a forest trail open to non-highway legal vehicles as in Alternative 3. Designation of this trail will allow a level of maintenance that will protect the primitive condition that make the John Bull Trail one of the best technical 4WD trails in the Forest.

Response 17.20: Comment noted. Developing a cross-forest trail for non-highway legal vehicles was not part of the purpose and need for this project. Under all alternatives, 3N10 would still be designated and maintained for 4WD highway legal vehicle use.

Comment 17.21: We appreciate and support the change in vehicle class of 3N03 to allow access by non-highway licensed vehicles to the Forest from the Eastern Desert communities.

Response 17.21: All action alternatives propose addition of non-highway legal use to 3N03, but please note that there would not be direct access to it from the Eastern Desert communities because a section of 2N02 at the forest border is not being proposed for non-highway legal use (1.7 miles from the junction with 2N61Y to the forest boundary) (EA p. 13). There are safety and land use issues with connecting the forest non-highway legal system to adjoining private land and a county road. However, there will still be non-highway legal access to 3N03 and the extensive non-highway legal loop system from the Cactus Flats staging area.

Comment 17.22: 2E43 Hickson Trail: We request that Batista Road between 2E43 and 2E44, the Alesandro Trail, be designated open to non-highway licensed vehicles to provide a loop trail experience rather than to dead end trails.

Response 17.22: This comment was made during scoping and considered by the interdisciplinary team. However, it did not raise a significant issue for the development of alternatives because it was already determined by the law, regulation, Forest Plan, or higher level decision. This route lies within an Inventoried Roadless Area and crosses an area which is eligible for Wild and Scenic River designation.

18 - Dana Bell, American Motorcyclist Association District 37 Off-Road Sports Committee, Big Bear Trail Riders, California Association of 4 Wheel Drive Clubs, California Trail Users Coalition, Off-Road Business Association, November 13, 2008

Comment 18.1: We encourage use of the term "sound" instead of "noise" in the EA. Noise is a perception. Sound is measurable and a more appropriate and accurate term.

Response 18.1: We agree that the term "sound" is more neutral and will edit the EA accordingly. (same as 15.1)

Comment 18.2: Appreciate elimination of proposal to widen 2W01.

Response 18.2: Comment noted.

Comments 18.3 – 18.9 were identical to Comments 15.3 – 15.9. See Responses 15.3 – 15.9 above.

19 - Chris Whittier, November 11, 2008

Comment 19.1: It seems you are closing many access roads in the SBNF. There are many rock and mineral clubs that go rockhunting in the SBNF area and would be cut off if you choose to close these roads.

Response 19.1: There are system roads that are being closed to public use or decommissioned in all action alternatives. In most cases, they are short spur roads. Access by foot is still unrestricted in the Forest Plan, so those areas can still be accessed for rockhunting. Additionally, there are still plentiful opportunities for rockhunting along system roads.

20 – Joyce Burk, Sierra Club, Southern California Forests Committee, November 10, 2008

Comment 20.1: We prefer Alternative 4 because it decommissions the most mileage, including 1N39A and 1N05A. 1N39A is adjacent to San Gorgonio wilderness and Fish Creek proposed

Wild and Scenic River. Decommissioning 1N05A will protect Fish Creek as a potential wild river.

Response 20.1: Comment noted. The benefits of decommissioning 1N39A and 1N05A are acknowledged in Table 44 and discussions in the EA on pages 136-137 and 149.

Comment 20.2: Non-highway legal use to 2N90A to Tip Top Mountain in the Bighorn Mountains Wilderness should not be added. It will create conflicts with the many hikers who climb Tip Top Mountain.

Response 20.2: Staff observations indicate that hiking use to Tip Top Mountain is relatively minimal compared with other areas of the forest. There are no designated hiking trails in the Bighorn Mountains Wilderness. Hikers who climb Tip Top Mountain generally walk on 2N90A which is already designated for motorized highway legal use, so there is no expectation now for hikers not to encounter motorized traffic. Addition of non-highway legal vehicle traffic is not expected to create conflicts either.

Comment 20.3: Management of the popular Deep Creek Roadless Area will benefit from decommissioning 3N59 and making 3N59A admin use only. This will do much to alleviate the current conflict between hikers and equestrians vs. motorized recreationists. This action in both Alternative 1 and 4 is to be applauded.

Response 20.3: Decommissioning 3N59 and making 3N59A administrative use only is not a part of any action alternative. However, all action alternatives do include decommissioning of nearby 3N95, 3N98 and 3N99 and making 3N59B administrative use only, so this may be what the commenter had in mind.

Comment 20.4: Holcomb Creek will benefit from restoring 0.6 miles of unauthorized routes.

Response 20.4: Comment noted.

Comment 20.5: We support Alternative 4 because it doesn't add non-highway legal use to 4S19. It doesn't make sense to increase OHV traffic in this fire sensitive area.

Response 20.5: Comment noted.

Comment 20.6: Wildlife will benefit from making 1N34, 2N87, and 2N88 administrative use only in all alternatives.

Response 20.6: Comment noted.

Comment 20.7: We support the suite of actions to provide a buffer for N. Lake Arrowhead residents who have valid concerns about noise, dust and proximity of routes to their homes.

Response 20.7: Comment noted.

Comment 20.8: Alternative 4 deletes or changes 25 miles of routes within one mile of wilderness, hopefully adding solitude.

Response 20.8: Comment noted.

Comment 20.9: If additional staging areas are planned, would make more sense to study cumulative effects now rather than a future EA.

Response 20.9: The potential for future staging area designations are discussed in the Cumulative Effects Analysis.

Comment 20.10: Restoration of unauthorized routes in Big Bear area is long overdue.

Response 20.10: Comment noted.

21 – Stan Van Velsor, The Wilderness Society, November 13, 2008

Comment 21.1: We appreciate elimination of the proposal to widen 2W01.

Response 21.1: Comment noted.

Comment 21.2: The SBNF Travel Management proposed action recommends that 55.3 miles of Forest System roads be reclassified to allow for non-highway legal vehicle use. On the surface, it would seem that this action will not cause any additional impact to the forest resources because the roads already exist and no changes to the roads are proposed. However, recent research indicates that this assumption may be false. As we described in our scoping comments submitted on March 9, 2007, roads used by all types of vehicles, including OHVs, have a greater amount of bare, compacted and eroded soil, suffer more damage to roadside vegetation, and have a higher prevalence off-road trails and hill climbs. Additionally, the negative impacts of roads on wildlife have been well documented. As the vehicle travel intensifies so does the degree of impacts to wildlife. Roads that are classified for use by all types of vehicles (including non-highway legal vehicles) would result in the highest level of human use, and consequently, the greatest impact to wildlife and other forest resources.

Response 21.2: The extent of change in adding non-highway legal vehicle use is not as great as it may appear, because 26.1 miles of these 55.3 miles proposed for “mixed use” have been managed for non-highway legal use since 1989 under a temporary designation (EA p. 15, 21). The decision designates 50 miles, instead of 55.3 miles, in this category (Decision Notice, pp. 1-2). It is also important to note that 24.9 miles of non-highway legal use is being removed on the NFTS. So there is no net increase of actual on-the-ground “mixed use” designations on existing NFTS. The watershed analysis addresses the points made in these two comments (EA pages 125-153). The Watershed Specialist Report and appendices, Full Text provides additional detail. The references provided in the Wilderness Society comment letter were reviewed and included in the original analysis, including K. Hunds' study (Soil/Water Spec Report, p 32; BA/BE, p. 22). The analysis acknowledges that a road may be used differently by non-highway and highway legal

vehicles (EA p 140, Soil/Water Spec Report p 12, 18). For this project, none of the proposed changes to vehicle class would result in increased route width since the routes to be reclassified are already greater than 50 inches in width. The analysis acknowledges that travel route erosion would continue (EA p 133, 134); sensitive landscapes are identified along with route examples (EA p 133-134, 137-138). The analysis acknowledges vehicle type and use influences on soil and water resources (EA p 134, 136, 140). In addition, effects to stream resources are described (EA p 134), effects of unauthorized routes are disclosed (EA p 137), and the benefits and restrictions of route restoration are discussed (EA p 139).

Comment 21.3: Several of the roads proposed by the SBNF for reclassification for use by non-highway legal vehicles are on the boundary of the Bighorn Mountains Wilderness area (i.e., 3N03, 2N90, 2N01, 2N89Y, 2N69Y, 2N71Y, 2N61Y) and located near the Butler Peak roadless area (i.e., 3N59A, 3N14, 4N16). Because there is evidence that demonstrates an increase in the frequency of off-road disturbances associated with roads that are classified for all types of motorized use (including non-highway legal vehicles), there is a high probability that reclassifying the aforementioned roads for use by non-highway legal vehicles would lead to illegal off-road vehicle trespassing in the Bighorn Mountains Wilderness and Butler Peak roadless area.

Response 21.3: All of the roads mentioned in this comment, except for 2N90, are already under a temporary designation for non-highway legal vehicle use so a permanent designation would not actually result in a change in use on-the-ground. Because of steep topography at the terminus of 2N90, it will not be possible for non-highway vehicles to continue farther and create unauthorized routes into the Bighorn Mountains Wilderness.

Comment 21.4: There is increasing scientific evidence to suggest that as the intensity of human use increases on roads there is a corresponding increase in the harmful impacts to natural resources and that roads with OHV use have a higher frequency of off-road intrusions than roads classified for street legal vehicles only. Consequently, we recommend that you do not reclassify the following roads for use by non-highway legal vehicles -- 3N14, 4N16, 3N16, 3N59A, 3N03, 2N01, 2N90, 2N89Y, 2N69Y, 2N71Y, 2N02, 4S19, 4S06.

Response 21.4: Most of the roads mentioned in this comment are already under a temporary designation for non-highway legal vehicle use so a permanent designation would not actually result in a change in use on-the-ground. The evidence cited in the comment was evaluated by the project team.