

# Alternatives Submitted During Scoping

Six groups submitted alternatives to the proposed action: the Blue Ribbon Coalition (2); Central Sierra Environmental Resource Center; Stewards of the Sequoia; Stewards of the Sierra; Merced Dirt Riders (MDR, Damaso); and, the Wilderness Society (representing a number of organizations). Because of the similarities of the proposals from the Stewards of the Sequoia, Stewards of the Sierra, and MDR, their proposals were combined into one for analysis purposes. As part of this analysis, a separate spreadsheet (Alternatives\_Routes\_Comment\_Analysis.xls) shows site specific route recommendations and the Forest Service actions regarding those routes.

## **BLUE RIBBON COALITION ALTERNATIVE**

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BRC believes that many so-called “user-created” routes are actually Forest Service “facilities” since appropriated funds were expended by the agency to place them on previous or current agency maps or are/were maintained by federal agents. Hence, these facilities are by definition actually system routes and should not be analyzed as user-created routes.

BRC believes the agency should fully embrace the concept of converting “roads-to-single track trails” or “roads-to-motorized trails less than 50 inches in width” and “roads managed as motorized trails greater than 50 inches in width” as a tool to help it achieve its budget objectives while still providing a substantive recreational route network. This could allow a number of the routes that have been proposed for closure to remain open.

BRC suggests that the agency develop a 2nd tier group of routes that are “conditionally approved/designated” once certain issues are addressed. Such routes could include those trails where the agency or non-profit OHV clubs have not yet obtained formal easement agreements with the land owner. Also, some routes may have significant safety or resource issues such as slipouts or water crossings that need to be hardened or bridges that must be constructed. Once said issues are resolved those routes would become “designated.”

BRC is concerned the Forest may not recognize the legitimacy of some historic motorized routes in use prior to the existence of NEPA, or which have been, for whatever reason, ignored in previous project-level decisions attempting to comply with NEPA’s procedural requirements.

BRC believes the recent passage of SB742 and the rather substantive funding pots set aside for OHV related trail maintenance, restoration, and law enforcement should address some of the fiscal concerns articulated by some agency staff and members of the public. New funding program should allow for a more robust motorized trail program and the increased fiscal potential of SB742 should be factored into one or more alternatives. (See attached SB742 highlights)

- If there are tracks on a well worn trail, it is used. Don’t close it.
- If the FS cannot afford to maintain a trail, don’t. It will be maintained by the user or become closed by nature.
- Allow reasonable low impact travel to existing primitive camp spots and fishing access
- Have a sign at the entry point of the forest that states “use at your own risk. Any person or vehicle stuck or lost will be responsible for their own recovery charges”.
- Reopen old existing trails that connect to worthwhile destinations.

<b>BRC Proposal</b>	<b>Forest Service Actions</b>
1. Designate at minimum all of the system or facility roads and trails receiving current OHV use unless the individual route is causing a "considerable adverse affect."	In Alternative 4
2. Designate a significant number of important and historic user-created routes as identified by the public. If a considerable adverse effect is found, review for mitigation (reroute, maintenance, closure, etc.).	Unable to quantify "significant number"
3. Focus on closures of redundant routes or routes causing a considerable adverse affect or routes that have little recreational value.	In all Action Alternatives
4. Designate all historic access routes which USFS has spent CA OHV division ("Green Sticker Grant Funds") funding on for OHV recreation use or where NEPA decisions approved OHV use on said routes.	Not all routes are well sited to provide sustainable OHV recreation. A substantial number of these routes are being proposed for addition to the NFTS in Alternatives 1 and 4.
5. Review existing level 3-5 roads and designate appropriate roads as mixed use based on updated CHP Memo. Such mixed use roads should act as connectors between various trail systems and staging areas or offer unique recreational or scenic opportunities to the OHV users.	In Alternative 1 and 4
6. Develop a 2nd tier group of "conditionally approved/designated" routes	Not part of the Purpose and Need. Conditionally approved routes are not ripe for a NEPA decision
7. Designate several "high use areas" where use is limited to existing routes. Such areas could be appropriate areas for concentrated ATV or motorcycle use.	Addition of areas would require a land management plan revision.
8. Change the definition of user-created routes to "system route" where appropriated funds were expended on said routes.	Routes have one of two definitions: routes have received environmental analysis and been added to the system or they are unauthorized. A number of these routes are being proposed for addition to the NFTS in Alternatives 1 and 4.
9. Do not use the 2001 Roadless Rule to arbitrarily reject motorized trails in inventoried roadless areas.	
	Addition of motorized trails is allowed in Roadless Areas.
10. Review the recreational value of OHV routes including expert level single-track motorcycle trails or slow speed 4WD rock crawling in a regional perspective.	Each Forest in the Region is on a different schedule for the completion of Travel Management analysis. Each route will have a trail management objective. The Forest is proposing a diversity of OHV route types and OHV recreational experiences.
11. Review historic road network to see if more portions of same could be downgraded from a road and designated as a motorized trail.	In Alternatives 1 and 4
12. Designate historic access routes for OHV use where needed for public access from resorts and cabins.	Public access from cabins and resorts is being considered in another analysis and outside the scope of this project.
13. Identify the number of OHV permitted events in appropriate areas and designate routes in those areas as authorized for OHV permitted events	Routes are being considered in alternatives 1 and 4 for addition to the system. Analyzing permitted events is outside the scope of this project.
14. Designate historic access routes for OHV recreation use when public input demonstrates that USFS made a mistake in the current OHV travel map(s).	The Forest has been working with groups to identify needed trails for the NFTS. The 2006 OHV Inventory is not the sole source of information used for this analysis.
15. Analyze and disclose environmental benefits of eliminating motorized cross-country travel and restricting said use to designated roads, trails, and areas.	In all alternatives
16. Review proposed routes and so-called user-created routes submitted by local recreationists that are legal and have important historic value or act as connectors between various trails and staging areas.	In all alternatives
17. Identify and designate some routes as "event only" to be used for permitted events.	In Alternatives 1 and 4
18. If needed, develop and implement a rainfall-based wet weather closure plan similar to other rainfall-based closure plans on other Forests. Avoid long period forest-wide closures.	Partially. Using this methodology solely does not meet public safety, wildlife, or soils needs.
19. Designate appropriate 100 ft corridors or buffers/areas for dispersed camping, staging, or parking.	Designated routes to dispersed recreation sites have replaced the 100 ft corridor concept.
20. note funding potential for OHV management activities in SB742	Yes

## **BRC RECREATION ALTERNATIVE PLUS**

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<b>BRC Proposal</b>	<b>Forest Service Actions</b>
1. Designate at minimum all of the system or facility roads and trails receiving current OHV use unless the individual route is causing a “considerable adverse affect.”	See above
2. Designate the maximum number of important and historic user-created routes as identified by the public. If a considerable adverse effect is found, review for mitigation (reroute, maintenance, closure, etc.).	Unable to quantify a “maximum” number. Alternative 4 has evaluated and is proposing the greatest number of trails.
3. Focus on closures of redundant routes or routes causing a considerable adverse affect or routes that have little recreational value	In all Action Alternatives
4. BRC believes that the agency too often overlooks the future needs of wheel vehicle-based recreation in the decision-making process.	
5. Incorporate all other relevant tenets of BRC Proposal into this BRC Alternative Plus Proposal.	
6. Reopen old existing trails that connect to worthwhile destinations.	Adding trails that access worthwhile destinations have been considered.
7. Allow reasonable low impact travel to existing primitive camp spots and fishing access	Routes will be identified, analyzed, and added to NFTS.
8. If the FS cannot afford to maintain a trail, don't. It will be maintained by the user or become closed by nature.	

## CSERC ALTERNATIVE

CSERC Alternative	In Alternative 5
1. Cumulative impacts of OHV use and other motorized use within the Forest boundaries are all given fair analysis at that cumulative- Big Picture scale. The cumulative environmental and social impacts of so many thousands of miles of roads and routes affecting water quality, soils, wildlife, and other resource values truly create significant negative impacts far beyond the ability of the Forest to mitigate.	Cumulative effects are being analyzed at their appropriate scales
2. Error on the side of closing roads or non-NEPA approved OHV routes rather than choosing to error on the side of keeping thousands of miles of roads and routes open.	Outside the Purpose and Need of this project.
3. Our single highest specific concern is the extremely high road and route density in critical winter deer ranges, particularly the Deer Creek area.	The effects of the alternatives on wildlife, including deer are being analyzed
4. Designate all dead-end spurs of 1/2 mile in length or less as either "Closed To All Motorized Vehicles" or as "Administrative Use Only" unless I.D. Team staff or District staff know of a specific destination benefit that will be accessed by leaving the dead end road segment open to the public.	Outside the Purpose and Need of this project to undertake limited changes to the transportation system.
5. Designate dead-end road spurs 1/2 to 1 mile long as "Administrative Use Only" in timberland production areas and "Closed to All Motorized Vehicles" in other areas of the Forest unless I.D. Team staff or District staff clearly determine that specific multiple-use benefits of keeping such road segments open exceed the wildlife, watershed, and non-motorized benefits of closing the dead end spur to public motorized access. There would be seasonal closures of all but absolutely essential roads and OHV routes within critical winter deer range areas, as collaboratively agreed to by the Forest, the Department of Fish and Game, and local deer experts. For analysis purposes, current polygon areas from Route Designation maps would be the basis for such seasonal closures.	See #4 above. Seasonal closures are being considered in Alternatives 1, 4, and 5 but not to the degree being proposed here
6. Reduce road density and OHV route density mileage to less than 3 miles of motorized road/route per square mile in all winter deer range polygons, spotted owl PACs, goshawk PACs, and furbearer territories by applying the following filter: Where the current combined road and route density exceeds the desired condition, identify the main roads within the polygons, furbearer territory, and PACs that are essential or preferable for retention, then the next most important roads, and on down until reaching the target density of less than 3 mi/sq mi. If all roads can be retained within the winter deer range polygons, furbearer territories, and PACs and the target density has not been exceeded, then allow OHV routes to be approved within these key wildlife areas, but only if the combined total road/route density can be kept below desired road density targets. As with roads, identify the highest priority OHV routes for approved use – then the next priority routes.	Road and trail density is being evaluated in all alternatives.
7. CSERC strongly supports for a much lower target density of <2 mi/sq mi, but we put forward the 3 mi/sq mi maximum as a middle ground policy solution.	
8. CSERC also urges a fourth basic criteria filter: Close (or do not approve use on) roads and routes with identified environmental impacts unless such routes are judged to be truly essential to keep open.	Closures are outside the scope of this project. not adding routes to the system that cause adverse environmental impacts is considered.
9. The Forest should list all specific road segments or motorized routes that either Forest employees or individual members of the commenting public have identified as causing some level of environmental effects or which have a high potential for substantial environmental impacts. Determine whether there is any valid information or personal knowledge by I.D. Team staff or District staff that counters the claim that a specific road or route is causing such damage. For any road segment or OHV route where some substantial degree of ecological impact is acknowledged or where the level of environmental harm is undetermined for roads with claimed problems, accept the public input as valid and move to the next step. Screen all such claimed "harmful" road segments or routes with the question as to whether or not the I.D. Team or District staff judges such individual OHV routes or road segments to be highly desirable or essential to keep open for management purposes. Where such routes or road segments are not clearly judged to be desirable or essential, then designate the route or road segments as unnecessary and determine the appropriate level of closure.	The scoping analysis lists all comments. A separate spreadsheet has been developed that lists all recommendations for roads and trails. Those recommendations that are outside the scope of this project will be available for other projects to consider.
10. Maintain a maximum road/motorized route density of 2 miles per square mile as the upper level of desired condition within critical winter deer range.	Road/trail density is being analyzed.
11. CSERC strongly asserts that there is no rationale for keeping open either 3N58 or 4N16 any later in the fall than November 1st. Firewood cutters would still have the previous four or five months to access areas for wood collection.	Each alternative has a different seasonal closure.
12. CSERC urges that 3N58, 4N16, and all OHV routes within the winter deer range polygon boundaries be closed from November 1st (or at the very latest, November 15th) until April 30th. Our Center urges the Forest to clearly sign and gate those roads and routes, requiring closure to all OHV and motorized vehicles and employing traffic-control gates and posted barriers on	See #11

CSERC Alternative	In Alternative 5
routes to ensure consistent compliance.	
13. It is vital that the Forest officially set a seasonal closure for all the spur roads and routes off of 3N58 and 4N16 within the Deer Creek basin to effectively shut down motorized use in the Deer Creek area for the prolonged winter season. Additionally, we emphasize that the seasonal closure should be extended from November 1st (or no later than November 15th) through April 30th to allow for protection of overwintering deer for the	See #11
14. CSERC urges that the Ruby Burn – Rose Creek basin be closed to all motorized use during the same November to April 30th winter closure period that we urge for the Deer Creek.	See #11
15. At a minimum, no new OHV routes be created in spotted owl PAC's already containing a moderate to high level of currently existing road segments, and we ask that the Forest Service purposely attempt to close roads wherever roads can be identified as either redundant, or as dead end spurs, or as unnecessary for management purposes -- especially within the PAC's.	No new routes are being considered. Existing unauthorized routes are being evaluated for addition to the transportation system.
16. One method the I.D. Team can use to protect at-risk wildlife is to designate as closed all unauthorized OHV routes that run through PACs or other important wildlife areas to any significant degree. Table 2 in Appendix A contains a list	
17. Urge the Forest to use this opportunity to close roads in goshawk PAC's and to reduce road density impacts for the species. Additionally, we ask the Forest to not open any new motorized trails in goshawk PAC's	
18. We urge the Forest to use this opportunity to protect the remaining at-risk furbearers in the Stanislaus Forest, and to reduce road and motorized trail densities in furbearer territories to significantly below 2.7 miles per square mile. Clearly, opening any new previously unauthorized motorized routes in these territories will further increase densities, and so we ask the Forest to not open any new roads or routes in these territories. Table 4 in Appendix	
19. Many of our specific closure recommendations have already been proposed by the Forest's draft proposed action, and our Center provides strong support for those closures. Other roads and routes are currently designated "open" for some form of motorized use, and with these comments our Center provides rationale for closure or restriction of each recommendation.	
21. Our Center asks that the Forest officially plan to sign and close all of these unauthorized and decommissioned roads and trails, so that it is clear to drivers or riders of vehicles as to which roads and routes are officially open and which are officially closed. This will ease confusion for motorized recreationists, as well as simplify enforcement for the Forest Service.	An implementation plan will be developed once a decision has been made
22. CSERC urges the Forest to permit trucks and Jeeps to travel only two car lengths of travel off of roads. A PROVISION THAT EACH DISTRICT COULD ADD TO THAT ONE-TWO VEHICLE LENGTH PROVISION THE ABILITY FOR CAMPERS, HUNTERS, WOODCUTTERS, BOOK-READERS, WILDLIFE VIEWERS, ETC. TO DRIVE MUCH FURTHER THAN ONE OR TWO VEHICLE LENGTHS – BUT ONLY AT CLEARLY MARKED "SIDE ROUTE" PULL-OFFS THAT ARE SIGNED AND POSTED.	Woodcutting is outside the scope of this project. Routes are either added or designated on a MVUM or parking will be allowed one vehicle length off of a designated route.
23. Vehicle travel off of system roads within the Forest will be restricted to no more than two vehicle lengths (or less anywhere that resource damage would be caused by such travel). However, District interdisciplinary staff may recommend, and then designate with District Ranger approval, additional side route pull-offs for recreational and other uses without additional NEPA as long as the following apply: Vehicle travel routes will not cross wetlands, springs, seeps, fens, or wet meadow habitat areas; Such vehicle travel will not create significant rutting or watershed damage; No known archeological, sensitive plant, or sensitive wildlife values will be directly affected; The identification and marking of such side route use will not likely lead to vehicle travel on beyond the marked end of the side spur end point.	See #22
24. There has been almost no communication concerning the need for the Forest to analyze and adopt the minimum necessary road system within the Forest or to consider alternatives that would significantly reduce the gap between realistic road maintenance budgets and the existing road system with more than 3,000 miles of Forest Service roads.	The scope of the project is confined to additions, limited changes to the system, season of use, and types of vehicle use (Subpart B Travel Management Rule). Identification of a minimum system is outside the scope.
25. A significantly reduced overall road system: by applying suggestions such as closing or converting to Administrative Use Only the majority of dead-end spurs that are one mile in length or less and which do not lead to a high-value destination or provide some other identified high-value benefit. Such a reduced overall road system would also be based on closure or Administrative Use Only for some roads within PACs and Winter Deer Range or furbearer territories where road density exceeds 3 mi/per sq mi of total road/routes. Significantly reducing the Forest's overall road system would provide resource and taxpayer benefits, and would reduce enforcement challenges and improve maintenance of the minimum necessary.	See #24
27. Vehicle travel off roads would be restricted to two vehicle lengths, except that side spur pull-offs would be allowed wherever Districts marked and signed appropriate longer off-road dispersed camping, wood-gathering, etc.	See #22
28. See attached table for site specific recommendations	See Alternatives Routes Comment Analysis

## MERCED DIRT RIDERS/STEWARDS ALTERNATIVE

Merced Dirt Riders/Stewards Alternative	Forest Service Action
1. All trails and roads referenced be evaluated and added to the Stanislaus National Forest Transportation System.	Will be evaluated
2. All existing routes should be fully evaluated.	Will be evaluated
3. I support a "Wet Weather Closure" as Eldorado and Mendocino forests are using. If an area receives 1" of rain in a 24-hour period then that area should be closed to dry out for 48 hours and then reopen for travel.	Consider
4. Need Over Snow Vehicle (OSV) "wheeled" vehicle areas	Will be evaluated
5. 4N12 should be combined use road	Will be evaluated
6. Rights of way for: 5N81Y, 5N33, 5N01	Will be evaluated
7. Oppose closure of Strawberry Rd.	Will be evaluated
8. Please display and identify site-specific problem areas and provide potential mitigation to correct the problem. Examples include; armoring creek crossings or sensitive soils, re-routes, trail adoptions by user groups, etc. Trail closure should be the last option not the first!	Will be evaluated
9. Agree with proposed action item #1: Adding 126.2 miles of existing trails to the National Forest System of trails open to wheeled motorized use.	
10. Agree with proposed action #3: Convert approximately 17miles of existing National Forest System roads to NFS trails open to wheeled motorized use.	
11. Support proposed action #4: change approximately 11.6 miles of existing NFS roads closed to wheeled use to NFS roads open to public wheeled motorized use.	
12. Oppose proposed action #5: change approximately 24.5 miles of NFS roads open to public wheeled motorized use to NFS roads closed to public wheeled use.	Will be evaluated
13. Support proposed action #6: change approximately 73.7 miles of NFS roads from open to highway legal only uses to NFS roads open to all public wheeled motorized use.	
14. 200 ft travel off of all designated roads and trails	Will be evaluated
15. Oppose proposed action #7: change 214.2 miles of NFS roads from open to all motorized uses to NFS roads open to highway vehicle use only, (street legal only).	
16. There are several areas that should not be street legal only: Bald Mt. between Hwy 108 and the South Fork of Stanislaus River. Bell Mt., Bourland Mt. and Hells Mt. area and areas in the Groveland RD.	Will be evaluated
17. Clearly display the baseline motorized use for the Stanislaus and its growth to show its impacts on existing roads and trails and the effects of this use on a reduced roads and trails system, please show this in your cumulative effects analysis.	Will be evaluated
18. Identify all trails and roads proposed for closure where funding was spent by the forest: include appropriated, Grant and Green Sticker funding	
19. Designate at minimum, all roads and trails that have received appropriated, and/or Grant and Green Sticker funding	Will be evaluated
20. Focus on closures of redundant routes or routes causing a considerable adverse affect or routes that have little recreational value	Will be evaluated
21. Change the definition of "user created routes" to "system routes" where appropriated funds were expended on said routes	
22. Designate historic access routes for OHV recreation use when public input demonstrates that USFS made a mistake in the current OHV travel map(s)	Will be evaluated
23. ML1 roads be open to OHV use unless there is clear evidence of resource damage.	Will be evaluated
24. All unclassified routes be included in the system pending a complete analysis.	
25. Provide trails and roads that are interesting and have loops	Will be evaluated
26. Provide trails and roads that lead to scenic and historical destinations	Will be evaluated
27. Provide trails that have varying degrees of difficulty	Will be evaluated
28. Provide trails and road connections through the use of designated combined use	Will be evaluated
29. See attached table for site specific recommendations	See Alternatives Routes Comment Analysis

# WILDERNESS SOCIETY ALTERNATIVE

Wilderness Society Alternative	Forest Service Actions
1. Adjust the purpose and need statement, as follows, to reflect more accurately the intent of the Travel Management Rule and the purpose of travel planning.	Purpose and Need have been refined to focus on Subpart B of the Travel Management Rule
2. the need to eliminate cross-country travel and move to a system of designated roads, trails, and areas consistent with the Travel Management Rule and the Executive Orders on use of off-road vehicles on public lands;	See above
3. the need to address degradation of environmental, social, and cultural resources associated both with user-created routes and currently designated roads, trails, and areas, as identified through Travel Analysis;	See above
4. the need to—by way of a science-based analysis—“identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands” and identify roads that are “No longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails”;	See above
5. the need to provide opportunities for motorized and Non-motorized recreation within the carrying capacity of the land (minimizing damage to soil, watershed, vegetation, cultural sites, and other resources of the public lands; and minimizing harassment of wildlife or significant disruption of wildlife habitats).	See above
6. the need to adjust both the core transportation system and recreation travel network in light of funding limitations for maintenance, monitoring, and enforcement; and	See above
7 the need to address public safety concerns, user conflicts, private property rights, lost Non-motorized recreational opportunities, and impact to natural soundscapes and air. quality that have arisen or might be expected to arise given recent trends in motorized use.	Included in analysis
8. What is the basis for your proposal to designate new motorized trails and areas in the proposal area and change the use categories for existing roads? How did you use Travel Analysis to assess the environmental and social impacts of the transportation system	Included in analysis
9. How was Travel Analysis used to determine the cumulative impacts of motorized travel on the environment? How was it used to assess the available resources to maintain and operate the forest transportation system?	Included in analysis
10. How did you define the minimum transportation system? What methods were used to determine the “minimum” system consistent with requirements established by 36 CFR 212.5 (b) (1) and the draft directives for implementing the Travel Management Rule? What are your decommissioning priorities, and what methodology did you use to arrive at them?	See Item #1
11. The No action alternative should be limited to the designation of current motorized system routes that are supported by prior NEPA analyses or decision documents that justify their inclusion on maps and in spatial databases.	The No Action Alternative is the baseline condition
12. We would expect the Forest Service to perform a comprehensive inventory of its past transportation decisions as part of Travel Analysis, but we have No knowledge whether or to what extent this has been done.	
13. However, as an interim step, we request that the Forest Service determine the decision status of all of the putative system routes that we have identified for decommissioning in our citizens’ alternative, and provide this information to us prior to the release of the Draft EIS.	
14. Finally, to the degree that our description of a “No action” alternative limited to documented routes differs from the Forest Service’s conception of “No action,” we request consideration of an additional, separate alternative limited to documented routes as described above.	
15. Prohibit travel off designated roads, trails, and areas	In all alternatives
16. Adopt our system road and trail closure proposal (as outlined in Appendix A)	See Alternative 5
17. Adopt our proposal for route additions and changes to the system in response to the Stanislaus National Forest proposed action (as outlined in Appendix B).	See Alternative 5
18. Should prohibit cross-country motorized travel for big game retrieval, dispersed camping, and other activities but allow Forest visitors to park their motor vehicle within one vehicle length from the edge of the road or trail surface when it is safe to do so, does not result in damage to Forest resources, and is not disallowed in Forest-specific orders or plans (see Appendix D). If certain dispersed camp sites are far from system roads, the Stanislaus NF should consider designating routes to these dispersed campsites instead of permitting cross-country travel. If cross-country exceptions are incorporated into the EIS, then extensive environmental analysis under NEPA would need to be completed on all lands affected by the exception. This analysis would include a complete ecological, cultural, archaeological, and historical site survey of the cross-country exception zone surrounding each motorized route.	Considered in the analysis
19. The Forest should implement seasonal wet weather closures of native surface roads and motorized trails to reduce erosion and sedimentation, to lower maintenance costs, and to reduce harassment and poaching of wildlife during times when they are most vulnerable. While we would	See seasonal closures

<b>Wilderness Society Alternative</b>	<b>Forest Service Actions</b>
agree to a seasonal closure triggered by precipitation or conditions on the ground, once closed these routes should remain closed until the end of the rainy season in the spring. A route system where multiple closures and openings are triggered by individual storm events throughout the season is too unstable and unreliable to be effectively implemented.	
20. A landscape level approach ensures that large areas of the Forest remain relatively quiet and undisturbed for the majority of forest users who enjoy public lands through hiking, backpacking, horseback riding, bird watching, photography, canoeing, hunting, and fishing.	Considered to some degree in analysis
21. A landscape perspective will help ensure that redundant routes are not designated and that routes are not merely examined in isolation. The agency should use spatial analysis to evaluate landscape-level impacts to natural resources.	
22. We agree with the strong language above. OHVs should be permitted only where they do not excessively interfere with other recreational uses or damage natural resources.	Considered in the analysis
23 We believe it makes sense to extend these analyses to motorized trails as well. It is difficult to assess the “necessary” road system, predict and minimize adverse environmental impacts, or analyze relative to long-term funding expectations in the absence of a comprehensive assessment of both motorized roads and trails. In the same way that travel planning provides an opportunity to downgrade or decommission unneeded roads, it provides an opportunity to decommission and restore or convert unneeded motorized trails to Non-motorized uses, consistent with a landscape zoning approach as described above.	
24. All route designations must be consistent with Land and Resource Management Plans for each of the National Forests. Where the Forest Plan does not, however, specifically prohibit the use of motorized vehicles in agency-inventoried roadless areas, we contend that these areas generally (with rare exceptions) should not contain designated motorized routes.	Considered in analysis
25. Where the Forest Plan does not specifically prohibit the use of motorized vehicles in citizen-inventoried roadless areas, we contend that these areas generally should not contain designated motorized routes. Any Non-essential Forest roads and trails – especially maintenance level 2 roads – should be decommissioned. No new unauthorized motorized routes should be designated in these areas.	Motorized trails are allowed to be added in roadless areas
26. Where these two Recreation Opportunity Spectrum (ROS) classes do not overlap with agency or citizen-inventoried roadless areas, motorized routes should not be permitted in these areas. Forest Plans and agency policy generally prohibit motorized use in these areas, but in situations where they do not expressly forbid it, we believe that these areas should not contain designated motorized routes.	
27. Motorized route designation is not appropriate in existing or proposed Research Natural Areas.	Evaluated
28. Non-essential Forest roads that cross the Pacific Crest Trail should be decommissioned, except where the PCT is explicitly routed on Forest Service roads.	Yes
29. Special Area Designations: Non-essential Forest roads should be decommissioned in these areas.	Where appropriate and allowed, roads and trails will remain
30. OHV trails should not be designated through or near cultural sites	Will be evaluated
31. The Forest Service does not Normally permit motorized travel on the trail system in the corridors of “Wild” rivers. Motorized routes should not be designated in existing or proposed Wild River Corridors. Unauthorized OHV trails should not be designated in existing or proposed Scenic or Recreational River corridors. Furthermore, all studied eligible Wild and Scenic river segments should be reviewed for current OHV use and their NEPA status, and possible damage due to OHV use. Non-essential roads in existing or proposed Scenic or Recreational river corridors should be decommissioned.	Will be evaluated
32. OHV trails should not be designated where “take” of an endangered species may occur. In addition, OHV trails should not be designated in ESA designated critical habitat for threatened or endangered species (both aquatic and terrestrial). Roads in critical habitat for endangered species should be decommissioned.	Will be evaluated
33. No new unauthorized OHV routes should be designated in critical habitat for Willow Flycatchers, Northern Goshawks (Protected Activity Centers and 400 m from nest trees), California Spotted Owls (Protected Activity Centers, Home Range Cores, and 400 m from nest trees), Great Gray Owls (400 m from nest trees), and all other species listed as “sensitive” by Forest Service Region 5. See maps sent under a separate cover.	Will be evaluated
34. Roads and OHV routes in critical winter deer range must be closed, at a minimum, between November 15 and March 30. In 1990, the Miwok Ranger District accepted and spent Hill Bill grant monies from the California Department of Fish and Game for the purpose of installing 4 gates “to keep motorized vehicles out of key deer winter range” between November 15 and March 30. In 1995 another traffic control gate was installed, also using Hill Bill monies, on FS road 4N01. The objective of this gate was “to close the road on critical deer winter range, to protect deer habitat by reducing disturbances to deer from public use, and reduce negative impacts to deer from such activities as poaching, night hunting, road hunting, and off-road vehicle activities.” The “gate is a seasonal closure locked with a USFS lock during the Fall and Winter when deer are present.”	Will be evaluated
35. To avoid impacts to water quality and riparian-dependent wildlife, OHV routes should only be	Will be evaluated

<b>Wilderness Society Alternative</b>	<b>Forest Service Actions</b>
designated in riparian conservation areas if they will have minimal impact on riparian habitat or water quality.	
36. OHV routes should not be designated in wetlands, wet meadows (especially montane meadows – a rare and declining habitat type), ephemeral ponds, shorelines, or other wet areas. Non-essential roads in montane meadows should be decommissioned. Routes that cause excessive erosion in or otherwise damage riparian areas should be closed. Stream crossings should be kept to a minimum, and all crossing should be perpendicular to the stream, bridged whenever possible, and approaches armored to prevent sedimentation.	Will be evaluated
37. OHV routes generally should not be designated in areas where the soil is classified as highly erodible (“severe” or “very severe”) by the Soil Conservation Service	Will be evaluated
38. Prohibit cross-country motorized travel for big game retrieval and dispersed camping. Restrict motor vehicle travel for dispersed camping and big game retrieval as follows: Forest visitors may park their motor vehicle within one vehicle length from the edge of the road or trail surface when it is safe to do so, does not result in damage to forest resources, and is not disallowed in forest-specific orders or plans.	Will be evaluated
39. See attached table for site specific recommendations	See Alternatives Routes Comment Analysis

<b>Area or Resource of Concern</b>	<b>System Roads</b>	<b>System Motorized Trails</b>	<b>Unauthorized Routes</b>
Wilderness	decommission	close to motor vehicles	do not designate
Administratively Endorsed Wilderness	decommission	close to motor vehicles	do not designate
Primitive and Semi-primitive Non-motorized areas	decommission	close to motor vehicles	do not designate
Research Natural Areas*	decommission	close to motor vehicles	do not designate
Endangered Species Critical Habitat	decommission	close to motor vehicles	do not designate
Wild River Corridor*	decommission	close to motor vehicles	do not designate
Agency-inventoried Roadless Areas	decommission (with rare exceptions)	close to motor vehicles (with rare exceptions)	do not designate
Citizen-inventoried Roadless Areas	decommission non-essential roads**	close to motor vehicles (with rare exceptions)	do not designate
Pacific Crest Trail	decommission non-essential roads	close to motor vehicles	do not designate
Special Interest Areas*	decommission non-essential roads	close to motor vehicles	do not designate
Cultural Sites	decommission non-essential roads	close to motor vehicles	do not designate
Scenic River*	decommission non-essential roads	close to motor vehicles	do not designate
Recreational River*	decommission non-essential roads	close to motor vehicles	do not designate
Montane Meadows	decommission non-essential roads	close to motor vehicles	do not designate
Meadow Management Zones	decommission non-essential roads	close to motor vehicles	do not designate
State Threatened or Endangered Species	keep open but monitor	keep open but monitor	do not designate
Forest Service Sensitive Species	keep open but monitor	keep open but monitor	do not designate
Critical Aquatic Refuge	keep open but monitor	keep open but monitor	do not designate
Riparian Conservation Areas	keep open but monitor	keep open but monitor	designate if no damage is occurring

\* or proposals for these designations

\*\* "Non-essential" can mean, for instance, roads that are not major travel arteries