

Appendix E- Response to Comments

Public Involvement

A legal notice was published in the Albuquerque Journal on January 29, 2008. A 30 day comment period was provided following publication of the legal notice. The Environmental Assessment for Travel Management on the Sandia Ranger District and other information on the project was distributed as follows:

- The issues and alternatives with maps were posted on the Cibola web site on October 18, 2007 and a letter was sent by email and US post to the Sandia Travel Management Mailing list to announce availability.
- Full text of the Environmental Assessment was posted on the web site effective January 28th, 2008, and a letter was sent by email and US post to the Sandia Travel Management mailing list announcing availability.
- 20 paper copies and 9 CD copies of the EA were mailed to individuals and organizations as requested.

Two public open houses were held on February 20th in Tijeras, NM and 21st 2008 in Albuquerque, NM following the release of the EA. These meetings were attended by a total of approximately 90 people. Paper and CD copies of the EA were available at the open houses. During the comment period 174 letters, emails, comment forms and one phone call were received from 126 individuals and organizations. There were an additional 13 emails and letters received after the comment period closed. Although these individuals do not have standing to appeal, the comments were included in this response to comments.

A number of emails received during the comment period were requests for the EA, web site concerns, and requests for confirmation that comments were received. These requests were not related to the proposed action, alternatives, or the EA, and are not included in the responses. A number of individuals sent duplicate comments, for example the same comment letter was sent through email and postal mail. Each version was assigned a unique number.

Comments received during the comment period:		
Comment #	Name	Organization
1, 13, 123, 150	John H. O'Malia	Blackfeather Trails Preservation Alliance
2	Dave and Twyla Reinig	
3, 4	Dan Dennison	Diamond Tail Ranch
5	Paul Butler	
6	Laurie Lange	
7, 20	David Old	
8	Gretel Follingstad	
9	John Lytton and Trisha Bergin-Lytton	
10	Don White	
11	Sharyn Davidson	
12, 146	Erik Peterson	
14	Ray Zvoch	
15	Carol & Rusty Babington	
16	Carl Smith	
17	Catherine L Rusk	
18	Michael L. & Ricki L. Morris	
19	David L. Hicks	
21, 54, 110	Lefty Folkman	
22	Brian Behling	

Comments received during the comment period:		
Comment #	Name	Organization
23, 121	Mark Huppertz	
24	Marcia Malcomb	
25	Ron and Barbara McCarty	
26, 168	Robert L. Hormell	
27	Susan Jean-Pierre	
28	Patrick Walsh	
29	Sandra Knox	
30	Eric D. Russell	
31	Shaun Harvard	
32	Cristina Olds	
33	Bradley Pickett M.D.	
34	Hugh Martin	
35	Bill Knox	
36, 37	Bruce E. Miller	
38	Lisa Vornholt	ABQ Wombats
39, 63	Ana Davidson	
40 A	Scott Rawlinson	
40 B	Lisa Theisen	
41, 175	Kay Burdette	
42	Philip R. Kennicott	
43	Brenda Wessel and Lara Boyd	
44	Damian Calvert	
45	Dennis and Georgianne Peek	
46	John Campbell	
47	Edward Hoffman and Chris Johnson	New Mexico Off Highway Vehicle Alliance
48, 132	Hurley Wilvert, Jr. and Chris Johnson	New Mexico Off Highway Vehicle Alliance
49	Yolanda Williamson	
50	Simona Derr	
51	Mark B. Baldus	
52	A. Ali	
53	David Luck	
55	Lawrence and Karen McCartney	
56, 57, 58, 59, 95, 96, 98, 99, 100, 101, 103, 104, 129, 153, 154, 155, 157	Mark R. Werkmeister	New Mexico Off Highway Vehicle Alliance, New Mexico 4 Wheelers
60, 138	Peter Callen	Pathways: Wildlife Corridors of New Mexico
61	Kathlene Ferris	
62	Shelley Eaton	
64	Jason Burnette	
65	Devin Cannady	New Mexico Trials Association
66, 130	Joseph A. Sholtis, Jr., LtCOL, USAF (Ret)	
67	Tim Bartel	Vista de Manana Homeowner's Association
68	Marcus J. Hamilton	
69	Jeff Harkwell	

Comments received during the comment period:		
Comment #	Name	Organization
70	David L. Hicks and Margherita Toscan	
71	Phillip Fuerschbach	
72	Steve Hemphill	
73, 75	Linda S. Butler	
74	Mike Maynard	
76	Renee Rector	
77	Diane Spengler	
78	Tony Rusk	
79	Gregory P. Fleming and Chris Johnson	New Mexico Off Highway Vehicle Alliance
80	Barry Herrero	
81	Gordon Masten	
82, 83, 84, 85, 90, 112, 115	Chris Johnson	New Mexico Off Highway Vehicle Alliance
86	Evan Ashcraft	
87	Laura Robbins	
88, 174	Michael Scialdone	New Mexico Wilderness Alliance
89, 173	Cyndi Tuell	Center for Biological Diversity
91	Daniel Silbaugh	
92	Rosanne and Steve Mitchell	
93	Gene Tatum	Albuquerque Wildlife Federation
94	Darrell Dimick	
97, 105	Cheryl Marlow	Tablazon Neighborhood Association
102	Diane Simmons	
106	Bonnie Davis	
107, 169, 172	Brian Hawthorne	Blue Ribbon Coalition
108	Robert J. Telepak MD	New Mexico 4-Wheelers
109	Robert Norton	
111	Frank G. Whiston	New Mexico 4- Wheelers
113	Daniel Galasso	
114	Jenny Galasso	
116, 119	Mark Toney and Chris Johnson	New Mexico Off Highway Vehicle Alliance
117	Simon and Felisa Palfery	
118	James and Amy Meier	
120	Marilyn Hershberger	
122	Maureen Hightower	
124	Henry R Lanman Jr.	
125	Jackie Bouker	
126, 167	Joanne Spivack	New Mexico Off Highway Vehicle Alliance
127	Robert K. Taylor	
128	Linda Barbour	East Mountain Coalition of Neighborhood and Landowner Association
131	Michael Morris, Robb Lee, Annie Stoltzfus (includes a copy of a letter sent during scoping by Robb, Laura and Ian Lee and John and Jennifer Franklin	Heatherland Hills Landowners Association
133	Mitch Johnson	
134	Laura Tweed	WHOA

Comments received during the comment period:		
Comment #	Name	Organization
135	Gordon M. Darbro	Pathways: Wildlife Corridors of NM
136	Elise Van Arsdale	Pathways: Wildlife Corridors of NM
137	Charles and Sandra Johnson	Pathways: Wildlife Corridors of NM
139	Matthew Wunder Ph.D.	State of New Mexico Department of Game & Fish
140	Mike A. Salazar	New Mexico Trials Association
141	Dane Hershberger	
142	Vern Hershberger	
143	Bob Guarnicri	
144	David Neal	
145	Bonnie Nuttall	
147	Denise Williams	
148	Mike Madden	Turquoise Trail Preservation Trust
149	Tom Murati	
151	Dr. Barbara June Hill	
152, 170	Robert B. Montoya	Pueblo of Sandia
156, 159	Kenmar and SuzAnn Smith	
158	Warren Crawford	
160	Susan K. Mobbley	
161	Tom Mobbley	
162	Reid Bandeen	Las Placitas Association
163	Rusty Cook	New Mexico Horse Council, Inc
164	Mark Wolf	
165	Lauri Rector	New Mexico 4-Wheelers

Comments received after the comment period ended:		
Comment #	Name	Organization
176	Brandon Falvey	
177	Alan Ross	
178	Sonya Ewan	
179	Donald W. Ferris	
180	Jens Nielsen	
181	Steven Strohl	
182	Dandee Fleming	
183	Gordon Eatman	
184	Ries Robinson	
185	Nathaniel Matter	
186	Chris Ksanznak	
187	Deborah Werendo, MD	
188	Rick Alcon	R & S Powersports Group

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Response to Comments

What follows are individual or summarized comments for each of the subject codes identified through the content analysis process, as well as the response to those comments. If numerous similar comments were received on a topic, they were summarized into a single comment and response. Comments have been edited in this version for length, but all original comments were reviewed by the ID team and the responsible official. Copies of the original comment submissions are available in the project record. This response to comment document was prepared as an aid to the responsible official in considering comments.

Alternatives Comments

This section is a summary of the comments received regarding preferences and concerns for the alternatives described in the EA.

<i>Comment #</i>	<i>Comment</i>
<i>(A1) Miscellaneous Alternative Comments</i>	
1,124	<u>Summarized Comment:</u> Preference for Alternatives 1, 2, and 4 but are opposed to seasonal restrictions included in Alternative 1. Comment 1 proposes an alternative for shortening the seasonal restrictions to be considered: “One possible alternative to shutting the motorcyclists out of the Cedro trails for five months out of the year, would be to shorten the duration of the seasonal closure to three months. If you were to close them from January 1st to March 31st every year, that would be an acceptable closure to the Blackfeather motorcyclists.”
<u>Response:</u> We have noted your preferences and concerns. Seasonal restrictions are discussed in more detail, including the rationale for the five month restriction in section A6 on page 52.	
60	I would suggest that the Forest pick one of the alternatives that presents a balanced, responsible approach to the needs of both the natural resource and the motoring public. Besides stepped up, armed patrols to enforce the new law, the Forest may consider some public outreach to the local communities, La Madera, Tablazon, etc. to explain and foster understanding of the sometimes drastic changes to "their" local forest access. This may help reduce vandalism to gates, signs, fences, and other physical kiosks and barriers to motorized travel.
<u>Response:</u> User education and information is a feature common to all action alternatives, as stated on page 17 in the EA.	
86, 91	<u>Summarized Comment:</u> Preference for Alternatives 1 and 3 because they offer more trail designations for larger OHV vehicles compared to the other alternatives. Excerpts from comments: <ul style="list-style-type: none"> • <i>Comment 86</i> – “Both alternative 1 and alternative 3 are acceptable to me. I understand that alternatives 4, 5, and 6 restrict full size vehicle access much more severely than alternatives 1 and 3. I live in the Tijeras area and I appreciate having some vehicle access to the forest roads so close to home.” • <i>Comment 91</i> - I like #3 very much, #1 is just fine, #2 is poor (because some sort of order needs to show up), and #4, #5 I am opposed to. #6 I would be vehemently opposed to.
<u>Response:</u> We have noted your preferences for Alternatives 1 and 3.	
107	Alternatives 3 and 4 best reflect the niche and meet the need. These Alternatives provides a motorized trail experience in an area with a long history of motorized use and also provides numerous environmental benefits over the existing condition. Although Alternatives 3 and 4 both best meet the purpose and need, Alternative 1 is a reasonable response to the purpose and need as well as the planning issues... except for the seasonal closure. Alternative 4 does a fair job of responding to an issue raised in Scoping. Either alternative would provide managed recreational opportunity while adequately protecting the resources.

<i>Comment #</i>	<i>Comment</i>
	<p>The analysis supports choosing alternative 3 or 4. The existing condition section in Chapter 1 clearly shows that the area has a motorized niche. Other non-motorized uses are also popular, but motorized uses are not available in other areas. Conversely, numerous opportunities for the wide variety of non motorized recreation exist nearby.</p> <p>The affected environment is impacted by numerous human activities. Environmental impacts from recreational use should be compared and contrasted to other human activities in the area. Alternatives 3 and 4 recognize that recreational uses have a large socio-economic value and the Cedro area is an appropriate place provide motorized trail based recreation. Alternative 3 and 4 are also a logical choices considering the agency’s refusal to consider designating some of the existing but “unauthorized” routes in the La Madera area.</p> <p>Alternative 5 does not meet the need and not supported by the analysis. Alternative 6 is totally unacceptable and seems to be a total change in management direction. It is not supported by the analysis and does not meet the purpose and need.</p>
	<p><u>Response:</u> While Alternatives 5 and 6 provide fewer trails designated for motorized use, these alternatives meet the purpose and need. A motorized route system is designated, types of use and restrictions are identified, and both alternatives comply with the Travel Management Rule. These alternatives reduce impacts to the environment compared to the existing condition, reduce recreation user conflicts, comply with the Forest Plan, and are responsive to budget constraints. A system of trail-based motorized recreation is provided, but with fewer routes compared to other alternatives. Both Alternatives 5 and 6 were developed to respond to significant issues identified during scoping. We have noted your preferences for Alternatives 3 and 4.</p>
145	<p>I am concerned that alternatives allowing for increased width (ATV, 4x4, car/truck) motorized use will impact the erosion and safety of trail use in the Cedro Area. I would support both options 4 and 6 which limit access by larger (non-single track) vehicles. I believe that minimizing motorized use will help to preserve the quality of the trails.</p> <p>Please consider limiting vehicular camping access in the Cedro area to reduce irresponsible land stewardship (littering, fire danger, etc.). Please consider limiting motor vehicle access in the La Madera area. I also support the use of seasonal closures on motorized roads to minimize erosion and impact of motorized vehicles. I would also support the use of “administrative” closures to limit impact.</p>
	<p><u>Response:</u> We have noted your preference for Alternative 4.</p>
153, 170	<p>Restriction on Motor Vehicle Use, Sandia Mountains (North of I-40). The Pueblo supports the common intent in Proposals 1,4,5 and 6 to prohibit 1.68 miles of National Forest System roads 445C and 445H in the Bernalillo watershed area, and designating 5.77 miles of road in the Bernalillo watershed (NFSR 445) for state licensed highway legal vehicles only.</p>
	<p><u>Response:</u> We have noted your support for Alternatives 1, 4, 5 and 6.</p>
164	<p>Anyone not well-informed on the Travel Management Plan and the process could very easily think that the status of the trails for non-motorized users will also be changed by the outcome of the decision. Acknowledgement of the numerous miles of trails that are not shown on the maps would allay fears that all the trails were being "turned over" to motorized users.</p> <p>We support Alternatives 1,4,5, and 6 in the northern section with the condition that there be signage in the proposed additional trailhead at the Oak Flat complex that states the area is multi-use, not exclusively for motorized users. Alternative 2 is not workable and Alternative 3 allows far too much ATV use in sensitive areas. We believe Tejon and Gonzales drainages are far too sensitive for motor vehicle travel.</p> <p>In the southern area (Cedro Peak), motorized travel is fine on the existing Forest Service road.</p>

Comment #	Comment
	<p>Mahogany should be closed, as it was prior to being opened for clearing out wood. Motorized travel can utilize 217 and 337 for access between Oak Flats and Juan Tomas. Please be aware that Pinon, Wildcat and Lone Pine trails are all heavily used by equestrians, many of whom have built homes in the area in order to have access to these trails. We would like to see all trails that are currently single track in the Cedro Peak area remain single track.</p> <p>In regard to the proposed alternatives in the southern section, we approve #1 and #2. Number 3 appears to be a free-for-all that would wreak havoc and end in the total decimation of the resource. Alternative 4 would be acceptable if there was not a gap in the designated route for full sized vehicles on either side of the FS land. Where do users go from the route and how are they to get to it? Alternative 5 does not provide many routes for dirt bikes and thus would be hard to manage. Alternative 6 would not be workable.</p>
	<p>Response: All system trails, including Wilderness trails, are shown on the Existing Condition maps, pages 125 and 126 in the EA. The miles of trails that are not designated for motorized use are displayed by alternative on page 29 of the EA. If Oak Flat picnic area is selected for use as a trailhead, this site would be open to all trail users, not just motorized recreationists.</p> <p>The designation gap in NFSR 462 where the road crosses private land would not effect the loop from NFSR 462 to NSR13 to NFSR 542, when accessed from NM 337. If the owners of the private land choose to gate NFSR 462 in the future or otherwise restrict use of the road, the north end of NFSR 462 would only provide access to the private land and the trail system from NFST 0511.1 Lower Pine.</p> <p>We have noted your preference for Alternatives 1, 4, 5, and 6.</p>
165	<p>Alternative 6 does not meet the directive of the Travel Management Rule which requires each district to establish a travel management plan which designates routes for motorized use on the forest. Therefore, I respectfully request it be removed from the document in entirety as Alternative 2 is essentially the same thing. It does not meet the criteria either, but it is widely accepted that a "no change" alternative be proposed in these type documents.</p> <p>Alternative 1 leaves me with the feeling of being cheated. The reasons cited for not allowing the La Madera area trails to be considered under this alternative are incorrect and full of opinions rather than scientific data to warrant the omission. I request that the La Madera trails be considered under this alternative. I also want to comment that with restricting vehicles to the south side of Interstate 40, trails have the potential to become overused. Use of the trails in the La Madera area would be infrequent and mostly on weekends (probably not in the summer months either as it would be too hot for comfortable driving). It would take a well equipped vehicle with much driver experience to utilize these trails and this prevents overuse. Maintenance of these trails would be best served under an "Adopt-a-Trail" agreement with an interested party. Access could be developed through a grant from the "Trails fund" that is given to the State of New Mexico every year and goes unused. I would be willing to prepare a grant application to assist with funds to develop the access to these trails</p>
	<p>Response: Sec. 1508.25 of the National Environmental Policy Act requires analysis of a No Action Alternative. No action in this document is continuation of the current management, cross country travel is permitted where there is not a previous decision prohibiting cross country travel, and there is no designation of a motorized road and trail system. Please see the response to comments 48, 132, 59, 155 in section A5 for a response to the compliance of Alternative 6 with the Rule.</p> <p>Alternative 1 is the proposed action as released during the scoping period on June 19th, 2007 (with some minor revisions listed on page 18 of the EA.) The proposed action is the initial proposal which was reviewed by the public. It is possible for the deciding officer to choose Alternative 1, while also incorporating elements from other alternatives. The deciding officer can also select any of the action alternatives being analyzed.</p>

Comment #	Comment
176, 177, 178, 182, 186	Summarized Comment: Preference for Alternative 4 because this alternative maintains the Cedro trails as single track. Concerns related to Alternative 1 due to designation of trails for ATV use that are valued for their qualities as single track. There are also concerns about the safety of mountain bkes sharing trails with ATVs. Comment 178 illustrates the concern: “Alternative 1 is simply unacceptable and would demote the status of the area from some of the country's very best single track, to the bottom of the list of Bests - at best. If I must choose, Alternative 4 seems okay, as it maintains the integrity and safety of the single track of Cedro Peak for use by both motorcycles and mountain bikes.”
Response: We have noted your preferences for Alternative 4 and your concerns related to designating trails for ATV use.	
50, 97, 146	Summarized Comment: Preference for Alternatives 4 and 5 because these alternatives maintain the Cedro trails as single track, and are considered more acceptable to area homeowners. There is a concern because ATVs and full size 4x4s have damaged Cedro trails. Comment 97 includes requested modifications to Alternative 4 and 5: “(Tablazon Neighborhood Association) are requesting that there be no improvements made on the trailhead that would encourage increased traffic now and in the future, i.e., enlarging the trails, paving the trails and adding restroom facilities. We are further requesting that the area be monitored to evaluate traffic in that area on an occasional as-needed basis. The majority of the neighborhood association is in favor of Alternative 4 or Alternative 5, both with modifications. Alternative 4 would need to be modified to bring the trail head in 1/4 of a mile from the National Forest border and all current and future residential areas. We would still prefer limited access on 462. Although we can agree that Alternative 4 or 5, both with modifications, may be acceptable we still have a significant concern about the current completed EA study.”
Response: The trailhead at Lower Pine is an existing trailhead that has been in use for many years. The trailhead was improved in 2005. There are no changes proposed to the trailhead in any alternative. We have noted your preferences for Alternatives 4 and 5. The publication of the MVUM, coupled with route marker signing at the roads and trails, will inform users of the designations for each of the trails and roads. This would reduce the likelihood that the wrong class of vehicle would use roads and trails not approved for their use.	
106, 120, 133, 134, 141, 142, 158	Summarized Comment: Preference for Alternatives 5 or 6 because these alternatives reduces the number of trails near residential areas around Cedro and reduce potential conflict with non motorized trail users in the Cedro area, and do not provide for motorized designations in the La Madera area These alternatives are also considered to be the most financially viable and improve management of these areas. Excerpts of concerns raised in these comments: <ul style="list-style-type: none"> • <i>Comment 120:</i> “Please choose either Sandia District TMR Alternative #5 or #6 to preserve at least a viable portion of the CNF Cedro Peak area for the host of existing quiet trail users. Preserving the Lower Pine, Wildcat and Pinon and other northeast quadrant trails for quiet trail users would make sense, esp. given the proximity of Tablazon neighborhood... Given recent amendments to 20.11.20 NMAC, the CNF must now be prepared (with funding & manpower) to control fugitive dust emissions on trails designated for motorized use. Therefore, only Alternatives #5 & #6 would be fiscally responsible/possible for CNF.” • <i>Comment 141:</i> “The motorized vehicle proposals 1, 2, and 3 are not good because the motorized vehicles rip up terrain, make dust, cause erosion, and there will not be enough law enforcement to stop them. The motorized vehicles are nuisance and danger to equestrians because they scare the horses. Alternative 5 and 6 are the best because there is no erosion, no dust, no ruined terrain, and the trial will not need as much law enforcement. Without motor vehicles there will be safe, quite, and peaceful trails.” • <i>Comment 158:</i> “I especially like alternatives 5 & 6 in the Cedro Peak area. Limiting

Comment #	Comment
	<p>motorized vehicle usage in this area, specially near forest road access routs that are within quiet neighborhoods like Tablazon, Juan Tomas area etc is very important to keeping the Cedro area thriving with wildlife, plant life and the very people who access it who use it for health and improving their well being that nature so fosters.</p>
<p><u>Response:</u> We have noted your preferences for Alternatives 5 and 6. Fugitive dust issues are discussed in section (AC8) Fugitive Dust section of this document beginning on page 109.</p>	
<p>46, 88, 93, 135, 163</p>	<p><u>Summarized Comment:</u> Preference for alternatives that do not designate roads or trails for motorized use in the La Madera area. Comment 88 expresses many of the shared concerns for the La Madera area: “As growth insulates the Sandia Mountain Range, places like La Madera become critical. This is a refuge for wildlife where they can seek water, food, and shelter. This area may serve as a link for wildlife moving to / from the Sandia Mountains to the Ortiz Mountains, the Galisteo Basin, Glorieta Mesa, and the Sangre de Cristo Mountains.</p> <p>Given this, we strongly support Alternatives 1, 4, 5, or 6 for this area since they do not include motorized use of the La Madera area, especially in Tejon and Gonzales Canyons. Regardless of wildlife concerns, these canyons are not appropriate for use as “rock crawling” playgrounds.”</p>
<p><u>Response:</u> We have noted your concerns related to motorized designations in the La Madera area.</p>	
<p>11, 64, 70</p>	<p><u>Summarized Comment:</u> Concern about environmental impacts from motorized recreation on the Sandia Ranger District. Comment 70 reflects many of the concerns from these comments: “The Cedro Peak area has been unmanaged for close to 40 years, resulting in significant damage to the flora, fauna and soils as outlined in detail in the USDA EA report. My foremost concern is that the most alternatives (1-5) not only condone but actively promotes the trend to destructive recreational through the construction of additional trailheads and parking lots and actively sanctions the use of existing trails by a variety of motorized vehicles. In short, the first real attempt by the National Forest Service to manage this previously unmanaged portion of their domain is to quicken the pace of the damage, and effectively condemn it to becoming little more than a off-road park.”</p>
<p><u>Response:</u> We have noted your concerns. There is no intent to open up more areas for bikers and OHVs, creating a primary usage area for ATV users, or managing the forest so that it becomes little more than an off-road park. OHV use already occurs in the Cedro area and all areas being considered for motorized route designation; this project would manage the motorized uses by designating an appropriate system of roads and trails.</p>	
<p>89, 173</p>	<p>We support Alternative 1 and Alternative 6, with the following exceptions, for which we provide comments below. Alternative 6 would provide the most protection for wildlife, habitat, watersheds and water quality, and would reduce user conflicts significantly and should be the alternative developed into the MVUM by the SRD. We do not support the No Action Alternative (Alternative 2), Alternative 3, Alternative 4, or Alternative 5, as these alternatives do not provide adequate protection for natural resources nor do they adequately reduce user conflicts as required by the Travel Management Rule. Alternatives 2, 3, 4 and 5 would have significant negative impacts on threatened and endangered species, management indicator species, and associated habitats...</p> <p>These alternatives would prohibit motorized travel on National Forest System Roads (NFSR) 445C and 445H in the Bernalillo watershed area. We support the closure of these currently open routes because it will prevent the negative off-road vehicle affects to wildlife through direct harassment and displacement and reduced security of areas between roads, including the affects of noise, which many studies show, and the SRD acknowledges, cause wildlife displacement and avoidance several hundred meters from routes. (EA: 46.) This closure would ensure the SRD would thereby be in compliance with Executive Orders 11644 and 11989.</p>
<p><u>Response:</u> We have noted your preference for Alternatives 1 and 6, and your concerns about environmental impacts of Alternatives 2-5.</p>	

Comment #	Comment
<i>(A1a) Alternative 1</i>	
42, 60, 71, 74, 80, 127, 151, 175	<p><u>Summarized Comment:</u> Preference for Alternative 1. Respondents feel that this Alternative provides a balanced approach providing for a variety of motorized recreation opportunities. Several commenters noted a preference for not designating motorized travel in the La Madera area. An example of La Madera comments include:</p> <p><i>Comment 151:</i> I am in favor of Alternative 1 (Proposed Action) because it protects La Madera which has never had significant motorized use while continuing to allow motorized vehicles to use the Cedro area which has a long history of motorized use.</p> <p>An example of the Cedro area comments includes:</p> <p><i>Comment 71:</i> I support Alternative 1 because it provides a balanced mix of OHV opportunities in the Cedro area...Although I support all OHV recreation I have serious concerns about the damage to my favorite area that can occur with increased ATV use. ATV's will trample down more vegetation than a dirt bike or mountain bike will. I am concerned that with too many ATV trails, the area will become an ATV park. The number of ATV trails in Alternative 1 is about right. It is important to recognize that ATV's are much more suited to the blue full size vehicle trails than dirtbikes are, so the number of ATV trails really is greater than it appears on the map. Please be advised that dirtbike use in the Cedro area will not increase with Alternative 1. The public has been aware that dirtbikes are allowed in this area for a long time and I believe the current use patterns will not be impacted with this plan. The trails are there because dirtbikes first started using them many years ago. Maintaining the current system of single track trails benefits many users including mountain bikes and hikers. It is a win win plan.</p>
<u>Response:</u> We have noted your preferences for Alternative 1.	
39, 68	<p>As an ecologist, US citizen, avid hiker/backpacker, and resident of the Tablazon community, I am extremely upset at the Forest Service's proposed plan (Alternative 1) outlined in the Environmental Assessment for 2 key reasons: 1 - This plan allows ORV use on the entire trail system in the Cedro Peaks area, even adding 3.5 miles of trails to accommodate ORV users (to re-route the current damage), and provides an unbelievable area for ORV use of 46 miles! 2 - This plan also makes the Lower Pine Trail, in the Tablazon residential community, as one of the key ORV access points.</p>
<u>Response:</u> We have noted your concerns related to Alternative 1. Other alternatives were developed in the EA that address the concerns you have identified.	
<i>(A1b) Alternative 2 (No Action)</i>	
71, 74, 89, 173	<p><u>Summarized Comment:</u> Alternative 2 (No Action) is not acceptable because commenters believe that improved management through road and trail designations should be implemented. An example from comments includes Comment 89 "Because Alternative 2 (the "no-action" alternative) would fail to comply with the TMR because it would impact species' habitat throughout the area north of I-40, would not restrict cross-country motorized travel, and would not protect cultural resources, this alternative should not be considered. The impacts to species' habitat with Alternative 2 include habitat loss through direct damage and root compaction, soil compaction around trees, and noise disturbance as noted in the EA prepared by the SRD. The EA also notes that populations for mule deer, Merriam's turkey, juniper titmouse, pygmy nuthatch, hairy woodpecker and house wren would experience a downward or slight downward trend with Alternative 2."</p>
<u>Response:</u> The National Environmental Policy Act requires that the alternative of no action be considered, even if it cannot be selected because it would violate policy such as the direction mandated by the Travel Management Rule. No action serves as a baseline for comparison of the effects of the other alternatives.	

Comment #	Comment
(A2) Alternative 3	
10, 74, 108, 160	Summarized Comment: Preference for Alternative 3 because this alternative provides more opportunities for ATV and other motorized recreation. Comment 160 typifies the support for Alternative 3: “It provides the most extensive and quality trails for ATV users and would bring them into better balance with other users in the Sandia Ranger District. Alternative #3 also provides the national forest administrators to close these trails based on weather conditions year round and not by calendar date. Some years the monsoons come early, some years they come late, some years they don't come at all. The same is true for snow pack and its melt down and run off, especially at the elevation in the Cedro Peak area.”
Response: We have noted your preference for Alternative 3.	
24, 71, 80, 127, 151	Summarized Comment: General concern about Alternative 3 due to possibility of increased fire risk in the La Madera area, impacts to wildlife habitat and migration, conflicts with single track users, and trail surface impacts. Examples of comments related to concern about Alternative 3: <ul style="list-style-type: none"> • <i>Comment 71:</i> Alternative 3 is a bad idea because it creates new ATV trails in areas that they do not exist. As mentioned above, increasing ATV access in Cedro will lead to more trail degradation and greater conflict with single track users. • <i>Comment 80:</i> I am opposed to Alternative 3 because the La Madera Area of the Forest is one of very few wildlife corridors open to allow wildlife safe passage from the mountains to the plains area and back. Or, I oppose Alternative 3 because of the fire hazard it would pose to the neighborhoods of La Madera, Paako, San Pedro Creek and the Overlook.
Response: We have noted your concerns related to Alternative 3, which were also raised during the many opportunities for public involvement during the process. Analysis of increased fire risk in the La Madera area, impacts to wildlife habitat and migration, conflicts with single track users, and trail surface impacts are contained in the EA with additional clarification in this response to comments.	
79	Please Make Alternative 3 The Proposed Action
Response: The proposed action was the proposal that was released with the scoping letter released on June 19 th (with minor revisions described on page 18 of the EA). Scoping is the “process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” (40 CFR 1501.7) The information received during scoping provides the basis for developing the alternatives to the proposed action. The proposed action is not the preferred alternative, and any alternative or combination of alternative may be selected by the decision maker. Selection of a preferred alternative is not required in an EA.	
52	Sandia Range, North of I-40 - I'm in favor of Alternative #3. It allows all motorized vehicles to share the trail and a trail head to park vehicles and trailers. Cedro peak, South of I-40 - I'm in favor of Alt #3 as well for the same reasons stated above. Alt # 4,5 & 6 are heading in the wrong direction in my opinion as they're greatly skewed toward one type of Recreation users or another. I'd like to see more motorcycle trails on the West side of hwy 337 in this Alt (perhaps they still are but they Yellow shading is not present in this area). Forest Road #242 and #252 are not highlighted in Blue but appears to be usable by all types of vehicular travels. I hope it remains this way in the new plan.
Response: The area west of highway 337 was designated through a decision signed on December 20 th , 1996 and is not being revisited with this project. 36 CFR § 212.52 states that “The responsible official may incorporate previous administrative decisions regarding travel management made under other authorities, including designations and prohibitions of motor vehicle use, in designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use”. The December 20 th decision west of 337 complies with the Travel Management Rule direction, motorcycle trails designated under that decision will be shown on the Motor Vehicle Use Map for the Sandia Ranger District.	

Comment #	Comment
	Most of Forest Roads #242 and #252 are under Bernalillio County jurisdiction, and subject to county regulations. NFSR #242 between the private land and the eastern district boundary is managed for highway legal vehicles only.
(A3) Alternative 4	
33, 34, 35, 38, 43, 54, 81, 180, 181, 183, 184, 185	<p>Summarized Comment: Preference for Alternative 4 because this alternative designates most Cedro area trails for single track motorized use, and limits ATVs to roads and National Forest System Trails (NFST) 0512 and 0525C that are currently managed ATVs and Full Size 4x4 vehicles.</p> <p>Examples of comments received in support of Alternative 4:</p> <ul style="list-style-type: none"> • <i>Comment 180:</i> As an avid mountain biker who enjoys single track trails, I support alternative number 4, as it provides a good balance of the interests of different groups. It keeps some of the best single-tracks single, which will help to retain the unique character of Cedro's trails. Opening these trails to ATVs will reward the behavior of users who effectively have "absorbed" these trails for their use. • <i>Comment 185:</i> I am in favor of map alternative 4, which preserves the single track trails Cedro Single Track (05252B) and Lone Pine (0511C). These swooping, narrow trails are some of the best and most popular trails in the Albuquerque area for mountain bikes and motorbikes. Allowing ATV traffic would essentially ruin these beautiful trails by turning them into wide jeep roads, flattening the banked turns, and destroying trailside vegetation. Since ATVs are the only users who need wider trails, allowing ATV traffic on these trails would significantly degrade the experience for the large majority of other users, including hikers, runners, horseback riders, mountain bikers, and motor bikers. • <i>Comment 81:</i> It occurs to me that, while I can hope for a rule that maximizes my opportunities for recreational bliss (that would probably be #4, in case you're interested), about the best you can hope for is to make every disparate user-group equally unhappy.
Response: We have noted your preferences for Alternative 4.	
125	I am for Alternative 4 with the exception that dirt bikes should not be allowed on Powerline, Dilbert, and the portion of Bear Scat or Pinon as described above. <i>(This comment is listed in section AG9.)</i>
Response: We have noted your concerns with Alternative 4. As noted in the EA, trails will be managed for the use that they are designated for. If these trails are designated for motorcycle use, a condition survey will be completed and they will be modified if necessary to meet the standards for motorcycle use.	
74	Cedro: No. This would prohibit most of the activities that my family and I enjoy.
Response: We have noted that you do not agree with Alternative 4.	
71	Alternative 4 shuts out ATV users too severely. Nonetheless, this alternative is my second choice because it maintains the current system of single track trails for dirtbikes. I can live with it but I believe it is somewhat unfair to ATV users.
Response: We have noted your concern with Alternative 4.	
30	I support Alternative 4 that allows motorized vehicles on established roads but no where else.
Response: To clarify Alternative 4, most system trails in the Cedro area would be designated for two wheeled motorized vehicles (motorcycles).	

Comment #	Comment
(A4) Alternative 5	
<p>9, 15, 27, 40A, 40B, 45, 61, 62, 66, 67, 76, 92, 113, 114, 117, 118, 121, 128, 137, 179</p>	<p>Summarized Comment: Preference for Alternative 5 because this alternative reduces the number of trails near residential areas around Cedro, while providing for some motorized trail opportunities. Examples of comments that support Alternative 5 include:</p> <ul style="list-style-type: none"> • <i>Comment 179:</i> As a resident of the Tablazon neighborhood, I am concerned about dust and noise in the area. The plan to concentrate motorized traffic on designated trails in the Cedro Peak area would result in greater traffic through and near Tablazon. In addition, it would compete with the non-motorized use now enjoyed by hikers, horseback riders and bicyclists. I realize that the forest must be open to a variety of uses. Therefore, I recommend that you select alternative 5. That will allow for some motorized as well as non-motorized use without disrupting the established neighborhood and quiet recreation in the Lower Pine area. • <i>Comment 128:</i> The East Mountain Coalition of Neighborhood and Landowner Association governing board has reviewed and discussed the proposed six options outlined in the recently published ORV Travel Management plan. We have consulted our Trails and Open Space liaison volunteers and have studied the concerns of Tablazon and Heatherland Hills Neighborhood Associations. We have examined the options and have used our previously stated position THAT ALL TRAIL SYSTEMS BE PLACED NO CLOSER TO THE NATIONAL FOREST BOUNDARY THEN 1/4 MILE to evaluate them. We feel that option 5 meets the intent of our position. for the following reasons <ul style="list-style-type: none"> A. This option reflects a buffer zone between the trails and the adjacent residential areas as well as those that will develop in the future. B. This option creates a buffer zone sufficient to halt inadvertent cross over into city and/or county open spaces as well as private lands. • <i>Comment 67:</i> Since we directly border the forest, we view either alternative 5 or 6 as the best for our community. The primary reason is that in the past 8 years (since the Los Alamos fire), we are constantly aware of the fire hazards which are around us. Alternative 5 or 6 maintain the trails closest to the forest-human interface nearest to us (specifically Lower Pine and Wild Cat trails) as non-motorized vehicle trails. Since these trails are located in the lower portions of the canyon, any fire which might be initiated by a motorized vehicle would endanger the homes directly uphill; that is, our community. We feel the increased risk of fire is not balanced by having an additional trail for motorized vehicle use; especially since the primary vehicle users of those trails will not be owners who live in the adjacent area. • <i>Comment 9:</i> Alternative 5 would seem the best compromise for all concerned. It would also fulfill the Forest Service’s stated commitment (to Heatherland Hills residents and board of directors in 2001 and 2004) to decommission the portion of Gambel Oak Trail just south of the Heatherland Hills subdivision and reroute the trailhead to the Pine Flat picnic area.
<p>Response: We have noted your preference for Alternative 5 and the concerns related to non motorized trail use conflicts, dust, noise, increased traffic, fire risk and law enforcement concerns.</p>	
<p>139</p>	<p>The New Mexico Department of Game and Fish...believe that this EA is well written and substantively addresses the issues...The Department recommends the implementation of Alternative 5 for the reasons stated below.</p> <p>The Department recognizes that a road and trail system is a necessary component of multiple use recreation and management on National Forest System lands. At the same time, the Department is very concerned with increasing road densities and motorized traffic on National Forests in New Mexico, which provide crucial habitats including, dispersal and migration corridors for wildlife. Increased road densities and motorized traffic have the potential to increase wildlife disturbance and harassment.</p>

<i>Comment #</i>	<i>Comment</i>
	<p>The Department has summarized the peer-reviewed scientific literature addressing the effects of roads and associated motorized vehicle traffic on wildlife, wildlife habitats and ecosystem functions and services in two different publications. Both of these publications document the benefits of roadless or relatively unroaded areas for the conservation and perpetuation of viable wildlife populations and healthy wildlife habitats, and conversely, the potential adverse impacts on these resources by increasing roads, trails and motorized vehicle use. We submit these two publications as part of the public record:</p> <ol style="list-style-type: none"> 1. Habitat Fragmentation and the Effects of Roads on Wildlife and Habitats on the web at http://www.wildlife.state.nm.us/conservation/habitat_handbook/documents/2004EffectsofRoadsonWildlifeandHabitats.pdf, and 2. Wildlife, Habitat and Hunting: New Mexico's Roadless Areas on the web at http://wildlife.state.nm.us/documents/RoadlessReport.pdf <p>The Department previously submitted two sets of comments on 29 May 2007 and 18 October 2007 responding to scoping requests for information for Travel Management Planning on the Sandia Ranger District. Both sets of comments expressed concerns regarding the potential for the authorization of ORV use north of Interstate 40 in the La Madera area, high road densities and ORV use south of Interstate 40 in the Cedro area, with special emphasis on the importance of the La Madera area in particular. We believe that this area is very important to protect from additional habitat fragmentation and disturbances from increased motorized traffic. This area is one of the last areas on the District that allows for some level of habitat connectivity for wildlife dispersal to nearby habitats such as the Ortiz and San Pedro Mountains and also the Jemez, Caja del Rio and Sangre de Cristo Mountains of the Santa Fe National Forest. There are also important but rare springs that occur in this area, which are critical for wildlife use and warrant protection. We provided documentation of unauthorized ORV use through one of these springs for your consideration during the scoping process...</p> <p>The Department appreciates the Sandia Ranger District's proposed protection of the La Madera area from ORV use in alternatives 1,4,5, and 6 of the EA... In addition to protecting this area, Alternative 5 proposes the most protection for wildlife and habitats south of I-40 in the Cedro area, while also providing what we believe to be a reasonable amount of motorized roads and trails for recreational use of single track, ATV and full-sized 4x4 motorized vehicles. Therefore, the Department supports and recommends the implementation of Alternative 5.</p>
	<p><u>Response:</u> We have noted your support for Alternative 5 as an alternative that provides for motorized recreation with fewer impacts to wildlife.</p>
<p>71, 74</p>	<p><u>Summarized Comment:</u> Concern about Alternative 5 because this alternative reduces motorized recreation opportunities in the Cedro area. Comment 71 expresses this concern as: "Alternative 5 is impractical because it closes off many trails that are important to local OHV users. The TMP process is about designating the trail system, not about closing trails. The public is not well served with this alternative. I believe the Cedro area is not currently overused because there are so many trails available. Closing off trails will lead to more conflict and greater use on the remaining trails. We need a wider distribution of trails and trailheads to reduce use and conflict."</p>
	<p><u>Response:</u> We have noted your concerns related to Alternative 5.</p>

Comment #	Comment
53, 69, 77	<p>Summarized Comment: Concern that Alternative 5 reduces motorized recreation opportunities in the Cedro area. Request that Alternative 5 be removed from the EA. For example, Comment 69 states that:</p> <p>“Alternative 5 severely reduces an already limited recreation opportunity by arbitrarily closing many trails on the east side of the Cedro area. There is no justification for the closures on the basis of soils, riparian area, wildlife, heritage or tribal issues. The only purpose would be to satisfy a few homeowners who have been making unproven complaints of noise, dust and trespass. They are attempting to influence the Forest Service to manage the public lands adjacent to them as if it were an extension of their private property.</p> <p>Alternative 5 is contrary to Item 4 in the Significant Issues on page 13, "Loss or reduction of motorized recreation opportunities'. Alternative 5 would greatly reduce the motorized recreation opportunities.</p> <p>I want you to remove Alternative 5 in its entirety from the EA.”</p>
<p>Response: FSH 1909.15 Sec 12.32 & 12.33 directs the ID Team to recommend to the responsible official the significant issues to be addressed, taking interested and affected agency, organization, and public comments into account through the scoping period. The responsible official approves the list of significant issues used to develop alternatives. The ID Team is directed to consider a full range of reasonable alternatives to the proposed action that address the significant issues and meet the purpose and need for the proposed action.</p> <p>There were many comments received through the public workshops, work group meetings, and the scoping process regarding concerns about motorized road and trail designation from residents who lived near or within the forest boundary and non motorized recreationists. Alternative 5 was developed to address significant issues raised during the public involvement process. The Travel Management Rule in section § 212.55 directs the responsible official to consider: “Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.”</p>	
<p>(A5) Alternative 6</p>	
39, 70, 78, 93, 94, 102, 161, 162	<p>Summarized Comment: Preference for Alternative 6 because this alternative designates only two trails for motorized use, and commenters suggest that this alternative the least impacts to natural resources and area residents.</p> <p>Examples of comments received that suggest a preference for Alternative 6:</p> <ul style="list-style-type: none"> • <i>Comment 102:</i> We have reported damage twice to the Ranger Station that has been caused by motorcycles and 4-wheelers tearing up the terrain because it was far to muddy... We avoid trails on weekends because it is unsafe to ride on either bikes or horses when there are volumes of dirt bikes in the area. Allowing them to use the trails, as their concentration and usage increases, eliminates the use by all others. <p>The population around Cedro is going to continue to increase. Continuing to allow destructive activity will add to the management problems of the FS overtaxed staff as neighbors and less damaging environmental users complain. 4-wheeling and dirt biking should be moved to more remote areas and not allowed in what is rapidly becoming a suburban park.</p> <ul style="list-style-type: none"> • <i>Comment 93:</i> Even on the areas resist to erosion, off road uses such as motorcycles, ATVs and 4-wheelers interrupt the hydrology of the landscape by removing vegetation cover, compact soils which concentrates surface runoff, providing for the development of erosion patterns such as rills and gullies. There is a synergism; the more vegetation is disturbed, the more erosion occurs causing the motorized vehicle user to move away

Comment #	Comment
	<p>from the original trail, making the trail wider or making another trail which causes additional reduction in vegetative cover providing for more erosion, and more trail is made. Table 6 Comparison of Alternative; indicates that Alternative 6 is the “Most beneficial to wildlife habitat”. The Table also indicates damage to soil, watershed, vegetation, and other forest resources is 26 acres for Alt. 6 compared to 43 acres for Alt. 1, and 63 acres for Alt.3. Although, the acres are relatively small there is significant differences in the per cent age of damage; Alt 6 is almost 60 % less than Alt 3 and 40% less than Alt 2. Table 4 displays the miles of Forest System trails, unauthorized trails to be designated and new trails constructed by alternative. Alt.6 has 16 miles of trail compared to 59 miles for Alt. 1 and 61.9 miles for Alt. 3. The data from these tables support Alternative 6 as the having the least impact to wildlife habitat, to soil, watershed, vegetation, and other forest resources. Still Alt. 6 does provide for recreational motorized use at levels that are more manageable while accommodating this type of use in sustained manner on the landscape.</p> <ul style="list-style-type: none"> • <i>Comment 70:</i> Alternative 6 permits access by a broad range of motorized vehicles to a large area of the Cedro Peak region while at the same time setting aside a portion for use by those pursuits which can, and do easily co-exist (hiking, biking, horseback riding etc.) in a natural undisturbed setting. What’s more this alternative maintains a sufficient buffer between the motorized use areas and local residences creating at least an illusion of a natural setting, limiting damage to housing values and health concerns (dust). <p>Alternative 6 would also allow sufficient time for remedial work to be performed on those areas which have been damaged by 40 years of unmanaged use, should the funds or volunteers make themselves available.</p>
	<p><u>Response:</u> We have noted your preferences for Alternative 6.</p>
68	I support Alternative 6 (though I do not support the inclusion of 16 miles of previously designated ORV trails)
	<p><u>Response:</u> Please see the discussion on the previous decision which included single track designations for comment # 52 on page 13.</p>
5, 9, 71, 74, 81	<p><u>Summarized Comment:</u> Concern that Alternative 6 provides the fewest motorized recreation opportunities in the Cedro area compared to the other alternatives. Comments receive express concern that Alternative 6 is unfair to motorized recreationists:</p> <ul style="list-style-type: none"> • <i>Comment 5:</i> Given the previous decision to completely close the Sandia area north of I-40 to off road vehicle use this seems intrinsically unfair given the recognized recreational use of motor vehicles contained in the Travel management directive. There are already ample quiet and motor vehicle free trail opportunities within the forest and the open space system maintained by the county. • <i>Comment 71:</i> Alternative 6 is unfair to the OHV public that currently use this area for legitimate recreation. Shutting them out is not what the National Forests are about. This area is not wilderness and is long established as a traditional OHV area.
	<p><u>Response:</u> We have noted your concerns related to Alternative 6.</p>
48, 59, 132, 155	<p><u>Summarized Comment:</u> Concern that Alternative 6 does not comply with Travel Management Rule Direction and should be eliminated from consideration. Comment 48 suggests that: “The Travel Management Plan (TMP) specifies that OHV is a legitimate use of Forest Service land and the purpose of this exercise is to designate where it shall be. This alternative does not follow the guidance and direction specified in the TMP.”</p> <p>Comment 59 suggests that Alternative 6 is a procedural error. “On page 16, in the last paragraph of Alternatives Considered and Eliminated from Detailed Study, the following statement was</p>

Comment #	Comment
	<p>used to eliminate a proposed alternative eliminating motor vehicle use anywhere on the Sandia Ranger District from detailed study: <i>‘Motor vehicle use is a permitted use in the (Forest Plan.) Since the purpose and need for this project is to designate roads, trails and areas open to motor vehicle use; this alternative is outside the scope of this project.’</i></p> <p>Alternative 6 presented in the EA is essentially the same alternative and it also should be eliminated from consideration... The elimination of any motorized use north of I-40 except state licensed highway vehicles combined with the elimination of all motorized trails in the Cedro area effectively removes all motorized recreation from the project area. The only motorized use within the project area in Alternative 6 would be on maintained Forest Service Roads that would not provide any semblance of a quality recreational experience.”</p>
	<p><u>Response:</u> From page 68271 of the “Public Comments on Proposed Rule and Department Responses” in the Travel Management Rule:</p> <p>“The final rule provides a national framework for local decision-making...the rule retains flexibility at the local level to determine, with public involvement, appropriate motor vehicle use on local NFS roads, on NFS trails, and in areas on NFS lands. The Department believes that decisions about specific routes and areas are best made by local officials with knowledge of those routes and areas, the local environment, and site-specific tradeoffs, with public involvement and in coordination with appropriate Federal, State, local, and tribal governments....</p> <p>Provision of recreational opportunities and access needs are two of several criteria the responsible official must consider under § 212.55 of the final rule in designating routes for motor vehicle use. National Forests are popular with many Americans for many uses. It is not possible to accommodate all user demands on all National Forests while also protecting water quality, wildlife habitat, and other natural resources that people come to enjoy. Forest Service managers must balance user interests against the other criteria for designating routes and areas under the final rule.”</p> <p>In Alternative 6, OHV recreation is provided for, but at a reduced level compared to the other alternatives. This alternative does respond to significant issues that were submitted during scoping and earlier public collaboration and the criterion specified in the Rule, and does not represent a procedural error of the Travel Management Rule.</p>

Comments Related to the Significant Issues

Significant issues (unresolved conflicts with the proposed action) were identified during scoping, and were approved by the Responsible Official Nancy Rose on October 12, 2007. These issues were used to define the alternatives can be found on pages 13-14 in the EA. The comments and responses have been organized around the issues.

Issue 1: Designation of Motorized Trails in the Cedro Area

A. Potential Impacts to Residents of Neighboring Subdivisions.

<i>Comment #</i>	<i>Comment</i>
<i>(AB3) La Madera Area - Private Land Concerns</i>	
6	I applaud the Proposal...in regards to closure of the unauthorized roads and travel on pipeline access, in the La Madera area. I believe the value of creating/repairing a corridor for wildlife in that area from higher to lower elevations, far outweighs the "rights" of ORVs there, especially on trails that have been illegally made.
<i>Response:</i> We have noted your preference for no motorized designations in the La Madera area.	
24	<p>Furthermore, as someone who frequently enjoys the solitude and great beauty of our national forests, I have often come across large areas of forest that are frequented by ATV enthusiasts. There are certain characteristics that ATV enthusiasts share - they bring with them large RVs and trailers that require adequate roads for turnaround and parking. Many who enjoy this sport do so responsibly. However, if such a road or parking area is not provided, then the unscrupulous members of this sport simply make their own roads and parking areas...through pristine forest. During major holidays there is rarely enough parking for RVs in our national forests and the resulting damage is high and simply heartbreaking to see. The Cibola National Forest in the La Madera area being considered for motorized use is much too sensitive to sustain or rebound from the damage which is, unfortunately, inherent in this sport.</p> <p>Lastly, the roads in San Pedro Creek Estates are privately owned and are maintained at quite a high cost by the Homeowners Association. On maps of the area, it appears that Via Entrada, the main road through the Estates, provides access to the La Madera area being considered for motorized use. Maps of the area do not reflect that there is a locked gate at the end of Via Entrada. It isn't hard to visualize RVs and pickups hauling heavy trailers upon our private roads only to find after 4 miles that there is no access...and they have to turn around...either causing damage to the shoulders of our roads or a residents private driveway.</p>
<i>Response:</i> If Alternative 3 is selected, a trailhead would be constructed inside the forest boundary for parking and unloading OHV vehicles. This area is not being considered for motorized dispersed camping in any alternative, and it is not expected to attract RVs if camping is not accommodated.	
As you have noted, Via Entrada is a private road, and there is a locked gate. The maps will be corrected, removing Via Entrada. The MVUM would not show Via Entrada, since it is not a road under public jurisdiction.	
36, 37	Being that the only access is thru a residential area and the use of La Madera Road the impact would be quite substantial. Starting at Hwy 14 it passes the Vista Grande Community Center and the High school plus a planned church. Going up La Madera you are passing the area which is owned my PAAKO and builders who are planning to build as well as Campbell Ranch which is Village 1, Continuing is the community of Vista Bonita, going on is the area of La Madera where more homes are being developed. The area cannot sustain the traffic and noise of trucks and trailers with ATV's and Motorcycles. The road now is badly maintained by the County of Sandoval. Is the Federal government going to pay for road up keep? Your department now can't provide the personal to see that the garbage (beer cans) etc and

<i>Comment #</i>	<i>Comment</i>
	campfires are properly taken care of. Beer cans along the side of the roads plus garbage! This is all residential and we want it to remain so.
<u>Response:</u> La Madera Road is under Sandoval and Bernalillio County jurisdiction and they provide the maintenance for this road. We have noted your concern about the access through a residential area on La Madera road.	
175	I am concerned about alternative #3. My concerns are in three areas: 1- the fire department in La Madera is only volunteers. It would be the first to respond if a fire was sited in the La Madera area and as in most of New Mexico, there is a limited water supply at the fire station; 2- the area under consideration is a wildlife migration path. With the increasing number of homes along Highway 14 there is less and less area for the wildlife to use for migration; 3- This is also water shed area and if the off road vehicles are ride with the soil is moist they will be damaging the water shed.
<u>Response:</u> 1) Regarding fire - an increase in human activities will normally increase risk, and the associated impacts to emergency services. It is also understood that higher risk activities will increase the risk proportionately. Many mechanisms allow emergency services to adapt to increased risk, whether it is in response to changes in population, industry, activities, or land use. Fire fighting is a coordinated effort in the La Madera area between the volunteer fire department, state, county and federal law enforcement agencies. The Forest Service would be responsible for initial attack on National Forest lands following a report of a fire. Items 2) and 3) The impacts to wildlife migration and soil and water resources are discussed in the EA.	
137	Lack of professional fire and rescue services. Any rescue or fire emergency causes undo stress on surrounding volunteer services. Motorized Vehicle routes need to restrict access so that neighboring residential areas will not be adversely affected by noise, traffic, erosion, and trespass. Enforcement will cost taxpayers too much money and without strong enforcement will render whole area accessible to motorized vehicle.
<u>Response:</u> Your concerns have been noted. Regarding emergency service, please see the response to comment 175 above. The effects to residential areas are addressed in the EA. Law enforcement issues are also analyzed in the EA and the Law Enforcement specialist reports.	

<i>Comment #</i>	<i>Comment</i>
<i>(ACI) Cedro Area - Private Land Concerns</i>	
9, 15, 19, 39, 45, 51, 55, 61, 62, 66, 68, 76, 114, 161, 162	<u>Summarized Comment:</u> Concerns about impacts to the Tablazon subdivision, including concerns related to public safety, dust, noise, property values, fire risk, potential for increased traffic, crime and impacts to non motorized recreation uses. Examples of comments received include: <ul style="list-style-type: none"> <i>Comment 55:</i> I oppose the proposal to allow off road vehicle use to be concentrated near the Tablazon subdivision. This would not only significantly increase the amount of dust in my neighborhood, but would increase the level of noise pollution that is already very loud due to the amplification of noise from the north side of Interstate 40. In addition to the reduction in our quality of life because of the noise and dust pollution, our property value would decrease as a result. <i>Comment 61:</i> The proposed designation of 462 for full size 4x4 use would bring more dirt and noise to my backyard...More traffic will bring more noise, dust, air pollution, and trash to our neighborhood. I also have concerns about home security and fire danger. Although the majority of public forest users are good citizens, higher traffic in this area is likely to bring in a few troublemakers. This increases the potential for drunk driving, vandalism and theft in the neighborhood. Additionally, more people in the area

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	<p>increases the risk of a careless act starting a dangerous forest fire very close to our homes.</p> <ul style="list-style-type: none"> <p><i>Comment 66:</i> As a Tablazon resident, issues important to me focus exclusively on the Cedro Area; specifically, the area in and around the vicinity of the Forest Road 462 Trail Head. Those issues include: (1) Public safety associated with motorized vehicles in very close proximity to hikers, pets, mountain bikers, and horseback riders in the area; (2) Increased traffic through as well as automotive (truck, trailer, etc.) parking within Tablazon, particularly that associated with off-road motorized vehicle operators using the Forest Road 462 Trail Head, which is currently inadequate to support motorized vehicle use in the area; (3) Air quality deterioration associated with the fugitive dust generated from motorized vehicle use in the area; and (4) Unwanted noise associated with motorized vehicle use in the area. The first issue would be adequately addressed by segregating motorized traffic from non-motorized traffic/users. However, with the additional consideration of issues (2), (3), and (4), the segregated motorized traffic should be confined to areas as far from residential properties as possible, with a Trail Head that is readily accessible and can adequately accommodate the parking of trucks, trailers, etc. without adversely impacting a neighborhood and its residents. Issues (2), (3), and (4) are basic to one’s quality of life, but can adversely impact property values as well if they are not addressed and considered with care in decision making.</p> <p><i>Comment 106:</i> We have had occasional problems with the 4 wheel drive traffic in our area. Some of the problems that we've seen include: Trucks getting stuck in the mud and deep ruts on Forest Rd. 462 while out 4-wheeling and then leaving their vehicles stuck in the middle of the road for a period of time blocking the road. (We have photos of this!) Four wheelers creating all kinds of new roads and trails while off-roading along with tearing around in the fragile desert meadow terrain. Jeepers and pickups coming into the nearby forest drinking beer and throwing the bottles and cans off of their vehicles. Kids coming up and starting a bonfire large enough that firefighters had to come out to put out the fire. Trucks intentionally chasing me off the road while hiking/jogging. Unsavory characters hiding out and camping illegally near our house</p>
<p><u>Response:</u> Your concerns have been noted. The effects have been analyzed to Tablazon and other residential areas near the Sandia Ranger District in the EA and the specialist reports. Alternatives 5 and 6 reduce the amount of motorized recreation designations and provide the responsible official with information with evaluating the expected impacts with each alternatives. These comparisons will be used when developing a decision.</p>	
<p>73, 75</p>	<p>It is not clear in the EA, how the current proposed plans meet the objective of having “routes that do not encourage trespass on private lands” This subject needs to be further developed.</p>
<p><u>Response:</u> Trails and roads that crossed onto private property or property that are under other jurisdictions were not considered for motorized designation. For example NFST 05604 Ponderosa crosses into Bernalillio County Open Space, which is managed for non motorized use. This trail is not considered for motorized designation in any alternative. Only roads and trails the connect to public roads (Forest, State or County) were considered for designation, or those roads that were needed to provide access to private inholdings within the Forest boundary.</p>	
<p>27, 39, 45, 51, 62, 76, 92, 113, 114, 118, 161, 162</p>	<p><u>Summarized Comment:</u> Concern from residents of the Tablazon Subdivision that designation of roads and trails near their subdivision will result in increased traffic and crime. Examples of comments include:</p> <ul style="list-style-type: none"> <p><i>Comment 45:</i> One pressing safety concern is that emergency egress from Forest Road (NFSR 462) (and the Tablazon neighborhood at large). The emergency egress is substandard. In the event of a forest fire, both egress by residents and access by fire fighting personnel at best is tenuous. These roads are not sized for the increased traffic. The roads will need to be upgraded. In addition, traffic speed is currently not monitored and many non-residents speed through the neighborhood to reach the forest parking lot. The increased traffic will required the speed limits to be enforced for safety.</p>

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	<ul style="list-style-type: none"> • <i>Comment 51:</i> This entry way (north on NFSR 462) will increase traffic exponentially, endangering the safety of the people who live here. It's hazardous enough with the current traffic. Vehicles come and go through this entry way at high rates of speed with little regard to children playing in the area, local residents walking their pets or just out walking enjoying their neighborhood. I have to be very careful letting my 5 year old play in the front of my property because the 4 wheel drive vehicles come out at high rates of speed, parking and tearing up my property. Will the Forest Service be responsible for the death of my son or his friends if they get hit by one of these vehicles once traffic increases even more? Will they be responsible for the clean up and repair of my property after the abuse caused by so many vehicles coming and going into the newly designated ORV entryway? Limiting the entry of ORV to the National Forest may be a good decision but designating one of the entry points in a densely populated neighborhood is not a wise decision! • <i>Comment 62:</i> This is the only trailhead in the Cedro area that is accessed by driving through an established neighborhood. All trailheads should be located on a main road such as South 14. Additional traffic in Tablazon will result in more safety issues for our residents as we use our community roads for walking, riding horses, and bicycling. Children, adults, and pets have an increased risk of injury and our property is more at risk for burglary and vandalism. • <i>Comment 76:</i> It is unknown what increase in traffic to expect as insufficient research has been done to analyze current usage. There is therefore no plan for dust control, crowd/traffic control, and other issues associated with the inevitable increased usage as other areas are 'removed' from OHV use. The 'known' trails still open will see exponential growth in use by OHV. It is unknown what percentage of usage is attributable to NON motorized vs motorized users. There is no clear plan to assure separation of hikers and bicyclists to prevent run over type accidents. There is insufficient enforcement staff to adequately control the area. There is no plan in place to control dust, nor fuel/petroleum spills.
	<p><u>Response:</u> NFSR 462 has connected to the Tablazon area since sometime before the 1950s. This road is shown on a 1958 forest map. Motorized use by all vehicles has been allowed since at least 1986 with the current Forest Plan. All alternatives except Alternative 2, No Action, reduces the amount of area open for motorized recreation. NFSR 462 does provide access to private lands with homes from the Tablazon subdivision, and it is necessary to provide motorized access on NFSR 462. Throughout this process, many residents of the Tablazon subdivision have mentioned that they purchase property in the area at least partially due to access to the National Forest. Many comments received from residents who hike or ride horses want motorized access to the Lower Pine trailhead, and subdivision residents likely make up a large percentage of trailhead users.</p> <p>The trailhead near the Tablazon neighborhood existed prior to the beginning of the travel management process and had been used for recreational motorized vehicle access for several years. None of the proposed actions include closing existing trailheads and so no redirection of existing traffic to this or any other trailhead is expected. The trails proposed in the alternatives are the same trails that have been used by motorized recreationists for many years. The analysis does not anticipate large increases in the use of those trails</p> <p>With the exception of Alternative 6, there is no reduction in access from public roads to the Sandia Ranger District. It is not anticipated that there will be a noticeable increase in access through the Tablazon Subdivision, since other points are more quickly accessed from Albuquerque and other surrounding areas.</p> <p>It is not likely, given the established use, that there will be a noticeable increase in traffic through the Tablazon subdivision as a result of motorized vehicle designations.</p> <p>Speeding on county roads outside the jurisdiction of the Forest Service. If speeding is a problem along the road</p>

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	<p>leading to the forest, the neighborhood can work with the local sheriff’s office to address this issue. The Forest Service will provide information to trail users about the importance of following traffic safety laws when accessing the forest.</p>
<p>97</p>	<p>We have concerns about designated use in this area. Collectively, we share some or all the following concerns, some of which were stated above:</p> <ul style="list-style-type: none"> ○ Impact on property values; ○ Impact of the noise level; ○ Danger to horseback riders; ○ Danger to bicyclists/mountain bikers; ○ Hikers, and all others using the trail system; ○ Safety ○ Increased road traffic throughout the Tablazon Community to access the trail head, ○ Increased pollution; ○ Disruption of wildlife; ○ Damage to trails, ○ Increased security concerns; ○ Damage to soil, watershed, vegetation, and other forest resources; ○ Harassment of wildlife and significant disruption of wildlife habitats; ○ Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; ○ Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands; ○ Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors, and ○ Fire danger. <p>As a neighborhood, we have many valid reasons for not wanting additional traffic in and out of the area and with having trail access in the Tablazon Neighborhood, including but not limited to narrow roadways, only one primary entrance, and the trails being so close to the National Forest boundary. A critical issue to consider is the designation of this area by the Community Wildfire Protection Plan as an area at risk due to the high risk of fire danger and poor exit availability. By the Forest Service's own admission, there is concern regarding the defensibility of this area in the event of a wildfire. We have talked with County Commissioner Michael Brasher and are aware that due to our road challenges and entry/exit issues, Tablazon would not even be approved as a subdivision for development if it was being developed now.</p> <p>We are concerned that limiting motorized vehicle access to a few specific areas will significantly increase traffic flow and overpopulate these areas given the large and growing percentage of people interested in operating their motorized vehicles in the forest, not only from our East Mountain Neighborhoods but also from the 800,000+ people in the greater Albuquerque area.</p>
	<p><u>Response:</u> Thank you for your comments, your concerns have been noted.</p> <p>Regarding your comments on the potential for increased traffic through Tablazon subdivision: No access points from public roads are being limited in the Cedro area in any alternative. Publication of the MVUM is not likely to result in a noticeable increase in use through the Tablazon subdivision. For people visiting the area from Albuquerque or other more distant locations, Cedro access is much easier from NM 337 at the western junction of NFSR 462, NFSR 242, or the Oak Flat area. The Lower Pine trailhead is small, and there are larger and more convenient trailheads that either exist or are being proposed closer to NM 337. Alternatives 1, 3, 4 and 5 all provide for additional trailhead parking at some level elsewhere in the Cedro area. The Lower Pine trailhead has</p>

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	<p>been shown on the Cibola Forest Visitor Map since 2006, and we have not received reports that there has been a noticeable increase in use since the publication of the map. It is likely that many of the people who access the Cedro area from the Lower Pine trailhead are residents from the Zuzax area such as Tablazon and Five Hills.</p> <p>Regarding concern for fire risk: An increase in human activities will normally increase risk, and the associated impacts to emergency services. Many mechanisms allow emergency services to adapt to increased risk, whether it is in response to changes in population, industry, activities, or land use. We do not expect that the motorized use designations in any of the alternatives would result in increases in trail or road use; these uses already exist in the area. We do not believe that the designations will draw new motorized users to the area, nor does the Forest Service plan to promote the area as a destination for new motorized users. The Fire and Fuels Specialist report provides an analysis of fire starts in the Cedro area during the last three years. Of the 35 human-caused fires from 2005-2007, 29 were in proximity to roads and recreation sites and only 5 fires were associated with trails or trailheads (page 8 of the report). It is unlikely that the percentage of fires associated with trails and trailheads would change.</p> <p>As stated, the area may be a high risk of fire danger and concerns of defensibility could exist, however it is important to note that many areas with the same degree of danger exist throughout the East Mountain Area. That said it is also important to note that each particular use has a different associated risk. Additionally, a decrease in the threat of catastrophic fire could also be realized as the area will be more intensively managed for the control of higher risk human activities and increased access for a faster response to a fire. It is very difficult to extend comparisons beyond this point as many dynamic elements exist in fire regimes.</p> <p>The EA, TAP, specialist reports and this Response to Comments document analyze the effects of each alternative to recreation use, impacts to private and other public lands, and natural resource concerns.</p>
121	<p>Our property borders the National Forest, and our quality of life would be severely impacted by the dust, noise, gunfire, and increased crime that would follow the opening of the single track to motorized traffic and funneling all of the districts traffic into this area. As it is, few people know about these trails, so the motorized traffic is minimal, but still dangerous.</p> <p>In light of the shrinking budgets, limited resources of the Forest Service, and few personnel to cover a huge forest area, we believe that it would be a shame, and the sacrifice of a beautiful area to allow what would (in reality) be unrestricted motor traffic in the Cedro area.</p>
	<p>Response: Noise, dust and traffic concerns are addressed in the comments above. There is a forest order prohibiting discharging of firearms anywhere on the Sandia Ranger District. The Sandia Ranger District should be contacted if people are shooting firearms on the district.</p> <p>The current condition of the Cedro area is unrestricted motorized use. The Motor Vehicle Use Map will show designated trails in the Cedro area and be a tool for enforcement of the prohibition for off-road vehicle travel that will be implemented by the Sandia Travel Management decision.</p>
131	<p>Our concerns with the proposed trail coming so close to our neighborhood (<i>Heatherland Hills</i>) remain and include:</p> <ul style="list-style-type: none"> ○ safety - in the past, motorcycles have unexpectedly shot out of the forest and on to private land with children outside playing at the time; ○ trespassing - in the past, motorcycles have followed existing paths directly on to private land even when the land was marked private property; ○ fire hazard - we that live in the forest are very concerned about the possibility of a fire destroying our homes and the beautiful forest lands that are adjacent; motorcyclists may not share the level of concern we have since they generally do not live in the area; and even though many may be careful it only takes one irresponsible rider to start a forest fire that destroys a lot of property and changes our lives forever; ○ noise - many people moved to the area to get away from the noise that is so prevalent in

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	<p>the city;</p> <ul style="list-style-type: none"> ○ property values - multiple neighborhood members have noted that they would not have bought in this neighborhood if they knew a motorized trail would be designated so near the neighborhood; ○ impact on wildlife - many neighborhood members moved to this area because it attracts various kinds of wildlife; we expect that a motorized trail near the neighborhood will have a negative impact on the wildlife that inhabits the area;
<p>Response: Once the travel management decision is signed the FS will produce a MVUM which will show users which trails and roads are designated for motorized use. None of the alternatives proposed designating trails for motorized use that terminate within the Heatherland Hills subdivision.</p> <p>Alternatives 1, 3 and 4 reroute the Cedro Creek trail between a meadow to the east and Heatherland Hills subdivision, and this trail would be designated for motorized use. However, the proposed alignment is 790 feet from the nearest home, and is located in a forested area east of the ridge from Heatherland Hills. The NFST 05618 does terminate on County Road 36 and would be designated for motorized use in Alternatives 1, 3, and 4. In Alternatives 5 NFST 05618 rerouted to terminate in Pine Flat picnic area, away from County Road 36. The Cedro Creek trail is closed to motorized use in Alternatives 5 and 6, and is not rerouted to the west.</p> <p>Pages 6-7 of the Social and Economic Specialist’s Report addresses the issue of noise, its attenuation, and the effects to property values.</p>	
69	<p>The Tablazon Neighborhood Association does not speak for all residents of the Tablazon community. I live on Kennedy Lane and have never had a problem with traffic going to the trailhead and rarely even see trucks carrying or dirt bikes headed to the trailhead. In my 14 years of residence, I rarely see children in the neighborhood and traffic is minimal. There is no sign of litter in the neighborhood. I get noise pollution from I-40. I do not get any from the forest or trailhead area and adjacent trails.</p>
<p>Response: We have noted your experiences with OHV use in the Cedro area as it relates to the Tablazon subdivision.</p>	
70	<p>Among those neighboring this area, the EA report states that that: “Most comments received from nearby residents during the scoping phase were from non-motorized recreation users...” Prior to this it implies that proximity to open space and trails played a large part in the decision of these (non-motorized users) residents to move nearby. Any plan needs to weight the effect on housing values, the local economy and the predominant needs and desires of those who live nearby. At least in part because these are the people most likely to feel invested in this area and most likely to help provide the labor as volunteers who will be needed regardless of which alternative is chosen.</p>
<p>Response: Property values and factors influencing housing in the area are addressed on pgs 1-2 in the Social and Economic Specialist’s Report. The social and economic effects of the alternatives are disclosed on pages 110-113 of the EA.</p>	
45	<p>We realize that this proposal is attempting to meet the needs of recreational ATV users and we have no wish to deny them a place to enjoy themselves. I believe that the best solution here is to keep all motorized traffic as far from residential areas as possible, with only one or two access points for motorized vehicles, that provide easy and safe emergency access and egress.</p>
<p>Response: Your suggestion has been noted. Page 68266 of the Travel Management Rule states that: “ The Department believes that National Forests should provide access for both motorized and nonmotorized users in a manner that is environmentally sustainable over the long term. The Sandia Ranger District is in the unique situation of being surrounded almost completely by residential development. It is challenging to provide for motorized recreation in a manner that is completely separated from residential development. Alternatives 5 and 6 analyze the benefits and impacts of a motorized trail system that is more separated from residential areas.</p>	

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(ADI) Property Values	
18, 19	<p>Summarized Comment: Concern regarding impacts to property values in the Heatherland Hills subdivision. Comment 18 states: One of the end results of added noise, increased illegal activity, increased fire danger and safety concerns, is the reduction of HHS property values. The arbitrary placement of OHV trails adjacent to HHS and the resulting reduction in the property value of HHS properties without giving consideration to the impacts on the existing HHS land use would likely be considered an "illegal taking" under constitutional law. This is particularly true when the residential use of adjacent property is existing and the proposed new OHV trail represents a change in the National Forest land use. The implications of the noise, dust emissions and other factors on the Heatherland Hills Subdivision must be given careful consideration by the Forest Service as dictated by 36 CFR 212(b)(5). If the Forest Service does not follow these requirements, its decision on the TMP would be viewed as capricious and arbitrary. Comment 19 suggests that: "much of the economic value of this area is directly related to this area remaining undisturbed and natural."</p>
<p>Response: OHVs and other vehicles have been using NFST 05618 near the Heatherland Hills subdivision prior to this decision. Motorized use, including cross country travel has been permitted near the subdivision since the Forest Plan decision in 1986, and was accepted prior to that. The location of the Cedro Creek reroute is not arbitrary, this site was selected to respond to natural resource concerns, while taking into account the proximity to HHS. There is a need to avoid a large meadow, and locate the trail in wooded areas. The trail is located on the eastern side of the ridge away from HHS, and locating the trail in forested areas reduces the chance that the HHS homes can be viewed from the trail. As stated on pages 6-7 of the Social and Economic Specialist's Report, none of the alternatives are likely to have a measurable effect on the property values in this subdivision.</p> <p>It has been determined that the direction to designate roads and trails under the Travel Management Rule has no takings implications. On page 68286 of "Public Comments on Proposed Rule and Department Responses" in the preamble to the rule it states:</p> <p><i>No Takings Implications</i> <i>Comment.</i> One respondent stated that the proposed rule could cause takings of private property when areas closed to motor vehicle use are then established as wilderness areas. Another respondent asserted that the rule revokes or modifies rights-of-way held by miners, inholders, and others, thereby effecting a taking of private property.</p> <p><i>Response.</i> There is no taking of private property from implementation of this final rule. The final rule applies only to NFS roads, NFS trails, and areas on NFS lands. Any NFS lands that will be closed to motor vehicle use will be Federal lands...Nothing in the final rule revokes or alters any rights-of-way held by miners, inholders, or others. The final rule merely requires responsible officials to designate which NFS roads, NFS trails, and areas on NFS lands are open to motor vehicle use. In making designations, responsible officials must recognize valid existing rights, including valid reserved and outstanding rights-of-way for a road or trail (§ 212.55(d)).</p> <p>On page 68287 there is a determination that "This final rule has been analyzed in accordance with the principles and criteria contained in E.O. 12630. It has been determined that the final rule will not pose the risk of a taking of private property."</p>	
83, 167	<p>At page 6, under Desired Condition, the EA states:</p> <p>"In designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing:"</p> <p>There follows a list of items to be considered, and the fifth item is:</p> <p>5. Compatibility of motor vehicle use with existing conditions in populated areas, taking in to account sound, emissions, and other factors (36 CFR §212.55).</p>

	<p>The first issue is whether sound from OHVs has had a negative impact on populated areas and housing values in residential areas near trails used by motorized recreation. The EA omits any information, data, or assessment from the measurement of sound from trail use which is audible in populated areas. The EA offers only hearsay, that homeowners have complained, and that there are 'concerns' (i.e. 'worries'). The EA offers no record of complaints. There is no data on number, location, dates, frequency and whether it is the same few people making complaints.</p>
	<p><u>Response:</u> The EA and specialist's reports address noise attenuation and fugitive dust. Comments received throughout the public involvement process indicate that noise has been a concern for area homeowners, including comments document in this Response to Comments appendix. Comments received are part of the project record.</p>
83, 167	<p>The second issue I raise is whether housing values will be used as a criteria for decision making.</p> <p>First: at Table 1, (pages 6-8) the Summary of the Existing Conditions and Desired Conditions and the Need for Action. This table identifies no negative socio-economic impacts of Negative Impact of Noise on Housing Values, as an undesirable existing condition. No socio-economic issues are listed under Desired Condition, and no Need for Action is identified on any socio-economic condition.</p>
	<p><u>Response:</u> The issue of housing values was raised by comment letters received during the scoping phase of the Travel Management process. The analysis in the EA responds directly to this issue as articulated by the commenters.</p>
83, 167	<p>Second: Although Housing Values are not identified as an existing negative condition in Table 1, Housing Values are suddenly identified in Chapter 3, page 112, as a socio-economic issue which could be negatively impacted by designation of motorized roads, trails and areas. Housing Values are given a substantial treatment in Chapter 3, pages 112-113, with a detailed discussion on the negative impact on Housing Values from noise from motorized recreation, and statements of noise impacts on housing values for each Alternative. This is wrongly elevating 'noise' from unsubstantiated complaints into an actual problem, although there is no data, studies, or records to support that. The EA is 'manufacturing' a problem.</p>
	<p><u>Response:</u> This issue was raised from public participation in the NEPA process and therefore as a result is analyzed in the EA. As you reference in your comment, in § 212.55 (5) c in the Travel Management Rule: "The responsible official shall consider: Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors."</p>
83, 167	<p>At page 112, the EA includes a lengthy discussion of Housing Values, including the alleged effects of noise on housing values. The EA then hypothesizes about the effects of OHV noise on housing values in each of the six alternatives.</p> <p>This inclusion of housing values as an impact in the alternatives indicates that the Cibola National Forest intends to use housing values as a criteria in making planning decisions for travel management.</p>
	<p><u>Response:</u> The National Environmental Policy Act requires the disclosure of potential impacts in the environmental documentation. The impacts of motor vehicle use in the Cedro area was raised as a concern by local landowners during project scoping. The potential effects were evaluated and disclosed in the EA. The Act has no requirements as to how those disclosures are to be used in the decision-making process.</p>
83, 167	<p>As the EA states in the Purpose and Need, page 2, one of the purposes of the Sandia Ranger District Travel Management project is to:</p> <p>Comply with the direction in the final rule for travel management; Designated Routes and Areas for Motor Vehicle Use (Travel Management Rule) was published in the Federal Register. This affects 36 Code of Federal Regulations (CFR) Parts 212, 251, 261, and 295;</p>

	<p>The Travel Management Rule addresses populated areas in Section 212.55, Criteria for designation of roads, trails, and areas. Subsection 5 reads as follows:</p> <p style="padding-left: 40px;">In addition, the responsible official shall consider: (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.</p> <p>Although housing values are not named in Subsection 5 as a factor which the responsible official 'shall consider' as a criteria for designating roads, trails and areas, the consideration of housing values could be inferred under 'other factors.'</p> <p>I want you to disclose whether or not the Cibola National Forest will use housing values as a criteria in its planning decisions to designate roads, trails and areas for motorized use.</p>
<p><u>Response:</u> NEPA requires the disclosure of effects. Forest Service policy requires the rationale for a decision to be displayed in the decision document. The responsible official may consider housing values when making a decision; if so, this would be explained in the decision document.</p>	
<p>83, 167</p>	<p>If the Cibola <u>is</u> using housing values as a criteria: I want you to insert the following wording at page 112, immediately under the heading 'Housing Values':</p> <p style="padding-left: 40px;">"The Cibola National Forest <u>does</u> considers housing values in neighborhoods adjacent to the Sandia Ranger District to be a legitimate criteria (according to the Travel Management Rule, 36 CFR Part 212) for making planning decisions about designating roads, trails and areas for motorized use in the Sandia Ranger District. The Cibola National Forest <u>will</u> use housing values as a criteria in making these decisions."</p> <p>If the Cibola <u>is not</u> using housing values as a criteria: I want you to remove Alternative 5 in its entirety from the EA. Alternative 5 has no purpose other than to prohibit motorized use on the trails on the eastern side of Cedro Peak where forest lands border a residential area. Also I want you to insert the following wording at page 112, immediately under the heading 'Housing Values':</p> <p style="padding-left: 40px;">"The Cibola National Forest <u>does not</u> consider housing values in neighborhoods adjacent to the Sandia Ranger District to be a legitimate criteria (according to the Travel Management Rule, 36 CFR Part 212) for making planning decisions about designating roads, trails and areas for motorized use in the Sandia Ranger District. The Cibola National Forest <u>will not</u> use housing values as a criteria in making these decisions."</p>
<p><u>Response:</u> The impacts such as noise and emissions near private land was among the concerns received during scoping that generated Alternative 5 and 6; consideration of these factors in making designations is required by the Travel Management Rule. Even though impacts from housing values were disclosed the issue did not directly generate any alternatives in the process. See the response to the previous comment regarding decision rationale by the responsible official.</p>	
<p>83, 167</p>	<p><u>Evaluating the EA's Analysis of OHV Noise in the Discussion of Housing Values</u></p> <p>At page 112 of the EA, the discussion of Housing Values reads:</p> <p style="padding-left: 40px;">The noise created by typical traffic in an urban environment is in the range of 50 to 95 dB (TranSafety, Inc. 1997). A study of freeway noise on property values conducted by the U.S. Department of Transportation (USDOT) found that noise above 55 dB (daily average) can have a statistically negative impact on property values (USDOT 1976). However, as distance from the freeway increased the effect of noise on property values decreased because it was offset by the positive correlation between distance from the noise source and property. Therefore, factors to consider when evaluating the effects of</p>

	<p>noise on property value are the noise emissions of the vehicle, distance from the noise source, and noise duration over a 24-hour period.</p> <p>As the EA quotes from the study, “noise above 55 dB (daily average) can have a statistically negative impact on property values (USDOT 1976).” The quote specifies that negative housing value effects do not occur unless sound is above 55db as a daily average. The study cited describes urban freeway noise. Urban freeways carry high density traffic on a multi-lane paved highway and the noise is continual 24 hours a day. This is not relevant to the Sandia Ranger District EA and the rural residential areas nearby, which are on dirt roads accessed by a few paved two-lane county roads.</p>
	<p><u>Response:</u> The neighborhoods in question also report hearing noise from I-40, a major interstate, and are also considered part of a major metropolitan statistical area by the US Census and many are within a few miles of a major interstate. It is; therefore, appropriate to compare the tolerance of their property values for noise nuisance to urban areas. 55 dB is a reasonable level to demonstrate effect because it is just above the level of sound commonly produced by a quiet suburb or normal conversation (OMSI, 2005).</p> <p>Oregon Museum of Science and Industry. 2005. Dangerous decibels: Teacher Resource Guide. Portland, OR. Available online at www.dangerousdecibels.org</p>
<p>83, 167</p>	<p>The EA includes only one measurements of the distance from the trails in the ranger district to the nearest houses in the Heatherland Hills subdivision. The discussion in Alternatives 1, 3 and 4 (pages 112-113) reads:</p> <p style="padding-left: 40px;">The closest of these trails is 575 feet from the subdivision on the northeast side and 680 feet from it on the southeast side.</p> <p>This information does not identify if there any houses at those points at the borders of the subdivision, and if so how many. The discussion omits any measurement of maximum or minimum distances from houses to trails The EA does not say if the trail merely approaches the border then turns away, or if the trail runs parallel to the border for any distance. All of these unknown factors are relevant to any discussion of sound originating from trails.</p>
	<p><u>Response:</u> The discussion includes the measurement of the one point closest to the trails in the alternative. Anything further away would have less impact. The measurement is from the property line the houses would therefore be set back from this and also further away from potential sources of noise.</p>
<p>83, 167</p>	<p>The discussions in Alternatives 1, 3 and 4, EA pages 19-23, also states:</p> <p style="padding-left: 40px;">Because of the amount of attenuation over distance, an off-highway vehicle producing its highest legal noise output at the closest point to the subdivision would still only generate 49-55 decibels in the neighborhood (assuming open field conditions).</p> <p>I appreciate the conclusion that sound would be insignificantly low. But no assumptions about the attenuation of sound across distances can be justified when there are no baseline sound measurements given or formulas offered, and the EA fails to state if the trail runs parallel to the border for any significant distance. The EA fails to mention what tree density exists between the trail and the border, or topographical features exist, both of which affect noise.</p> <p>The EA omits any data from sound tests of either OHV sound from the trails nearest Heatherland Hills, or sound from the residential traffic on the streets in the subdivision. The EA does not claim to have done any such sound testing. It is a misuse of the quoted research to infer any relation between, or relevance of, the USDOT 1976 study to Heatherland Hills subdivision, a low density rural residential area with low traffic density dirt roads. It is a misuse of the research to use it to make the unfounded assumptions in the six alternatives about the alleged effects of OHV sound on housing values in the Heatherland Hills subdivision. Those assumptions have no basis</p>

	<p>in either theory or data. The entire discussion of OHV sound lacks data and any quantifiable scientific methodology for arriving at an accurate assessment of OHV sound in the subdivision. And finally, the author of the report has not identified herself as a Certified Residential Appraiser who is qualified to make statements about housing values. Neither is she a sound engineer who is qualified to make predictions about sound levels and movement.</p>
	<p>Response: The physical properties of sound and the logarithm used to calculate the attenuation of sound over distance use the laws of physics and some well-disclosed assumptions to make the reports conclusions.</p> <p>Even though the social and economic specialist is not a Certified Appraiser, she is a member of the American Institute of Certified Planners with 3 years experience in local government planning and economic development. She also has completed relevant course work in demographic and economic forecasting and real estate feasibility analysis.</p>
<p>83, 167</p>	<p>I want you to insert the following wording at the end of the paragraph on Page 112, at the end of the section titled “Housing Values”:</p> <p style="padding-left: 40px;">The Cibola National Forest has no data from studies, monitoring or sound tests performed in the Heatherland Hills subdivision to assess sound from the OHV trails near the subdivision or the sound from street traffic in the subdivision. There is no current data that OHV sound from the trails can be heard in the Heatherland Hills subdivision at the level of 55db (daily average). There is no evidence that sound from OHVs on trails nearest the Heatherland Hills subdivision has any connection with, or causality to, fluctuations in housing values in the subdivision.”</p> <p>At page 113, under Alternative 2, I want you to delete the following paragraph in its entirety:</p> <p style="padding-left: 40px;">Currently there are some non-system trails being used that are closer to the Heatherland Hills Subdivision than 575 feet and, therefore, could have an effect on the property values in the subdivision. However, above average housing demand in this area, as demonstrated by the above average increase in housing between 1990 and 2000 is likely to offset any depreciation in property value.</p> <p>This paragraph should be deleted because it is improper and misleading for the EA to make statements which have no basis in the scientific analysis of actual data, or are based on misuse of research. It is unwise, and unfair to the public, for the Cibola Forest to make potentially alarming statements about housing values decreasing. It is entirely outside the scope of authority, or expertise, of the Cibola Forest’s to make any statements about housing values, the causes of changes in housing values, to make conjectures about the degree of such changes, and to make conjectures about future property appreciation and whether a decrease in housing values would be substantial or insignificant.</p>
	<p>Response: This is a comparison of existing conditions and the alternatives being analyzed and is appropriate for meeting the requirements of NEPA.</p>
	<p>At page 112, is the following wording:</p> <p style="padding-left: 40px;">Alternatives 1, 3 and 4 In alternatives 1, 3 and 4, there are several trails in and around the Heatherland Hills Subdivision in the Cedro area. The New Mexico Off-Highway Vehicle Regulations set a legal noise limit of 96 dB for a recreational motor vehicle. The closest of these trails is 575 feet from the subdivision on the northeast side and 680 feet from it on the southeast side. Because of the amount of attenuation over distance, an off-highway vehicle producing its highest legal noise output at the closest point to the subdivision would still only generate 49-55 decibels in the neighborhood (assuming open field conditions). The USDOT study was primarily evaluating noise in the vicinity of a freeway in Portland, Oregon, and, therefore, assumed a constant stream of traffic with variable decibel levels</p>

	<p>over a 24-hour period (USDOT 1976). The scenario for the Sandia Ranger District is different because the traffic pattern for motorized recreation would be occasional, rather than constant, and would increase in intensity on weekends, rather than daily at rush hour. The frequency of hours throughout the day producing noise near 55 decibels would be less frequent than the FHWA study and it is, therefore, not likely to have any effect on the property values of Heatherland Hills.</p> <p>This wording includes:</p> <ul style="list-style-type: none"> -unsubstantiated predictions of a decibel level. -unsubstantiated conjecture about the movement of sound across an undefined and unmeasured area. -unsubstantiated prediction of decibel levels at different times and on different days, with no basis in any data from field studies in the area. In addition the statement omits to identify at what location and at what distance from the sound source (trail) the predicted decibel level of 55db would occur. - unsubstantiated conjecture about the effect of these unknown decibel levels on the values of unidentified houses, which could be anywhere throughout an entire subdivision, close to or far away from trails. -unsubstantiated assumption of ‘open field conditions’ in an area which not been subjected to a scientific investigation to determine if there actually are open field conditions. <p>I want you to delete the paragraph under the heading ‘Alternatives 1,3 and 4’ on page 112 in its entirety, and replace it with the following wording, which is purged of unsubstantiated statements and contains the verifiable facts.</p> <p style="text-align: center;">Alternatives 1, 3 and 4</p> <p style="text-align: center;">There are several trails in forest land adjacent to the Heatherland Hills Subdivision in the Cedro area. The New Mexico Off-Highway Vehicle Regulations set a legal noise limit of 96 dB for a recreational motor vehicle. The closest of these trails is 575 feet from the subdivision on the northeast side and 680 feet from it on the southeast side.</p>
	<p><u>Response:</u> We disagree with your assessment of the analysis in the Social and Economic Specialist’s report. In addition, the trail reroute in the Cedro area to the east of the Heatherland Hills Subdivision (Alternatives 1, 3, 4), is located on the other side of the ridge at the east boundary of the subdivision and in a heavily-treed area. For this trail, open field conditions are likely to overestimate the attenuation of noise and therefore its effects on the subdivision. For the trail terminus on County Road 36, open field condition would be fairly close to the on the ground conditions after the fuel treatments that were completed in the late 1990s.</p>
<p>83, 167</p>	<p>I want you to delete in its entirety, the following statement on page 113, because it is conjecture about a negative relationship between forest trails designated for motorized use, and property (housing) values</p>
	<p><u>Response:</u> Noise nuisance is a well-documented private property issue. In fact, most cities have noise ordinances to limit the trespass of excessive noise onto private property, particularly at night.</p>
<p>83, 167</p>	<p style="text-align: center;">Alternatives 5 and 6</p> <p style="text-align: center;">Because roads and trails in the Cedro area are not included in these alternatives, there would be no effect of noise on properties and property values in the Heatherland Hills Subdivision.</p> <p>At page 113 the EA addresses Cumulative Effects, saying:</p> <p style="text-align: center;">In addition, demand for OHV and motorcycle recreation has been primarily driven by increases in disposable income, population growth, and improvements in technology. It is unclear whether the effects of travel management are large enough to offset these factors.</p>

	<p>The EA fails to supply the readily available demographics on OHV ownership in New Mexico, from the Forest Service’s own 2005 OHV Study. The study is named “Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE)”. It is on the web at http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf. There is already a hardcopy print of this study at the Cibola office. It is in Nancy Brunswick’s box of recreation reference materials. The table on OHV Ownership in New Mexico is from page 62 of that study. The table on OHV Ownership in the West, with the accompanying comment is from page 22.</p>
	<p>Response: In the study that you reference, approximately 27 % of survey respondents indicated that they have participated in OHV recreation between 1999-2004. Determining OHV ownership was not questioned directly in the survey. While 27% of survey respondents from New Mexico indicate that they have participated in OHV recreation, the survey does not indicate specific locations for their recreation activities. In the NVUM survey for the Cibola National Forest 1.4% of people that were surveyed for their recreation participation in 2006 indicated that they participated in OHV recreation. We stand by our analysis that it is difficult to predict if limiting OHV recreation to designated roads and trails on the Sandia Ranger District will influence the economic trends related to OHVs in New Mexico.</p>
<p>83, 167</p>	<p>I want you to insert this wording above the tables:</p> <p>“The 2005 study of OHV ownership done by the Forest Service shows that over 25% of New Mexicans aged 16 and older participated in OHV recreation, 1999-2004. OHV participants generally have a high level of income and education. These numbers suggest that demand for OHV recreation will remain strong.”</p> <p>I want you to insert the following tables from that study in the EA on page 113, directly above the heading ‘Heritage Resources’: <i>(Table available in the Project Record.)</i></p> <p>The socio-economic section of the EA states at page 112:</p> <p style="padding-left: 40px;">Part of the growth of housing along the boundary of the district is generated by the desirability of living near accessible trails and open space. Most comments received from nearby residents during the scoping phase were from non-motorized recreation users but some residents also expressed that access to motorized recreation opportunities was a consideration in their decision to move to the area. Each of these users includes their ability to access their preferred recreation activity as part of their enjoyment of their home.</p> <p style="padding-left: 40px;">Because of the growth of housing in the East Mountains, nearby residents have expressed concerned about the effect of noise from ATV activities on their property values.</p> <p>I want you to delete that statement in its entirety, and replace it with the following:</p> <p style="padding-left: 40px;">Part of the growth of housing along the boundary of the district is generated by the desirability of living near accessible trails and open space. Most comments received from nearby residents during the scoping phase were from non-motorized recreation users but some residents also expressed that access to motorized recreation opportunities was a consideration in their decision to move to the area. Each of these users includes their ability to access their preferred recreation activity as part of their enjoyment of their home.</p> <p style="padding-left: 40px;">A few residents have expressed concern about the effect of noise from ATV activities on their property values. However, the ATV users they are concerned about are primarily their neighbors. The Recreation Report written for the EA states at page 8 “District personnel indicate that residents from home near the forest boundary are the primary</p>

	<p>ATV users. They have seldom seen ATV trailers at area trailheads and parking areas. “Riding an ATV or dirt bike from the housing area to the trails in the forest is legal.</p> <p>The New Mexico Off-Highway Vehicle Regulations allow OHV users to ride on the shoulders of roads to access riding areas.</p> <p>“66-3-1012. DRIVING OF OFF-HIGHWAY MOTOR VEHICLES ADJACENT TO HIGHWAY.—</p> <p>A. Off-highway motor vehicles issued a validating sticker or nonresident permit may be driven adjacent to a highway, yielding to all vehicles entering or exiting the highway, in a manner so as not to interfere with traffic upon the highway, only for the purpose of gaining access to or returning from areas designed for the operation of off highway motor vehicles by the shortest possible route and when no other route is available or when the area adjacent to a highway is being used as a staging area. Such use must occur between the highway and fencing that separates the highway from private or public lands.</p> <p>There are no measurements of noise in the EA or the Recreation report or the Socio-Economic report to support the complaints of noise from trails being a significant issue in all or part of the Heatherland Hills Subdivision. However noise in the subdivision is used as a reason to reroute trails. The re-routing of trails is one thing, but it is wrong to say it is being done to satisfy unproven complaints from a few homeowners. It is a mistake for the EA to elevate a few complaints to the status of a proven and documented problem. It is a worse mistake for the Responsible Official to make decisions based on spurious accusations. I note the mention of ‘security concerns’ which appears only in Alternative 5. I want you to delete that. It is not documented and the claim does not appear among issues listed in other parts of the EA. This is an example of ‘manufacturing’ a problem.</p>
	<p>Response: This issue was brought up during from public participation for this project and therefore is appropriate to address in the EA.</p>
<p>83, 167</p>	<p>I want you to DELETE parts of the statements in Table 6 at page 38. For each Alternative I want you to delete the wording I have put in bold type.</p> <p>Alt 1 - The trail segment along Cedro Creek is located below the ridge to the east to reduce noise impacts to the Heatherland Hills Subdivision.</p> <p>Alt 3 - The trail segment along Cedro Creek is located below the ridge to the east to reduce noise impacts to the Heatherland Hills Subdivision, but it is designated for both ATV and motorcycle use.</p> <p>Alt 4 - The trail segment along Cedro Creek is located below the ridge to the east to reduce noise impacts to the Heatherland Hills Subdivision.</p> <p>Alt 5 - Northern end of NFST 05618 is rerouted to the Pine Flat Picnic Area to reduce noise impacts to the Heatherland Hills Subdivision. No motorized dispersed camping on NFSR 242 and 9 to reduce noise and security concerns near Sabino Canyon and Heatherland Hills Subdivision.</p>
	<p>Response: We stand by our assessment of the noise impacts related to the Heatherland Hills Subdivision and do not see a need to revise these statements in the EA.</p>

Comment #	Comment
(AC8a) Fire Risk to Private Lands	
18, 19	<p>Summarized Comments: Concern that motor vehicle use increases fire risk and threats to area homes. Comment 18 specifically mentioned the Heatherland Hills subdivision: “In 2002 the Forest Service created the firebreak surrounding HHS in recognition of the threat of fire to the subdivision...In addition, many HHS residents have significantly thinned their lots to be able to better defend against wildfires. The creation of OHV trails near HHS would dramatically increase the threat of fire due to sparks and heat coming from OHV motors and the prevalence of cigarette smoking by OHV operators.</p>
<p>Response: It is understood that higher risk activities will increase the risk proportionately. Referencing Table 35 in the Environmental Analysis, the highest risk for fire starts are areas with high frequency mixed use such as destination recreational sites. Comparatively, 28.6% of fires are adjacent (within 1.5 miles) to roads and 54% in proximity to recreation sites. About 15% of the human-caused fires in the last three years were associated with trails and trailheads. Because this project does not create OHV trails, but regulates the motorized use that already is occurring, it is unlikely that the threat of fire would “dramatically increase”.</p> <p>Cigarettes ironically are usually a relatively low risk, as a very finite combination of parameters such as relative humidity, fuel type and exposure, placement, time, sun exposure, and air temperature must all be in complete alignment for a start to occur from this source.</p>	
21, 24, 25, 41, 45, 73, 75, 127	<p>Summarized Comments: General concerns related to increased fire danger related to motorized recreation roads and trails designation. Comments 24, 25, 41 and 127 are specific to the neighborhoods near the La Madera area and also share concern that the area is served by a volunteer fire department. Examples of comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 21:</i> How do you keep the area safe from fire danger, when the vehicles are driving across tall, dried grasses, and there are campfires in the area left unattended? • <i>Comment 45:</i> Another concern is considering the influx of numerous motorized vehicles being proposed, along with the years of drought, the result would be an accident (fire) waiting to happen. • <i>Comment 73:</i> According to the USFS there are four threats to the health of the Nation’s forests and grasslands. Two of these threats are related to the current USFS CNF SRD TMP. These are 1) fire and 2) unmanaged recreation. In addressing Threat #1 – Fire, the entry of motorized vehicles increases the risk of fire. This is demonstrated by the requirement by the USFS policy requiring no-spark engines and engine shields on equipment and vehicles that are on forest land particularly during dry conditions. The EA report does not address this issue in detail. <p>Examples of comments specific to Alternative 3 and the La Madera area:</p> <ul style="list-style-type: none"> • <i>Comment 25:</i> We are seriously concerned about the possible fire hazard that would be presented to the neighborhoods of La Madera, Paako, San Pedro Creek and The Overlook, by motorized use of La Madera. The first responders to fire or any other emergency in this are of the Forest would be the volunteer fire station at La Madera, and they may not have the equipment to respond to emergencies in an area of the Forest which can be particularly wild and rugged.
<p>Response: Abandoned campfires are indeed a prevention and enforcement concern, however conditions exist in both high frequency use areas and areas managed for such use that decrease the risk of an escape and subsequent wildfire. This is an example of designated areas which usually have reduced fuel loadings, frequent patrols, and increased public awareness. This is referenced in Table 35 as dispersed area camping, and presents the lowest risk of human activity wildfire starts. It is important to note, that abandon campfires along roads in unmanaged areas do present a higher risk.</p> <p>The US Forest Service utilizes fire restrictions in times of increased danger. There are four stages with varying degrees of limitations on human activities, ranging from smoking to full Forest closures. These restrictions are</p>	

<i>Comment #</i>	<i>Comment</i>
	<p>based upon historical trends and scientific indices relating to the fuel availability and degree of difficulty in the control of wildfires. While it is required that there be Forest Service approved spark arresters on vehicles, vehicles are not the only heat source in human caused fire related to motorized recreation. Historical data does not contain sufficient detail to accurately compare heat sources other than referencing a cause.</p> <p>Enforcing a designated system will also reduce the risk of wildfire compared to the current management. Since cross country use is currently allowed, vehicles can drive off roads through grasses and brush. With a designated system use off of roads and trails is prohibited. The one exception is the dispersed camping corridor being considered for ¼ mile off NFSR 9 in Alternatives 1 and 3. As stated above, confining dispersed camping to designated locations improves the effectiveness of law enforcement and patrols by volunteers.</p> <p>As referenced the area may be at risk of catastrophic fire, however it is important to note that many areas with the same degree of danger exist throughout the East Mountain Area. That said it is also important to note that each particular use has a different associated risk. Additionally, a decrease in the threat of catastrophic fire could be realized if the area is managed for the control of higher risk human activities. It is difficult to extend comparisons beyond this point, since many dynamic elements exist in fire. However, all action alternatives allow for motorized travel only on designated roads and trails, and designate where motorized dispersed camping is permitted. The increase in management should reduce the fire risk from motorized recreationist activities compared to the existing condition.</p>

<i>Comment #</i>	<i>Comment</i>
<i>(AB6) Noise Concerns</i>	
6	<p>If it is within the scope of this particular document, I think there should be specific mention that among the uses of our wilderness and forest areas is participation in the quiet to be found there. Motorized use destroys this irreplaceable resource. I believe the plan should spell out specifically that silence in the forest is a resource for humans, as well as wildlife---one that is not available, essentially, anywhere else. This is a case where a fragile, easily destroyed resource is drowned out in other uses, and will continue to be if it is not given specific recognition.</p>

Response: This is outside the scope of this decision.

On page 68266 of the “Public Comments on Proposed Rule and Department Responses” of the Travel Management Rule it states that:

“Many other respondents supported environmental protection and nonmotorized recreational uses of NFS lands and suggested confining OHVs to small, geographically isolated areas separated from nonmotorized users. These respondents believed that OHVs harm the environment, as well as people looking for quiet, peaceful recreation experiences. They suggested that the agency support the public interest, rather than letting manufacturers and user groups drive agency policy. These respondents were concerned that motorized interests have an unfair advantage in public involvement due to better funding, organization, and access to decisionmaking.

Response. The Department believes that National Forests should provide access for both motorized and nonmotorized users in a manner that is environmentally sustainable over the long term. National Forests are not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the National Forests to provide different opportunities for recreation. The Department believes such choices and evaluations are best made at the local level, with full involvement of Federal, tribal, State, and local governments, motorized and nonmotorized users, and other interested parties, as provided for in this final rule.”

18	<p>First and foremost, our concern is the impact of the proposed new OHV trail to be constructed near northeast corner of the subdivision and the OHV designation of the Gambles Oak/Mahogany trail south of the subdivision.</p> <p>The Travel Management Plan is being developed in accordance with the requirements of 36 CFR 212 promulgated on November 9,2005. One of the requirements of Part 212.55&(5) is that:</p> <p style="text-align: center;"><i>The responsible official (Forest Service) shall consider the Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound emissions, and other factors.</i></p> <p>It does not appear that the Forest Service has given adequate consideration to the impact of noise to the HHS, Although the current trail use does not allow OHVs, it is not uncommon for OHVs to travel through areas adjacent to HHS and most HHS homeowners have had to confront OHV riders and ask them to leave their property. From these experiences, the homeowners have learned of the very high noise associated with these types of vehicles. The establishment of trails created specifically for OHV use would dramatically increase the amount of traffic. The result will be an endless assault of noise greatly exceeding nuisance levels.</p>
<p>Response: Pages 6-7 of the Social and Economic Specialist’s Report addresses the issue of noise, its attenuation, and the effects to property values in the Heatherland Hills Subdivision.</p>	
27	<p>Another serious concern for my neighborhood is noise pollution. Many of the current trails at the northern Cedro area are within easy earshot of homes. This is both a quality of life issue as well as a property value issue.</p>
<p>Response: Pages 6-7 of the Social and Economic Specialist’s Report addresses the issue of noise, its attenuation, and the effects to property values.</p>	
50	<p>I am opposed to your proposal to close down other off-road areas and concentrate them next to my neighborhood because this will have the effect of increasing traffic on my neighborhood roads and I am concerned about the noise. We live on a hilltop. From our house in Tablazon we hear noise from the interstate constantly. If there is also noise from the OHV’s coming from the other direction, I fear the noise level will become intolerable. If we choose to sell our house and the potential buyer stands outside hearing vehicle noise from the North AND the South, our property value will drop.</p>
<p>Response: In the Tablazon neighborhood, the closest homes to the trailhead are 754 ft and 790 feet from the Lower Pine trailhead, and any OHVs accessing the trails would be traveling south, away from Tablazon homes. As stated in the Social and Economic Specialist’s Report, at this distance, there is unlikely to be effects to housing values from noise due to OHV recreation. Therefore, motorized recreation activities are unlikely to add to the noise produced by Interstate 40.</p> <p>Regarding your comments on the potential for increased traffic through Tablazon subdivision: No access points from public roads are being limited in the Cedro area in any alternative. Publication of the MVUM is not likely to result in a noticeable increase in use through the Tablazon subdivision. For people visiting the area from Albuquerque or other more distant locations, Cedro access is more convenient from NM 337 at the western junction of NFSR 462, NFSR 242, or the Oak Flat area. The Lower Pine trailhead is small, and there are larger and more convenient trailheads that either exist or are being proposed closer to NM 337. It is likely that many of the people who access the Cedro area from the Lower Pine trailhead are residents from the Zuzax area such as Tablazon and Five Hills.</p>	

Comment #	Comment
(AD2) Cedro Creek Trail Reroute around	
18	The creation of OHV trails adjacent to HHS will result in OHVs in the area traveling at very high speeds. These vehicles can easily achieve speeds in excess of 50 MPH and there is no mechanism

	<p>in the Travel Management Plan to regulate their speed in some of the areas in the proposed trail. The OHVs will be both in the Forest adjacent to HHS and trails and streets within HHS. It happens now and there is nothing in the Travel Management Plan to prevent it from happening in the future. The problem will only get exceedingly worse because the number of OHVs with access to the HHS area will increase. These vehicles in the HHS area will create a real threat of personal injury to both HHS residents and pets, both in the National Forest and on their own properties. Likewise, the increased incidental trespassing of OHVs onto private property will result in ruts and damage to vegetation increasing erosion and fugitive dust on the private property. This type of damage can happen in a matter of seconds when five or six OHVs trespass onto private property.</p>
<p>Response: The only new trail that is proposed near the Heatherland Hills Subdivision is the reroute of the trail adjacent to Cedro Creek. This trail is proposed in Alternatives 1, 3 and 4. The reroute construction is not proposed in Alternatives 5 or 6. In Alternative 5, rerouting the segment of NFST 05618 Gambles Oak/Mahogany that ends at County Road 36 is proposed to be rerouted away from Heatherland Hills so that the trail terminates in the Pine Flat Picnic Area.</p> <p>If the Cedro Creek reroute is selected in the decision it will be located and constructed so that speeds are low. This is done through adding curves, and maintaining shorter site distances by locating the trail in a wooded area. Other concerns, including safety, fugitive dust and impacts to private property have been analyzed in the EA, and further clarified in the Response to Comments.</p>	

Comment #	Comment
(AC5) Gating NFSR462 Through Private Lands (Sections 18, 19 & 20)	
15	We want to know if the roads that we use to our property can be closed to public since Map 5 shows both north and south point of entries stop at private lands. Are we allowed to place a gate at those points? If there is no gate, the public will come through.
<p>Response: Where NFSR462 crosses private lands in Sections 18, 19 & 20 there is no public right recorded with the Bernalillio County registrar. The Forest Service has no jurisdiction over this road where it crosses these sections on private land, and gating it would be subject to any local or state laws or regulations.</p>	

B. Potential Impacts to Non-motorized Recreation Uses.

Comment #	Comment
(AB4) Cedro Area – Concern about the quantity of designated roads and trails	
19, 21, 23, 39	<p>Summarized Comment: These comments express a general concern that the trails not be designated for motorized use in the Cedro area. Several express concern that restrictions north of I-40 will further concentrate use in the Cedro area. Examples of the concerns submitted:</p> <ul style="list-style-type: none"> • <i>Comment 19:</i> Recreational activities which only apply to a single limited use group such as off-road motor vehicle use should be located further away from large population centers in order to allow the maximum use by the owners of the land, i.e. the public. • <i>Comment 23:</i> I don’t buy the argument that restricting the entire district’s motor vehicle traffic to our Cedro area won’t result in more traffic than we have now. If you were to say, for example that there will be a travel management plan for the Cedro area that will define usage, that would be one thing. No one would disagree there. It (seems) disengenuine to slip in the “oh, by the way we are closing the rest of the forest to motorized traffic altogether”. • <i>Comment 39:</i> The fact that the Forest Service has kept ALL trails open to motorized vehicle use within the Cedro Peaks area demonstrates it is not being a responsible steward of our public lands...The noise, air pollution, enlarged trails, and tire tracks both on and off trail from ORV use greatly reduces the quality of the outdoor experience. Additionally, ORV’s are not compatible with horseback riding, hikers, and mountain

Comment #	Comment
	<p>bikers, as ORV's pose major safety threats to non-motorized users... ORV's will not stay only on those official trails. They will use the entire spaghetti network of trails, as they already have, and continue to create more. With the heavy ORV use this area already receives, with additional use encouraged by USFS with their new proposed maps, these ORV's will rapidly deteriorate the natural forest area, ultimately turning the area into a trashed park.</p>
	<p>Response: We have noted your concerns. The anticipated impacts to trails in the Cedro area were analyzed in the EA, and supplemented in this Response to Comments. To clarify several points:</p> <ul style="list-style-type: none"> • Not all trails in the Cedro area are being considered in all alternatives. In Alternative 5, fewer trails are being considered for motorized use designation, and in Alternative 6, only two trails are being considered for designation. • There are areas where motorized cross country use and motorized trail use has been permitted north of I-40. However, there has been little motorized trail use occurring historically in that area so we do not expect many motorized recreationists to be displaced and therefore concentrated into the Cedro area as a result of the motorized system designations. The Cedro area was currently the area of the district with the bulk of OHV motorized recreation. The designations in Alternatives 1, 3, 4, 5, and 6 would clearly define where motorized use is allowed in the Cedro area.
73, 75	<p>d) Lack of loop for Motorized Vehicles. Motorized vehicles particularly motorcycles and ATVs are not going to respect a one way trail, meaning a trail that goes up and stops at a point where the same trail then changes use restriction, thus requiring the motorized vehicle user to turn around. Unless this extremely enforced and huge bulletins and warning posters are posted most motorized vehicle users will not see the postings due to the speed of travel. If they do see the posting, they will probably ignore them, since it is much preferable to make a loop of travel, rather than turn around and go back the same way</p> <p>It is not understood why the USFS wants to encourage motorized vehicle use of the Lower Pine trail in the Cedro Area without any improvements being made. The publication of the Motorized Vehicle Trail Use Map showing the Lower Pine trail head will encourage and significantly increase traffic and use of this trailhead. The USFS has the responsibility to develop plans for the improvements, maintenance, enforcement, and monitoring for this action, prior to finalization and publication of this action.</p>
	<p>Response: None of the trails being considered for designation are one-way trails. The majority of trails being considered in the Cedro area form loops. In some cases a trail user would need to share sections of a loop with larger vehicles.</p> <p>NFST 0511.1 Lower Pine is being considered for single track (motorcycle) motorized designation in Alternatives 1, 3 & 4. This is a use that this trail has been maintained for, and motorized use has been permitted on this trail for many years. The Lower Pine trail is not included for motorized use in Alternatives 5 and 6.</p>
15	<p>We also think there should be areas for equestrian owners. We are not horse owners but think there needs to be a balance of uses.</p>
	<p>Response: Equestrian uses, as well as other non motorized trail uses, were considered in developing and analyzing the alternatives. It is not within the scope of the travel management process to designate trails for specific non motorized uses, as specified in the Travel Management Rule.</p>

Comment #	Comment
(AC4) Non Motorized Recreation	
14, 19, 21, 27, 32, 40A, 54, 70, 92, 94, 117, 118	<p>Summarized Comment: Concerns relate to conflicts between non motorized and motorized use of Sandia Ranger District trails and the potential for damage to trail surfaces by motorized vehicles especially when the trails are wet. Examples of comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 19:</i> Recreational activities which only apply to a single limited use group

Comment #	Comment
	<p>such as off-road motor vehicle use should be located further away from large population centers in order to allow the maximum use by the owners of the land, i.e. the public.</p> <ul style="list-style-type: none"> • <i>Comment 27:</i> These trails are very popular for walking (oftentimes with children and/or family pets), horseback riding and mountain biking. There is absolutely no way that these trails, even when converted, could be shared safely by motorized and non-motorized traffic. Not only are some of them steep, winding and rugged (with inherent limited visibility), but the speed differential of motorized vehicle drivers coupled with their inability to hear other travelers would create undue risk for current users. • <i>Comment 32:</i> I am an avid mountain biker and hiker and am asking you to please consider preserving single track trails for non-motorized vehicles, especially Lone Pine and the trails referred to as "single track". I fear the damage motorized vehicles will cause to the trails integrity and the danger posed toward others recreating on non-motorized vehicles. • <i>Comment 40A:</i> I am an avid mountain biker and hiker and am asking you to please consider preserving single track trails for non-motorized vehicles, especially Lone Pine and the trails referred to as "single track". I fear the damage motorized vehicles will cause to the trails integrity and the danger posed toward others recreating on non-motorized vehicles. • <i>Comment 92:</i> I have hiked when the ground was still wet and had been used by ATVS and it became so muddy and rutted after their use that I had to turn around and forgo my hike.
<p><u>Response:</u> Your concerns have been noted. The anticipated impacts have been analyzed in the EA. Alternative 5 reduced the number of trails designated for motorized use compared to the other alternatives and Alternative 6 only considers motorized designations on two trails in the Cedro Area. The responsible official will review the impacts and benefits of each alternative when making a decision.</p>	

Comment #	Comment
<i>(AC9) Safety</i>	
19	<p>This area borders on three sides regions which are populated by residences which routinely use this area for hiking and other non-destructive means of public land utilization which are wholly incompatible with an extensive network of ATV traffic. Hiking, picnicking, Horseback riding, mountain biking, birdwatching etc... or any activity which assumes a undisturbed natural setting (as one might expect to find in a National "Forest") will become impossible, and even dangerous in such a setting.</p> <p>Focusing all off-road vehicular traffic in Cibola National Forest to this limited area further intensifies the health and safety of nearby residents and other members of the public who routinely use this land.</p>
<p><u>Response:</u> This project will designate motorized vehicle use on the Sandia Ranger District. Similar processes are currently being conducted for the Mount Taylor and Mountainair Ranger Districts and motorized vehicle use will be designated through separate decisions. During Fall 2008, similar planning will take place for the Magdalena and Kiowa/Rita Blanca districts. While OHV motorized recreation north of I-40 is only being considered in Alternative 2 (no action) and Alternative 3, historically there has been very limited OHV motorized recreation north of I-40 as stated in the EA. The motorized use being considered in Alternatives 1, 3, and 4 are similar to current uses that are allowed, but provide more trailhead parking areas and prohibit cross country travel. Alternatives 5 and 6 consider OHV motorized designations in the Cedro area, but at a reduced level compared to Alternatives 1, 3, and 4.</p>	
21	<p>In addition, there are many illegal campfire sites along the 4 wheel drive roads. Many mornings I have run by to see these fires smoldering. There is typically trash and litter, especially beer cans/bottles by the campfire sites. In the Tablazon area I have come upon the carcass of a</p>

Comment #	Comment
	<p>beautiful red tailed hawk, obviously a victim of a bullet, if the large gaping hole in its body was any indication. Everywhere in the Tablazon and Cedro area are empty shotgun casings.</p> <p>All of these are of great concern to me, but there is another issue of even more serious concern. Since I frequent these areas quite a bit, I am very cautious of all vehicles, either two wheel or four wheel. I almost always, when I hear them approaching, leave the trail and wait in the trees until they pass. On one occasion, I was passed by a man on a 4 wheeler, with a gun/rifle across his lap, driving slowly, searching in arroyos for something. I have heard on numerous occasions the sound of guns being fired.</p> <p>How do you prevent off road vehicles from carrying weapons, therefore keeping all uses of the forest safe?</p>
	<p>Response: Closure Order # 03-102 (2) on the Sandia Ranger District prohibits discharge of fire arms (this closure is available in the Sandia Ranger District Office for review.) Pursuant to 36 CFR 261.50(a) “discharging a firearm, air rifle, or gas gun” is prohibited. It is not illegal for a person to carry a firearm on the Sandia Ranger District. Forest Service law enforcement routinely patrol and have the authority to cite anyone discharging firearms in the Cedro area.</p>
27, 49	<p>Summarized Comment: Several comments have concerns that designation of routes in the Cedro area will increase use through the Tablazon subdivision, and could potentially be a concern for egress and access from that subdivision. Comment 27 states “Another pressing safety concern is that emergency egress from Forest Road (and the Tablazon neighborhood at large) already is substandard and for years has been a great cause for concern by residents. In the event of a forest fire, both egress by residents and access by fire fighting personnel is tenuous at best. Considering the influx of numerous motorized vehicles being proposed, along with the years of drought, the result would be an accident waiting to happen. Any plans to provide access to motorized vehicles would need to address this issue—safe access, safe egress.”</p>
	<p>Response: No access points from public roads are being limited in the Cedro area in any alternative. Publication of the MVUM is not likely to result in a noticeable increase in use through the Tablazon subdivision. For people visiting the area from Albuquerque or other more distant locations Cedro access is much more convenient from NM 337 at the western junction of NFSR 462, NFSR 242, or the Oak Flat area. The Lower Pine trailhead is small, and there are larger and more convenient trailheads that either exist or are being proposed closer to NM 337. It is likely that most of the people who access the Cedro Area from the Lower Pine trailhead and the northern end of NFSR 462 are residents from the Zuzax area such as Tablazon and Five Hills.</p>
61, 62, 92, 94, 97, 117, 118	<p>Summarized Comment: Comments relate to concerns about safety considerations when motorized and non motorized recreationists share trails, and the potential for lengthy emergency response times. Examples of comments received:</p> <ul style="list-style-type: none"> • <i>Comment 61:</i> Currently, most users of Lower Pine trail are hikers (many with their dogs), mountain bikers and horseback riders. I have safety concerns about establishing Lower Pine as a motorized trail with potentially heavy use. It can be scary to animals and people to have motorized vehicles speeding along on the same trail. Since most traditional user of Lower Pine are foot, bicycle and animal traffic, it would be best NOT to introduce a concentration of motorized vehicles sharing that trail. • <i>Comment 92:</i> Here are many points on the Cedro trails where your view is obstructed due to trees or sharp turns and this could result in serious accidents between motorized users and non motorized users of the trails. In the event of an accident and the necessity to receive medical attention it would take hours to carry an individual out. This happened to a friend of mine who lives in Tablazon when her horse spooked and she was thrown off and broke her leg. She laid in the forest for several hours before the firemen were able to get to her and carry her out on a litter.
	<p>Response: Thank you for your comments, your concerns have been noted. Safety issues were analyzed in the Recreation section of the EA and in the Safety specialist report. A search of the Bernalillio County Sheriff’s</p>

Comment #	Comment
	Department database indicated that there have not been any motorized vehicle/ non motorized recreation accidents reported in the past three years. Awareness that there are trails designated for motorized use where mixed use is occurring should improve the safety, because all users will be aware of mixed uses.

Issue 2: Designation of Motorized Trails for Shared Use between ATVs and Motorcycles.

Comment #	Comment
(AC3) Impacts from widening or designating trails for ATV use	
16, 27, 29, 30, 40A, 40B, 44, 45, 125, 176, 177, 178	<p>Summarized Comment: Comments indicate concerns for concerning ATV designation on trails that are currently managed for single track use in Alternatives 1 and 3. Examples of the comments include:</p> <ul style="list-style-type: none"> • <i>Comment 16:</i> My major concern is the potential converting of two singletracks to ATV use. Specifically, 0525B – Cedro Single Track and 0511C – Lone Pine. These are two excellent single track; some would argue they are the finest in the Cedro area. It would be major loss of singletrack if these were opened to ATVs. • <i>Comment 29:</i> I have hiked at Cedro almost every weekend this winter, and am very dismayed by the vehicle and ATV damage that has occurred since last fall. Have you hiked up there recently? There is now a "maize" of user created roads that drop off (literally in some cases, where the vehicle users are challenging their 'rides') from fs road #462 down to Chamisoso trail. • <i>Comment 30:</i> - Sections of Pinyon, 05607, Wildcat, 05608, and Lone Pine, 0511C, are also narrow, single track, cross streams and in some places are steep with sharp turns, all that will become significantly eroded by 50" ATV's. So I don't think these are appropriate for 50" ATV's. • <i>Comment 40 B:</i> Narrow singletrack trails are much more enjoyable and peaceful than wide doubletrack trails. • <i>Comment 44:</i> The single-track trails at Cedro are among some of the best in the state, why would the forest service allow this to be turned into a quad track or dirt road and upset the low-impact community of hikers, bikers, and equestrian riders? • <i>Comment 176:</i> I do not want to see the trails named Cedro Single Track (Trail 05252B) and Lone Pine (0511C) converted from their current Single Track status in order to allow use by ATV's. I have been involved in the volunteer effort to build and maintain these trails and I'd like to say that these two trails were designed for use by two wheel vehicles (mountain bikes and motorcycles) and contain the proper elements that make them fun, challenging, and safe. They are indeed the best trails in the Cedro Peak area for mountain bikes because of their sinuous course through the woods and they have developed natural banking in the turns. Both of these elements would be ruined by ATV usage. The trails would have to be significantly widened and further straightened to allow ATV riders to see each other in order to pass each other safely; and the extremely fun banked turns would be flattened out by their usage making the downhill run of these trails more difficult and dangerous for two wheel riders. Plus, there are steep sections to these trails that without a significant reroute, ATV's not be able to clear.
<p>Response: Thank you for your comments, your concerns have been noted. Impacts anticipated to recreation and other resources are analyzed in the EA. Alternatives 4 and 5 were designed in part to respond to these concerns, and the impacts analyzed in these alternatives will be compared against the impacts of Alternatives 1, 2 and 3, where ATV use is permitted on some of the Cedro trails. The deciding officer will consider these comparisons when making a decision.</p>	

Issue 3: Designation of Locations for Dispersed Camping in the Cedro Area

<i>Comment #</i>	<i>Comment</i>
<i>(AGI) Dispersed Camping</i>	
89, 173	<p>While we understand that the responsible official has some latitude to “include in the designation the limited use of motor vehicles within a specific distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal,” we believe these exceptions must be applied sparingly and the SRD is obligated to provide justification for any such exceptions. In former Chief Bosworth’s memo entitled “Implementation of the Travel Management Rule,” he directs officials to apply the rule “sparingly” rather than issue blanket exceptions.</p> <p>The SRD fails to justify its decision to allow exceptions to the ban on motorized cross-country travel. This is a violation of the TMR and the responsibility designated to the SRD via that rule. Dispersed camping opportunities add to the character of Forest Service land. However, the practice of allowing excessive cross-country travel to maintain these opportunities is inappropriate. Instead, we recommend designating terminal routes or spurs that provide access to dispersed camping opportunities and/or allowing camping adjacent to designated routes. This will serve to protect the environment and other users and will not detract from a visitor’s camping experience.</p> <p>In 2004, the Chief identified unmanaged recreation, specifically motorized vehicle, as one of four key threats to our public lands because of the damage that these vehicles do to the soil, wildlife, plants and critical habitat. Exceptions for dispersed camping will allow motorized vehicle travel to remain largely unmanaged and damage will persist and likely increase in intensity.</p> <p>Currently, the agency does not have enough resources to enforce and maintain the route system that it has. If users are allowed to travel off a route to find a camping spot, this provision will increase user-created routes and decrease the probability that people will stay within the designated fixed distance.</p> <p>While we support the very limited use of designated dispersed motorized camping corridors within the Cedro area, we believe the designation of a 100 foot corridor on each side of a designated route is excessive. Given that the Cedro area was already plagued by a “number of authorized trails,” (EA:19) we believe that allowing a broad swath on either side of designated routes will lead to the creation of additional user-created routes, eventually spider-webbing into a network of unauthorized routes that will make enforcement impossible in this area. The designation of a limited number of camping sites or a provision allowing for a camper to pull one vehicle length from the designated route is a more reasonable approach to motorized dispersed camping in the Cedro area.</p>
<p><u>Response:</u> In Alternatives 1 and 3, one 100’ corridor along NFSR 9 is proposed for approximately ¼ of a mile. This includes about six acres, which represents a very limited use of designated dispersed motorized camping corridors. The other five dispersed sites are designated spurs, and not corridors.</p>	
128	<p>We would suggest the following modification.</p> <p>Dispersed camping off of Juan Tomas (#242) be added and a trailhead considered at the point where the single tract crosses 9 on both the north and south side. We feel that people are used to camping in the National Forest and that particular spot is a favorite. It is also easily accessible and monitored. There is an open field at that intersection which is informally used now and it could be expanded. The unpaved section of Juan Tomas that runs through the National Forest is often impassable during melt off and rainy seasons. That would inhibit the use of that site as a fully developed trailhead but would provide an alternate during those times that ORV trails are open.</p>
<p><u>Response:</u> This is a reference to Alternative 5. Dispersed camping at this junction is included in Alternatives 1</p>	

Comment #	Comment
	through 4. If Alternative 5 is selected, the responsible official may select to provide for dispersed camping at this location since the effects were analyzed in Alternatives 1 through 4. We have noted your interest in the location of dispersed camping.

Issue 4: Loss or Reduction of Motorized Recreation Opportunities

Comment #	Comment
(AE8) Need for Motorized Recreation Access	
72	<p>This is a general comment. Too much these days we are pigeonholing our children (not to mention ourselves) to their TVs and desktop computers by restricting travel in the outdoors. To really appreciate nature, it must be accessible by motorized vehicles. One can respond that "anyone can hike out there" but the reality is that much, much less than one percent of the population has the time and inkling to actually do that. However, that extremely small minority is very vocal.</p> <p>If there is a problem with people abusing the forest, they should be punished. Let's not punish all of America and weaken our spirit by restricting travel in the outdoors. For those who would hike the forest, there is already a far greater percentage of land as "wilderness area" per person who would use it like that. Let's keep our National Forests accessible to the vast majority of our Nation.</p>
Response: We have noted your interest in maintaining motorized access.	
81	<p>Issues 2 and 4 deal with balancing the needs of motorcycle (MC), ATV, and full-size 4x4 operators. I'm not convinced that any of the existing alternatives balances those needs in an effective manner. Each user group needs trails that are pleasing for their chosen OHV type -- that is something that I think you're well aware of, and have been thinking about. In the best of all possible worlds, the "length" of trail would be balanced as well. However, and this is an important point, I think "length" should be measured in terms of "trail time" rather than miles. This will be tough to quantify exactly, but as a rough measure, if I spend 2 hours riding trails in my 4x4, I might only cover 5 miles, whereas that same 2 hours on my MC would allow me to cover about 20 miles. An ATV will be somewhere in between -- maybe 10 miles. So, balancing "trail time" opportunities should result in about 4 times as much single-track as full-size two-track, and about twice as much ATV trail as full-size two-track.</p>
<p>Response: The preferences and use patterns were considered in the Recreation section of the EA and the specialist reports. Given the other resource and recreation uses issues and concerns is not possible to balance for every motorized use in every alternative, especially given the limited size of the Sandia Ranger District.</p> <p>The on page 68272 of the Travel Management Rule “Public Comments on Proposed Rule and Department Responses” section indicates that it wasn’t the intent of the Rule to provide for motorized recreation opportunities that accommodate current and future demand on every Forest.</p> <p>“<i>Comment.</i> Some respondents asked the Forest Service to commit to designating enough OHV routes to accommodate current and future demand.</p> <p><i>Response.</i> Provision of recreational opportunities and access needs are two of several criteria the responsible official must consider under § 212.55 of the final rule in designating routes for motor vehicle use. National Forests are popular with many Americans for many uses. It is not possible to accommodate all user demands on all National Forests while also protecting water quality, wildlife habitat, and other natural resources that people come to enjoy. Forest Service managers must balance user interests against the other criteria for designating routes and areas under the final rule.”</p>	

Comment #	Comment
91	<p>As both an avid outdoorsman (Wilderness backpacking, mountaineering) and 4 Wheel Drive enthusiast (Toyota Land Cruisers) I really think that there needs to be room for all of the different activities. I really don't want access for 4 wheel drive vehicles to the Cedro Peak area to be removed. It is the only area in the Sandias for real off road use, and has been far from pristine wilderness for the entire time I have lived here (my entire life). I would not be opposed to a tightening of restrictions on OHVs in the Cedro peak area such that one be restricted to posted trails (to include popular obstacles such as "The Hill.")</p> <p>I do not particularly want to see more OHV access to the north of the Sandias (La Madera). I prefer the concept that motorized access be south of I-40...</p> <p>I had the Land Cruiser on the Cedro Peak trail just this morning, and I really enjoy the ability to travel into the woods, and I can bring along friends who would otherwise not be willing to travel with me (not everybody enjoys a bivy sack and 30 miles a day as much as I do). I know that horse traffic is a big concern in this issue, and I like the idea that horses should have separate trails to the OHV trails, and that both groups be restricted to their published trails. Sure they would cross one another occasionally, but it's much easier to cross a path than travel along the same one.</p>
Response: Your preferences have been noted and will be considered.	
116, 119	<p>(<i>The comment includes a quote from page 97 in the EA</i>) “The general designation of motorized use on all system trails in the Cedro area is a conflict for some non-motorized trail users...”</p> <p>Rather nearby residences are inconvenienced or not is irrelevant for travel planning, if the Forest Service catered to “nearby residences” That would be discriminatory toward the general public, the Forest service is required by federal law to treat all visitors the same rather they live near the forest or downtown. All national Forest lands are for the enjoyment of everyone.</p> <p>As it is un-clear which routes were not considered for designation due to the catering to the “nearby residences” I request the EA be removed for consideration until such time the Forest Service can produce a travel plan that does not discriminate against the general public.</p>
<p>Response: In the Travel Management Rule’s § 212.55 “Criteria for designation of roads, trails, and areas” the responsible official is directed to consider:</p> <ul style="list-style-type: none"> • Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; • Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors. <p>The analysis quoted from page 89 in the EA is appropriate given the criteria as stated in the Rule.</p>	
149	<p>My concern is that any of the restrictions or alternatives proposed will further restrict and confuse the issue of forest trail usage. I would like to see no changes made and that trails are open to all (including motorized vehicles.)</p> <p>Leave things as they are or open up more trails for usage by all.</p> <ol style="list-style-type: none"> 1) The alternatives are confusing, unwarranted, and will probably lead to excessive forest service patrolling and further expenditure of tax dollars for enforcement. 2) The number of signs put up in the forest would make it look like a billboard heaven, exactly what I don’t want in the forest. 3) NM is already very restricted on ATV use (AZ, Utah- more lenient) and this is just another attempt to further restrict ATV usage. 4) ATV tire pressure (4-6 lbs) is less damaging than a horse and an ATV doesn’t crap.
Response: Thank you for your comments your concerns and preferences have been considered.	
160	I am an ATV trail rider. This is a great way for me to enjoy the National Forest as my physical

<i>Comment #</i>	<i>Comment</i>
	<p>condition does not allow for me to participate in most of the other user groups (hiking, biking, motorcycles, and equestrian). Riding in a full size 4 x 4 vehicle is not the same. As stated in paragraph 5, pg5 of the EA, there are no trails constructed specifically for ATV use. The other user groups have many opportunities in the Sandia Ranger District. Hikers and Equestrians who do not wish to encounter motorized users have the large areas of wilderness. Paragraph 7, pg 5 of the EA explains the equestrian residents in the Cedro area do not use the wilderness due to limited trail heads. However, on page one of the overview of Alternatives Hand Out, it states most of the motorized recreation occurs in the Cedro area and has been a popular use for more than 40 years. This is long before most of these subdivision's were there. Mountain bike riders have many areas and opportunities if they don't want to share the trail with motorized users. I believe that during the summer months they can ride the chair lift at the ski area up the mountain with their bikes and then ride the trails down. This seems like it would be a lot of fun. The motorcycles seem to be the fastest, noisiest, dustiest users in the forest. They have come up on me while I have been riding my ATV in the Cedro area so fast it was scary. If they don't want to share the trail with ATV's, they have the area west of NMSH337 designated in a previous decision.</p>
<p>Response: Your concerns and preferences have been considered.</p>	
<p>188</p>	<p>We are not attempting to deny that there are physical effects upon the natural environment from OHV recreation. We are attempting to help the FS produce an accurate analysis. We know there will be some effects, and not all will be positive. But the purpose of the NEPA is not to find that place where there are no effects, but to find the balance between the benefits to the human environment and the effects upon the natural environment. NEPA, Section 2 "prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man", and Section 101 under Title I, "recognizing the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man."</p> <p>Therefore, it is incumbent upon the Forest Service to provide a professional examination of the social benefits of wheeled motor recreation. Given the diversity of cultural values present in modern American society, and the fact that it is not the role of the government to dictate the particular ways in which individuals and families choose recreation activities that those individuals find most stimulating and beneficial, the Forest Service is expected to develop a science-based management protocol for motor vehicle recreation activities, just as the Forest Service has found ways to accommodate other linear recreation activities-all of which have their own negative effects upon the natural environment (Gaines 2003). By developing an accurate description of each of the following activities, and place it prominently in the draft EA in a professional presentation, the contribution of motor recreation to the "welfare, development, and stimulation" to individuals and families that participate in OHV recreation will become evident, and thus create a science-based and professional weighing of the benefits with such environmental effects as may occur.</p> <p>To do this you will need to bring experts from outside the Agency, as the List of Preparers does not include a single person who could contribute any substantial or professional information on these activities: 1) Trail bike riding, 2) ATV riding, 3) 4- WD driving on unimproved Forest roads and 4) "Rock Crawling." The reason we want non-Agency experts, is that there is a large body of literature describing the emotional and social benefits of this sort of "serious leisure," and this draft EA is totally silent about it. This is an incredible omission. If you review some of the literature, you will find that:</p> <p>Recreation research reveals that leisure activities can be rated according to quality, which is defined as an overarching quality-of-life benefit to the participant. Very high quality leisure activities, called "serious leisure" by researchers in the field, require a considerable number of</p>

Comment #	Comment
	<p>complex factors which, in combination, provide satisfaction, personal growth, and fulfillment to the participant. (Stebbins, R.A. 1982, "Serious Leisure, A Conceptual Statement," Pacific Sociological Review, 25, 251-272).</p> <p><i>(This comment includes a review of Stebbins' paper, a copy was obtained by the Recreation Resource specialist and is included in the project record.)</i></p> <p>Motorcycle trail riding falls directly into the most complex forms of "serious leisure,"</p> <p>Examples of some other forms of serious leisure that are pursued on NF lands include all types of skiing, mountain bicycling, and kayaking. Therefore, there is a compelling case to be made for closely examining the perceived negative impacts, and correcting inaccuracies. There is also a compelling case to be made that the "err on the side of caution" policy, in matters of speculative negative impacts, is counterproductive to the USFS purpose and mission of offering quality recreation opportunities on the National Forest (particularly opportunities that are not available in any other setting).</p> <p>And finally, there is most definitely a case to be made in favor of reasonable trade-offs between the significant social benefits of motorized trail recreation and any measured negative resource impacts that may be noted after monitoring begins.</p> <p>Since the quality of a forest recreation experience is measured in hours, and the average speed of a motorcycle on easy single track trail could be as fast as fifteen MPH and on a difficult trail as slow as three MPH, longer trails are necessary to provide a "good day's" recreational experience. Trail routes need to be anywhere from 50 to 100 miles long depending on the skill of the rider and the difficulty of the trails.</p> <p>It is especially important that the loops are really loops and not a series of out-and-back segments. In addition to the improved recreational experience of a loop, the out-and back segments are more dangerous because of the higher chance of a head-on collision.</p>
	<p><u>Response:</u> In the "Need for a Revised Rule" on pages 68264-5 of the supplemental information for the Travel Management Rule it states "Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management...Americans cherish the National Forests and National Grasslands for the values they provide: opportunities for healthy recreation and exercise, natural scenic beauty, important natural resources, protection of rare species, wilderness, a connection with their history, and opportunities for unparalleled outdoor adventure. The agency must strike an appropriate balance in managing all types of recreational activities. To this end, a designated system of roads, trails, and areas for motor vehicle use, established with public involvement, will enhance public enjoyment of the National Forests while maintaining other important values and uses on NFS lands."</p> <p>Motorized recreation is recognized as a legitimate recreation activity both at the national level and the on the Cibola National Forest. This could be equated to recognizing that motorized recreation has the potential to be a "serious leisure pursuit" and can have societal values as recreation activities. However, the Rule also emphasizes the need to balance motorized recreation interests and opportunities with natural resource concerns and directs the responsible office to consider conflicts with other recreation uses and adjacent private and public lands when making a decision regarding designation.</p> <p>The Stebbins paper, written in 1982, was addressing a concern that in the future there may be less emphasis on careers and professional pursuits defining individuals' self worth. He suggests that "serious leisure" pursuits such as amateurism, hobbyist pursuits, and career volunteering can provide the same self fulfillment as devotion to excelling in a career. Most of the motorized and non motorized recreation activities on the Sandia Ranger District</p>

<i>Comment #</i>	<i>Comment</i>
	<p>are likely pursued by some participants to the level described by Stebbins, which in addition to the activities referenced in the comment could include such non motorized activities as photography, bird-watching, equestrians and hiking.</p>
	<p>There were multiple sources that were used to develop the Proposed Action, the alternatives, the Recreation Specialist Report and the EA. There is an extensive literature review in the specialist report that included numerous sources on motorized recreation preferences and the qualities that are valued in a motorized recreation experience. There has also been an extensive public involvement process that included over 15 public workshops and workgroup meetings attended by motorcyclists, ATV and Full Size 4X4 riders who were active participants and shared values, preferences, concerns, and identified roads and trails that provided quality experiences for their activities. ID team members also participated in a number of field trips with motorcyclists and ATV riders to visit trails that provided quality experiences, and to review areas of concern. All of this information was used to develop the proposed action, alternatives and analyze effects. The recreation specialist who prepared the report has over 25 years of recreation management experience, including trail design and construction for both motorized and non motorized recreation.</p>
	<p>Regarding loops, the ID team recognizes the importance of loops when developing the Proposed Action and subsequent alternatives. There are instances where a motorcyclist would need to use a road to reach another trail, however a loop is provided. In the case of full size 4x4s, since many of these vehicles are highway legal, a highway or county road does form part of a loop.</p>
	<p>Through both the literature review and comments received through the public involvement process we recognize that motorcyclists prefer 50 to 100 miles of loop opportunities. Most people who ride motorcycles in the Cedro area have commented that this area provides about a four hour opportunity. However, this was often cited as a valued feature, given the close proximity to Metro Albuquerque. The Cedro area is often used for a morning ride or late afternoon, saving full day rides to more distant areas such as the Jemez Mountains. Another concern shared by motorized recreationists was that they preferred to not have trails too close together, because many valued a sense of solitude. There was an indication that fewer quality trails with separation provided a better experience than a dense system such as the one as Montessa Park operated by Albuquerque Open Space. The Cedro area is only about four miles wide at the widest point, and eight miles long, it is not feasible to provide 100 miles of loops in that area and still maintain a quality experience that provides some sense of solitude. The La Madera area is even more limited. The terrain that can be considered is about ½ of area of Cedro, about four miles long and three miles wide with steep terrain and cliffs that reduce the space to be considered even further.</p>

<i>Comment #</i>	<i>Comment</i>
<i>(AB9) Trials Motorcycle Areas</i>	
7, 20, 22, 65	<p><u>Summarized Comment:</u> General requests for areas to be designated that provide suitable terrain for trials bike recreation. Examples of the comments received:</p> <ul style="list-style-type: none"> • <i>Comment 7:</i> It is vital that TRIALS not be considered or lumped in with ATV’s and jeeps or even other bikes such as enduro and MX. We are a very different and completely benign form of sport. I urge you to consider the club as a separate category and class of motorized sport and to make every allowance. Additionally the New Mexico Trials Association (NMTA) has a tremendous record of being good stewards in the sense of obeying restrictions, leaving areas cleaner than they found them and in general taking care of the land. • <i>Comment 22:</i> I am concerned that you are not following the process correctly as I see no inclusion of areas dedicated to the sport of observed trials as requested by New Mexcio Trials Assn.(NMTA). Can you explain why there are no areas for the motorized sport of observed trials indicated and how NMTA can work with Forest Service representatives so that this can be corrected? • <i>Comment 65:</i> Purpose of and Need for Action - The purpose of and need for action

Comment #	Comment
	<p>speaks only of a trail-based system for motorized travel, there is no mention of areas. The sport of trials is performed on obstacles such as rocks and logs. We utilize a trail system to get to the obstacles, but do not stay on the trail when riding a section or practicing in an area. For this reason the lack of designated areas would eliminate our sport from the Forest under the current proposed conditions...</p> <p>Bullet #3 discusses complying with the TM rule "Comply with the direction in the final rule for travel management; Designated Routes and Areas for Motor Vehicle Use" yet no areas were identified in any of the alternatives presented... Bullet #3 discusses complying with the TM rule "Comply with the direction in the final rule for travel management; Designated Routes and Areas for Motor Vehicle Use" yet no areas were identified in any of the alternatives presented.</p>
	<p>Response: Our understanding of the Trials sport is that there are very specific terrain features to respond to the needs for this sport. Very rocky areas, or areas with large amounts of downed timber are needed as obstacles to test the skills of the riders. There was a member of the NMTA organization that participated in the Sandia Ranger District Work Group for this project. There were no specific areas with these terrain features that were proposed during any of the public participation activities through the scoping of the proposed action. A map was provided during the EA January 2008 open house, and a response to that map is given below under Comment 140. If an area is designated for motorized use, this area is a relatively unrestricted area, where cross country travel would be permitted by the designated class of vehicles.</p> <p>NMTA association representatives met with a representative from the Sandia Ranger District on February 29, 2008. Notes are available in the project record. During that meeting two areas were identified that were of most interest to NMTA. Both of these sites were west of NM 337 (further discussed in the response to Comment 140 below), and areas along the Cedro creek drainage. Recently there has been a large financial and time investment to restore the Cedro Creek drainage, and the district does not consider that drainage suitable for consideration as an area designated for motorized use at this time. If other areas are proposed in the future, following the necessary analysis, a decision could either be made to include these areas for public use on the MVUM, or through a special use permit with the NMTA.</p>
140	<p>The interest of the New Mexico Trials Association are not represented in any of the plans. We need an area to ride our Trials motorcycles. An area close the Alb metro area is very desirable. We are the largest Trials club in the USA. An area close to rest of our members where we can practice our sport would be most helpful. A lot of fuel spending going to areas we use. Attached is a map of the areas we have used in the past. We would like these areas included in a plan. (A map was provided that is available in the project record)</p>
	<p>Response: The map provided with this comment shows areas primarily to the west of NM 337, and immediately adjacent to NM 337 and County Road 242. The areas to the west of NM 337 are outside of the current project, since motorized travel in that area was designated in a previous decision that complies with the requirements of the Travel Management Rule. Since motorcycle trails riding is a specialized sport with unique requirements, it would be possible for your group to work directly with the district to identify areas that respond to these requirements.</p>

A. Conflicts with Seasonal Closures

Comment #	Comment
(A8) Seasonal Designations –General	
1, 5, 42	<p>Summarized Comment: Concern about weather variation and if the EA considered the expected impacts related types of vehicles that could be considered for designation. Use of established dates for designations on the MVUM of particular concern. Comment 1 suggests shortening the period that seasonal restrictions would be in place: “One possible alternative to shutting the motorcyclists out of the Cedro trails for five months out of the year, would be to</p>

Comment #	Comment
	<p>shorten the duration of the seasonal closure to three months... from January 1st to March 31st every year” Another suggestion is to consider administrative closures based on soil moistures. Comment 5 suggests: “I believe a temporary closure of the area to all vehicles at times when the ground is saturated from recent storm activity is called for given the significant erosion problems in many of the meadows and surrounding roads... I believe most of us who ride there honor a self imposed ban during these periods. Unfortunately just a few vehicles using this area when these conditions exist can cause significant damage”</p>
<p>Response: Class of vehicle was addressed and the seasonal designations applies to all classes of motorized vehicle considered in the analysis. As stated in the response to A7 it is understood that the restrictions in Alt. 1 apply primarily to motorcycles and ATVs based on the trails considered. The statement pulled from page 17 of the EA highlights the ability of the line officer (e.g. District Ranger) to apply administrative closures for resource protection. Those closures can be more flexible and based on on-the-ground conditions. Administrative closures are available to implement under any Alternative. Administrative closures can be more costly and difficult to implement than dates based on defined dates.</p>	
<p>47B</p>	<p>The Environmental Assessment for Travel Management on the Sandia Ranger District (hereafter referred to as the “EA”) proposes a “seasonal closure” for alternatives 1 & 5...The Executive Orders (11644 as amended by EO 11989), CFR 295, and the Travel Management Rule intend the National Forests and districts charged with enforcing the rule to consider vehicle class/types in any decision process, to include closures of any duration, seasonal or temporary.</p> <p>By not addressing types of vehicles in seasonal closure, the EA does not account for differences of vehicle characteristics. Page 104 of the EA states “...research indicate that single-track users generally avoid trails when they are wet and traction is poor. As a result, little damage is expected to trail surfaces.” Furthermore, compaction and deep trenching on road surfaces does not occur from motorcycle use during wet conditions...Additionally, the EA does not follow the guidance presented in the Transportation Analysis Process for the Sandia Ranger District, page 17... This statement correctly recognizes the existence of variations in the yearly weather patterns that would allow OHV use (by vehicle type) well beyond the seasonal closure time frame suggested and in some instances, year-round.</p> <p>Inherent in the travel management process is the need for active management of the forest transportation system. Seasonal closures are essentially passive management and not responsive to the public, the OHV community nor the direction presented in the Travel Management Rule.</p> <p>The “seasonal” closure as implemented does not comply with the direction of the Executive Orders, CFR 295 nor the Transportation Management Rule. The seasonal closure concept should be either 1) eliminated from the EA or 2) replaced with a “temporary” closure concept that is administered based on current weather/trail conditions and vehicle type.</p>
<p>Response: The inclusion of a seasonal closure to motorized use in Alternatives 1 and 5 (and 6) in the EA is consistent with the Executive Orders and the Travel Management Rule. These alternatives would prohibit motorized use between December 1 and April 30. Although specific classes of vehicles are not listed, it is clear from the information in the EA that motorized use would be prohibited on these routes, including all classes of motorized vehicles. 36 CFR 295 no longer exists and does not apply to this project as it was removed in its entirety when the final Travel Management Rule was published on November 9, 2005.</p> <p>The statement from the Travel Analysis Process (TAP) “Depending on snow conditions, there can be year-round motorized recreation use” is used out of context. In the TAP, this statement refers to the management direction that currently exists. It does not suggest that such use is appropriate, only that it is allowed under current direction.</p>	
<p>1, 13, 107,</p>	<p>Summarized Comments: Requests for consideration of administrative closures based on</p>

<i>Comment #</i>	<i>Comment</i>
108, 116, 119, 124, 150	<p>specific weather conditions, rather than the seasonal designations that are specified on the MVUM or that periods for motorized seasonal prohibitions be reduced. If seasonal designations are implemented, there is a recommendation that these are applied to non motorized use in addition to motorized uses.</p> <p>Comment 107 suggests that: “The motorized community could support the development and implementation of appropriate wet weather seasonal closures to motorized and non-motorized use – based on specific rainfall amounts – to reduce soil erosion and damage to trail and road beds... We would like to draw your attention to the “Features Common to All” section (Chapter 2, pg 16 – 17) (describing) seasonal restrictions for wildlife concerns and temporary restrictions for wet conditions. This is exactly the right way to address these concerns.”</p> <p>Comment 1 recommended that seasonal designations apply to non motorized uses as well: “you should also close (trails) to equestrians and bicyclists, as they do as much or more damage as the motorcycles.” Comment 13 suggested the seasonal designations are a defacto designation of non motorized trail use and be removed from consideration : “As this document is written, you have violated your own ground rules listed on page 15, in order to allow the non-motorized community sole access to all of the Cedro area trails for five months out of the year. This blatant decision on your part, to show favoritism to the relatively few equestrians that utilize the Cedro area, is unacceptable, and will be challenged. Cedro is a multiple use area, and it needs to remain just that.”</p> <p>Comment 150 suggests that: “Either remove all reference to seasonal closures, or shorten the closures to 1 January to 31.”</p>
<p><u>Response:</u> The purpose and need and Table 1 (pages 2 and 7 of the EA) do not state that seasonal restrictions are the need. They are listed in Table 1 as a possible solution to erosion and rutting. The need for action is to “minimize damage to soils (erosion and rutting) during wet periods. Further discussion about seasonal restrictions, including variability and administrative closures, is included in the response to comment included in section A7, page 25. The examples provided from the Mendocino and Eldorado National Forests are examples of administrative closures.</p> <p>The analysis of cross-country use in Alternative 2 (No Action) is included in the EA on pages 79-80. Likewise analysis of route relocation and additional mitigations incorporated into trail design are discussed in the Watershed and Air analysis on pages 73 -85 and in the Watershed and Air Specialist Report.</p> <p>Page 68274 in the “Public Comments on Proposed Rule and Department Responses” of the Travel Management Rule, states that “The purpose of this rule is to provide better and more consistent management of motor vehicle use on National Forests and National Grasslands. Regulation of nonmotorized use is beyond the scope of this rulemaking.” Since this purpose of this project is to bring the Sandia Ranger District in compliance with the Travel Management Rule, restrictions for equestrian and mountain bike use were not considered as they are not within the scope of this project.</p>	
88	<p>We strongly support the proposal to close the Cedro roads from Dec 1 to Apr 30. This makes economic and environmental sense. It will also aid in compliance by making the rules clear. Further, if the CNF moves forward with making Cedro an area dominated by motorized trails, this will provide a timeframe by which quiet recreationists can enjoy the area.</p>
<p><u>Response:</u> Your preference for the seasonal designations has been noted.</p>	

<i>Comment #</i>	<i>Comment</i>
<i>(A7) Seasonal Designations – Weather</i>	
1, 48, 132	<p><u>Summarized Comment:</u> Concern that the seasonal restriction would apply based on calendar date designations, and not on precipitation and soil conditions in a given period. Comment 1</p>

<i>Comment #</i>	<i>Comment</i>
	states: “Short term closures due to wet conditions, could easily be managed by the Sandia Ranger District. Seasonal closures, especially when it’s dry out there, are ridiculous and unnecessary.” Comment 48 requests that seasonal designations be removed from all alternatives: “There is no documentation to indicate the amount of precipitation during these times showing there is sufficient precipitation to warrant such a closure, or that the times are appropriate to the amount of precipitation. Likewise there is no documentation of the normal temperatures to help back up the closure times.”
<p><u>Response:</u> - The Rule allows for seasonal designations: “if appropriate, the times of year for which use is designated” (36 CFR § 212.56.) The Motor Vehicle Use Map (MVUM), the enforcement instrument is printed annually. It is necessary to establish dates for seasonal restrictions when these designations are part of the MVUM.</p> <p>The timing of the seasonal restrictions was based on snow depth information recorded at weather stations and snow courses in the general area (Sandia Park, Tijeras and Oak Flat). Review of historic snowfall data indicated that snow on average began to fall and stay in December and persisted into mid to late March. Permitting use at the end of April allows for soil moisture drying and late spring snow. This can mean that 1) the snow may completely melt off then snow again, 2) a given year may be dry and the soil moisture will not be high throughout the entire restricted period or 3) that soil moisture may be high longer than the set dates or at a different time of year all. The dates were determined based on annual averages based on soil moisture with the understanding that there would be considerable variation.</p>	

<i>Comment #</i>	<i>Comment</i>
<i>(A6) Seasonal Designations – Motorcycle use</i>	
1,81,124	<p><u>Summarized Comment:</u> Concern about seasonal restrictions are unnecessary as they relate to motorcycle use. The concern as stated in Comment 124 is: “Motorcyclists do not ride on the trails when the conditions are muddy as the dirt in the Cedro area is so slippery when it is wet that it is nearly impossible to keep the bike upright and the experience is not enjoyable.”</p> <p>Comment 1 suggests an inequity where only trail seasonal designations are considered: “The main problem with erosion in the Cedro area comes not from motorcycles, but from four-wheel drives rutting out FR-462 during the wet season. As the current EA document is written, the seasonal closure only affects the motorcyclists, and allows the four-wheel drive community year-long access to the forest roads that they are tearing up. It seems like we are being punished, for something we do not do.</p>
<p><u>Response:</u> It is understood that the seasonal restriction in Alternative 1 primarily restricts motorcycle and ATV trails and not full-size vehicle roads and trails. Alternatives 5 and 6 address this concern by having the seasonal closure apply to more roads and trails. Addressing closures to only some trails within a loop or segments of a route poses problems for enforcement as individuals would likely not turn around at a problem spot along a known route. We have noted your comments on motorcycle use during wet periods. Alternatives 3 and 4 do not include seasonal restrictions. This provides a comparison for the responsible official to make a decision as it relates to seasonal restrictions.</p>	

<i>Comment #</i>	<i>Comment</i>
<i>(AB1) Seasonal Closures – Full Size 4X4 use</i>	
1, 124	<p><u>Summarized Comment:</u> Commenters suggested that NFSR 462 needs to be considered for seasonal designations in addition to trails due to erosion and rutting concerns.</p> <ul style="list-style-type: none"> • <i>Comment 1:</i> “The real erosion at Cedro comes from full size vehicles and ATV’s (quads) getting in there during wet conditions resulting in huge deep ruts. If you need to close something, close FR-462” • <i>Comment 124:</i> “As I interpret the EA, the closure of all trails for the five month period

<i>Comment #</i>	<i>Comment</i>
	only affects the motorcyclists and not the four wheel drive and quad community. These are the vehicles that are causing the erosion on FR-462, not the motorcyclists. It appears that the motorcyclists are being singled out and restricted from riding due to a problem they are not creating. This is unfair and unjust treatment.”
<u>Response:</u> Seasonal restrictions for NFSR 462 are included in Alternatives 5 and 6. For further discussion on seasonal designations please see the response in section A7, page 51.	

B. Additional Designations for Full-Size 4x4s and ATVs.

<i>(AB3) La Madera-Motorized Recreation Opportunities</i>	
42	I would like to see a second look taken at the closure of the area north of La Madera Road. In the early 90s, when I asked about areas in the Sandia Ranger District, I was directed to this area by the recreational specialist. I think there are excellent visual resources to the north in this area, and I feel it should remain available for motorized travel. The majority of the area is on a flat area and would require little or no maintenance for occasional use by motor vehicles. Areas with extreme gradients could be closed if required, and the entire area could be closed in wet weather.
<u>Response:</u> We have noted your interest in having the La Madera area considered for motorized recreation. This area is being considered for motorized designation in Alternative 3.	

Issue 5: Environmental Impacts

<i>Comment #</i>	<i>Comment</i>
<i>(AB3) La Madera – Natural Resource Concerns</i>	
24, 60, 87, 122, 136	<p><u>Summarized Comments:</u> Requests that the La Madera area not be designated for motorized use due to environmental concerns, especially potential impacts to wildlife. Examples of comments received:</p> <ul style="list-style-type: none"> • <i>Comment 24:</i> “First, the La Madera Area of the Forest is one of the very few wildlife corridors open to allow wildlife safe passage from the mountains to the plains area and back.” • <i>Comment 122:</i> “I would like to protest opening up the La Madera wildlife corridor to the use of all terrain vehicles. This is the only corridor for wildlife in the area, and all terrain vehicles would make it more difficult for animals to use the corridor. The animals need to be able to move around to search for food, and to move back and forth from the mountains to the valley in order to escape from the cold in the winter, and from the heat in the summer. • <i>Comment 136:</i> “I would prefer OHV use to be restricted to those areas where it is already allowed. No new areas should be created. La Madera needs to remain closed.”
<u>Response:</u> We have noted your concerns. Your concerns are addressed in the design of the alternatives and the effects analysis, and impacts to wildlife are analyzed in the EA on pages 41-73 A note of clarification is needed. Motorized use in the La Madera is currently unrestricted as long as resource damage is not occurring, with the exception of the pipeline road as described in the EA. Motorized use would be restricted to designated routes in Alternative 3, and would be prohibited in Alternatives 1, 4, 5, and 6.	
73, 75	The area called La Madera should not be considered for any development for recreational use of motorized vehicles. The reasons are based on the current EA and the points identified below. <ul style="list-style-type: none"> a) The EA states that the La Madera area provides a viable corridor for wildlife movement from the Sandia Mountains to other mountain ranges and is at risk of deterioration, (loss of viability as a wildlife corridor) due to increased pressure from development, which includes increased MV use.

<i>Comment #</i>	<i>Comment</i>
	<p>b) The EA also states that the area called La Madera will become even more critical for wildlife migration and dispersal after the proposed action is implemented.</p> <p>c) The NM Department of Transportation (NMDOT) together with the NM Game and Fish Department (NMG&F) and the Tijeras Canyon Safe Passage Coalition (TCSPC) have expended a considerable amount of effort and public money to restore the Tijeras Canyon area for wildlife migration corridors. This area was very important for wildlife migration until I40 was built, and now is identified as critical. Other projects in the area and region are underway to restore wildlife corridors which are key components to their survival. The reasons why the USFS would jeopardize this effort is not understood. Furthermore it goes against the USFS policies of forest “stewardship”, “long term planning on an ecological basis” and the USFS dedication to forest protection and restoration. A written statement from the NMDOT, the NMG&F, and the TCSPC should be included in this EA in order to provide the public and all impacted parties, with the information regarding the position of these agencies regarding the development of La Madera in the proposed action. This is an example why an EIS is needed or at least some additional studies, before finalization of this action.</p>
	<p><u>Response:</u> The La Madera area was considered for motor vehicle designations in one alternative in response to an issue identified in scoping. Because motorized use is currently permitted in La Madera, it is appropriate to consider an alternative that provides for motorized use. The EA provides information on the environmental effects of this alternative. The purpose of the EA is to analyze and disclose the effects of the proposed action and the alternatives – it is unclear how including a written statement in the EA characterizing the position of NMDOT, NMG&F or TCSPC would provide meaningful information about effects. We are also in formal consultation with the US Fish and Wildlife Service.</p>
89, 173	<p>We are very pleased that your preferred alternative does not include motorized use of the La Madera area, especially in Tejon and Gonzales Canyons. These canyons are not appropriate for use as “rock crawling” playgrounds. As stated in the EA on page 15, the main access road in to this area is not supposed to be available to public use to protect the pipeline from exposure. We are concerned however, that the EA does not include a specific plan for how the Sandia RD will keep motorized uses out of the area. We believe a specific plan would give law enforcement officers the ability to address any violations with confidence and will also provide for better communication with the public about this closure.</p> <p>New Mexico Wilderness Alliance has lead a number of outings to the La Madera area to raise awareness about what was at stake with the development of the Sandia RD Travel Management plan. Along with their members, they also went out with the caving club Sandia Grotto and many who live in the region who are concerned about wildlife. Everyone was struck by a clear need to protect this area for the benefit of wildlife. As growth isolates the Sandia Mountain Range, having places like La Madera becomes a critical place for quality wildlife habitat and can provide an important wildlife corridor. La Madera is a refuge for wildlife where they seek water, food, and shelter, while connecting to other undeveloped landscapes.</p>
	<p><u>Response:</u> We have noted your comments about the La Madera area. Effects of the various alternatives on the resources in La Madera are discussed in the EA. Inclusion of a plan in the EA to ensure that law enforcement officers are able to deal with violations would not be necessary. The outcome of the decision would be a Motor Vehicle Use Map that shows routes available for motorized traffic. Any motorized uses inconsistent with the map designations would be a violation subject to citation by law enforcement. A point of clarification, the proposed action was not the preferred alternative. There was no preferred alternative identified in this EA.</p>
138	<p>My concerns with the La Madera area especially, I’m concerned that opening up this area to full OHV use will cause even more erosion and degradation of the already badly eroded hillsides. This in turn impacts the springs in Tejon and Gonzales Canyons which impacts wildlife in the area. This is a unique wildlife corridor area and the impacts of motorized use in this, one of the last unpopulated area surrounding Sandia Mountain, is an impact that these animals don’t need.</p>

Comment #	Comment
	Close the La Madera area to motorized use. The pipeline company (Giant) has stipulated that this across road is for USFS administrative use only- so close it and gate it to keep vehicles out
Response: Thank you for your concerns. Watershed and air analysis is included in the EA on pages 73-85. It discusses some of your concerns about erosion and impacts to springs. It should be noted that the trail designation being considered ends before the spring in Tejon Canyon in Alternative 3	
153, 170	<p>In particular, the Pueblo is very concerned about the degrading impacts of motor bike, all terrain vehicle, and jeep traffic on trails, roads, and culturally-sensitive areas within Las Huertas Creek and adjacent watersheds to the east including the La Madera area. The routes and trails of particular concern are listed as 0565, 63C, 0562, 62B, 05247, and 0567A as shown on your map dated January 19, 2007.</p> <p>We are concerned that greatly increased visitation to these areas would surely increase potential looting, vandalizing, and disturbance of these areas. Many of these sacred, sites lie undocumented and would be forever lost to our tribal identity if they were destroyed, even inadvertently.</p>
Response: NFST 05247 and 05567A originate in Las Huertas Creek and are not currently being considered for designation as motorized travel routes under any of the alternatives identified in the Environmental Assessment. In Alternatives 1, 4, 5, and 6 of the Environmental Assessment NFSR 62B, 63C, and NFST 0562, and 0565 would not be designated as motorized travel routes and public access to these areas would be restricted. In Alternative 2 of the Environmental Assessment NFSR 62B, 63C, and NFST 0562, and 0565 would be open for motorized travel, but access to these routes is currently not open to the public. In Alternative 3 of the Environmental Assessment NFSR 62B, 63C, and NFST 0562, and 0565 along with routes in Gonzales Canyon and Tejon Canyon and along the oil pipeline road would be designated for motorized use. As Gonzales and Tejon Canyons and the oil pipeline road are not currently system routes, they received extensive heritage resources survey to determine if any historic properties might be impacted by their designation as motorized routes. If Alternative 3 is selected, heritage resource surveys will be conducted as future maintenance projects are planned in the La Madera area. If historic properties are present and have the potential of being impacted by motorized use, site mitigation measures will be implemented to ensure that the resources are being protected.	
163	<p>The La Madera area is an extraordinary wildlife habitat and healthy and diverse ecosystem that fortunately remains largely undisturbed at this time. Its delicate balance and captivating natural ambience is a local resource that needs to be preserved for the benefit of everyone both today and into the future.</p> <p>It simply makes no sense to allow ORV's access to this critically sensitive area because of the extraordinary damage that will be so easily and quickly inflicted. LPA is actively involved in watershed restoration in the Placitas area, currently serving as an agent of the state in improving water quality in area watersheds. Since 2005, LPA has been funded by the New Mexico Environment Department to enact measures to reduce surface erosion and sedimentation/siltation in area streams. It is widely known that ORV use increases surface erosion via the establishment and use of new trails. Introduction of ORV use into a sensitive riparian area such as Gonzales Canyon would be a tremendous setback to our mission. Additionally, our wonderful State of New Mexico has available extensive other Forest and other natural areas where ORV owners can experience their off-road enjoyment.</p>
Response: Additional information and analysis concerning watershed and air resources is included in the EA pages 75-85, in the Watershed and Air specialist report and in the Sandia TAP Appendix B.	
25	First, historically, Cedro Peak has had extensive motorized use; therefore, the trails are already constructed, and while many of them may need to be repaired and some may need to be closed, the basic work has been done. On the contrary, except for a very few miles of forest road, one of which crosses or comes close to an active pipeline, no motorized-use trails have been constructed in the La Madera area of the Forest. Thus the expense of constructing trails properly designed for motorized travel could be significant.

<i>Comment #</i>	<i>Comment</i>
	<u>Response:</u> NFSR 63 and 62 B are existing roads that are on the Forest inventory. The routes through Gonzales and Tejon Canyons were requested by motorized recreationists due the challenge they provide. Maintenance would be minimal, stabilizing the drainage bottoms where necessary to reduce the damage caused by vehicles traveling through the canyons.

<i>Comment #</i>	<i>Comment</i>
<i>(AB4) Cedro Area – Natural Resource Concerns</i>	

6, 8, 19, 70	<p><u>Summarized Comment:</u> Concern about the natural resource impacts if motorized trails are designated in the Cedro area. Examples of the comments received:</p> <ul style="list-style-type: none"> • <i>Comment 6:</i> It seems to me that considerable acreage has been and is still is being sacrificed to Forest users who don’t seem to have suitable ethics for widespread motorized use of our national Forests... And as this document points out, they have open space/BLM/etc areas where these destructive outdoor activities can be carried out. I’d like to see as much restored habitat in the Cedro as can be budgeted for. • <i>Comment 8:</i> I have done extensive work in watershed restoration and ORVs are the leading cause of erosion and sediment loading throughout the Rio Grande Watershed. • <i>Comment 70:</i> From the viewpoint of allocating a limited natural resource to the broadest possible population alternatives 1-5, (all of which encourage, enhance and focus off-road motor vehicle use in the Cedro Peak Area) are the least efficient, catering to the smallest minority of users, causing the most damage to the natural environment, putting the most stress on the human and fiscal resources of the District and ultimately leaves future generations with the least number of options.
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Response: The EA analyzes the effects of motorized trail recreation on the Cedro area to natural and cultural resources. Your concerns have been noted.

73, 75	<p>Based on the current EA, the CEDRO Area trail from the Tablazon area trail head (Lower Pine) should not be open to motorized use except on the main road. An EIS and revised alternatives are needed to better manage the future development and use of this Cedro Area.</p> <p>a) The EA report states that “the density of roads and trails has contributed to habitat fragmentation and wildlife disturbance in the Cedro Area”.</p>
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Response: The EA analyzes the effects to wildlife. Wildlife, and impacts associated with it, is one of a variety of resources and concerns that the responsible official is directed to consider when making designation decisions for travel management.

73, 75	b) The EA also states that the “Cedro area has the most potential conflict between heritage resources and motorized routes.”
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Response: The majority of the routes on the Sandia Ranger District being considered for designation under the Travel Management Rule are located in the Cedro Area. As such, the designation of these routes has the greatest potential to affect the integrity of heritage resources located in this area of the Sandia Ranger District. However, all of the routes proposed for designation have been surveyed for heritage sites. A designated system will reduce the potential of damage to heritage sites, compared to the existing condition where cross country travel is permitted and does occur throughout the Cedro area.

73, 75	c) The entrance to the Cedro area, from Forest Road in the Tablazon subdivision is obscure, not very well maintained, and small. There is not enough room for vehicle parking and many times vehicles park on the edge of the road, destroying roadside vegetation. There is evidence of erosion, and frequently the road and adjacent terrain is subject to severe tire gouging. The trail itself is narrow and steep which sharp turns in places. When motorized vehicles are using segments of the trail, pedestrians and non-motorized traffic are forced down off the trail to get out of the way. There is frequent use of the arroyos as an alternative to avoid collisions and dust generated from the motorized vehicles. This is causing adverse impacts to the arroyo, an important riparian corridor.
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<i>Comment #</i>	<i>Comment</i>
	<u>Response:</u> Your concerns have been noted. In Alternatives 1, 3 and 4 additional trailhead capacity in the Oak Flat and southern NFSR 462 areas, which will help to relieve potential use beyond the capacity of the trailhead at Lower Pine. No changes are proposed for the Lower Pine trailhead.

<i>Comment #</i>	<i>Comments:</i>
<i>(AD5) General Natural Resource Concerns</i>	

19, 21, 39, 70, 133, 158	<p><u>Summarized Comment:</u> Comments indicate concerns related to natural resource impacts related to motorized vehicle use on the Sandia Ranger District. Examples of comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 39:</i> Motorized vehicles cause significant damage to our natural lands, from harassment and killing of native wildlife, to damage of vegetation, to soil erosion. Indeed, ORV use is now considered the greatest threat to our natural, public lands. In fact, the Forest Service ruling cites ORV use as having increased 109%, and that ORV use is one of the top four threats to our National Forests... We live in the wealthiest and one of the most beautiful countries in the world, and we are allowing people to trash our protected lands. The Forest Service is not being a responsible steward of our public lands by allowing ORV's on these lands. • <i>Comment 158:</i> This pristine, protected area housing animals, plants, and all the key ingredients to native contributing to our health and well being would be greatly harmed if opened to all kinds of motorized vehicles. There needs to be a limit to the amount of 4 x 4 recreational vehicles, so that the wildlife is not too compromised from the vehicles, noise, added pollution. Other service vehicles, ATV's, and motorized vehicles that are not recreational have the responsibility and accountability to not disrupt the wildlife, plants and people (myself) living up the east mountains (Cedro Peak area.)
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Response: We have noted your concerns. The anticipated natural resource impacts for each alternative were analyzed in the EA, and supporting documents such as this Response to Comments, the specialists reports and the TAP. Mitigation, monitoring and project design features will be included in the Decision Notice.

160	<p>The concerns of residents in neighboring subdivisions of safety, increased fire risk, noise, dust, crime, trespass and effective law enforcement is valid, but these are concerns of all people living in the east mountain area, most people living in New Mexico for that matter. In the last forty years the Cedro area has been popular with motorized users and has there been a substantial fire caused by these users? My ATV has a forest service approved spark arresting exhaust system as I believe most of them do.</p> <p>Environmental impacts to wildlife and their habitat, plant species and vegetation, soils, water and erosion can be minimized by proper trail placement, construction and maintenance. Education and trail volunteers could also soften this impact.</p>
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Response: You are correct that an OHV can not be operated in New Mexico without a Forest Service approved spark arrestor. Title 18, Chapter 1, Part 3 New Mexico Off-Highway Motor Vehicle Safety Standards Section 18.15.3.8 states that: "A person shall not operate an off-highway motor vehicle...unless the vehicle is equipped with a spark arrestor approved by the United States forest service."

Mechanical equipment, specifically internal combustion engines are known ignition sources whether it is from unspent carbon particles, heat from the combustion process, brake lining particles, broken parts, etc. Historical data in the Cedro area does not contain sufficient data to accurately compare sources other than a cause. ATV's as well as other mechanized equipment are known causes of wildfires. The fire risk concerns are not just the threat of fire from the vehicles, but from trail users who may light campfires, smoke cigarettes and other related activities. These concerns have been analyzed in the EA and the specialist reports.

Other anticipated impacts to natural resources have been analyzed in the EA and the project specialist reports. Mitigation and design criteria were also addressed in the EA, as well as the role of education and trail volunteers.

73, 75	I would also like to share my concern for the health of the Lower Pine/ Cedro area forest. In my humble opinion the forest in this area is not in good health. There are signs of various tree illnesses and there is a lack of wildlife abundance and diversity. Additional and appropriate thinning management is needed. I was hoping the EA included a current status of the forest health for areas proposed for development, but I did not find this information. Perhaps this information is included in a different document. If so, I would appreciate the opportunity to review it. In a converted approach to action selection, if this forest area is already in bad health, then perhaps letting it go down via allowance of all motorized vehicle use, may be the best option, in order to allow protection of other areas that are still in good (relatively undisturbed) health.
<p>Response: Forest health, that is, health of individual trees and stands, is outside of the scope of this project. Forest health as it relates to erosion concerns is analyzed in the Watershed section of the EA and the Watershed and Air Resources specialist report.</p> <p>We do not understand your reference to the “allowance of all motor vehicle use” (perhaps Alternative 2 No Action) and stand health. There may be a forest health issue related to soil erosion caused by trails and roads. This is addressed in the watershed analysis section of the EA.</p>	

Comment #	Comment
(AD3) Wildlife	
18	<p>Another subsection of Part 2 12 is 36 CFR 212(b)(2) which requires the responsible official when designating trail locations to minimize harassment of wildlife and disruption of wildlife habitat.</p> <p>The wildlife in the Cedro areas adjacent to HHS is probably more diverse than other areas within the Sandia Ranger District. It is not uncommon to see wild turkey, black bear, deer and elk. There have also been sightings of bobcats and mountain lions. The establishment of OHV trails in this area would have a significant adverse impact on the wildlife populations and irreversible negative impacts on wildlife habitat in the area, which has previously been classified as a sensitive area.</p>
<p>Response: The majority of these species were analyzed by alternative in the existing Sandia travel wildlife reports and effects were described. The effects of each alternative on MIS were analyzed (see MIS report). The trails and the OHV use in this area already exist; all action alternatives presented would have less impact than existing conditions (since cross country travel is presently allowed). There are no official sensitive area classifications in the HHS area by the Forest Service or New Mexico Department of Game and Fish.</p>	
21	<p>From the Tablazon trailhead is a four wheel drive road that leads not just to a forest road, but to some private homes as well. Right next to the four wheel drive road is a sign from the New Mexico Stamps for Habitat program, proclaiming this to be an area reclaimed for habitat. The morning I ran by the sign, around Christmas time, there was an assortment of beer bottles and trash strewn by the sign. How could this possibly be a habitat safe for wildlife with the vehicles frequenting the area, obviously out for more than a pleasurable visit to the mountains?</p> <p>How are you going to protect the wildlife from off road vehicles?</p>
<p>Response: Several alternatives provide for seasonal designations and all alternatives prohibit cross country travel. The habitat project was thinning to improve forage; with the prohibition of off route travel, OHVs would not be permitted to travel off roads/trails into the thinning treatment area. FR 462, which passes through the thinning treatment unit has been an existing route from many years, since sometime prior to 1958.</p>	
24, 41	<p>Summarized Comments: Comments state concerns for the wildlife migration through the La Madera area. Comment 24 states that “We are concerned about the effect that motorized travel might have on wildlife, particularly as we understand that the La Madera area of the Forest presents one of very few wildlife corridors free of motorized traffic which allows animals safe passage from the mountains to the plains area and back.” Comment 41 adds that “With the increasing number of homes along Highway 14 there is less and less area for the wildlife to use for migration.”</p>

Comment #	Comment
	Response: Alternatives 1, 4, 5 and 6 do not provide for designation of any motorized routes in the La Madera area; effects to wildlife were described under these alternatives.
47C	<p>The Environmental Assessment for Travel Management on the Sandia Ranger District (hereafter referred to as the “EA”) proposes “seasonal closure” for alternatives 1 & 5 and incorrectly attempts to justify closures due to a “direct mortality” relationship with the Dwarf shrew, Merriam’s shrew and Long-tailed vole.</p> <p>EA Tables 22 and 23, “<i>TES effects from alternative 3</i>” and “<i>TES effects from alternative 4</i>” respectively, regarding the Dwarf shrew, Merriam’s shrew and Long-tailed vole, state, “<i>Lack of seasonal restrictions is likely to cause more direct mortality.</i>” Table 25, TES effects from alternative 6 states, “<i>Seasonal restrictions would lessen direct mortality</i>”. These statements are not “science based” within the Cedro analysis area and should not be included in the EA.</p>
	Response: The statements relate to the potential of year round OHV use versus seasonal use, which presents less opportunity for direct mortality to small mammals.
47C	<p>The US Fish & Wildlife Service (US F&WS), Southwest Region, New Mexico Ecological Service Field Office lists New Mexico Sensitive Species. Neither the Dwarf shrew, Merriam’s shrew, nor the Long-tailed vole is listed in any category within the analysis area. The American Society of Mammalogists (ASM) which lists mammals and categorizes them by federal and state as threatened, endangered, proposed or candidate, does not consider any of the three shrew species to be in a TES category.</p>
	Response: These species are on the Regional Foresters Sensitive Species List.
47C	<p>The Sandia District Travel Management Plan, Biological Assessment and Evaluation document, section E, paragraph 10, states “<i>a check of NM Natural Heritage data showed no records of this species on the Sandia Ranger District...its higher elevation primary habitat does not occur in the analysis areas.</i>” A finding of “<i>No impact on the species</i>” was rendered. Yet, the EA states in numerous areas regarding the Dwarf shrew, page 66 for example, “<i>Lack of seasonal restrictions is likely to cause more direct mortality</i>”. This is an erroneous conclusion.</p> <p>Table 10, Special status species considered, for the Dwarf shrew states status in the project area is “<i>Unknown; but potential. Primarily alpine/subalpine habitats. Has been captured near Tree Springs Trail</i>”. Table 7, Habitat acreages in the Sandia district project area, does not indicate acreages conducive to this species in the Cedro area. The Tree Springs Trail area is at an altitude of 8500 ft, well above that of Cedro and is near a wilderness area. The capture is only listed as “<i>near</i>” Tree Springs and may have actually been the wilderness area. Any association of “<i>direct mortality</i>” with closure in the Cedro area is inappropriate and misleading.</p>
	Response: We agree that the EA should be adjusted, and will be shown on the Errata Sheet.
47C	<p>Table 10 regarding the Merriam’s shrew does not specify its’ status, merely that records exist from Tree Spring Trail and Sandia Cave. As indicated above, the US F&WS and ASM do not list the Merriam’s shrew in any of the status categories indicating they should not be included in the TES tables of the EA. The Cedro area is not affected, therefore any association, direct or indirect, of “<i>direct mortality</i>” with seasonal closure in the Cedro area is inappropriate and misleading.</p>
	Response: This species is on the Regional Foresters Sensitive Species List. The literature also records the wide range of elevations where this species has been trapped. The New Mexico subspecies (in the few cases it has been trapped) shows the same wide elevational variance; therefore, we consider the Cedro area to have potential habitat
47C	<p>Table 10 regarding the Long-tailed vole indicates the status is “<i>unknown; but potential. Mesic (wet) mixed conifer forest</i>”. Table 7 indicates there are only 72 acres of potentially qualifying habitat and that is only in the La Madera area. As above, the Long-tailed vole is not listed by the US F&WS and ASM. The Cedro area is not affected, therefore any association of “<i>direct mortality</i>” with seasonal closure in the Cedro area is again inappropriate and misleading.</p>
	Response: This species is on the Regional Foresters Sensitive Species List. We agree that the EA should be adjusted with regards to the Cedro area, and will be shown on the Errata for Alternatives 3-6.

Comment #	Comment
47C	<p>EA page 62, Alternative 1 – Proposed Action, states “<i>The proposed action would protect burrows and nest sites from off-road vehicle travel</i>”. EA page 64 Alternative 2 – No Action, states “<i>There would be no protection of burrows and nest sites from off-road vehicle travel</i>”. It has been established by references above that the Dwarf shrew does not exist in the Cedro area, that notwithstanding, these statements assume a concern based on cross country travel, not seasonal closure. With the exception of Alternative 1, the “No Action” alternative, all other alternatives would eliminate all OHV cross country or off-trail travel between the trails/roads as mandated by the TMR. Additionally, page 46 of the EA states that motorized travel creates “...<i>a buffer around the road that wildlife will generally avoid while the roads are in use...</i>”. The Dwarf shrew, Merriam’s shrew and Long-tailed vole are burrowing/nesting animals and do not use the packed surface of trails for burrowing or nesting. The regular use of the trails would establish a comfort buffer for these animals. Any direct mortality of the species mentioned above would be due to cross country travel which by Travel Management Rule, will be eliminated therefore, association of direct mortality with seasonal closure is misleading and could adversely affect the decision process resulting in selection of an alternative that unfairly penalizes the motorized community.</p>
<p>Response: We agree that the EA should be adjusted, and will be shown on the Errata sheet. The statements relate to the potential of year round OHV use vs. seasonal use; which presents less opportunity for direct mortality to small mammals.</p>	
48, 132	<p>5. Chapter 3. Affected Environment and Environmental Consequences, pg. 70, Cumulative Effects – Alternative 1 (Proposed Alternative)</p> <p>The following statement leads off this section:</p> <p>“Unfortunately, no baseline information for wildlife populations exists on the Cedro area before all the roads and trails were developed. Many of the trails have been in existence for years.”</p> <p>However, the next to last sentence in that section says this:</p> <p>“Many of the species on the MIS list are not endangered or threatened under the Endangered Species Act, but are seeing a decline over time due to habitat loss and human disturbance.”</p> <p>This statement cannot be confirmed, if the first statement is true. In addition, OHV is only one source of “human disturbance” and should not be singled out to solve the problem. The whole document is written to imply the OHV is the predominate source of human disturbance. There are studies that show that humans on foot, especially in the company of domestic animals, are of much greater disturbance to some forms of wildlife. To imply the OHVs are the predominate form of wildlife disturbance, as it applies to this EA, is false, misleading, and not supported by the documentation. Remove the second statement.</p>
<p>Response: MIS species are analyzed forest wide regarding populations and habitats. The next to last statement does not refer specifically to the Cedro area, but to Forest-wide trends, which is Forest Service policy for analyzing MIS effects. The purpose of the Environmental Assessment is to analyze designation of motorized routes for OHV use; therefore the analysis focuses mainly on OHV use, but other recreation use is considered in cumulative effects. There are other citations referenced that do discuss disturbance from other recreational activities.</p>	
58, 157	<p>I want to point out omissions, inconsistencies, and compromises in the integrity of scientific research in the <i>Environmental Assessment for Travel Management on the Sandia Ranger District</i> (EA).</p> <p>On page 4 under Existing Conditions, in reference to the La Madera area, the EA states:”<i>This area provides a viable corridor for wildlife movement from the Sandia Mountains to other</i></p>

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	<p><i>mountain ranges like the Ortiz and San Pedro Mountains (Watson 2007).</i>” The referenced citation is listed as a “Personal Communication” from Mark Watson with the New Mexico Department of Game and Fish (NMDGF). Personal communications used as a citation does not meet the requirements of 40 CFR 1502.21: <i>”Agencies shall incorporate material into an environmental impact statement by reference when the effect will be to cut down on bulk without impeding agency and public review of the action. The incorporated material shall be cited in the statement and its content briefly described. No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment. Material based on proprietary data which is itself not available for review and comment shall not be incorporated by reference.”</i> (Emphasis added). Since the public can not be “party” to personal communications, or review or inspect a record of such communication, it does not meet the requirements and must be stricken from the EA and its referenced documents.</p> <p>The use of personal communication as the basis of science-based decision making is also not in compliance with 40 CFR 1502.24: <i>“Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix.”</i> (Emphasis added). Again, based on the overarching CEQ regulations, personal communications do not meet the threshold for making “...explicit reference by footnote to the scientific and other sources relied upon for conclusions...”</p> <p><u>To ensure compliance of this EA with the overarching CEQ regulations, please delete any reference to any “personal communications” from the EA, the referenced specialists’ reports, or any listed citations.</u></p>
	<p><u>Response:</u> NM Department of Game & Fish brought forward the issue of La Madera during the Travel Mgmt. Work Group; the issue was discussed in numerous public meetings and was well established. Letters from New Mexico Game and Fish as well as notes from work group meetings and comments and presentations from the public meetings are part of the Project Record and are available for review.</p>
58,157	<p>While I realize that the EA is actually a summary, the statements in the EA on page 4, paragraph 6 pertaining to a wildlife movement corridor conflicts with other research that I have reviewed. Therefore I followed up on the research that the Cibola biologist, Mr. Falvey, used in the Biological Assessment and Evaluation (BAE) that was completed in support of this EA.</p> <p>Many of the citations Mr. Falvey references within the BAE are not relative to the project that is the subject of this EA, describing the wildlife effects of two-lane paved highways (Forman and Alexander 1998),(Baker and Knight 2000), (Wisdom et al. 2000), or noise and disturbance effects that are not relevant to the creation of a motorized road and trail system (Cassier and Ables 1990 describes the effects of cross-country skiers on elk, hardly applicable to wildlife disturbance from motorized trails). <u>Please review all of the citations in Mr. Falvey’s BAE for pertinence to the subject of this EA and remove any and all that do not apply to the project scope.</u></p> <p>After a careful review, I have concluded that none of the scientific research cited by Mr. Falvey in the BEA addresses the issue of wildlife corridors or wildlife migratory movement.</p>
	<p><u>Response:</u> The analysis was based on overall review of vehicle disturbance, noise effects and disturbance related to recreation activities to wildlife. The citations in question are relevant to the analysis.</p>
58,157	<p>Lacking any relevant citations pertaining to wildlife movement corridors in the EA or the BAE, I examined the rest of the BAE for relevant information on wildlife corridors. The species listed on the Cibola National Forest and Grasslands Sensitive Species List (2007) that Mr. Falvey analyzed in depth are summarized here: <i>(Comment lists twelve species sensitive species from the BAE</i></p>

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	<p>document.)</p> <p><u>Vehicle use in the riparian portions of Tejon Canyon is not proposed in any of the alternatives so this statement is not in the scope of the project. Please remove the statement.</u></p>
	<p>Response: The discussion on corridors was specific to the La Madera area and is based on NMG&F comment letters. The analysis was focused on noise disturbance and habitat loss from roads.</p>
58,157	<p>Completing our review of Mr. Falvey’s BAE with no relevant input to the potential issue of La Madera as a “wildlife corridor”, I turned to the Management Indicator Species Assessment (MISA).</p> <p>Once again, I find a plethora of citations that either addresses a topic that is not within the scope of this document or citations that are synthesis of many other studies. Stalling 1994 referenced on page 5 of the MISA is a study of mortality rates on elk from hunting. Hunting is not within the scope of this project. “Hunting” is not discussed in the EA’s Purpose and Need and the word “hunting” is not part of the Final Rule for Travel Management. <u>Including a citation on a study of elk mortality rates from hunting is not within the scope of this EA and the citation and any reference to it should be removed.</u></p>
	<p>Response: The purpose of this citation is to show that greater road densities allow greater hunter access. Road densities are relevant to effects on wildlife.</p>
58,157	<p>It is clear that the Cibola staff has “cherry-picked” bits and pieces of the huge array of study results condensed in large, synthesized citations to support their general argument that motorized recreation is “bad” for wildlife. There are many examples of this “selective research technique”.</p> <p>The MISA cites Gaines et al (2003) on pages 6 and 7 and then include a “zone of influence” table on page 7 taken from the Gaines study (the table appears as Table 10, page 24 in Gaines et al 2003). Conspicuously not noted in the MISA is that the Gaines synthesis includes studies for both motorized and non-motorized effects and that the effects are similar for non-motorized activities. An excerpt from page 19 of the Gaines work states: <i>“Several studies have been conducted on the effects of linear recreation routes on mule deer. For example, ski trails seem to displace mule deer to greater distances than occurs along snowmobile routes (table 8) (Cassier et al. 1992, Freddy et al. 1986). Freddy et al. (1986) reported that mule deer displacement by skiers was independent of skier numbers or group size. Perry and Overly (1977) showed that deer were displaced up to 800 m from roads.”</i></p>
	<p>Response: That is correct that Gaines discusses motorized and non-motorized activities. Since the travel planning focuses on OHV use, it is appropriate to use zone of influence data from the Gaines report.</p>
58,157	<p>Omitting the data as it relates to non-motorized activities logically leads the EA reviewer to infer that the zone of influence distances for motorized use are higher than other Forest uses. That hypothesis is not borne out by the Gaines report if it is viewed as a whole. The transference of the effects of “human” activity to “motorized” activity without specifying what the human activity is (in this case, it was “non-motorized”) is inaccurate. The team writing this EA must state the original purpose of the research and then describe how the cited research purpose and results support their conclusions within the EA.</p>
	<p>Response: The table clearly states “The zone of influence applied to each side of a motorized trail or road based on road type and use level for the deer and elk summer habitat influence index.” As above, analysis focuses on OHV use.</p>
58,157	<p>Here is more evidence of inaccurate use of research. In this case, the IDT supplied only part of the complete information contained in the cited document. On page 20 of the Gaines document, Table 7 lists the <i>“Road- and recreation trail-associated factors for ungulate focal species.”</i> This is an excerpt from that Table (Table is available in the Project Record):</p> <p>The listing of factors for motorized trail-associated factors and non-motorized trail-associated</p>

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	factors for mule deer and elk are EXACTLY THE SAME! But because of the selective research techniques employed by the IDT, the Responsible Official is left with the skewed view of motorized recreation having a greater impact to wildlife.
	Response: The factors are the same, but the disturbance distances from motorized vs. non motorized are clearly different. Since the proposal is for the designation of motorized routes (trails and roads) it is appropriate to use information from the Gaines paper relative to motorized use.
58,157	<p>And yet more evidence of the EA writer’s mis-use of research is the use of Gaines’ ‘zone of influence’ table (Table 10, page 24 in Gaines) out of context of the main point Gaines was making. This is Gaines’ conclusion taken verbatim from page 54 of his work: <i>“Monitoring that is well thought out can be used to validate the assumptions of the cumulative effects models developed in this assessment, and to gain a better understanding of the interactions between wildlife and recreation. The use of adaptive management allows managers to acknowledge uncertainties and information gaps but still move forward with project design and implementation. To implement an adaptive approach, researchers and managers will have to work closely together. But by learning as we go, through the use of monitoring for adaptive management, we will have a higher probability of accomplishing the mutual objectives of providing a highly effective wildlife habitat and offering recreation opportunities.”</i></p> <p>Citing Gaines’ work in the context of disturbance zones for specific species and the potential effects motorized trails could have on those species instead of using the zone of influence as suggested baseline spatial models for the assessment and monitoring model that it was intended to be is clear evidence that the IDT team has compromised the intent of the cited research and the required scientific method. Gaines was suggesting baseline models for assessment and monitoring of the species, not identifying proven disturbance zones from motorized recreation. Mis-use of a study by only quoting specific bits to support conclusions that are not grounded when the whole study and its context are used compromises the professional integrity of the research and its use in the EA. CEQ regulations (40 CFR 1502.24) are very explicit on how scientific research is to be utilized in Environmental Impact Statements and their decision documents including EA’s:”...:“<i>Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement.</i>”(Emphasis added)</p>
	Response: Gaines clearly summarizes the “zone of influence” (disturbance buffer) from a suite of studies. The model Gaines describes is using these distances to “buffer” roads on Geographical Information system (GIS) layer to show the distances from roads avoided by wildlife. In the Summary, Gaines notes “The most common reported interactions included displacement and avoidance where animals were reported as altering their use of habitats in response to roads or road networks”. We disagree that we have misused the study or its conclusions.
58,157	There is also obvious contradiction among the citations listed. The aforementioned Gaines report concludes that deer and elk avoid moderately traveled roads by a distance of at least 1000m. Yet, on the same page 6 of the MISA, another citation (Rost and Bailey 1979) concluded that deer and elk avoid road only at a distance of 200m for heavily traveled roads and that the distance is even less in pinyon-juniper habitat (the habitat of the La Madera and Cedro areas).
	Response: Noted in the MIS report (page 6): The interactions associated with non-motorized trails were similar to that of motorized trails and include displacement, avoidance, and disturbance at a specific site during a critical period. The interaction varied depending upon wildlife species, with some more sensitive to motorized trail use and others more sensitive to non-motorized trail use. Although both forms of recreation have effects on wildlife, motorized trails showed a greater magnitude of effects than non-motorized trails, such as longer wildlife-displacement distances, for a larger number of focal species (Gaines et al. 2003). The “contradiction” represents a range of disturbance zones from different studies.
58,157	Here is even more egregious evidence of citing scientific research out of context. To understand the full implication, this is the full passage containing the citation lifted directly from page 6 of

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	<p>the MISA: “What is important, particularly where OHV trails are concerned, is that users stay on existing trails. Traveling off the existing network of roads and trails. MacArthur et al (above) showed much greater stress responses when desert bighorns were exposed to activity off of existing road and trail networks. Schultz and Bailey (1979) showed the same results for elk in National Parks. Ruediger (1996) estimates that displacement of some species, or indirect habitat loss due to roads, may average 1 km on each side of a highway in a forested area and up to 3 km on each side in open habitats.” (Emphasis added) **The Ruediger reference has been added to the Project Record</p> <p>While citing research based on highways is not pertinent to this EA when the project area is Class 2 roads and motorized trails, the abuse of this particular citation is even more obvious. What species was the researcher referring to when he wrote, “some species”? A review of the actual research cited reveals that Mr. Ruediger was talking about rare carnivores, specifically grizzly bears, grey wolves, lynx, fishers, and eastern cougar. These species are hardly species of concern on the project areas within the Sandia Ranger District. This citation could be perceived as deliberately out of scope. I have attached a copy of Ruediger 1996 for your review so that you don’t have to take my word for what the actual cited document contains.</p> <p>But unless the Responsible Official and the public take the time to read the full text of each and every one of the citations in the EA and the Specialists’ Reports, they depend on the citations used by the Forest staff to be relevant, factual, and pertinent and that they maintain the professional integrity of the research document. I have clearly shown that not all of the citations used in conjunction with this EA meet the criteria.</p>
	<p>Response: This citation was added to show another disturbance zone example from the literature.</p>
58,157	<p>I also have concerns with a comment attributed to the letter from New Mexico Department of Game and Fish (NMDGF) and dated 10/18/07. This comment is quoted on page 8 of the MISA document as: “<i>With regard to the potential for wildlife to disperse to habitats to the north and east of the Sandia Mountains, the northeastern corner of the District is all that remains relatively unroaded</i>”: <i>this northeastern corner (if undeveloped) “may continue to allow some level of habitat connectivity for wildlife dispersal to nearby habitats such as the Ortiz and San Pedro Mountains, and the Jemez, Caja del Rio and Sangre de Cristo Mountains of the Santa Fe National Forest.”</i></p> <p>First of all, the claim that “the northeastern corner of the District is all that remains relatively unroaded” is inaccurate. The “District” contains the Sandia Mountain Wilderness, which at 37,877 acres dwarfs the La Madera area that is stated to be 6,312 acres on page 3 of the MISA. NMDGF is asserting that the La Madera area is the last “unroaded” acreage in the District. In reality, the Sandia Mountain Wilderness, a much larger area of legislated and permanent unroaded terrain is directly adjacent to the La Madera area. The Wilderness is currently providing, at a much larger scale, the same “connectivity for wildlife dispersal” that NMDGF claims as a unique role for the La Madera area. <u>To make the EA truthful, this inaccurate citation should be deleted.</u></p>
	<p>Response: The reference is to “last low elevation unroaded habitat” in NMG&F comment letter. Since the statement refers to connectivity (“habitat linkage”) to the north and east of the Sandia Mountains, this statement is correct for the La Madera area in question.</p>
58,157	<p>The next topic of concern is the potential for a wildlife corridor and linkage to other areas of wildlife dispersal. The La Madera area was identified within the EA as offering wildlife potential routes to many points north and east as has been illustrated on a map that I have prepared and attached. The NMDGF letter references a map they provided that plots reported large game animal/vehicle collisions for the past ten years. While collisions of vehicles on the highway with wildlife might be indication of wildlife movement, it points out even more clearly that even</p>

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	<p>paved roads do not serve as barriers to wildlife movement. Any of these potential wildlife movement routes, even if very circuitous to take advantage of less developed areas, have to cross highways and roads in order to reach the “destinations” identified by the NMDFG letter. If we limit the discussion to travel routes to the San Pedro Mountains (the closest of the destinations), the wildlife would first need to cross La Madera Road, a constructed, gravel road that is much larger and more heavily traveled than anything proposed within the project area. Then they would need to cross Highway 14. Highway 14 is a paved, two-lane highway with a fair amount of private development along its length. Its construction, traffic volumes, development, and associated human population pose a much more formidable barrier to movement than a few sporadically used, non-improved motorized routes in La Madera. After crossing Highway 14, the wildlife would still have to negotiate the spider web of subdivision roads in neighborhoods between Highway 14 and the base of the San Pedro Mountains. And all that before reaching the closest of the proposed destinations! If La Madera is considered a connecting link to the Caja del Rio area, Jemez Mountains, or Sangre de Cristo Mountains as listed in NMDGF letter, the absurdity of concern about a few unimproved trails in La Madera is even more pronounced. Wildlife would have to cross an extremely busy four lane divided highway and a major railroad grade in addition to a number of other paved highways, gravel roads, and numerous dirt roads to reach those end points. And with all that said, no where within the EA, or its specialists’ reports, or citations is any hard, factual data given that supports the existence of a “wildlife corridor” in La Madera other than NMDOT data on animal/vehicle collisions.</p>
	<p>Response: The fact still remains that road use can displace wildlife. Realizing that there are other areas of higher use roads within the big game travel corridor only shows the higher value of a relatively non-roaded area to wildlife</p>
58,157	<p>It bears repeating. What the Cibola staff did not do within the EA or any of its supporting documentation is provide or cite scientific literature or data that provides a compelling argument that the La Madera area is used or needed as a wildlife corridor or that motorized recreation occurring within La Madera is detrimental to any such corridor.</p>
	<p>Response: We cited expert opinion from the New Mexico Game and Fish comment letter to the scoping proposal.</p>
58,157	<p>Therefore, I want the EA to be corrected as follows:</p> <p><u>Page 4, Sandia Mountains, third paragraph – Please remove the entire third paragraph.</u> If you choose to let it remain, correct it to read as follows: <i>“The La Madera area is one of the last areas of the lower elevation portions of the ranger district adjacent to relatively undeveloped private lands. This area provides a valuable potential source of motorized recreation opportunities to meet the increasing demand of quality, diverse motorized recreation. Because this area is relatively lower in elevation and is less rugged and free from snow as compared to the higher elevation lands, it is more readily available to meet recreation opportunities for the whole spectrum of Forest users for a greater portion of the year. Historically, there has been little motorized recreation use observed in the La Madera area. The area has been discovered as challenging OHV terrain through exploration by OHV users related to identifying potential routes prior to travel management designations. As a result, there was increased motorized recreation during the 2007 summer and fall periods. As private lands surrounding La Madera becomes subject to greater development pressure, this key recreation area becomes even more important.</i></p>
	<p>Response: We disagree, and since the analysis and effects disclosure in this section is for wildlife (not OHV recreation), we stand by our analysis of the wildlife impacts.</p>
58,157	<p><u>Page 13, Fragmentation and wildlife security:</u> Please correct the paragraph as follows: <i>There is a concern that designating NFS roads and trails and unauthorized routes and constructing new trail segments may fragment wildlife habitat and create barriers to movement. There is also a concern that the addition of such routes will reduce wildlife habitat capability to sustain populations and increase areas of disturbance. However, no evidence has been uncovered that</i></p>

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	<i>supports the existence of a wildlife corridor in the La Madera area.</i>
	Response: See reference to NMG&F letter; we see no need to change the specialist report.
58,157	<p>On page 37, Alternative 1, the EA states, “<i>Prohibition of cross-country travel is beneficial to wildlife. Not designating for motorized use in La Madera improves wildlife security and effectiveness of the area as a wildlife corridor. Seasonal motorized trail restrictions in the Cedro area improve the effectiveness of Cedro as winter habitat.</i>”</p> <p>Mr. Falvey, on page 7 of the MISA, states, “<i>The Sandia Ranger District’s OHV planning areas are considered summer range.</i>”</p>
	Response: Based on data from the Rocky Mountain Elk Foundation (for elk) and the Western Association of Fish & Wildlife Agencies (for mule deer) the Cedro area provides year-round habitat for these species. Seasonal motorized trail restrictions in the Cedro area would improve the effectiveness of the Cedro as winter habitat, when resources are scarcer for these species. We stand by our analysis on Table 6. The MISA will be edited to reflect that the Cedro area provides year-round habitat.
58,157	Given the referenced statement above and the lack of any data or information within the EA, specialists’ reports, or citations lending credence to the LA Madera serving any unique role as a wildlife corridor, please correct the statement on page 37 to read, “ <i>Prohibition of cross-country travel is beneficial to wildlife.</i> ”
	Response: See reference to NMG&F letter; we see no need to change the statement.
58,157	On page 70, correct the third paragraph under Cumulative Effects - Alternative 1 to read: “ <i>...Past, present, and future cumulative impacts are very similar for La Madera as private land development anticipated in the future could reduce security areas and travel corridors for wildlife that exist outside of the Sandia Ranger District boundaries. It is unknown what, if any, impact current development has had or future development will have on the La Madera area inside the jurisdictional limits of the Forest.</i> ”
	Response: The Cumulative Effects Analysis will remain as stated in the EA.
58,157	On Page 71, correct the 2 nd paragraph under Cumulative Effects – Alternative 2 to read: “ <i>The La Madera area already has numerous user-created trails in areas of relatively gentle terrain in pinyon-juniper habitat. Both single-track and 2-track trails would be expected to increase over time. These are the areas expected to become more important to both wildlife and motorized recreation in the future as the surrounding area increases in development. It is unknown what impacts, if any, future development will have on main travel corridors outside of Cibola National Forest for both migrating and dispersing ungulates (to and from the Ortiz-San Pedro Mountain areas). The area surrounding Bernalillo watershed could potentially see an increase in unrestricted use by OHVs. In washes and areas of more gentle terrain (low ridges between the washes), loss of vegetation could potentially be severe in these dry habitats, reducing forage for wildlife and increasing erosion.</i> ”
	Response: Since the analysis is based on wildlife effects, importance to motorized recreation is not relevant.
58,157	I also want you to carefully review the EA, the supporting specialists’ reports, and all citations within to ensure that each citation is pertinent to the specific scope of the project and factually accurate within the context of the project. If you discover any citations that do not meet the expected standards of the Council of Environmental Quality regulations on best available science, please remove the substandard citations and any reference to them in the EA and specialist’s reports. Let us quote, once again, the CEQ standards (40 CFR 1502.24) on the use of scientific citations: “ <i>Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix.</i> ”

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Response: We stand by the analysis and disclosure in the EA, the supporting specialist reports, and the sources used in them.	
58, 157	<u>Ensure the professional integrity, including scientific integrity, of citations throughout the document and make sure the reader is informed of the original intent of the cited research. Make certain that when non-motorized human activities that disturb wildlife are cited, the EA clearly indicates it.</u> The EA cannot conceal that it is using non-motorized activities as examples of wildlife disturbance in a motorized recreation analysis. To do so is does not meet professional integrity requirements required in Forest Service EA requirements.
Response: <u>The EA states by reference where effects were non-motorized or motorized.</u>	
79	<u>Noise and the Effects on Wildlife</u> I did not find in the Draft EA any measurement of human impact on the scoping area. No measurement of sound levels created any user group in the scoping area measured in DBA. No measurement or estimates of time or frequency of visits to the area by a single user group or totals for all user groups. I did not see in the wildlife portion what species are sensitive to sound and which ones are not. At what level does sound disturb wildlife enough to make them move from their current habitat. How much human activity of any kind does it take to disturb wildlife enough to make them leave their habitat. We have all seen stories about birds being a problem around airports. The EPA has done studies, over a twenty year period to find out the effect of sound on wildlife and found that the effects are highly species-dependent. I found this information at www.nonoise.org/epa/roll9/roll9doc.pdf Page 65 With the attached Graph, Figure 9.1. The more time I spend reading and trying to understand how OHV use is detrimental to the wildlife and wildlife habitat in the scoping area the more I disagree with the conclusions in the Alternative Proposed Actions, Chapter 3, Affected Environment and Environmental Consequences.
Response: We reviewed numerous studies and stand by the analysis and conclusions in the EA. We were unable to locate the document referenced in the comment and the URL was not usable.	
89, 173	The EA does not address the need to develop and implement a plan for vegetation and habitat recovery. We find this omission astounding given the purposes of the Travel Management Rule and Executive Orders, as well as Chief Bosworth's acknowledgement of the serious negative environmental consequences of off-road vehicle recreation.
Response: The purpose and need in the EA is designation of routes for motorized use; vegetation and habitat recovery is outside the scope of the project and the decision to be made.	
89, 173	As we recommended in our scoping comments, the SRD should use a buffer of at least 200 meters from each proposed designated route to determine the impacts of noise on wildlife. The SRD acknowledges the impacts of noise on wildlife in the EA at page 46: “ Noise Disturbance: Many studies have been conducted on the effects of noise disturbance on wildlife displacement and avoidance. Noise from developing, using, and maintaining roads, affects wildlife within hearing distance. Studies on the issue of road avoidance as it impacts species are relatively numerous (primarily for big game species such as elk, deer, and bear). The most common interaction identified in the literature was displacement and avoidance, where animals altered their use of habitats in response to the motorized routes. The effects on wildlife behavior and habitat utilization due to noise from road and trail use may extend as far as several hundred meters from the road or trail.”
Response: The analysis of disturbance effects was based on numerous studies to illustrate that the motorized recreation (and non-motorized in some cases) zone of influence varied from study to study.	
89, 173	The SRD analyzed the project area and determined that there were three areas on the District where MIS habitats occur. In <i>Ecology Center v. Austin</i> , CV-03-00019 (U.S. District Court, District of Montana

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	<p>2005) the court states NFMA’s substantive and procedural requirement that the Forest develop a land and resource management plan and that subsequent agency actions be consistent with that plan. “In providing for multiple uses, the forest plan must comply with substantive requirements of the Forest Act designed to ensure continued diversity of plan and animal communities and the continued viability of wildlife in the forest...” <i>Id.</i> at 16036. While <i>Ecology Center</i> goes on to state that the Forest’s choice of methodology for monitoring the impacts of a project on species, some methodology is required. In the EA, the SRD does not address how low the population of the MIS located in the project area would be to be downgraded from sensitive to threatened or endangered. Nor does the EA offer <i>any</i> plan to monitor the MIS in the project area.</p> <p>We therefore believe the EA is not in compliance with the National Forest Management Act because it fails to protect or monitor MIS in the project area.</p>
	<p>Response: The purpose of MIS analysis is to use species that represent various habitats; we rely on NMG&F to monitor big game species (as well as wild turkey). The forest monitors MIS bird populations through breeding bird surveys. We monitor and discuss trends forest-wide, not on a project basis.</p>
89, 173	<p>Alternative 1, 2, 3, 4, and 5 would allow motorized routes through spotted bat, Allen’s lappet-browed bat, and Pale Townsend’s bat habitat. These bats are listed as sensitive species in the EA. We strongly recommend that if routes listed in Alternative 1 are designated, the SRD develop a plan for educating the public about the need to avoid using trees in these areas as winch trees to protect the bats during roosting. Similarly, routes near boulder piles could result in significant negative impacts to roosting bats and should be prohibited and the public should be educated about the need to avoid motorized travel on, over, or near boulder piles in these areas.</p>
	<p>Response: As to education, this will be addressed as part of project implementation. We know of no routes designated adjacent to boulder piles (or over them); the routes have been in existence for some time-three of the alternatives would result in less potential impacts compared to the existing conditions.</p>
89, 173	<p>Alternative 6 provides substantial improvement in habitat types and wildlife protection and is the alternative that SRD should adopt as its Travel Management Plan. Threatened, endangered, and sensitive species protection should be a prime consideration in development of a recreational motorized travel plan. Alternative 6 would also provide the “greatest possible reduction in cumulative impacts from noise disturbance and habitat loss.” (EA page 72.)</p>
	<p>Response: Thank you for your comment, we have noted your preference for Alternative 6.</p>
90, 167	<p>I am providing information about errors and omissions made in the wildlife biology reports (the Biological Assessment and Evaluation (BAE) and the Management Indicator Species Assessment (MISA), and in the EA itself. I am providing some new information which is the result of using the research correctly.</p> <p>SUMMARY:</p> <p>Consideration of wildlife issues will influence the decisions the Responsible Official will make about designating roads, trails and areas for motorized use. We want to be confident that the wildlife studies underlying the EA are accurate, thorough and have site-specific relevancy. I have found significant problems in the BEA and MISA, which have been repeated in the EA.</p> <p>Despite repeated use of the terms 'disturbance to wildlife' and 'habitat fragmentation', and the citing of many articles, 'disturbance' and 'fragmentation' are not in any way specified, scaled or quantified in the EA, BAE or MISA. The Responsible Official must consider both the wildlife resource and the recreation resource. It is not possible to come to any rational determination of the significance of 'disturbance' or 'fragmentation' in the absence of any functional definitions or parameters for those terms, and a complete lack of empirical evidence from the analysis area.</p> <p>Although many studies are cited, the EA presents no site-specific data or study of interactions</p>

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	<p>between wildlife and OHV use, and no record of negative conditions of wildlife which have causality in OHV use. The many statements phrased as 'could', 'may' or 'might' are unsubstantiated and merely conjecture.</p>
<p>Response: No research based on disturbance has been conducted in the project area; the effects analysis was based on the most appropriate research examining impacts to wildlife from motorized use.</p>	
<p>90, 167</p>	<p>The EA omits any discussion of the impacts of non-motorized users on wildlife which would provide understanding of how wildlife is impacted by all types of human activity and presence. The EA, BAE and MISA omit stating that many of the 'negative impacts' of human activity will remain even without motorized use. Since no 'fault' or portion of fault is assigned to non-motorized use, the implication is that OHV use is responsible for all alleged disturbance and fragmentation, and that those issues can be 'solved' by removing motorized users from the recreation mix. Such understanding is critical to the decision-making.</p>
<p>Response: It is appropriate to limit the effects analysis to the impacts of motorized use since that is the focus of the proposal (designation of roads and trails for motorized use) and the only activity that would change from the current situation.</p>	
<p>90, 167</p>	<p>There are many assertions regarding habitat fragmentation, but no data or maps are provided which would show changes over time, and the research cited is irrelevant. There is not the slightest documentation provided to prove the allegation of trail proliferation other than the repeated statements that this has occurred. The EA, and the BAE and MISA and Recreation reports fail to disclose that non-motorized users are allowed to travel cross country. This means non-motorized users and/or animals can be the source of trail proliferation. The EA, BAE and MISA fail to disclose that after motorized use is designated and restricted to routes, all the non-motorized users will still be allowed to travel cross country, that they could continue to create new trails and will continue to affect wildlife habitat with human presence and activity. The BAE, MISA and the EA fail to disclose to that if routes open to motorized users really have 'fragmented' habitat, the fragmenting effect will remain if those same routes are open only to non-motorized users, and that banning motorized use will not change or 'cure' the fragmentation.</p>
<p>Response: The unauthorized routes have not been inventoried and mapped, but an increase has been observed through the years by district personnel. However, no maps are needed to illustrate the concept of habitat fragmentation. The trails that exist in the area have physically fragmented the habitat, both through impacts to previously undisturbed areas, and due to disturbance effects. The literature shows that this disturbance effect extends for a greater distance from a motorized trail or road than from a non-motorized trail. The analysis in the specialist report and the EA focuses on the disturbance effects on wildlife from motorized use because the changes being considered are motorized vehicle use as a result of implementing a designated system.</p>	
	<p>These omissions make the discussion of fragmentation incomplete and inaccurate. In the absence of accurate information, the Responsible Official might decide to choose alternatives which reduce or eliminate OHV use under the mistaken impression (given by the EA), that to do so would provide substantial benefits to wildlife by reducing or eliminating the major source of disturbance and habitat fragmentation.</p> <p>Many citations are used to support assertions in the BAE and MISA. Examination of actual cited articles often revealed the species, environment, climate or the experiment itself were irrelevant to the Sandia Ranger District. In some cases parts of cited articles were omitted which, if included, would have shown impacts from non-motorized recreation to be very similar to those from motorized recreation. An article by the same author as a cited one, but which disagrees with the opinions in the MISA and BAE, was not included. Neglecting to consider legitimate research that reaches a different conclusion than one might prefer is not 'best available science'. A citation used to support generalized assertions about 'disturbance' and 'fragmentation' failed to disclose that the cited research was on species that don't exist in New Mexico (lynx, martin, fishers). The BAE and MISA failed to disclose that a cited study admitted to information gaps, or that results have varied widely among different researchers studying the same species and issue.</p>

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	<p>These are serious problems. Since the BAE and MISA are the basis for the statements about wildlife in the EA, the flawed analysis in those underlying reports casts much doubt on the accuracy of the EA itself.</p>
<p>Response: Again, no research based on disturbance has been conducted in the project area; the effects analysis was based on the most appropriate research examining impacts to wildlife from motorized use.</p>	
<p>90, 167</p>	<p>In the Discussion we will cover these issues in detail. The Discussion shows the BAE and MISA reports are not accurate and thorough, and therefore do not present the 'best available science'.</p> <p>These mistakes could be remedied by rewriting the BAE and MISA reports, and then rewriting the EA to reflect the new analysis. However that would cause considerable delay in reaching a decision. Instead, I want you to delete all references in the EA to 'proliferation of trails', 'wildlife disturbance' and 'habitat fragmentation'. They should be removed because the BAE and MISA reports do not provide a legitimate justification for using 'disturbance' and 'fragmentation' as reasons to close roads, trails or areas for motorized use. I want you to remove all mentions of 'trail proliferation' because it has not been substantiated, and no user(s) identified as the source. When the EA is corrected, I want you to revise the proposed action and the alternatives as necessary, so the decisions will be made using the best available science, properly applied.</p>
<p>Response: We stand by the analysis as presented.</p>	
	<p>DISCUSSION: (note: page numbers for the BAE and MISA refer to PDF file pages as they appear on a computer. The BAE and the MISA were printed with no page numbers)</p> <p>Failure to define the terms 'Disturbance to wildlife' and 'habitat fragmentation'. Definitions are available in the cited literature but were not included in the MISA or BAE.</p> <p>These terms appear many times in the EA: This paragraph on page 4, in the Purpose and Need, sets the tone for the discussion of wildlife disturbance in the EA:</p> <p style="padding-left: 40px;">Generally, roads and motorized trails cause disturbance or displacement of wildlife, habitat fragmentation, habitat loss, and reduction of habitat productivity and, in some cases, wildlife mortality. In some areas, improper placement of roads and trails has led to loss or reduced productivity of important wildlife habitats. The density of roads and trails has contributed to habitat fragmentation and wildlife disturbance in the Cedro area.</p> <p>On page 13 of the EA, Wildlife Disturbance is one of the Significant Issues:</p> <p style="padding-left: 40px;">5. Environmental impacts: Motorized use designations being proposed could cause environmental impacts including:</p> <p style="padding-left: 80px;">a. Fragmentation and wildlife security: There is a concern that designating NFS roads and trails and unauthorized routes and constructing new trail segments may fragment wildlife habitat and create barriers to movement. There is also a concern that the addition of such routes will reduce wildlife habitat capability to sustain populations and increase areas of disturbance;</p> <p>These are summaries of statements made in the BAE and MISA. They should not be in the EA because of the flawed research in the BAE and MISA fails to justify the statements.</p>
<p>Response: Disturbance issues related to OHV use have been well documented. Habitat fragmentation simply refers to the breaking up of larger blocks of habitat, whether by direct disturbance (the acres removed from habitat or indirect disturbance (the "zone of influence" concept). We believe that "fragmentation" is an accepted term to describe impacts.</p>	
<p>90, 167</p>	<p>The EA contains no discussion of the degrees of 'disturbance' and comparisons of types of disturbance. There are none in the BAE or MISA. Detailed discussions of disturbance</p>

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	<p>are in the same source cited in the MISA, (Gaines et al 2003) but the MISA failed to include any of it or even mention it: Gaines, William L.; Singleton, Peter H.; Ross, Roger C. 2003. Assessing the cumulative effects of linear recreation routes on wildlife habitats on the Okanogan and Wenatchee National Forests. Gen. Tech. Rep. PNW-GTR-586. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 79 p.</p> <p>The MISA (PDF file page 6) cites Gaines et al. 2003, saying: Although both forms of recreation have effects on wildlife, motorized trails showed a greater magnitude of effects than non-motorized trails, such as longer wildlife-displacement distances, for a larger number of focal species (Gaines et al. 2003).</p> <p>This is a distortion of Gaines et al. The MISA omits the tables, data and conclusions Gaines et al 2003 provides, which show that motorized and non-motorized effects are more similar than they are dissimilar, and that for 'Displacement or avoidance' non-motorized effects are greater than motorized.</p> <p>I want you to delete the quote from the MISA shown above, and insert the following section of information which includes the necessary information from Gaines et al. 2003.</p>
	<p>Response: Gaines clearly summarizes the “zone of influence” (disturbance buffer) from a suite of studies. Although the types of effects are similar, the magnitude (measured by distance) from motorized vs. non-motorized is greater for motorized uses. In the Summary, Gaines notes “The most common reported interactions included displacement and avoidance where animals were reported as altering their use of habitats in response to roads or road networks”. We disagree that we have misused the study or its conclusions.</p>
<p>90, 167</p>	<p>(Beginning of statement to be inserted) 'This is the table in Gaines et al. 2003 (page 10) (<i>Available in the project record</i>) which compares the effects of non-motorized to motorized use. The bar chart on the top shows interactions between 29 species and motorized trail use. The chart below shows the same effects for interactions with non-motorized trail use. Note that some effects are greater from non-motorized trail use. Of particular interest is that 'displacement or avoidance' effects are higher from non-motorized recreation and "disturbance' is the same.</p>
	<p>Response: You have misinterpreted the Gaines tables on pg 10; that shows the numbers of species impacted by both motorized and non-motorized as a comparison. It does not show “greater effects” at all, but the total numbers of species affected by similar types of disturbance. Gaines demonstrates that disturbance distance is greater from motorized vehicles.</p>
<p>90, 167</p>	<p>The tables on analysis of impacts in the MISA and EA say that disturbance will be reduced if OHV trails are closed. That would be true only because eliminating OHV use would result in the fewer people in the forest overall, and not because OHV is the major cause of disturbance. The Gaines et al.2003 data is quite robust. It is a thorough review of the literature, as stated on page iv in the Summary:</p> <p>We identified 238 articles on the effects of recreation trails, roads, and related subjects on wildlife. Of these, 183 articles were used to identify the interactions between roads and recreation trails and 29 focal wildlife species. These articles included technical publications, books, agency publications, theses, and dissertations.</p> <p>Table 2 (Available in the project record) (page 5 of Gaines et al. 2003) provides a framework for assessing degree of disturbance. This clearly shows that physiological responses (heart rate and stress hormones), disturbance at a specific site, and displacement are 'Type 1', with the least effect. The EA, BAE and MISA do not identify types of disturbance and do not distinguish between levels of disturbance. Gaines et al uses the neutral word "effects', rather the pejorative</p>

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	'impacts', which presumes harm is being done.
	<p>Response: The issue of disturbance from motorized recreation (which is the focus of the analysis) still exists no matter what type it is classified as. Gaines notes habitat loss/fragmentation; movement barrier or filter; and edge effects as Type 2 disturbances, which are also relevant to the creation and use of motorized routes. Just as we did not attempt to quantify the “zone of disturbance” for many species, we focused on the general issues of direct and indirect disturbance to wildlife from motorized uses.</p>
90, 167	<p>Table 3 (page 6 of Gaines et al. 2003) (<i>Available in the project record</i>) shows that some of the effects of roads and trails on wildlife are caused by the existence of the road or trail itself, aside from the uses on the road or trail. These include edge effects, access provided for competing or predating species and poaching.</p> <p>Conspicuous by its absence in Gaines et al. 2003 is any indication that OHV recreation on roads or trails have significantly greater effects on wildlife than non-motorized use. The Gaines et al. 2003 study includes many effects (poaching, predators, and snag reduction) which are outside the scope of the EA, and not covered in the BAE or MISA. These three tables give us a more complete picture of motorized use of roads and trails than that offered by other researchers, who do not consider these individual sources of effects. The Sandia Ranger District has no data or studies measuring disturbance of wildlife or linking roads, trails or the motorized use of them to ‘disturbance’. " (end of statement to be inserted)</p>
	<p>Response: Certainly Gaines took a broad view of many potential disturbances; this does not negate use of his review as it relates to motorized recreation. We disagree that the citations do not show a link between motorized use of roads and trails and disturbance to wildlife.</p>
90, 167	<p>How the MISA Misinterpreted and Misused Gaines, et al, 2003</p> <p>The MISA makes a very serious error with this citation from Gaines et al. 2003 . At PDF File page 7 the MISA reproduces a chart from Gaines et al, page 24. (<i>Available in the project record</i>)</p> <p>The MISA placed the following wording above the Gaines chart, but this is NOT in Gaines et al 2003:</p> <p>The following table from Gaines et al, (2003) shows the areas impacted by roads (deer and elk avoidance zones) on summer ranges on the Okanagan and Wenatchee National Forests:</p> <p>Here is the chart as it appears in Gaines et al, 2003, (pages 23-24) with the wording above and below it. There is no statement that the chart is meant to show avoidance zones or distances from roads to which elk and mule deer avoid roads. (<i>Available in the project record</i>)</p> <p>I want you to delete Table 10 and the added wording above it as it currently appears in the MISA at PDF File page 7.</p>
	<p>Response: We disagree; on page 8 of Gaines, he states “The most commonly reported interactions included displacement or avoidance where animals were reported as altering their use of habitats in response to roads or road networks (Cassier and Groves 1990, Hutto 1995, Johnson et al. 2000, Klein 1993, Mace et al. 1996, 1998) (fig. 2). The “zone of influence” is the area impacted by roads and trails that big game alter their habitat use.</p>
90, 167	<p>The chart is not about avoidance distances. The Zone of Influence is simply a tool used for assessing what percentage of roads in a habitat area lie within a zone. The zones are artificial constructs for the purpose of habitat analysis. Here is the description in Gaines et al. 2003, page 23-24, for Table 10: (emphasis added). Note that the word 'avoidance' does not appear.</p> <p>Mule deer and elk summer habitat disturbance index—Previous generations of deer and elk habitat-effectiveness models have used road density as an index for summer ranges. However, Roloff (1998) and Rowland et al. (2000) suggested that <i>a spatially explicit roads variable</i>, based on distance to open roads, may be more</p>

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	<p>appropriate. In addition, Johnson et al. (2000) showed that different levels of traffic can have different degrees of influence on deer and elk habitat use. <u>Therefore, to evaluate the cumulative effects of road and motorized trails on deer and elk summer ranges, roads and motorized trails would be buffered by the distances shown in table 10. These buffers would be applied to all the roads in a 5th-field watershed, and the proportion of the habitat in the watershed would be determined. The zone of influence may be modified based on the topography adjacent to the linear recreation route. This becomes the portion of the watershed that is influenced by roads. This number is then divided by the total area in the watershed to estimate the percentage within a zone of influence.</u> A relative ranking of the level of road and trail influences on deer and elk summer range is then applied as follows: >70 percent of the summer range outside of a zone of influence is ranked as a low level of human influence on deer and elk summer range, 50 to 70 percent of the summer range outside of a zone of influence is ranked as a moderate level of human influence, and <50 percent outside of the zone of influence is ranked as a high level of human influence.</p> <p>What the MISA failed to grasp is that the 'Zone of Influence' concept is only a tool for assessing habitat, 'a spatially explicit roads variable'. Table 10 and 'Zones of Influence have nothing to do with distances to which elk or deer avoid roads. Table 8 at page 21 in Gaines et al. 2003 is titled 'Displacement distances and mean distance from roads reported for ungulate focal species'. It shows displacement distances caused by hikers and snowmobilers encountering mule deer. Mule deer moved 191 meters away from hikers, but only 133 meters away from snowmobilers. (Average distance at which animals reacted to human activities and were displaced from the area, Gaines et al 2003, page 21, Table 8 footnote).</p>
	<p>Response: We believe our interpretation of the zone of influence (or displacement distance) is clear; displacement (meaning an animal has moved from its habitat) is clearly avoidance and stand by the analysis.</p>
<p>90, 167</p>	<p>Here is wording in Gaines et al. 2003 telling us they are developing a model. This is at page 7 in Gaines et al, 2003:</p> <p>The assessment processes and models described in the document were designed to address broad-scale issues, such as cumulative effects, and to provide information that could be used to evaluate project-level effects. These models could best be viewed as working hypotheses about the interactions between roads, trails, and wildlife. As such, wildlife responses should be monitored and models adapted as new information becomes available.</p> <p>Note that Gaines et al, 2003 describes the models as working hypotheses and reminds us that monitoring is essential. The MISA omits any mention of this, it merely reproduces Table 10 and then mislabels it as a table of avoidance zones.</p> <p>The stated purpose of Gaines, et al, 2003 is to develop a planning model, which can be used with site-specific data from monitoring and GIS sources. Gaines et al. 2003 used wildlife data that are site-specific to the Okanogan and Wenatchee National Forests. The numbers in the models are not universal and not relevant outside those forests. Since they are in the State of Washington, the environment and climate of those forests are vastly different from those of central New Mexico. Here is what Gaines et al 2003 has to say about developing a model (page 40). As he says, the study uses data from the Okanogan and Wenatchee National Forests 'to “test drive” the proposed cumulative effects process': (emphasis added)</p>
	<p>Response: We disagree that the zones of influence are not relative; since Gaines is a literature review, he cites studies from outside the Okanogan and Wenatchee to illustrate the overall point of avoidance zones.</p>
<p>90, 167</p>	<p>This section illustrates how <u>cumulative effects of linear recreation routes on wildlife habitats can be assessed by using the GIS models developed in the previous sections.</u> This section is</p>

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	<p>intended to display current conditions relative to the influences that linear recreation routes have on various wildlife habitats, which in turn provides a baseline of information for planning efforts. Finally, this section discusses the results and management implications of applying the proposed cumulative effects models.</p> <p>The assessment area includes all of the lands that lie to the east of the crest of the North Cascade Range between Lake Chelan and the Interstate 90 Highway corridor, extending east to the Columbia River. This area provides a diversity of winter and nonwinter recreation opportunities <i>and a diversity of wildlife habitats making it an excellent area to “test drive” the proposed cumulative effects process.</i> The area includes 11 BMUs, 22 LAUs, 9 ungulate winter range units, 15 LSRs (including MLSAs), and 19 5th-field watersheds.</p> <p>At page 4 Gaines et al, 2003 describes the site-specific data needed to run the model. (emphasis added) It is of interest that no such data has been offered in the EA, the BAE or the MISA. Therefore no conclusions about effects could be surmised even if the Gaines model had been properly understood.</p>
	<p>Response: We disagree that Gaines’s discussion of a model was not properly understood. His model implies adding a buffer to road and trail networks on a GIS layer, and using that buffer (the width of the zone of disturbance) to show an area surrounding each route that wildlife are displaced. Since the results of the zone of influence for many studies cited was a variable width, we used those examples not to determine an exact width that would apply to the Sandia Ranger District, but to illustrate that wildlife avoid motorized routes.</p>
<p>90, 167</p>	<p>Step 4. Processes and models—Assessment processes and models were developed to provide a consistent approach to the evaluation of the cumulative effects of roads and recreation trails on wildlife habitats. These were based on the habitat requirements of the focal species and the trail- and road-associated factors found to affect the focal species. The models and assessment processes were developed to use GIS and corresponding <i>data layers that included roads, trails, wildlife habitats, watersheds, and subbasins. Ideally, these models would incorporate the following variables: (1) spatial extent of the immediate effect of the factor (such as distance a species was displaced from a road or trail), (2) the level of intensity of human use on a road or trail that resulted in a factor being identified as affecting the focal species (such as number of people per day or density of roads), and (3) the extent, or a threshold, of human influence (assessed by 1 and 2 above) on wildlife habitats within a given area, such as a watershed or subbasin (such as 50 percent of a watershed within a trail zone of influence with >10 people per day).</i></p> <p>And finally, the MISA omits the critical point Gaines et al, 2003 makes (page 12) about information gaps (emphasis added). Note it mentions human use, hikers, snowmobiles, trails and roads. but does not specifically mention OHVs and motorized trails. OHV use is not identified other than as a human use’.</p>
	<p>Response: We maintain that the table of zones of influence for big game species clearly shows a displacement of wildlife from motorized routes.</p>
<p>90, 167</p>	<p>Over the course of this review, we kept track of information gaps that hindered our understanding of wildlife, road, and recreation trail interactions. Further research in the following suggested areas of study, which can be accomplished through the use of an adaptive management approach and well-designed monitoring and research (Gaines et al. 1999; Gutzwiller 1991, 1993), would help improve our understanding of wildlife, road, and recreation trail interactions.</p> <ul style="list-style-type: none"> • The interactions between wildlife, nonmotorized trails, snowmobile routes, and ski trails for many wildlife species, especially those with small home ranges and limited mobility. • The interactions between wildlife and the intensity of human use on recreation trails (such as trail density or number of hikers per unit time). • The interactions between wildlife habitat use and the spatial extent (such as the proportion of a

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	<p>home range or watershed) of recreational activity.</p> <ul style="list-style-type: none"> • The relation of recreation trail and wildlife interactions to the demography of particular species of management interest. Adaptive management and monitoring designed to lead to greater understanding of any of these areas would greatly facilitate our management goals of conserving ecosystem processes and functions while providing recreation opportunities (see “Monitoring and Adaptive Management” on page 51). <p>The misuse of Gaines et al 2003 is of particular interest. The MISA omits critical information from Gaines, et al which explains the purpose of the study is to develop a model. It gives an erroneous interpretation of the Zones of Influence table. And it omits the Gaines et al 2003 discussions of the importance of site specific data. I The MISA misuses Gaines, et al. 2003 in a way that makes OHV recreation look like the dominant source of negative effects on wildlife. This is an especially egregious example of flawed research.</p>
	<p>Response: See the many comments above; Gaines’s review was broad in scope, and we used his results on motorized routes since that is the primary focus of the analysis.</p>
90, 167	<p>The MISA has no site-specific data of its own to justify its conclusions about disturbance, and it fails to disclose that Gaines et al 2003 says it is essential have detailed data in order to draw any meaningful conclusions. Gaines et al 2003 shows how inadequate and flawed the MISA and its conclusions really are.</p>
	<p>Response: We have noted previously that we do not have site specific data on the Sandia Ranger District, but the narrative and literature cited illustrate the main point that wildlife avoid (are displaced from) motorized routes.</p>
90, 167	<p>Wildlife Disturbance, Review of Citations:</p> <p>1. Canfield, J. E., L. J. Lyon, J. M. Hillis, and M. J. Thompson. 1999. Ungulates. Pages 6.1-6.25 in G. Joslin and H. Youmans, coordinators. Effects of Recreation on Rocky Mountain Wildlife: A Review for Montana. The Wildlife Society, Helena, Montana, USA.</p> <p>I want you to remove this statement in the BAE at PDF file page 3: Canfield et al. (1999) and Toweill and Thomas (2002) both state that the effects of open motorized trail use are likely similar to those resulting from open roads.</p> <p>The following statement is on page 6:17 of Canfield et al. 1999. Canfield et al 1999 is clearly saying exactly the opposite of what is claimed in the BAE. (emphasis added)</p> <p>Information Needs Since any off-road vehicle travel in pursuit of a game animal is already illegal, we hesitate to suggest research in this area. <u>Nevertheless, there is a lack of information concerning the relative disturbance caused by ORV traffic as compared to vehicles on open roads.</u> We also lack an adequate description of the relationship between security cover and hunter density.</p>
	<p>Response: The statement you quote is not at all relevant to the one you compare it to; the term ORV implies “off road” meaning travel off of established motorized roads and trails. Canfield et al is clearly noting that the lack of information relates to studies of off-route impacts to wildlife; not studies relating to impacts of vehicles traveling on established routes.</p>
90, 167	<p>I want you to replace the deleted statement with this statement:</p> <p>At page 6.2 of Canfield et al. 1999, states: Snowmobiles have received the most attention compared to other wintertime disturbances, and the majority of reports dwell on negative aspects of snowmobile traffic. However, snowmobiles appear less distressing than cross-country skiers, and for several ungulate species, the greatest negative responses were measured for unpredictable or erratic occurrences.</p>

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	<p>Canfield et al, 1999 is a study about elk hunting issues in Montana. At page 6.17, Canfield et al 1999 states:</p> <p>Since any off-road vehicle travel in pursuit of a game animal is already illegal, we hesitate to suggest research in this area. Nevertheless, there is a lack of information concerning the relative disturbance caused by ORV traffic as compared to vehicles on open roads. We also lack an adequate description of the relationship between security cover and hunter density.</p>
	<p>Response: We maintain the reference is correct as used in our analysis</p>
<p>90, 167</p>	<p>In the PDF file of Canfield et al., 1999 a word search on 'open motorized trail use', 'motorized trail use', and 'motorized trail', all showed zero results, meaning those phrases do not occur in the article. A search on 'road' returned many instances, but none having anything to do with a comparison to motorized trail use. Searching on 'trail' returned four instances. The first suggests no off road/trail use in wintering habitats, the second is about mountain bike trails, the third is about restricting human intrusion in habit for mountain goats and bighorn sheep, and the fourth is about trail restrictions during archery season. Canfield et al.1999 is primarily about hunting, problems with unethical hunting, deer and elk reproduction, and with the overhunting of bull elk. It is important to note that the study and all the recommendations for habitat and herd management are only for elk and particular to Montana.</p>
	<p>Response: Canfield et al.1999 states on page 6.6 “Very often, road closures can be used as an adjunct method of reducing simultaneous disturbance by hunters and vehicles”, which notes that hunting and vehicles are one cause of disturbance that can be reduced by closing roads, which is relevant to the title “EFFECTS OF RECREATION ON ROCKY MOUNTAIN WILDLIFE” of which hunting is one factor among many. The paper is quite clearly not about disturbance from hunting alone, but similar to Gaines, is a review of many disturbance factors.</p>
	<p>A search on the word 'motorized' showed the two places the word occurs in the article. These are shown below. Both instances are in reference to controlling the hunting harvest and have nothing to do with OHV recreation.</p> <p>Page 6.13:</p> <p>One of the surest methods of increasing elk security has been to close roads and/or areas to <i>motorized</i> vehicles. Lonner and Cada (1982) assumed an inverse relationship between density of open roads and hunter opportunity by using the rationale that high road densities make elk highly vulnerable to hunter harvest. Basile and Lonner (1979) found that vehicle closures generally increased the time hunters spent walking and tended to prolong the time required to achieve the desired harvest.</p> <p>Page 6.17:</p> <p>Guidelines/Recommendations Management techniques that <i>reduce the potential for overharvest of ungulates and help promote ethical behavior by hunters during the big game hunting season</i> include the following, by priority:</p> <ol style="list-style-type: none"> 1. Establish interagency objectives by hunting district and herd unit for deer and elk security that are consistent with state plans for these species. 2. Maintain and improve security through road restrictions and cover management, recognizing that area closures are far more effective than individual road closures. 3. <i>Limit all motorized users (including ORVs) to designated routes.</i> 4. Enforce hunting season restrictions (including the use of such programs as TIP MONT where hunters can report travel violations). 5. Modify hunting regulations where objectives for populations cannot be met through road and cover management alone (for example, restrict the harvest of mature males, restrict

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	<p>hunting pressure during the ruts, or shorten the length of the season).</p> <p>6. Evaluate and consider road/trail restrictions during the archery season.</p> <p><u>7. Develop ORV and vehicle management strategies that prohibit ORV and/or vehicle use in the pursuit of pronghorn antelope.</u></p> <p>8. Promote recognition that the ethical lapse represented by “trophy” hunting under game-farm conditions is contrary to the position of professional wildlife managers and the Montana Chapter of The Wildlife Society.</p> <p>2. Ruediger, B. 1996. The relationship between rare carnivores and highways. Proceedings of the Florida Department of Transportation/Federal Highway Administration Transportation-related Wildlife Mortality Seminar, April 30-May 2, 1996. U.S. Department of Transportation. Federal Highway Administration. FHWA-PD-96-041, Washington, DC. (the full paper is on the internet at http://www.icoet.net/downloads/96paper02.pdf) (This paper was reviewed by the wildlife biologist and has been added to the project record)</p> <p>The species covered in the Ruediger 1996 article do not exist in the Sandia Ranger District, no rare carnivores are listed in the MIS, and the analysis areas in the EA do not have 'highways' or paved roads. The dirt roads and trails in the analysis area are certainly not 'busy highways'.</p> <p>The abstract of Ruediger, 1996 (in its entirety, page 2 of PDF file) states: (bold added)</p> <p>One of the most severe conservation issues facing rare carnivores (grizzly bear, <i>Ursus arctos</i>; gray wolf, <i>Canis lupus</i>; wolverine, <i>Gulo gulo</i>; lynx, <i>Lynx canadensis</i>; fisher, <i>Martes pennanti</i>; and the eastern cougar, <i>Puma concolor</i>) is the impact created by highways. There is a paucity of information relative to highway impacts on rare carnivores, and how to effectively mitigate these impacts. Carnivores are particularly vulnerable to highway habitat fragmentation because of the large spatial requirements of individuals and populations. Large spatial needs require individual animals to regularly cross busy highways. Highways are habitat issues that need to be addressed by land management, wildlife management and highway departments at all levels. Highways adversely affect carnivores by increasing direct and indirect mortality, displacement of animals and avoidance of habitat near highways, habitat fragmentation, direct habitat loss and habitat loss due to associated human developments. The impacts on carnivores resulting from upgrading and newly paved roads is permanent and severe. The author hypothesizes that: (1) There is an increasing adverse effect on carnivores as the standard of road or highway increases; and (2) The extirpation of carnivores in the lower 48 states is partially a factor of highway densities. Resolving carnivore/highway conflicts will require more coordination at the highway planning and reconstruction phases, more involvement of wildlife biologists in highway planning, educating wildlife biologists, highway engineers and the public on the crisis relating to carnivore conservation and highways, adaptive management, monitoring and more research.</p> <p>The Ruediger 1996 article is not relevant, I want you to remove it as a citation, along with this statement in the MISA report on PDF file page 6:</p> <p>"Ruediger (1996) estimates that displacement of some species, or indirect habitat loss due to roads, may average 1 km on each side of a highway in a forested area and up to 3 km on each side in open habitats."</p>

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	<p>Response: We agree that Ruediger focuses on highways in his paper. On page 4, he states, “Impacts Of Increasing Standards Of Roads And Highways On Carnivores. I call this “hypothesis #I.”</p> <p>The hypothesis I present here is that as the standard road, and the associated traffic level increases-the impact on carnivore populations also increases. Figure 3 provides a graph of how I believe this impact occurs. It starts with a situation where no roads of any type exist. The impact on carnivores is obviously none or zero. As low standard roads are built, an impact begins to occur. Human development has arrived! Depending on whether or not the road is open or closed, and the associated traffic and use patterns-the impact can be low, or greater. A significant change in impact occurs when roads are paved, and when highways are 4-laned or twinned.” The Sandia District has rare carnivores, the mountain lion and bobcat (even though these particular species are not noted in Ruediger, the rare carnivore concept is a useful reference). While we do not imply the roads will ultimately become highways (and certainly impacts from habitat loss and disturbance from highways are the greatest possible), we believe the paper well illustrates the concepts of direct habitat loss and displacement and avoidance.</p>
<p>90, 167</p>	<p>3. Yarmaloy et al, (1986) The Yarmaloy et al, 1986 study is not described properly by this statement in the MIS report on PDF file page 6:</p> <p>Yarmaloy et al. (1986), subjected collared mule deer to experimental harassment by ATV (five deer were collared and three harassed for a period of nine minutes per day for a total of 15 days). His results showed that the deer abandoned their home ranges more often, shifted their feeding activity to nighttime, and increased their flight distance from the ATV’s (compared to the non-harassed deer).</p> <p>The MISA includes this citation among a cluster of others which studied disturbance. Deliberate harassment is not the same as disturbance. It is hardly surprising that an animal becomes afraid of something that has chased it for 15 days in a row.</p> <p>I want you to insert this statement after the quote above, on page 6 of the MIS:</p> <p>"This study used deliberate harassment, which is not the same as disturbance which can occur from chance encounters between humans and wildlife. In the Yarmaloy experiment, the non-harassed deer were completely indifferent, the deer became trained such that they did not perceive ATVs as a threat. This was one of the main objectives of the study, to find out how the non-harassed animals reacted."</p>
	<p>Response: We maintain the reference was used correctly to illustrate the concept of disturbance to mule deer.</p>
<p>90, 167</p>	<p>4. Cassier and Ables (1990). Wildlife Society Bulletin, 20:375-381, 1992</p> <p>The Cassier and Ables 1990 experimenters used groups of cross country skiers who deliberately approached pregnant elk in the remote northern area of Yellowstone National Park, in winter. The elk's ability to flee was hampered by deep snow. These elk were selected because the area sees almost no human visitation, and the animals are unhabituated to humans. The animals were approached until they fled, so the distance could be measured. This study is not relevant to mule deer or elk in the Sandia Ranger District which do not experience long harsh winters and are habituated to humans and an environment changed by human use. The study is not relevant to the discussion of recreation - wildlife interactions for travel management in the Sandia Ranger District. Approaching animals until they flee is harassment, not the normal incidental occurrence of a chance encounter between humans and animals. The subject animals were approached by people on foot, not motor vehicles.</p> <p>The Sandia staff, by omitting the very important detail that that unhabituated animals were approached on foot, are failing to use the research as it was intended to be used and failing to accurately report the actual conclusions drawn from the research. The ethical use of research means that the objectives of the research, and the complete (not interpreted) results of the</p>

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	<p>research must be used to accurately assess the appropriateness of the research to the Sandia EA.</p> <p>Cassier and Ables 1990 indicates that reactions are at least somewhat dependent on habituation. It is particularly inappropriate to draw conclusions about Sandia wildlife from animals groups that live in remote areas and have little contact with humans. The extrapolation of responses of energy costs based on studies of other species in other environments is pure conjecture. Energy costs of unhabituated Yellowstone elk moving through deep snow are not applicable to the Sandia Ranger District.</p> <p>This Cassier and Ables 1990 citation is at page 6 in the MISA</p> <p>Cassier and Ables (1990), in a study of elk reactions to cross-country skiers in Yellowstone National Park, found that heart rates of the animals increased measurably even when they appeared to show no flight response.</p> <p>I want you to insert the following wording after that statement:</p> <p>Reactions caused by humans on foot do not support conjecture that reactions to machines would be similar or more pronounced. At page 6.2 Canfield, et al. states "However, snowmobiles appear less distressing than cross-country skiers, and for several ungulate species, the greatest negative responses were measured for unpredictable or erratic occurrences."</p> <p>The Cassier and Ables 1990 article includes these facts which the MIS omits:</p> <p>page 375 (describing the area where the study was conducted): "Snowmobiling is allowed for administrative purposes only. Skier use is unrestricted, but little skier activity (<10 visits/winter) occurred in the Lamar and Stephen's Creek areas. Therefore, elk in these areas were exposed to few, if any, skiers other than those associated with this study."</p> <p>p 376: "Adult females were chosen for the study because they are the most abundant sex and age class of elk in YNP (Yellowstone National Park) and the most likely to be encountered by skiers. Most cows are pregnant in winter, and their condition also can affect calf recruitment the following year. (Thorne et al. 1976, Blaxter and Hamilton, 1980) Radiomarked elk were intentionally disturbed by groups of people walking or skiing directly into their location."</p> <p>The study was done in Yellowstone National Park in the winter because the purpose was to assess the impact of skiers, Cassier and Ables 1990, p375:</p> <p>Our objectives were to measure immediate movement of elk when disturbed by cross-country skiers, to assess energy costs associated with these movements, and to identify factors that might influence elk behavior."</p> <p>The elk were in deep snow, and one of the measurements of the experiments were to record the snow density and depth of the tracks the animals left. This study involved groups of people deliberately approaching pregnant females who haven't seen humans, and whose ability to move is hampered by deep snow. The study intentionally disturbed elk which were unhabituated to humans. Cassier and Ables 1990, p379:</p> <p>"Predictability seemed to influence elk responses to disturbance in other studies of habituated elk."</p>

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	<p>and: "Seventy-five percent of nonhabituated elk flight responses in northern Yellowstone occurred within 650 m. Skiers would likely have to stay at a distance of >1,700 m to completely avoid disturbing elk. Although elk can habituate to human activity, this may be a localized phenomenon even in national parks."</p>
<p>Response:</p>	<p>We would argue that the concept presented, that animals can show stress even when it is not evident to the observer, is relevant to the analysis of disturbance to wildlife.</p>
<p>90, 167</p>	<p>Sandia District elk are very habituated to living among humans. At PDF file page 8 in the MISA is this statement, (emphasis added):</p> <p style="padding-left: 40px;">In a second comment letter to the Sandia Travel Plan proposal (10/18/07), the New Mexico Department of Game and Fish (NMDGF) expressed concern with the increasing human development surrounding the Sandia Ranger District, and they state that: "Connectivity of important wildlife habitats is necessary for wildlife conservation, allowing wide-ranging species such as deer, elk, pronghorn, bighorn sheep, bears and cougars to migrate and disperse to suitable habitats. Corridors of relatively undeveloped lands are needed to connect biological refugia such as NFS lands and National Parks. Connecting important public lands habitats with biological corridors increases the ability of these protected public lands to maintain native biological diversity by allowing wildlife dispersal and gene flow (Noss and Cooperider 1994)."</p> <p style="padding-left: 40px;">Specific to the Sandias, "With regard to the potential for wildlife to disperse to habitats to the north and east of the Sandia Mountains, the northeastern corner of the District is all that remains relatively unroaded"; <u>this northeastern corner (if undeveloped) "may continue to allow some level of habitat connectivity for wildlife dispersal to nearby habitats such as the Ortiz and San Pedro Mountains, and the Jemez, Caja del Rio and Sangre de Cristo Mountains of the Santa Fe National Forest."</u></p> <p>I want you to add the following statement after the NMGF letter quoted at PDF file page 8:</p> <p style="padding-left: 40px;">"For any animal to travel from the northeastern corner (La Madera) to the Jemez or Caja del Rio, they would have to cross a 4 lane divided highway, Interstate Highway 25. To travel from La Madera to the Ortiz or San Pedro Mountains, animals would have to cross State Highway 14, a paved two lane road which is the alternate 'back road' between Albuquerque and Santa Fe. State Highway 14 is designated as a Scenic Byway and carries much traffic on weekends, especially in the summer. In addition, it is the only access to the town of Madrid which is a tourist destination."</p>
<p>Response:</p>	<p>Since the statement refers to connectivity ("habitat linkage") to the north and east of the Sandia Mountains, this statement is true for the La Madera area in question.</p>
<p>90, 167</p>	<p>The second example used (also PDF file page 6 of the MISA) is bighorn sheep:</p> <p style="padding-left: 40px;">For bighorn sheep MacArthur et al., (1982) reported that even without evidence of obvious behavior changes, the animal's heart rates increased 20% when humans moved to within 50m.</p> <p>Here again, an animal is being deliberately approached on foot until the animal showed a reaction. This is not 'OHV recreation' .and has nothing to do with OHV recreation. The MISA then extrapolates to other species (PDF file page 6) but provides no study, saying (emphasis added):</p> <p style="padding-left: 40px;">Even brief disturbances can have long-lasting effects on bighorn sheep heart rate and thus are probably energetically costly to animals (Hutchins and Geist 1987). Other ungulates (deer,</p>

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	<p>elk, and pronghorn antelope) would be expected to show similar results to stress. Other ungulates (deer, elk, and pronghorn antelope) <i>would be expected</i> to show similar results to stress.</p> <p>I want you to delete the two statements quoted above, the first is irrelevant and the second is purely conjecture. The studies show that effects are very specific to species and sites, and the experiment itself.</p>
	<p>Response: As with the Yellowstone elk example, we believe that the discussion is relevant to disturbance that may not be obvious to the human viewer, and will continue to use the citation for analysis of disturbance to wildlife.</p>
90, 167	<p>5. Wisdom, M.J., Cimon, N.J., Johnson, B.K., Garton, E.O. and Thomas, J.W., 2004. Spatial Partitioning by Mule Deer and Elk in Relation to Traffic. Transactions of the 69th North American Wildlife and Natural Resources Conference</p> <p>This citation is conspicuous by its absence. As a 2004 reference, it would have turned up in the 2006 search done by the National Forest Library. Page 2 of the BAE states: (emphasis added)</p> <p>The following discussion (and literature cited) was obtained from the National Forest Service Library performing a literature search on effects of roads to wildlife. While some of the documents referenced are from the 1970's, the general impacts from disturbance to wildlife should be considered as the operative point, no matter what year the study was performed. <u>As such, it was considered as the best available science available to Forest Service reference library personnel when they did their literature search in the summer of 2006.</u></p> <p>The "Spatial Partitioning" article is cited within this Wisdom et al 2004 citation, which is in 'Literature Cited', PDF file page 24 of the MISA:</p> <p>Wisdom, M.J., R.S. Holthausen, and B.K. Wales. 2000. Cited in Gucinski, H., M.J. Furness, R.R. Ziemer, and M.H. Brookes. 2001. Forest Roads: A Synthesis of Scientific Information. General Technical Report PNW-GTR-509. USDA Forest Service, Pacific Northwest Research Station, Portland, Oregon. 103pp.</p> <p>I want you to insert the following statement in the MISA, starting at page 16, in the section on elk, and in the EA on page 41 under Affected Environment:</p> <p>(begin section to insert)</p> <p>'Spatial Partitioning by Mule Deer and Elk in Relation to Traffic' (Wisdom et al, 2004) provides information which does not support, and is even contrary to, some of the statements in the EA. At page 2 of "Spatial Partitoning", Wisdom states:</p> <p>Despite the assumption that any road open to traffic elicits avoidance, researchers have suspected that the rate of traffic influences the magnitude of potential avoidance, especially by elk (Lyon and Christensen 2002). This was confirmed indirectly by Perry and Overly (1977), Rost and Bailey (1979), and Witmer and decalesta (1 985), among others, who found less elk use of areas near primary or main roads than near secondary or primitive roads, presumably due to a higher rate of traffic on primary roads and a higher level of human activity associated with the traffic.</p> <p>This finding is contrary to the claims of the New Mexico Game and Fish Dept, that La Madera must be entirely closed to any OHV use (not even designating just a few trails) because any motorized use would harm the area's ability to function as a wildlife corridor. The above quote</p>

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	<p>from 'Spatial Partitioning' shows that three separate researchers have found that elk use is strongly related to traffic density. In the NMGF letter quoted above, NMGF claims that La Madera wildlife corridor can't co-exist with any OHV trails, but in the same paragraph they say that elk and deer are willing to cross Interstate Highway 25.</p> <p>In "Spatial Partioning' (Wisdom et al, 2004) at page 511 (page 3 of the PDF file), the authors describes the purpose of the study: (emphasis added)</p> <p style="padding-left: 40px;">In this paper, we build on the earlier analyses by Johnson et al. (2000) at Starkey to further explore the spatial patterns of mule deer and elk in relation to roads of varying traffic rates and management. We specifically relate traffic rate with areas selected by mule deer and elk on spring and summer range. <u>Our objectives were (1) to assess the degree to which mule deer and elk avoid areas near roads, based on variation in rates of motorized traffic, (2) to examine differences in response of mule deer versus elk to trafic, as an explicit test of the assumption made by earlier investigators that mule deer avoidance of open roads is similar to that of elk and (3) to describe the implications and potential uses of results for management.</u></p> <p>The results of this study are very relevant to the Sandia Ranger District, with its concerns about the effects of roads on these two ungulate species. First the researchers assessed the traffic by using traffic counters. Then they divided the road segments into five categories according to traffic density, and devised a way to relate the habitat to the road segments in a quantifiable way, recognizing that use changes seasonally, and day to night (page 513)</p> <p style="padding-left: 40px;">Each segment of road was then assigned to one of the five categories of traffic rate for day and one of the three categories for night, based on the category that was associated with that segment's traffic counter. The Main Area was then subdivided into 86,000 0.22-acre (30- by 30-meter) pixels, and spatial analysis software (Ager and McGaughey 1997) used to calculate the distance of each pixel to the nearest road of each of the categories of traffic. Because segments of road often changed categories across season-year periods, the mean distance of the 86,000 pixels to the nearest road of each category of traffic often was unique for each season-year period (Table 1). Rowland et al. (1997, 1998) described additional details about the spatial database and the methods used to derive distance estimates for the traffic variables.</p> <p>Then they tracked the animals over two spring-summer periods (page 513):</p> <p style="padding-left: 40px;">We used the ATS during spring and summer, 1993 to 1995, to collect more than 160,000 locations from 12 to 31 radio-collared females per species per season-year period. Animals were systematically located approximately once every 3 to 4 hours ($\bar{x} = 3.7$ hours among season-year periods, $SE = 0.6$), which generated an average of 447 locations per female per season-year period ($SE = 69$).</p> <p>The meticulous research of Wisdom et al, 2004 is in sharp contrast to the complete lack of data for the Sandia Ranger District analysis area. There is no data which describes roads, traffic density or animal movements. There is no site-specific science to support any claim that the lightly travelled dirt roads in the analysis area have any effects on deer or elk which must be mitigated by reducing access for OHV recreation.</p> <p>The results of the spatial partitioning study are evaluated and the researchers frankly state the results were surprising, and showed some inconsistent behavior: (pages 520-522) (emphasis added)</p>

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	<p><i>A number of strong and surprising patterns emerged from our results. First, deer and elk selected areas in opposite ways in relation to rate of traffic, with the magnitude of difference increasing with increasing rate of traffic. Second, thresholds existed for both species in terms of direction in selection: elk were generally farther from roads with traffic rates more than 1 vehicle per 12 hours, both day and night, while deer were closer. By contrast, selection by both species was inconsistent in relation to roads with little or no traffic (less than or equal to 1 vehicle per 12 hours). Third, the type of road often correctly indexed the direction in selection shown by both species in relation to rates of traffic; that is, elk were farther from and deer were closer to roads that were open to all vehicular travel, which agreed with the overall direction in selection shown by both species in relation to most roads that had nonzero rates of traffic (i. e., all roads having more than 1 vehicle per 12 hours). Moreover, both species showed a weak or inconsistent pattern of selection in relation to closed or restricted roads, which agreed with the inconsistent pattern of selection shown by both species in relation to roads with little or no traffic (<1 vehicle per 12 hours). And fourth, the type of road sometimes failed to index the magnitude of selection in relation to the traffic variables. For example, mule deer were approximately 100 to 150 yards (91-137 m) closer to open roads than available, yet deer were more than 250 yards (229 m) farther from roads of second-highest traffic rate (D4) and more than 550 yards (505 m) farther from roads of highest traffic rate (D5).</i></p> <p>These conclusions confirm that much is unknown about the interactions between roads and ungulate habitat. Without the proper studies and analysis of data the closure of roads and trails cannot be justified by vague claims of disturbance. Closure of lightly used forest roads and recreational trails only to motorized use would not 'cure' the effects (if any) of road and trail use in the analysis area on wildlife. The roads and trails would continue to exist and be in non-motorized use, and would continue to bring humans into contact with wildlife. Non-motorized users would continue to be allowed to travel cross-country, off roads and trails."</p> <p>Wildlife Disturbance, conclusion</p> <p>There is no relevant citation given in the BAE or MISA to support claims that OHV use restricted to forest roads and designated trails creates disturbance effects to wildlife which vary significantly from effects caused by non-motorized users. There is no site-specific data for the analysis area offered by the BAE or MISA to verify significant disturbance to wildlife from any human source. There is no site-specific data for the analysis area offered by the BAE or MISA to support any claim of significant effects on wildlife from disturbance by OHV use on forest roads and trails. There is no record offered in the BAE or MISA of incidents of harassment of wildlife by OHV users on roads and trails in the analysis area.</p> <p>I want you to delete every single statement in the EA in which wildlife disturbance is claimed to be related to the designation of roads, trails and areas for motorized use.</p>
	<p>Response: Our use of references is similar to the Wisdom et al paper you cite above; it is not a site-specific reference yet is relevant to the discussion of disturbance to wildlife from motorized vehicles and the referenced literature is pertinent to the analysis presented.</p>
<p>90, 167</p>	<p>Habitat Fragmentation, Review of Citations:</p> <p>The BAE report contains the following statement on page 2, under DIRECT AND INDIRECT AFFECTS OF OHV USE TO WILDLIFE</p> <p>Impacts can be considered as direct mortality, and displacement and avoidance of wildlife due to noise and OHV use. Amphibians and reptiles are particularly susceptible to mortality on two-lane roads with low to moderate traffic (Forman and Alexander 1998). Roads by</p>

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	<p>wetlands and ponds have high roadkill rates and roadkill is probably the greatest transportation impact on amphibians (Forman and Alexander 1998). Many reptiles are killed by vehicles because they use roads for heating and cooling (Wisdom et al. 2000). Predators and scavengers feeding on roadkill, and animals attracted to salts or vegetation on or alongside roads, also suffer mortality (Baker and Knight 2000). In general, effects of roads and trails on most wildlife species are negative (Boyle and Samson 1985).</p> <p>The citations have been examined for relevance to the issues in the Sandia Ranger District.</p> <p>Forman and Alexander, 1998: A word search for 'dirt road', 'forest road', 'unpaved' and 'trail' returned zero occurrences of those terms. A reading of the article revealed nothing relevant to the Sandia Ranger District EA. The only mention that came close is a mention of 'forest road' on page 208:</p> <p>In the United States, 6.2 million km of public roads are used by 200 million vehicles, ten percent of the road length is in national forests, and one percent is interstate highways. The road density is 1.2 km /square km, and Americans drive their cars for about 1h/day.</p>
	<p>Response: The discussion above “10 percent of road length in National Forests” applies to the travel analysis presented. The citations will remain.</p>
90, 167	<p>Amphibian and reptile mortality on two lane roads and roadkill by wetlands and ponds are not relevant to the Sandia EA. I want you delete the following section of the statement at PDF file page 2 in the BAE:</p> <p>Amphibians and reptiles are particularly susceptible to mortality on two-lane roads with low to moderate traffic (Forman and Alexander 1998). Roads by wetlands and ponds have high roadkill rates and roadkill is probably the greatest transportation impact on amphibians (Forman and Alexander 1998).</p>
	<p>Response: We disagree; we have noted that a route in Tejon Canyon goes directly through a spring area and its runoff, and maintain the reference is entirely relevant.</p>
90, 167	<p>There are no reptiles mentioned in the EA, BAE or MISA, (with the exception of a small area of the Bernalillo watershed which might be at low enough elevation to be habitat for the Texas horned lizard) No paved roads are under consideration in the analysis area. I want you to delete the following section of the statement at PDF file page 2 of the BAE:</p> <p>Many reptiles are killed by vehicles because they use roads for heating and cooling (Wisdom et al. 2000).</p>
	<p>Response: Our species analysis was mainly focused on sensitive species (Federally listed, Candidate, and Regional Foresters Sensitive). However, many of the literature cited shows impacts to other species (in addition to sensitive species) and we believe the citation is relevant to direct disturbance (mortality) of reptiles.</p>
90, 167	<p>Baker and Knight 2000: This is a citation within Gucinski, et al, Forest Roads: A Synthesis of Scientific Information. This is Forest Service Research Station paper no. gtr509. The Baker and Knight 2000 citation in the BAE at PDF file page 2 states wildlife is harmed by roads because of road kill related issues. A review of the occurrences of Baker and Knight 2000 citations within Gucinski et al reveals that no Baker and Knight 2000 statement is about road kill on unpaved roads, forest roads or trails. There are three occurrences of 'Baker and Knight' in the Forest Roads Synthesis:</p> <ol style="list-style-type: none"> 1. page 23: 'Findings—Roads and their adjacent environment qualify as a distinct habitat and have various species, population, and landscape-scale effects (Baker and Knight 2000,' 2. pages35-36 'Because most forest roads are not designed for highspeed travel, and the speed of

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	<p>the traffic is directly related to the rate of mortality, direct mortality on forest roads is not usually an important consideration for large mammals (Lyon 1985). An exception is forest carnivores, which are especially vulnerable to road mortality because they have large home ranges that often include road crossings (Baker and Knight 2000).'</p> <p>3. page 36: 'Predators and scavengers are killed while they feed on road-killed wildlife, as are other species attracted to roads because of salts or vegetation, or because roads facilitate winter travel (Baker and Knight 2000).'</p>
<p>Response: The citation is relevant to a general discussion of road impacts to wildlife species. In statement #2 & #3 above, the citation were referenced adequately and we believe, are self-explanatory.</p>	
90, 167	<p>To make sure there was no discussion of road kill and trail in Gucinski et al. 2001, I word searched 'trail'. There are four instances of the word 'trail':</p> <p>1. page 8: ' Recreation surveys suggested the three most highly ranked uses of land administered by the Forest Service and Bureau of Land Management in the interior Columbia basin today are timber, fishing, and hunting. Projected major uses by 2045 will be a shift to motor viewing and day and trail use, even though this area has 70 percent of the unroaded areas of >200,000 acres remaining in the conterminous 48 states.'</p> <p>2 and 3. page 62 ' Roads that were or are significant in this way include early Spanish roads, such as El Camino Real (the Royal Highway) in California and New Mexico; those that follow the routes of American Indian trails (Davis 1961); military roads such as Cook's trail, which crosses the forests of northern Arizona (Scott 1974); and some early routes established for commerce, such as the Santa Fe Trail, which crosses the Cibola National Forest.'</p> <p>4. page 102: ' The three most highly ranked uses of lands administered by the Forest Service and Bureau of Land Management in the basin today are timber, fishing, and hunting. Projected uses by 2045 will be motor viewing and day and trail use; this for an area where 70 percent of the unroaded areas of >200,000 acres occurs in the lower 48 states (Cordell and Bergstrom 1991, Tarrant and others 1999).'</p> <p>This confirms that Gucinski et al 2001 does not include trails in its review of roads. The Baker and Knight 2000 citation is not relevant to the Sandia EA. I want you to delete the following wording at PDF file page 2 of the BAE:</p> <p>Predators and scavengers feeding on roadkill, and animals attracted to salts or vegetation on or alongside roads, also suffer mortality (Baker and Knight 2000).</p>
<p>Response: As above, the discussion is to Forest Roads, and is relevant to analysis of the travel management plan.</p>	
90, 167	<p>Boyle and Samson 1985: This citation is misrepresented by the BAE at PDF file page 2. In general, effects of roads and trails on most wildlife species are negative (Boyle and Samson 1985).</p> <p>Reading the full article, there is no mention of the effects of roads and trails on wildlife species. I want you to delete the Boyle and Samson 1985 citation at page 2 of the BAE. The article does, however, speak to negative effects on wildlife from a wide range of recreation activities. I want you to replace the deleted statement with the following statement which accurately represents the Boyle and Samson 1985 review:</p> <p>The 1985 review by Boyle and Samson studied the effects of nonconsumptive recreation on wildlife. They selected 166 articles which contained original data about hiking, camping, boating, wildlife observation and photography, off-road vehicle use, swimming and shore</p>

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	<p>recreation and rock-climbing. As stated on page 110, Negative effects were reported most commonly for all activity types and all major taxa (Table 1); reports of positive effects are few.</p>
	<p>Response: Nonconsumptive refers to recreation that does not “take” the animal (as in hunting). We agree (as in other literature reviews cited) that the authors examined a range of uses, and have referenced other articles showing stress to animals from other forms of recreation, specifically to illustrate the concept of where stress may not be noticeable to the observer. The issue under analysis is travel management, specifically for motorized vehicles, so it is appropriate to cite (re the table on page 111 of Boyle & Sampson) that overall, the effects of motorized travel on roads and trails to wildlife is generally negative in the aggregate of studies Boyle & Samson reviewed.</p>
<p>90, 167</p>	<p>At page 45 the EA states, under the heading of Environmental Consequences All Alternatives:</p> <p style="padding-left: 40px;">Roads and trails affect terrestrial species through: (1) loss of habitat due to conversion of native vegetation to a particular road/trail surface (paved, gravel, dirt); (2) fragmentation of habitats due to road and trail system development; (3) interruption in migratory patterns of wildlife to reach breeding habitat or winter range habitat; and (4) lack of habitat use by wildlife due to disturbance caused by use of the road or trail system.</p> <p>I want you to delete that statement. The statements about fragmentation, migratory interruption and disturbance rely on the assertions made in the BAE and MIS, which relied on inappropriately used citations. Without proper science to back them up, those assertions are reduced to mere opinion or conjecture. The statement about habitat lost to road/trail surfaces is just a generalization which has no site-specific application to the Sandia EA.: the scope of the EA does not include erasing and re-vegetation of any road or trail so the mention of loss of habitat is irrelevant. Secondly, the statement is too generalized to be of any use. The research clearly shows that not all terrestrial species are affected in the same ways by all types of roads and trails at all times of day or in all seasons.</p>
	<p>Response: The statement about road/trail surfaces causing direct habitat loss is irrefutable; forage species are lost through conversion to road or trail, as well as through invasive plant species displacing native plant species. We believe that “habitat fragmentation” concept adequately refers to the breaking up of habitats into smaller blocks (in this case, road & trails effects to habitat). Certainly this concept also applies to the potential of disturbance/fragmentation altering migratory/dispersal patterns of (in this case), big game species. We argue that the “zone of influence” concept reiterated in many of the citations applies to this analysis, and maintain the paragraph is applicable to the analysis.</p>
<p>90, 167</p>	<p>The following paragraph is at page 46 in the EA:</p> <p style="padding-left: 40px;">The disturbance effects of these routes on wildlife, whether roads or trails, are similar. Lack of wildlife use in habitats along roads and trails can also be correlated to the level of use a road receives over a period of time. Low use roads may tend to have wildlife using roadside habitats more frequently than roads with high traffic volume. Off-road vehicle travel on undesignated routes (i.e. cross-country) is presently allowed from existing roads (excluding previously closed areas), regardless of road type. Off-road vehicle use affects wildlife directly by harassment and displacement, reducing the security of areas between roads. Over time, habitat can be lost by uncontrolled cross-country use as currently exists.</p> <p>I want you to delete the following statement from that paragraph. Examination of the BAE and MISA reports has shown these statement is not supported by the research.</p> <p>The disturbance effects of these routes on wildlife, whether roads or trails, are similar</p>
	<p>Response: In the analysis area, we believe that the disturbance impacts from a vehicle on a forest road or on a trail are in fact, quite the same to wildlife.</p>

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90, 167	<p>I want you to delete the following wording from the statement in the EA at page 46:</p> <p>Off-road vehicle travel on undesignated routes (i.e. cross-country) is presently allowed from existing roads (excluding previously closed areas), regardless of road type. Off-road vehicle use affects wildlife directly by harassment and displacement, reducing the security of areas between roads. Over time, habitat can be lost by uncontrolled cross-country use as currently exists.</p> <p>And replace it with the following wording:</p> <p>Cross-country travel (off roads and trails) is currently allowed for all users, motorized and non-motorized (excluding previous closed areas). Off road and trail activity from all types of users may affect some species of wildlife. Cross-country travel by any type of user may reduce the security of areas between roads. Over time habitat can be lost by uncontrolled cross-country use as currently exists. The current planning process addresses only motorized use, and will end cross-country travel only for motorized users. The wildlife disturbance and habitat loss and security reductions caused by the cross-country travel of non-motorized users will continue. Those issues are outside the scope of the travel management rule and will need to be addressed in a separate planning process in the future.</p>
<p>Response: We disagree; the statement will remain, since the focus of the analysis is on motorized roads and trails by vehicles and the prohibition of cross country travel by same.</p>	
90, 167	<p>Habitat Fragmentation, Conclusion:</p> <p>The citations offered in support of habitat fragmentation has been shown to be inappropriate, irrelevant and/or unethically used to support the unjustified opinions in the BAE and MISA.</p> <p>I want you to delete every single statement in the EA in which habitat fragmentation is claimed to be related to OHV recreation or the designation of roads, trails and areas for motorized use. Habitat fragmentation is irrelevant and outside the scope of the EA because neither the Proposed Action nor any of the Alternatives would erase existing roads and trails. None of the decisions possible in the EA will reduce the amount of road and trail in the analysis area. The decision making only concerns whether or not motorized use will occur and what type of use would be allowed on which roads and trails. The entire lengths of all the roads and trails which currently exist will continue to be used by hikers, mountain bikers and horseback riders whether or not motorized use is allowed on any of them. They will continue to be on the forest system inventories to be maintained. Not only that, the non-motorized users will continue their current privilege of being allowed to travel cross country. The non-motorized use will continue to create new paths. If there is any substance to the charge that trails fragment habitat, that process of fragmentation would continue if no motorized use was allowed at all.</p> <p>Thank you for making this a more thorough analysis, by removing the unfounded statements from the document and correcting the errors and omissions.</p> <p><i>(A research article was provided, that is available in the project record: Wisdom, M.J., Cimon, N.J., Johnson, B.K., Garton, E.O. and Thomas, J.W., 2004. Spatial Partitioning by Mule Deer and Elk in Relation to Traffic. Transactions of the 69th North American Wildlife and Natural Resources Conference)</i></p>
<p>Response: Again, our focus is on motorized route designations. All of the action alternatives would prohibit cross country travel. Unauthorized trails would not be included in the system, and would not be maintained as trails. Either through agency reclamation or natural regeneration, in time vegetation will become established across unauthorized trails reducing habitat fragmentation. As cited in the literature review for the EA and the Wildlife specialist report, research has shown that habitat fragmentation is a concern with motorized use, and is entirely relevant to the analysis.</p>	

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98, 104	<p data-bbox="334 233 1448 359">On Page 47 of the EA, under Alternative 1 of Table 12, it states: <i>“Prohibition of off-road and trail travel should eliminate habitat loss, damage to trees from using trees as anchor points for winches, cables, etc. Seasonal restrictions will limit impacts to wintering birds in the Cedro area”</i>.</p> <p data-bbox="334 401 1419 562">The rest of the EA and its underlying specialists’ reports and citations do not support this statement. The statement is made in reference to Merriam’s turkey and its primary habitat of ponderosa pine. A word search of the EA turned up five other references to “winch”, four of them in reference to bat roosting habitat on pages 62 and 64, and a single direct reference to motorized recreation (on a hill climb out of Chamisoso Canyon) on page 102.</p> <p data-bbox="334 600 1474 762">Since the specialists’ reports are the documented analysis from which the EA is derived, it can be assumed that the concern for damage to trees from winch use flowed from the referenced specialists’ reports. Turning to ALL of the referenced specialists’ reports, a word search for “winch” turned up three more occurrences, all in the Management Indicator Species Assessment (MISA).</p> <p data-bbox="334 800 1468 898">The first occurs on Table 1 of the MISA and is the same tabular information that shows up in the EA as Table 12. Our assumption about information flowing from underlying specialists’ reports to the summarizing EA is holding true so far.</p> <p data-bbox="334 936 1471 1163">The next occurrence of the word “winch” appears in the MISA under “Migratory Birds, 1. Juniper Titmouse, Effects to Habitat: <i>”In some areas of the District, since off-road travel has not yet been closed, OHV drivers were using these large pinyon-juniper trees to attach winch cables to, so they could pull themselves out of steep stretches. This caused severe damage to trees. It is anticipated that with the restriction on off road/trail travel, and vehicles remaining on established routes, that this activity will cease.”</i> No supporting or collaborating data was referenced.</p> <p data-bbox="334 1201 1468 1299">The third, and last, reference to “winch” is under Game Species, 4. Merriam’s Turkey, Effects to Habitat: <i>”The prohibition of off road/trail travel should eliminate damage to trees from direct impact of vehicles, as well as using trees as anchor points for winches, cables, etc.”</i></p> <p data-bbox="334 1337 1471 1535">That is all. That is the entire body of “evidence” contained within the EA and its supporting specialists’ reports that winching by motorized recreationists has caused “damage to trees” in the Sandia Ranger District. This assertion poses a high concern as a simple unsubstantiated statement in a MISA can flow all the way back to an declaration in the EA that a choice of an alternative will significantly impact management indicator species habitat (the title on Table 12 in the EA is “Effects on management indicator species habitat”).</p> <p data-bbox="334 1572 1468 1734">We call your attention to 40 CFR 1502.24 on the use of scientific citations: <i>“Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement.</i></p> <p data-bbox="334 1772 1479 1934">An unsubstantiated assertion by a resource specialist, without any other evidence or data to back up the claim of habitat damage, does not meet the CEQ requirements for an EA. In fact, even the unfounded assertion that winches are being used improperly was in reference to juniper/pinyon habitat, <i>“...OHV drivers were using these large pinyon-juniper trees to attach winch cables to...”</i> The unfounded use of winches on pinyon-juniper then spread up the document trail to vehicles</p>

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	<p>driving into trees, "...should eliminate damage to trees from direct impact of vehicles...", and then broadened into "...using trees as anchor points for winches.." on ponderosa pine (an entirely different species and habitat) in the EA. <u>Please correct the EA to only reflect substantiated fact by removing all mention of habitat damage or potential habitat damage from winch use from the document and remove all unsubstantiated statements in the specialists' reports.</u></p> <p>The CEQ requires high standards: "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses..." Only by ensuring high standards of integrity in the underlying analysis documents can the Responsible Official and the public be assured of the accuracy of the information presented for decision in the EA.</p>
	<p>Response: Cibola National Forest personnel, on field trips to the OHV planning areas, have personally observed winch damage to trees. When large ruts and soil damage are associated with obvious tree damage at the upper point of the rutting, and observing the terrain features (in most cases, where a steep climb begins to level out) we concluded that tree damage was caused by winch placement used to extricate a vehicle.</p> <p>It is appropriate to base the effects analysis not only on supporting scientific information, but also on personal observations and conclusions by trained resource professionals. The conclusions presented in the table are based on these observations and on the design of Alternative 1, which: 1) limits motorized use to designated routes, 2) designating routes that do not require extraordinary measures to traverse, and 3) including seasonal limitations to avoid trail use when they are susceptible to damage.</p>
112	<p><i>(The complete 12 page comment letter is available in the project record, as well as the research article that was submitted "Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana.")</i></p> <p>This statement appears in the Biological Assessment and Evaluation (BAE), at page 6 of the PDF file posted on the Sandia web site (emphasis added):</p> <p>The riparian areas in the Bernalillo Watershed and Cedro areas consist almost entirely of ephemeral (flowing only in response to moisture events) systems. A portion of Sabino Canyon adjacent to the Juan Tomas Road is spring fed and wet most of the year. Except for this area, ephemeral drainages lack riparian overstory and understory vegetation, and as such, do not have a mix of ages and size classes of vegetation suitable for owl occupancy. The La Madera riparian zones are intermittent (flows for short distances, then dries up). These areas as well lack sufficient riparian vegetation at present to support spotted owls. However, due to the presence of short stretches of flow, they have some potential in these areas to provide for multi-storied riparian habitat.</p> <p>The following definition is found at a USDA Forest Service web site for the Southern Research Station, http://www.srs.fs.usda.gov/news/93</p> <p>Riparian zones, the lands along streams and rivers, maintain water quality as well as the ecological health of waterside communities. Riparian zones filter sediments and nutrients, stabilize stream banks, provide habitat and food for stream organisms, and, by shading streams, moderate temperature. Riparian zones also provide habitat for moist-zone animals and plants and travel routes for others.</p> <p>The Cibola biologist is stretching the concept and application of 'riparian' far beyond its normal definition. A riparian zone is defined by the presence of water and its vegetation. Yet the biologist wants to apply 'riparian zone' to places which have water only when it rains or snows, and which lack riparian vegetation. This is not good science. These questionable riparian zones call into doubt all the claims about 'riparian areas' in the BAE, MIS, the Migratory Bird report, and which have made their way through summary into the EA itself, and which affect the</p>

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	alternatives, and will affect the final decision.
	Response: Riparian vegetation is not exclusive to permanent, year-round water in the drainage. If the water table remains high enough (where the stream has not been downcut through erosion), even intermittent and ephemeral streams can support a riparian vegetation component such as willows and cottonwood trees. The intermittent flows of lower Tejon Canyon could support this type of vegetation where the stream banks are allowed to heal and riparian plant seedling establishment could occur.
116, 119	<p>Chapter 1. Purpose and Need</p> <p>Generally, roads and motorized trails cause disturbance or displacement of wildlife, habitat fragmentation, habitat loss, reduction of habitat productivity and, in some cases, wildlife mortality. In some areas, improper placement of roads and trails has led to loss or reduced productivity of important wildlife habitats. The density of roads and trails has contributed to habitat fragmentation and wildlife disturbance in the Cedro area.</p> <p>General assumptions are not adequate in any EA, the Forest Service must use sound unbiased scientific data when making decisions, As the EA does not specify which routes are improperly placed, what wildlife has supposedly been harmed, or if OHV activity causes more disturbance than other human activity and it is unclear which routes have been effected by this “general assumption” I recommend the entire EA be removed for consideration until such time the Forest Service provides data on the particular route(s) that are causing problems with habitats</p>
	<p>Response: The proposed action and the alternatives (except for No Action) would designate fewer roads and trails for motorized use than currently exist. Initially roads and trails were considered for their risks to natural and cultural resources and benefits in the Travel Analysis Process (see the TAP in the project record.) Through this initial assessment, coupled with information gathered during the public involvement process, some routes were not included in the proposed action. Some routes were not included because they were poorly located or presented some management concern. To provide a discussion of the sort suggested by the comment would have added needless detail to the document and provided no pertinent information related to the routes that are proposed for motorized use.</p> <p>We believe we have documented the displacement impacts of motorized vehicles; by definition, this reduces habitat productivity (the zone of influence) adjacent to motorized routes. By now, habitat fragmentation is a commonly accepted term for the proliferation of human impacts to the landscape. Certainly, whenever motorized vehicles are used there is a chance for direct wildlife mortality.</p>
135	The alternatives, except for Alt. 6, do not address any wildlife concerns. The wildlife is already crowded and wildlife corridors will be compromised. What about the wildlife?
	Response: The alternatives are designed to address one or more of the significant issues identified during scoping. We disagree that none of the alternatives except alternative 6 address wildlife concerns. All of the alternatives that do not designate motorized travel routes in the La Madera area in large part were designed to address wildlife concerns in that part of the forest.

<i>Comment #</i>	<i>Comment</i>
(AE2) Soil, Erosion and Watershed	
40A	The Cedro area has soil that erodes easily and has low bearing strength. Due to the soil conditions that exist in the Cedro area along with the topography of the area, maintenance of the trails is a continuous battle.
	Response: Soil concerns are addressed on pages 73-85 of the EA and in the Watershed and Air Specialist Report.
41	(Concerns for the La Madera area) This is also water shed area and if the off road vehicles are ride with the soil is moist they will be damaging the water shed.
	Response: Soil concerns are addressed on pages 73-85 of the EA and in the Watershed and Air Specialist Report.
73, 75	It is not understood why the alternatives in the EA have varying criteria for control against soil

Comment #	Comment
	<p>and vegetation damage, particularly during the monsoon season, from motorized vehicle use. All of the plans should have the same restrictions. There appears to be an inconsistency in the EA report regarding this subject. In Table 3, page 26, it is stated that all alternatives will be subject to closure during times when the soils are easily damaged. However in the description of the alternatives, for example Alternative 3 and 4, the EA states that there are NO seasonal restrictions. This needs to be clarified.</p>
	<p>Response: The alternatives were developed to respond to different significant issues that were identified during the scoping process. Variations from no seasonal designations in Alternatives 3 and 4 to more extensive seasonal restrictions in Alternatives 5 and 6 are analyzed. This gives the responsible official a range of alternatives, with their respective impacts and benefits to consider when making a decision.</p> <p>The seasonal restrictions included as part of the alternatives are a separate process and would restrict use of certain roads or trails during the stated time period based on average seasonal weather and soil moisture conditions. While the restrictions included in the alternatives are not flexible (the dates in the EA would be the dates the roads/trails are open) the Administrative (referred to on page 26 of the EA) closure/restrictions can be implemented on a more flexible basis to more closely match seasonal weather and soil moisture conditions in a given year.</p>
<p>89, 173</p>	<p><i>Comment 89 asserts that “For the reasons described...this Travel Management Plan will violate the Clean Water Act in its present form.” The original letter is available in the project record. The comment issues are summarized below:</i></p> <ul style="list-style-type: none"> • Over ¼ of the mapped roads and 36% of the mapped trails have a severe erosion hazard, yet there is no analysis of how each action alternative will impact, positively or negatively, these grave resource issues. • Again, there is no discussion <i>at all</i> in the EA about the impacts the proposed alternatives will have on air quality. Instead, the reader (i.e. the public) is referred to the TAP for a “more thorough discussion of the effects of roads and trails on soil and water resources[.]” (EA:74) A thorough review of the TAP however, reveals that there is not in fact any discussion, beyond a general indication that routes can cause watershed damage and air pollution. • A chart on page 75 of the EA shows a comparison of the “primary effects indicators of road and trail designation on project area.” ...From this chart, it is clear that the only alternative that would reduce the impacts of motorized recreation on soil, air and water quality would be Alternative 6...However, again, the EA provides no analysis beyond the mere reporting of these numbers. The cumulative effects analysis for each alternative again reports the number of miles of routes on soils with erosion hazards and the number of stream crossings, but does not analyze the impact of those miles or crossings on the environment, habitat, recreation opportunities, or economic impacts. There is no quantitative analysis. Rather, the EA repeatedly states, “little or no improvement would be noticed.” (EA: 77, 79) • Soil is the foundation upon which all life in the forest grows. While all soils are vulnerable in some degree to compaction and erosion from ORV use,² certain soils are particularly erodible. ORV routes should not be designated in areas where the soil is classified as highly erodible (“severe” or “very severe”) by the Soil Conservation Service³ or the Forest Service Manual on soil classification. Compaction is severe in wet, poorly drained soils.⁴ • Furthermore, the Clean Water Act requires the implementation of Best Management Practices (BMPs)⁵ for non-point sources that would result in water quality violations if

Comment #	Comment
	<p>they were not controlled. BMPs direct the Forest Service to identify areas where ORV routes cause, <i>or are likely to cause</i>, degradation of water quality. The Clean Water Act also requires that states identify all water bodies that are “impaired” and establish the Total Maximum Daily Loads that these water bodies can assimilate and still meet water quality standards. Steep slopes are also especially susceptible to soil damage from motorized vehicle use. No routes should climb directly up hillsides or be in excess of 15% slope. The Forest Service’s policy paper on unmanaged motorized recreation calls mud bogging and hill climbs “thoughtless or irresponsible behavior.” We are therefore dismayed that Alternatives 1 and 3 reward this behavior with a hill climb in Chamisoso Canyon off NFST 05184 that ends in an open meadow. (EA:102) The SRD acknowledges that discouraging ORV users from using the proposed loop in Chamisoso Canyon will be an enforcement challenge. (EA:102)</p>
	<p>Response: Analysis of the affected environment for soil, water and air quality resources starts on page 76 of the EA. Pages 73-76 discuss the effected environment of the potentially effected resource. Air quality issues are primarily related to particulate matter (fugitive dust) and discussed in the effects of alternatives on pages 76-85 and further in the Watershed and Air Specialist Report. As the effects to particulate matter are minimal and vary little by alternative much of the analysis in the specialist report was summarized in the EA. The Travel Analysis Process (TAP) addresses air quality on page 35 of Appendix B in response to Question PT4: “How does the road and trail system contribute to airborne dust emissions resulting in reduced visibility and human health concerns?”</p> <p>Indicators used as part of the environmental analysis for soil, water, and air resources are reported as indicators of the future potential for damage and degradation to soils. These indicators are used to describe potential effects of each alternative. Additional analysis is included in the text in the EA (pages 76-85), in the Watershed and Air Specialist Report and in the Travel Analysis Process and its appendices. Much of the analysis discussed current trail and road conditions and related those to potential future conditions and how these varied by alternative.</p> <p>The comment on the “quantification” of effects of Alternative 2 highlights the difficulty this alternative poses given that only in this alternative is cross-country use authorized. Strict quantification is not possible as with the action alternatives since use and potentially disturbed area is not set based on the final map. The effects of the other alternatives are “quantified” in Table 26 on page 75 of the EA while Alternative 2 is at least 69 acres. The actual potential is greater but could not be specifically defined as was stated in the EA.</p> <p>Thank you for your comment on soils vulnerable to erosion and compaction. This is further discussed on pages 73-85 of the EA, in the Watershed and Air Specialist Report and in the Travel Analysis Process including its appendices.</p> <p>Roads and trails proposed in Alternatives 1-6 do not affect Las Huertas Creek, on the State of New Mexico’s impaired waters list. Further the Best Management Practices for road and trail management are listed in the Watershed and Air Specialist Report and vary by alternative selected. Most, if not all, of these BMPs are incorporated into the design of the project. As discussed many of the existing trails lack proper design and the BMPs will be incorporated into the maintenance of these trails to help limit the impact of the roads and trails on the soil, water and air resources.</p> <p>The hill climb in Chamisoso Canyon is only proposed in Alternative 3 and is analyzed by resource in the EA (pages 73-85 for soil, water and air resources).</p> <p>Note: References 2 and 4 are specific to non-motorized trail use – primarily pedestrian traffic. Reference 3 is not necessary as the Cibola National Forest’s Terrestrial Ecological Unit Inventory, similar to a soil survey covers the areas in question. Soil survey data from the Natural Resources Conservation Service, formerly the Soil Conservation Service, is out-of-date for the area, especially on National Forest System lands.</p>

Comment #	Comment
101, 103	<p><i>This comment letter stated that there is inadequate analysis on the impacts of designating trails in the bottom of arroyos in the EA. The original letter is available in the project record. This is a summary of the comment letter:</i></p> <p>“There is no doubt that “impact” will occur with motorized use in the bottom of a dry arroyo. Even slight tire tracks are “impact”. In question is the scale of the “impact”, or its significance. The “rock dislodging” and “bedload movement” are both characteristics of “impact” in typically dry arroyos in the southwest when a large precipitation event occurs. It should be noted, with a large degree of irony, that the specialist is talking about minimizing erosional impact to an arroyo when the existence of the arroyo itself is evidence that erosion occurs. In fact, the specialist makes this very point later on the EA text on page 82: ‘... when these channels do flow with water, they are during extreme events...’</p> <p>Erosion will continue to occur, as it has since rain first started running down the eastern side of the Sandia Mountains. The presence of vehicles in two arroyos in La Madera will not significantly alter historical erosion patterns.</p> <p>The EA and supporting specialists’ report does not provide any data substantiating the concern for significant degradation of the system and certainly not, in the words of the EA on page 82,: “negative effects on stream channels on National Forest System land to migrate downstream through downcutting and gullyng onto private land.” <u>Please correct the accuracy of the EA by removing all unfounded claims of potential future arroyo system degradation and impact to downstream properties on pages 81 and 82.”</u></p>
	<p>Response: Driving in channel bottoms and on the channel sides/banks will destabilize the channel. This is described as stated in the EA and the Watershed and Air Specialist Report. Further information about these activities effects is included in the Travel Analysis Process for Sandia Ranger District as referenced in the Specialist Report and the EA. Both statements quoted in the first paragraph of this comment couch degradation as “could result” or “potentially.” These terms were used as the end result of degradation is less certain and would depend on level of use and actual activities on the ground (driving on sides of channels, movement of stabilizing rock structures, etc.)</p> <p>The impacts to “dry wash” or “arroyo” channels may appear to be so minimal as to be disregarded especially in the light of high intensity precipitation events (i.e. monsoons). However, the impacts that vehicles have on these channels is to destabilize the banks and in some cases the channel bottom itself. This enables the banks or bottoms to erode and move in successively less intense rainfall events. As more sediment, cobble, boulders etc. begin to move in increasingly smaller rainfall events the systems are changed and can begin to degrade. This can lead to gullies parallel to the channels through the banks and up and down that channel itself. Even though high-intensity rainfall events shape these channels in drastic ways they usually maintain grade and do not down cut rapidly over time. Again this can happen depending on level of use and vehicle activities in the channels (dry wash, arroyos etc.).</p> <p>We appreciate your calculations of horsepower relating the power of streamflow with that of a motor vehicle. It is obvious that streamflow is much more powerful than a given vehicle. Two quick points to note on the calculations: 1) stream velocity in high gradient streams is typically 4-6 ft per second and rarely exceeds 10 feet per second which is less than 7 miles per hour. This would reduce the calculated force of a stream, but again it is still much greater than a given vehicle. 2) The assumed streamflow in your calculations may occur once if at all in a given year during the monsoon period (typically July and August in New Mexico). Motor vehicles would utilize the channels much more frequently. The frequency would be a guess at best but may result in higher horsepower in the channel from vehicles than from streamflow. All that being said the actual issue is not force of each disturbance in the stream channels. Use of the channel as motorized trails or roads reduces the channel roughness (moving rocks, vegetation, woody debris, etc.) and results in increased disturbance from rare streamflow events.</p>

Comment #	Comment
	<p>Streams, including arroyos and dry washes as is the case here, run faster and have more energy when roughness is reduced. This leaves more energy for the water to erode banks and the channel bottom as outlined in the environmental effects on pages 76-85 of the EA, in the Watershed and Air Specialist Report and in the Travel Analysis Process for the Sandia Ranger District.</p> <p>The safety concern about users in canyons in the area is addressed in the recreation section and is only included in the Watershed section to valid concerns about flash flooding during extreme (high-intensity) rainfall events.</p>
<p>112</p>	<p><i>(The complete 12 page comment letter is available in the project record, as well as the research article that was submitted “Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana.”) Below is a summary of the comment letter:</i></p> <p>“Watershed report: The Watershed report is seriously flawed by omissions in several respects. First, it provides no quantification, or even an estimate, for the amount of sediment in different areas. It makes no estimate of a 'background' count of soil movement over the analysis area, as compared to soil movement caused by trail users. Considering that only one half of one percent of the surface area is in roads and trails, there is no justification to conclude that soil movement and the sediment load (which is unmeasured) is due mostly to users. The Watershed report provides no quantification, or even a guess, about what percentage of the sediment which could be attributable to the one half of one percent of surface area taken by roads and trails. And it provides no differentiation between user types, and no attempt to estimate which users are responsible for what amount of soil movement. The report doesn't even recognize that different users have different impacts... This information gap was not necessary, because literature is available which measures impacts from various user types. The following quote is from: Ecological Impacts of Mountain Biking: A Critical Literature Review Author: Jason Lathrop (Missoula, MT, 406-327-1501) Prepared for Wildlands CPR through the University of Montana's Environmental Studies Scientific Approaches to Environmental Problems</p> <p>The Air and Watershed Report presumes to provide an analysis of the impacts of motorized recreation on soil for each of the Alternatives. Those analyses are completely flawed, since they fail to discuss that many users of different types are on the trails, and all of them are affecting the soils. There is no recognition that wheels are not worse, and may even be less, damaging than hooves and feet. There is no recognition of the user mix, let alone any attempt to quantify the differences between users, even though studies are available, such as the one cited above.</p> <p>The Watershed Report is very flawed in another way, again because of omissions. It is not possible to make any connection between the 'Existing Condition' and the 'Desired Future Condition'. The Existing Conditions provides only a table showing slopes and soils, and a brief discussion of Las Huertas Creek (which is not under consideration for any designated routes). The Desired Future Conditions lists specific functions and qualities. The Existing Condition doesn't even mention those functions or qualities, and does not state if any of those goals are met or not met in any area. Without knowing what, if anything is 'wrong' in a given area, how can the report presume to make recommendations? But it does.</p> <p>I want you to retract the Watershed and Air Report, have it rewritten to use best available science, to provide site-specific data, to revise the Existing Conditions and Desired Future Conditions so they relate to each other, to make the TEUI table comprehensible by providing maps of where the 'units' are, to revise the report to recognize that Cedro Creek headwaters are the only true riparian zone which will be affected by the designations for motorized use, to account for the impacts of other trail users. When the Watershed report is corrected, I want you to revise the EA, particularly the Alternatives, to reflect the new corrected information from the Watershed Report, and to provide a corrected summary of that report in the EA.</p>

<i>Comment #</i>	<i>Comment</i>
	<p>Thank you for making this a more thorough analysis, by removing the unfounded statements from the document and adding the information which will improve the analysis of properly revised documents which will use the best available science.”</p>
	<p><u>Response:</u> Pages 73-85 of the EA are a summary of the Watershed and Air Specialist Report and cite the Travel Analysis Process done for the Sandia Ranger District. Within these documents the effects of roads and trail on runoff and erosion show that compacted surfaces of roads and trails can funnel water onto surfaces prone to erosion. This has been verified on many trails and roads on the District. Additionally as stated in these documents mitigations that can be implemented on roads and trails to limit increased runoff and erosion. In many case on the District these mitigations have not been done as these trails and roads were not designed with standard management practices but were constructed by the users. To address this concern is one of the goals of the Travel Management process and is part of the project design for all action alternatives. Roads and trails have a disproportionate effect on water runoff, erosion and sedimentation. They may only take up a small percent of the area but they have a much greater negative effect on runoff and erosion than almost every other activity on National Forest System lands. Again design of the roads and trails can go a long way to limiting those negative effects as stated in the documents cited above.</p> <p>No erosion modeling was done for the project as noted in your comment. Modeling would relate the potential erosion associated with a given road or trail. It could also only be done for specific road segments as either examples for the rest of the area or averaged over the entire area (this may stretch the useability of information gained from any model runs). Overall the level of erosion from the roads and trails within the project area is approximately proportionate to miles and area within roads or trails or by roads and trials on high erosion hazard soil. These characteristics are considered for each alternative so the relative effect of roads and motorized vehicle trails on erosion is analyzed and discussed in the EA and more specifically the Specialist Report. Any additional information gained by an attempt at quantifying that erosion would be minimal and provide little if any additional information to the deciding official.</p> <p>The study you cited (Lathrop) that further cites Wilson and Seney (1994) provides data on the actual effect of the use of trails. This information is useful and important to consider. It highlights the differing impacts of wheels rolling over a surface versus feet (or hooves) stepping and pushing off on a surface. We appreciate the addition of this information as it adds to the cumulative effects of mountain bicycle, hiking and equestrian use on erosion of the trail tread. Since no alternative restricts where no motorized trail use can occur, non motorized trail use has the potential for erosion impacts across more of the landscape. It is additionally important to note the relative impact determined by this study for the four uses. We would add that the relative force of a horse hoof typically causes more compaction than most vehicle or types of equipment in the area it steps. This furthers the cumulative effects analysis of trails by noting that both non motorized uses and motorized uses impact trails. As non-motorized use is not specifically changed through designations by alternatives within this project, this impact could be expected on all roads and trails within every alternative. One issue that the study by Wilson and Seney does not address is the impact of the trail itself. The resulting compacted surface of a trail can impede infiltration and channel water down the trail tread causing erosion of the tread itself and on the adjacent land when and where the water is drained off the trail, or potentially directly into a channel, either dry or flowing.</p> <p>In response to the concern about the connection between the effected environment and the desired condition; Desired Future Conditions were used generically as goals to try and achieve, but as you noted the connection between what was described in the effected environment was not explicitly connected. The desired future conditions were established in the Forest Plan and the TAP document. We will include a brief description of areas where a given Desired Future Condition is not being met.</p> <ul style="list-style-type: none"> • Erosion and sedimentation is minimized and controlled through road and trail design and proper best management practices where applicable,

Comment #	Comment
	<ul style="list-style-type: none"> ○ Many roads and trails within a project area are not properly designed or maintained so that erosion and sedimentation from roads and trails is limited. To rectify this the project proposes that Best Management Practices or mitigation are incorporated into design of these routes in the action alternatives. ● Water quality standards are met in all stream reaches and are not negatively influenced by the transportation network. As a result all state designated uses for a given stream reach are met, <ul style="list-style-type: none"> ○ Las Huertas is the only place not meeting water quality standards on the District but no proposed changes were included in any alternative in this watershed, with the only road being State Highway 165. There are no additional roads or trails being considered for designation in the Las Huertas watershed. This was done to avoid any potential for further degradation of water quality within the stream itself. ● Wetland and riparian areas are properly functioning and not negatively affected by road or trail location of related effects of the transportation network, <ul style="list-style-type: none"> ○ Wet areas were avoided by routes though there are very few true wetlands or riparian areas within the project area. Thus negative effects are limited and this condition is for the most part being met. ● Surface and subsurface hydrology networks are minimally impacted by the transportation network, <ul style="list-style-type: none"> ○ Subsurface hydrology is typically so deep within the project area as to not be affected. Roads along Las Huertas Creek and Cedro Creek do have impacts on the shallow subsurface hydrology along with the surface hydrology. As these are not Forest Service roads no changes could be proposed in this project. The surface hydrology network is primarily ephemeral (dry channels that only flow in response to rainfall or snow melt). This was being negatively affected within the project area. Best Management Practices, or mitigations, were proposed in the action alternatives to address this concern and help to come closer to meeting this Desired Future Condition. ● Storm runoff is attenuated on the landscape there are no increases in peak flows, <ul style="list-style-type: none"> ○ Compacted surfaces of the roads and trails increase peak flows during storm events so this condition is not being met. Again some of the mitigations will help come closer to meeting this condition, but overall this condition will likely never be fully met. ● Stream channel geomorphology is not impacted by road or trail crossings or the location of road or trails adjacent to streams (roads and trails can limit the meandering of streams by confining the floodplain), <ul style="list-style-type: none"> ○ This condition is not being met at many of the current stream channel crossings (even if they are dry). Again mitigations were proposed to address this and proposals in some alternatives were added to address this (e.g. not having routes in channel, even dry arroyo channels, in most of the alternatives). ● Aquatic passage is not impaired, <ul style="list-style-type: none"> ○ This condition is not being met in Las Huertas Creek. There are other water quality problems inhibiting aquatic life in this channel and the road is a State Highway so it was not address within this project. ● Aquatic habitat is not lost as a result of road or trail location or the resultant effects of a given road or trail, <ul style="list-style-type: none"> ○ Again this condition is not being met in Las Huertas Creek but it was not addressed within this project for the reasons described above. ● National, State and local air quality standards and regulations will continue to be attained. <ul style="list-style-type: none"> ○ This is being met and is expected to continue to be met by all action alternatives.

Comment #	Comment
	<p>Many of the concerns, issues, and problems associated with the roads and trails on the District are addressed in the Travel Analysis Process for the Sandia Ranger District. This document also addresses much of the existing condition issues presented in your comment.</p> <p>The Terrestrial Ecological Unit Inventory was not shown in a map as it is very detailed and would likely overwhelm the reader at the scales published in the EA. The Geographic Information System file is on the Cibola National Forest web site. The numbers you cited are symbols to designate a given map unit. There is no name given to these map units only associated soil properties and use interpretations. These interpretations are included in the Table you cited within the Watershed and Air Specialist Report. The interpretations analyzed are presented by the miles, or acres, of road or trail on map units with these same ratings. This is included in the effected environment for the current condition and also by alternative to show the differing potential effects of each alternative on soil resources.</p>
<p>188</p>	<p>The EA is silent about the climate in the study area. The background information developed for the EA is nearly silent about climate. Because one of the key concerns supporting a seasonal closure is erosion, and many of the claims of "resource degradation" are tied to soil movement, this is a stunning omission. We are particularly interested in precipitation levels, and the timing and intensity of rain and snow events. The present analysis is silent.</p> <p>For the purposes of a motorized recreation travel plan, the Cedro Peak area south of I-40 is the primary focus of this comment...As noted in the EA, this is called the Upper Tijeras Arroyo subwatershed. The area described above is 19,240 acres, with 15,450 acres in pinyon juniper, or 80 percent (page 41 Table 7). Pinyon-juniper is the single most frequently occurring vegetation in arid, high elevation desert environments. So, this is apparently an arid or semi arid environment (although the Sandia RD staff has declined to reveal).</p> <p>To find out what the climate in the areas is, without Cibola NF support, we went to NOAA's historic weather event data webpages. Attached to this comment is a map (<i>available in the project record</i>) of the weather stations we used to calculate the climate of the study area, and the records from four stations: Bernalillo, Tijeras Ranger Station, Sandia Park, and Albuquerque. The daily precipitation normals were computed using the natural spline function and they may be used to compute precipitation over time intervals,</p> <p>The statement made on page 1 of the watershed and air program manager's background analysis, that there are no known documented occurrences of landslides or other forms of mass wasting associated with roads on the Sandia RD is true. Landslides and mass wasting are usually (but not always) the result of saturated soils. With an average annual precipitation in the form of rain of about 13 inches, and no average single month precipitation exceeding 3 inches, the soil is never deeply saturated.</p> <p>Snowfall, as recorded by the station with the best available data, Sandia Park, occurs across three months, January, February and March, and does not average more than 13 inches in any single month, and the cumulative effect of the arid environment and the small amount of snowfall results in annual snow depths of zero to two inches. In other words, there may be 58 inches annually, but there is never 58 inches of snow on the ground. It would be unusual for there to be more than 12 inches on the ground. Furthermore, it is clear that there are many winters when the snowfall averages are significantly lower than 40 or 50 inches, resulting in some winter months when there is no snow on the ground.</p>

<i>Comment #</i>	<i>Comment</i>
	<p>The reason that staff must not leave rainfall data out of this analysis: Below we have provided a simple glossary of erosion terms, as defined by the Soil Science Society of America (SSSA). Note the frequency that words such as mud, water, wet, precipitation, flows, storm events, hydrologic, water-saturated, mud-floes, melting snow, subsurface flow, and surface waters, appear in this short list. (<i>Glossary is included in the comment letter in the project file.</i>)</p>
	<p>Response: In the area covered by this analysis, precipitation seasonality varies due to the influence of the southwest monsoon. Areas affected by the southwest monsoon receive greater amounts of summer precipitation from moist air masses derived from the Gulf of Mexico and Gulf of California. Most of the annual precipitation comes in the form of rain originating from convective thunderstorms during the months of July through September. Higher elevations of the analysis area also receive some cool season moisture in the form of snow. In addition to temporal variability of precipitation, spatial variability of precipitation is also a characteristic within the analysis area. Topography and storm type are two factors that control the spatial variability of precipitation. At the local scale, precipitation tends to increase with elevation due to the effects of orographic lifting. Summer precipitation tends to have more spatial variability than winter frontal storms. The ability to respond to precipitation events of different sizes and timing is an important ecophysiological characteristic of plants and determines whether they are able to persist under a particular precipitation regime.</p> <p>Within the analysis area, average annual precipitation is generally between 16 and 20” per year. However, the intensity of the precipitation also affects the hydrology of the project area. Precipitation intensity (amount of water/unit of time) tends to be very high in this part of the state due to the convective nature of the storms. For example, the intensity of precipitation within the project area shows that the 2 year (a storm that happens on average once every two years in a given area), 5-minute storm can produce upwards of 0.25 inches of water (intensity of 3 inches per hour during those 5 minutes). Antecedent soil and vegetation conditions can help determine whether this amount of precipitation results in beneficial infiltration or erosion generating runoff.</p> <p>Droughts are common in New Mexico due to the overall low amount of annual precipitation and the previously described spatial and temporal variability of that precipitation. Regional precipitation patterns are regulated by global scale fluctuations in ocean surface temperatures. Over the long term, the Pacific Decadal Oscillation (PDO) tends to influence the precipitation regime in this part of New Mexico. Studies of 20th century precipitation patterns show that there have been three distinct precipitation regimes. The first was a relatively wet period from 1905 to 1941. Next was a period of dry from 1942 through 1977. This was followed by a period of wet from 1978 through 1998. The years since 1998 have marked a shift back to a dry period and suggest that we could be in for another 1-3 decades of drier than average conditions. This information has important implications on ecosystem management due to the influence of precipitation on disturbance regimes and the capacity of ecosystems to resist or recover from those disturbances.</p> <p>Snow depth data from the stations you provided, and a Remote Weather Station in Oak Flat, indicates that snow is present in most years from the beginning of December through the end of March. Obviously there is wide variability in annual weather patterns throughout the world and here in New Mexico. The data show that snow does melt off several times through the winter months. It may even be possible for the soil moisture to be low in the winter in long stretches between precipitation events. That being said the time period for the proposed seasonal restrictions was chosen to include the time frame when the area on average had high soil moisture leaving the soil, including that within trail treads and roadways, at greatest risk of compaction and rutting. On average snow begins in approx. the beginning of December – December 1 was chosen as the beginning of the seasonal restriction. On average the last snow fall is in late March/early April, we approximated a few weeks to fully dry out the soil – April 30 was chosen as the end date for seasonal restrictions.</p>

Comment #	Comment
188	<p>Now please refer to page 1 of the watershed and air travel management background analysis: <i>"Additionally there are erosion problems in trails that run up "dry" stream channels, known as arroyos or ephemeral streams... "</i></p> <p>It appears that the hydrologist does not really mean that the ephemeral streams are dry, and in fact the narrative in the EA treats these dry washes as streams, and leaves the clear implication that they are not dry. For example, the table 26 on page 75 of the EA gives the number of "stream channel crossings." However, these are all dry washes, not streams, as the EA states that there is only one perennial stream in the study area and that is Cedro Creek. In other words, the relentless references to all dry washes as streams is misleading.</p>
	<p><u>Response:</u> We would like to clarify the definitions for stream channels, dry washes and arroyos. In the EA on page 74 it is clearly stated that only Las Huertas Creek and a short section of Cedro Creek are perennial streams (typically have water in the channel year around). On page 73 it describes the dry stream channels as arroyos or ephemeral streams. As you point out in your list of definitions an ephemeral stream is a stream or reach of a stream that only flows in direct response to precipitation. There was never any intent to mislead the public. Streams, even dry channels often referred to as arroyos or dry washes, are still referred to as streams as appropriate scientific terminology, with ephemeral describing the intermittent nature of the stream.</p>
188	<p>The statement from the background report "Trails and roads in "dry" channels also disturb the stream bed and banks making them more susceptible to erosion during a rain event," and on page 7 of the same report, "Alternative 1 would somewhat reduce the existing system of authorized and unauthorized routes which in turn would reduce storm runoff rates and volumes" require a bit of research to place in their proper context. We have found that research and following is a brief summary of what we learned:</p> <p>According to the USDA Agricultural Research Service records for the Walnut Gulch Experimental Watershed (a dry channel in the Arizona desert), the term for the <u>normal</u> condition of these channels is <u>dry</u>. Weather events that actually cause water to flow in these channels in a storm event have runoff rates ranging from 264 cfs (cubic feet per second) to 20,000 cfs. The monitoring flumes are built to carry as much as 22,500 cfs. 32 cubic feet of water equals one ton. In a rain event in which the stormflow in a normally dry channel is only 264 cfs, the weight of the moving water in the channel is over four tons. That means four tons of water flow past any given point in one second. In an event whose flow is measured at 1,525 cfs (August 17,2006) means that 24.1 tons of moving water (per second) is flowing in the channel. "Flow" does not describe the violence that results, in fact, the Ag Research Service calls them "wave fronts." When the weather event produces waterflows at these rates, the impact and the scouring is of a scale so large that it is not possible to measure any increase in soil movement that an DRV trail one or two feet wide would cause. The measurement would be utterly minute-which the Sandia hydrologist would know if he had a complete description of the activity (recall again, OHV's range in weight between 250 pounds and as much as 700 pounds with rider). The disturbance to the "bedload" in the channel, or even the slight movement of a boulder in the channel by a full-sized rock crawler, is quite literally obliterated by a twenty-four-ton wave front. We have calculated that to be 2,999,000,000 horsepower. Not being mathematicians, we may be slightly off, nonetheless, every attempt at conversion produced horsepower numbers in the hundreds of thousands, upwards into the millions, depending on the volume of water (cubic feet per second) we used in our conversion. Remember our OHV, with its relatively minimal horsepower rating of as little as 12 horsepower, and no more than 70 horsepower?</p>

Comment #	Comment
	<p>The above <u>new information</u> that we have provided reveals that the Sandia staff has lost its perspective.</p>
	<p><u>Response:</u> The comment describes issues relating to roads and motorized vehicle trails in ephemeral stream channel, arroyos or dry washes. This is related to the analysis in Alternative 3 for the full-size 4x4 vehicles. The comment implies that only ATV and motorcycles would be using the arroyos. As stated in the response to comment 101, 103 under section AE2 It is obvious that streamflow is much more powerful than a given vehicle. Two quick points to note on the calculations: 1) stream velocity in high gradient streams is typically 4-6 ft per second and rarely exceeds 10 feet per second which is less than 7 miles per hour. This would reduce the calculated force of a stream, but again it is still much greater than a given vehicle. 2) The assumed streamflow in your calculations may occur once, if at all, in a given year during the monsoon period (typically July and August in New Mexico). Motor vehicles would utilize the channels much more frequently. The frequency of use is an estimate, because there has not been frequent established motor vehicle use in the channels. Frequent motor vehicle use may result in higher horsepower in the channel from vehicles than from streamflow. The actual issue is not force of each disturbance in the stream channels. Use of the channel as motorized trails or roads reduces the channel roughness (moving rocks, vegetation, woody debris, etc.) and results in increased disturbance from rare streamflow events. Streams, including arroyos and dry washes, run faster and have more energy when roughness is reduced. This leaves more energy for the water to erode banks and the channel bottom as outlined in the environmental effects on pages 76-85 of the EA, in the Watershed and Air Specialist Report and in the Travel Analysis Process for the Sandia Ranger District.</p>
<p>188</p>	<p>Refer to page 5 of the watershed and air travel management background analysis: The primary effects of roads and motorized trails are:</p> <ul style="list-style-type: none"> ○ <i>Compaction of soils</i> ○ <i>Accelerated erosion from trail surfaces and adjacent areas</i> ○ <i>Increased sedimentation in stream channels,</i> ○ <i>Concentration of flow and increased channel length (more areas with concentrated water flow during a rain event-i.e. roads and trails act as streams) . Stream flow can be intercepted and directed into a surface drainage system</i> ○ <i>Creation of drainage or wet areas due to road/trail crossing design</i> ○ <i>Constriction of aquatic species movement</i> ○ <i>Bare soil areas that could contribute to fugitive dust concerns.</i> <p>Now please refer to Table 26 (From pg 75 of the EA):</p> <p>In the limited time available, we have found that the variety of reporting methods of each specialist for their "affected acreage" difficult, and often not providing any clear statement of the total acreage of the study. On page 113 we find: "Approximately 8,730 acres, or around 26 percent, of the 33,025 acres currently being analyzed within the Sandia Mountains and the Cedro Peak area of the Manzanita Mountains of the Sandia Ranger District On page have been surveyed for heritage resources during the conduct of 132 individual project surveys."</p> <p>On page 9 we find the numbers 31 miles for system trails, 8.6 miles of "Unauthorized trails, --- but that is different than the 51. 1 miles of "system trails" on the Sandia District (different than the project area?).</p> <p>So, is the study area containing the acreage shown in Table 26 33,025 acres? Or is it 19,240 acres, as calculated in Table 7 on page41? Do we have 39.6 miles or 51.1 miles of trail?</p>

Comment #	Comment
	We need to calculate the total acreage of ground converted to roads and trails.
	<p>Response: There are areas on the Sandia Ranger District that were closed to cross country travel prior to the initiation of this project. The area open to full analysis where cross-country travel is currently permitted is 29,473 acres. There is another 4748 acres analyzed where there is cross country travel is prohibited under a previous decision. That is a total area of 34,211 acres. The acreage cited in Table 7 on page 41 is specific to the wildlife analysis. The wildlife biologist defined a smaller area for the purpose of analysis, where motorized use was being considered for potential changes through designation (<i>a map submitted to Fish and Wildlife Service with the BA is available in the project record.</i>) The analysis only includes the Cedro Peak area, the Bernalillo Watershed area and the La Madera area for a total of 19,240 acres. Each resource area has the discretion to focus or expand their analysis as necessary to better analyze their resource, as was done here in the case of wildlife specialist. The Heritage Specialist analyzed different acreages (33,025 acres) in the analysis, again based on resource concerns. The analysis area used by the heritage specialist does not have any bearing on the watershed analysis. The total analysis area for heritage was used in relation to the area previously surveyed (26% was surveyed). Changing the total analysis from 33,025 to 34,211 acres the heritage report would still show 26 percent surveyed (rounding).</p> <p>The 39.6 miles of trails referenced in Table 4 is the trails considered for single track (motorcycle) designation in Alternative 1. This figure includes 16 mile of trails that were designated in a previous decision, as noted in the asterisked statement below Table 4. The 16 miles were included to provide information on the total miles that would be available if Alternative 1 were selected.</p> <p>The 51.1 miles of trails was a figure that was stated in the existing condition for the recreation report. This includes trails that were not designated for motorized use in a previous decision west of NM 337. This needs to be clarified, and will be added to the Errata Sheet to the EA.</p>
188	<p>On page 46 we find: "Currently, about 0.6 % of the Cedro area, 1 percent of the Bernalillo Creek watershed, and about 0.2 % of the La Madera area have been converted from habitat to roads. These estimates do not include direct habitat loss due to trails, which would add more acres to the total and increase the percentages of disturbed habitat."</p> <p>This gives the false impression that the trails will occupy the same acreage as roads. Since we do not wish the Deciding Officer to receive the wrong information we will calculate the acreage in trails. Unfortunately, we are having difficulty identifying exactly how many miles of trails are under discussion. For example, Page 75: "<i>Most activities in these alternatives occur in the Upper Tijeras Arroyo subwatershed (see figure 1.)</i>" But, Figure 1 includes the Wilderness, yet it is not clear whether the numbers provided in Table 26 include the Wilderness or not. It is not clear in any of the watershed discussions which areas and trails are included in the calculations-the writers appear to use different numbers for different calculations. Some include the Wilderness mileage and some do not. The writers include in the No-Action column a calculation that appears to include trails for ATV width activity when there are presently almost no AT V-width trails, so we are left to wonder how the Alternative 2 calculations were accomplished. To further confuse the issue, if we calculate using the acreage in Table 26 and the total acreage described for the Manzanita Mountains and the Cedro peak area, we arrive at only 2/10ths of one percent of the landbase dedicated to roads and trails in the existing situation.</p> <p>Remember, we are adding the trail acreage to the acreage dedicated to roads and trails to finish the page 46 discussion.</p> <p>So, for our calculation we will use the south of 1-40 trail mileage figure of 51.1 miles of trail</p>

Comment #	Comment
	<p>from page 3 in Chapter 1, and the 19,240 acre figure from Table 7 on page 41 (because it correlates best with where the most routes currently exist), and keep the 0.6 % of one acre (Cedro Peak area) figure from page 46, in order to be consistent with the "most of the activity occurs south of we-40" statements in the EA.</p> <p>For our calculations we will also assume that all activity is limited to trails and roads (in other words, if the existing mileage is retained as open to motor travel, but cross-country travel is eliminated by regulation). The reason is, we wish to close in a bit tighter on the actual <u>scale of the effects</u> of motorized access in a designated trail system.</p> <p>If we use an average width of two feet for these trails, times 5,280, we get 10,560 square feet with calculates out to 2/10th of one acre of surface. That amounts to one-one hundred thousandths of one percent of the study area, or .001 of 1 %.</p> <p>We can now safely state that the 6/10ths of one percent figure accurately represents the amount of the study area presently dedicated to roads <u>and</u> trails.</p> <p>The Sandia staff fails to enlighten the Deciding Officer about the nature of the dedicated <u>OHV portion</u> of this 6/11ths of one percent: it is less than 1/10th of one percent~ it is not a contiguous block of acreage but rather, it is a very narrow (less than 4 feet wide, and mostly 2 feet wide) linear configuration, protected from wind and rainsplash by adjacent vegetation, and protected from long reaching water runoff by the combination of very low rainfall rates and frequent irregularities in the slope, grade, and surface of the trail (Coe 2006). The present analysis does not provide sufficient factual information to provide a fully informed answer to whether or not these trails belong in the context of an irretrievable commitment of resources.</p> <p>However, we can say with confidence that roads and trails are not considered an irreversible or irretrievable commitment by Congress, because the NFMA, Section 8, section B instructs the Forest Service to restore any road used in timber sales by reestablishing the vegetative cover by either artificial or natural means. The roads that the law refers to are 16 or 24-foot wide graded and ditched road designed for tractor-trailers hauling timber and timber harvest equipment, weighing upwards of 50,000 pounds. In this EA, we are examining very small trails, intended for the use of vehicles with weights ranging between 250 pounds and 700 pounds- 98.6 percent lighter.</p>
	<p>Response: The Upper Tijeras Arroyo subwatershed, as with most watersheds cover areas not part of the current project. Cumulative effects of activities within other areas are considered, but the numbers relating to the project specifics e.g. (Table 26) do not include trails not considered in the project, including hiking trails in the Wilderness. Numbers for Alternative 2 in Table 26 start with Alternative 3 because these numbers are approximations. Alternative 2 is no action and would continue existing management which allows for cross-country travel. Therefore effects in this alternative would be at least as great as those in Alternative 3 and likely greater as stated in the footnote to Table 26.</p> <p>Your comment about the actual area taken up by roads and trails was calculated as one and is accurate. There was no intent to mislead the public. The citation of Coe (2006) is not appropriate for the assertions of runoff and erosion. Vegetation cover adjacent to the trails does provide some protection, but evidence on the existing trails indicates that erosion is still occurring much above background rates. Lack of initial trail design for limiting erosion, runoff and sedimentation also reduces the applicability of this assertion.</p>

<i>Comment #</i>	<i>Comment</i>
	<p>There is not an assertion in the EA that roads and trails in this project are irretrievable commitment of resources as you stated in your comment. Rutting and compaction associated with roads and trails are a negative impact on the soil resource.</p>
<p>188</p>	<p>The next bit of confusion lies in the Table 26 stream channel crossings. The writer does not reveal whether these include all roads, such as State Highways and county roads, or only Forest roads and trails. For example, the road width for highway legal vehicles is cited, giving the clear impression that the number of crossings cited in the Table does include these roads. Yet State Highway 337 intersects Cedro Canyon 10 times (ref the GIS data supplied on the Cibola NF web site). The state highway has improved crossings, that is to say, bridges and culverts, so there is no connectivity between road runoff and the Cedro stream channel. Further examination of the road/stream crossing intersects reveals that a significant number of the "stream" channels are crossed by graded, ditched and drained Forest roads, which are roads that the FS will not close in any alternative and in fact must be kept open and maintained year-round for the FS to continue with its other activities. Examples: Road 11 and 11a, crossing Tablazon Canyon~ 462, crossing Cedro and Tablazon Canyons; 242, crossing Cedro Canyon and Juan Tomas Canyon If these are included, then in the Table 26 No action column the number 34 suddenly becomes about 20-a 42 percent reduction in the FS "effects indicators" for OHV -dedicated activity.</p> <p>This is a rather large difference. Except in the event of 100 year weather failure, these developed crossings are not connected to the waterways, and must be separated from the undeveloped crossings. In this analysis, the writer is silent about the effects of this difference.</p> <p>Continuing on to another disingenuous bit of writing, please refer to Table 26 "Primary effects indicators of road and trail indicators." But the Table does not give "indicators." "Effect indicators" are units of measure, for example sediment load changes between a control point and the point of interest, or trail tread depth rate of change from a baseline. Table 26 only calls out the number of crossings and the acreage and mileage of trail by trail type.</p> <p>Now for another calculation: the actual reach of the dry wash banks affected by trail/road crossings.</p> <p>Taking the Table 26 figure of 34 stream channel crossings, and subtracting what we know are developed, dis-connected road/stream intersects, and comparing with a count (as best as possible) of the trail-wash intersects Horn the GIS layers supplied by the Cibola NF, we estimate that there are 20 trail-wash crossings south of I-40, east of SH 337, and west of the Forest boundary. It is not likely that in this arid environment that any of these trail crossings are improved. We will use an average width of 4 feet per crossing (remember, we are only counting the trails, those most at risk of closure without a science-based analysis). 4 feet multiplied by 20 (crossings) is 80 feet of stream bank actually intersecting with a trail.</p> <p>Neither the maps or the GIS data provide mileage of stream or dry channel. The GIS line Feature ill number totals 464 stream feature segments. Each one has its own name. Thus it is likely that at least a few of these are more than one mile in reach, such as Cedro, which appears to be several miles in reach. However, if we use one mile per stream reach and calculate the percentage of trail intersects, we arrive at three ten-thousandths of one percent (.003 of 1%) of wash banks are affected (acres of wash bank disturbed divided by total washbank surface).</p>

Comment #	Comment
	<p>By the EA writer's own admission, not all roads and trails actually cause any negative water quality problems and, with average rainfall of only 13 inches per year, non-point source pollution is not a serious issue (recall that there are no downstream impairments from this watershed. Not sure? That's because the EA writers have never said so. They have named one, unrelated to this analysis, but decline to say that there is no problem in the area of the most intense motor recreation activity). Snowmelt does not cause erosion in the same way; snow melts from the ground up and does not displace soil particles by impact as rain does. Snowmelt is a factor when the snow depth is much greater than that in the study area, and it tends to be absorbed by the soil, hence its function as an aquifer recharger.</p> <p>Nonetheless, land managers nationwide are concerned that "OHV's" have a special ability to destroy water quality by crossing streams and dry washes. The Sandia staff has no field data to confirm or refute this; in the background reports supporting this EA, staff admits that no one on staff has even looked at 85% of the routes (in the entire area, not just south of I-40). Sandia staff has no field data from anywhere in the nation to confirm or refute this. So, as a courtesy, we have provided the results of six water quality monitoring programs from OHV crossings on perennial streams. The results of all of these field studies reveal that in fact, OHV trail crossings do not have any measurable effect on downstream water quality. (Ref 2- USDA Mendocino NF Water Quality Reports and 4- Eldorado NF Water Quality Reports, attached.) These are areas that receive in excess of 40 inches of rain annually, or average a minimum of five feet of snowpack annually. Thus, while the <i>location</i> is different, and the climates are significantly <i>wetter</i> than the Sandia Peak area, the <i>activity</i> is identical: OHV's crossing streams.</p>
	<p>Response: The stream channel crossings data in Table 26 of the EA is for only those roads and trails considered in this project. It does not include state highways, federal highways, county jurisdiction roads, etc. This table only deals with the direct effects of the system roads and trails in the project area, or those routes being considered for designation or construction and does not include information for cumulative effects. Therefore it is not inflated or misrepresentative of the proposed Alternatives and is a valid indicator. As outlined in the analysis in the EA, in the Watershed and Air Specialist Report and in Appendix B of the Travel Analysis Process roads and trail can be connected to streams, including ephemeral streams, even where there is an improved crossing.</p> <p>The effects indicators are exactly that, indicators of the potential effects of a given alternative. Higher numbers indicate greater effect – lower numbers indicate less effect. Sediment load changes are the actual (indirect) effect of an action.</p> <p>The calculation of effected (dry) stream mileage first reduces the crossings though these are all crossings by proposed roads or trails in the proposed alternatives. Second the effects of roads and trails on stream channel, even ephemeral streams, is much greater than just the small area of an individual crossing. The actually crossing area is likely less than one percent, as you calculated, but the effect of these crossings is typically much greater through increased runoff and water entering the channel, increased sedimentation into the channel, etc (<i>Sandia Travel Analysis Process in the project record</i>). These effects of the crossings can be seen for the entire reach down stream and in some cases up stream if a headcut develops and creates a gully up stream of a crossing. In many cases since the trails and the crossings were not designed to limit negative effects on the channels, these conditions exist currently in the project area. Again as part of the proposed alternatives Best Management Practices are to be implemented to help rectify some of these existing deficiencies.</p> <p>The statement that a dry climate results in few problems with water quality is a misnomer. The monsoon season</p>

Comment #	Comment
	<p>can result in some of the highest rainfall intensities in the Continental United States of America. These events are responsible for much of the erosion in the Southwestern US. There is no state listed water quality impairment within the Cedro Peak area or immediately downstream. It is difficult however to say that there is no problem if you have ever seen the Tijeras arroyo channel. This is included in the cumulative effects discussion in the EA on page 75 and in the Watershed and Air Specialist Report (p. 7).</p> <p>Your comment on the lack of data concerning the effects of water quality and road and trails crossings or streams, including ephemeral streams, is inaccurate. The Watershed and Air Specialist Report cites the analysis done within the Travel Analysis Process for the Sandia Ranger District. This analysis looked at many peer-reviewed technical references and several references that accumulated and discussed the results of several studies on the effects of road and trail crossings on water quality, stream channel geomorphology and more. Also most of the roads and trails considered within the proposed alternatives have been assessed in the field by the watershed and air specialist for this project along with the Cibola National Forest hydrologist. The analysis is based on the roads and motorized vehicle trails conditions that have been observed by the Cibola National Forest soil scientist and hydrologist in the project area.</p> <p>We appreciate you providing the monitoring data from two other National Forests which did water quality monitoring in perennial stream channels during group activities. This was direct water quality sampling for turbidity only during these events (poker runs and group equestrian rides). This monitoring only had the objective of determining the effect of event tracking sediment into a channel or mixing up sediment already in the channel. This monitoring did not attempt to look at sedimentation (via turbidity) from high-intensity rainfall events. This is typically the primary driver of erosion and sedimentation throughout much of the country including the Southwestern United States. This is especially true as there are no areas where perennial stream reaches are crossed on the project area for Sandia Travel Management. Turbidity would not be an issue if there is no water in the channel during use. Likewise, studies from outside the ecophysiological region of the southwest are overall not valid on which to base assumptions for areas within this area based on difference in climate, soil types, and vegetation.</p>
<p>188</p>	<p><i>(The comment letter 188 summarized statements made in the six preceding comment topics. The full letter is available in the project record.)</i></p> <p>Without any baseline data, the burden of an <i>informed</i> speculative analysis is on the Sandia RD. By omitting all information about weather and climate from the document, and confusing trail mileages and acreages between the Wilderness area, the Bernalillo watershed area, and the Cedro Peak area, and providing no actual field results of OHV stream crossings of its own or from any other credible agency, it is difficult to consider this an informed analysis.</p> <p>The <i>omitted</i> information is conspicuous by its absence. The <i>provided</i> information is by admission, speculative. There is no monitoring data and no administrative records to show that these trails are presently a problem. The cited examples of erosion problems (Los Huertas Creek, for example, where the paved highway is the problem, or Forest Road 242, a full-size road and not an OHV trail) are too far removed from "OHV" trails to inform the analysis. The EA writers combine the troubles on the roads with all of the trails, problematic or not, to create a globalized "OHV effects" paradigm. How did this happen? It happened because no one on the team analyzing the effects of OHV has a description of the activity.</p>
	<p>Response: Additional analysis on the effects of climate has been included in the responses to the six comments from letter 188 above. There is also a discussion to clarify the source of the acreage and mileages cited above. As mentioned above, specialists have the discretion to define areas for analysis based on resource impacts and</p>

Comment #	Comment
	<p>concerns. Effects analysis for soil and water conditions include conditions observed during field reviews of the roads and trails in the Cedro and La Madera areas.</p>
<p>143, 188</p>	<p><u>Summarized Comment:</u> Concerns that there was insufficient analysis related to the variations in vehicle types being considered for designation. The specific concerns related to the weights and sizes of vehicle types result in different intensities of impacts. Original letters are available in the project record.</p> <ul style="list-style-type: none"> • <i>Comment 143:</i> I believe that restricting motor vehicle use is much needed, particularly multi tracked vehicles. Motorcycles are generally much light in weight and have lower power than 4 wheelers, so I think that limited use by them would be acceptable. Their limited “payload” capacity also restricts the amount of material that could be turned to litter of material that could be turned in to litter full size vehicles use would be extremely detrimental due to size, weight, torque, # of people carried and litter volume potential. • <i>Comment 188:</i> The EA has no description of the activity that it proposes to manage, including a description of the vehicles. A description sufficient for analysis purposes would include two aspects: One aspect describes the vehicles, that is, the weight, tire contact patch, average speed. This would inform the soils and hydrology portion of the analysis. It is not possible for any professional to accurately asses the physical effects of any activity without a complete description of the activity. The technical narrative in the background documents for the EA, and in the EA itself, was developed by specialists with no information about the vehicles. This also is a stunning omission... Vehicles that this analysis calls "OHV's" have GVW ranging from 250 pounds to 600 pounds with rider, and the average horsepower of an OHV ranges between 12 and 80. The tire contact patch for off-highway motorcycles is approximately 4 square inches. The tire patch for ATV's is approximately 24 square inches. The actual impact pressure of the tires of an ATV is 0.10 kg per square centimeter. (1.4 pounds per 14 sq. inches). The average speed of an OHV on an OHV trail will range from five mph to 15 mph. We can direct you to a vast collection of engineering data on the connection between the above listed characteristics and the absence of significant impacts on the erosion rates... If the ID Team had a description of the activity, it would be self-evident that it is not possible for a three-hundred pound vehicle to have the same effect as a five-thousand pound vehicle. To help the ID Team fully understand this concept, we will point out an example of how big a difference the size and power of a vehicle makes to any design consideration: the signs posted on the smaller bridges on secondary paved roads and especially on Forest roads that inform the road user of the vehicle weight limits for that bridge. If the limit is five thousand pounds, then a 400-pound ATV could safely cross, but a seven thousand pound truck or car could not.
	<p><u>Response:</u> The specialists are familiar with the equipment and vehicles in question. Many of the trails have been ridden by the specialists writing the analysis. They have used a variety of vehicles including full-size 4x4 trucks (highway legal), ATVs less than 50 inches in width, and off-road motorcycles. The Soil Scientist, who you appear to have directed this comment, has ridden the trails on both ATV and full-size vehicles as appropriate and is familiar with the full range of vehicles including off-road motorcycles. The lack of vehicle definitions in the EA does not indicate a lack of knowledge on the part of the specialists doing the analysis.</p>

Comment #	Comment
	<p>The comment about a trail developing an “armor” that is less erosive as a result of compaction is erroneous and the citation provided does not make a similar assertion, in fact the citation contradicts this assertion. Compacted soil loses its structure and root holding capacity and as a result is actually more erodible in high-intensity rainfall events. Compacted soil may be somewhat less erosive to the forces of wind, but overall it is much more erosive especially when runoff is concentrated as is the case on most of the motor vehicle trail and roads in the project area. As the comment states motorized trail compaction doesn’t typically lead to large scale reductions in productivity for the timber stand, but there is a reduction in soil productivity. Soil productivity includes the production of <u>any</u> vegetation and the biological functioning (microbes and fauna that lives within the soil) of soil. The extent of compaction caused by full-size vehicles is different both horizontally (width of compacted area) and vertically (how deep the compaction is evident) than that caused by ATV (less than 50 inch wide) and motorcycles.</p> <p>The Terrestrial Ecological Unit Inventory for the Cibola National Forest and Grasslands (Strenger et al. 2007) is complete and does include the appropriate interpretations for wheeled off-road vehicles along with several other management interpretations and physical properties as outlined in the National Cooperative Soil Survey. The National Cooperative Soil Survey (NCSS) is a nationwide partnership of federal, regional, state and local agencies; and private entities and institutions. This partnership works together to cooperatively investigate, inventory, document, classify, interpret, disseminate, and publish information about soils of the United States and its trust territories and commonwealths. The activities of the NCSS are carried out on national, regional, and state levels.</p> <p>The Natural Resources Conservation Service (NRCS) is responsible for the leadership of soil survey activities of the U.S. Department of Agriculture, for the leadership and coordination of NCSS activities, and for the extension of soil survey technology to global applications. Additional information about the soil survey program is in the <u>NRCS General Manual</u> under Title 430, Part 402. Documentation for these interpretations and much more are included in the National Soil Survey Handbook. (Soil Survey Staff, Natural Resources Conservation Service, National Soil Survey Handbook, title 430-VI (2007).)</p> <p>The use of the interpretation for wheeled off-road vehicles is appropriate as an indicator especially as it was used in conjunction with the interpretation for unsurfaced road.</p> <p>The use of NFSR 462 as an <u>example</u> is again just that, an example. The entire list of roads and trail where rutting is evident would be lengthy and add little to the analysis. The intent was to inform the deciding officer by providing an example of rutting that most users in the area would be able to identify with. The rutting in NFSR462 is also an extreme case given the depth of the rutting (2 feet deep) and amount in one area. Other routes with known rutting problems include: Meadow 2-track, Cedro 2-track, Chamisoso, Poker Chip, NFSR 9 south of NFSR 242, Wild Cat, Coyote, Meadow Ridge, FR 63C, and FR 62B. It is noteworthy to point out that this list includes motor vehicle trails not accessible by full-size 4x4 vehicles. ATVs (less than 50 inches) and motorcycles can create ruts within trails though not as deep or as easily (soil must be wetter for vehicles with less ground pressure) as a full-size vehicle.</p>
188	<p>Page 3: Delete the phrase "and other routes" from the sentence " <i>Examples of soil damage by travel routes on low bearing strength soils can be found in the Tablazon Canyon area near the northern end of NFSR 462 where rutting in the forest road and other routes is prevalent.</i> " And, please add to this paragraph the following: <u>However, it is important to note here that this road is predominantly used by full-sized highway legal vehicles (pickups and SUV's) whose average weight ranges from five thousand pounds to seven thousand pounds and apply approximately 400 horsepower and 500 foot-pounds of torque to the road surface. Thus, the “rutting” on this road is</u></p>

Comment #	Comment
	<p>not representative of the effects of OHV's District-wide. <u>OHV's weigh as little as 180 pounds and as much as 500 pounds. and their horsepower ratings range from 12 to 80. This is a significant difference in any analysis of motor vehicle effects on roads. whether paved or untreated.</u>" (The statement we want you to add is underlined).</p> <p>Page 3: Add the word "may" to the phrase <i>"These conditions may make travel route construction and maintenance more difficult ... "</i></p> <p>Page 3: Remove <i>"considering the resource mitigations necessary to limit damage to soil productivity."</i> Replace with, <i>"The elimination of "open" OHV riding will resolve concerns about impacts on soil productivity. The reason is that the surface area dedicated to vehicle routes will be strictly limited to trails and roads."</i></p> <p>Page 3: Change <i>"Stream channels can be damaged by travel routes that either pass through or are directly adjacent to these channels. There can be damage even when use only occurs when the channels are dry."</i> to <i>"This analysis will address the concern that Stream channels may be <u>damaged</u> by travel routes that either pass through or are directly adjacent to these channels. There may be damage even when use only occurs when the channels are dry."</i></p> <p>Page 3: Delete <i>"An example of potential damage to stream channels is in the headwaters of Cedro Creek near the intersection with Forest Road 242, where there has been a greater than 20 foot downcut from erosion in a few locations. Another example is Las Huertas Creek, where the channel is degraded."</i></p> <p>Page 73: Change: <i>" The TEUI is a broad brush product so there may be small areas within a given map unit or area that have properties or characteristics that are different than the predominant characteristics of the area."</i> by adding, <i>"However, it does not contain airy menu entries for OHV, wheeled, or motorized recreation sustainability. Therefore, Sandia RD staff has added two columns, and made an estimate of the risk potential and based predominantly on speculation."</i></p> <p>This would be revised differently than the above, if a complete and accurate description of the OHV activities is included in the analysis. In that event, the "risk" factors would be revised also.</p> <p>Page 73: Delete this sentence: <i>"Trails and roads in "dry" channels also disturb the streambed and banks making them more susceptible to erosion during a rain event."</i> Please replace it with the following true statement: <i>"While it cannot be denied that activities of any type in the dry washes increase soil movement in a rain event, in the most severe events, when the stormflow does proceed to the lower reaches of the watershed, the volume of water, the force of the wave front, and the volume of soil displaced by the stormflow make any increase caused by the recreational activity so minute that it is not measurable, and thus it is not credible to claim that is a significant factor during these events. The light, monthly averaged rain events that occur during the summer season do not cause these dry washes to run any water.. In the event that there is any flow at all, the sediment does not proceed to the lower reaches of the watershed because there is no flowing water in the wash. These conclusions are supported by the fact that there are no impaired waterbodies downstream of the upper Tijeras subwatershed, and by the water quality monitoring</i></p>

<i>Comment #</i>	<i>Comment</i>
	<p><i>programs conducted on other National Forests."</i></p> <p>Page 73: Change "<i>The watershed with the most area...</i>" to "<i>The subwatershed with the most area.....</i> "</p> <p>Page 73: Change the last sentence: "All of these areas end up draining to the Rio Grande" to "All of these areas end up draining to the Rio Grande, but there is no evidence to support the conclusion that sediment from the upper Tijeras subwatershed all automatically proceeds to the Rio Grand. Nor is there any evidence that, of that fraction of sediment that does end up in the Rio Grande, the total Rio Grande River sediment load would be affected by trail crossings in the upper Tijeras watershed"</p> <p>Page 74: Revise the entire list under the heading Environmental Consequences Effects Common to All Alternatives Direct and Indirect Effects to remove the conflicts between the list and changes caused when the omitted information (weather, description of the activity and visitor numbers) is provided to the specialists doing this analysis.</p>
	<p><u>Response:</u> The statement is correct as stated in the EA. Runoff and sediment is drained to the Rio Grande. As you point out it would take a large high-intensity rainfall event to allow the channel to run from the project area into the Rio Grande. However such an event is not unheard of even within that last few years. Similarly sediment that may deposit in a channel continues to be moved down stream with each event and will eventually end up in the Rio Grande River.</p>

<i>Comment #</i>	<i>Comment</i>
<i>(AC8)Fugitive Dust</i>	
18, 131	<p><i>Summarized Comment:</i> Residents of the Heatherland Hills Homeowners Association are concerned about the impacts of dust from motorized vehicles on area trails and request that the EA address how the agency will comply with Bernalillio County fugitive dust regulations. Both comments submitted the same information on the Bernalillio County fugitive dust regulations. The following is the submission in Comment 131:</p> <p>"Fugitive dust - if the proposed motorcycle trail is the only designated trail in the area and it becomes heavily use and it runs close to Heatherland Hills, then fugitive dust entering private land from the forest could potentially become a significant problem.</p> <p>In fact HHLOA recently became aware of new county regulations regarding fugitive dust. On December 6, 2007 Bernalillo County published new proposed fugitive dust regulations which when adopted would have a significant impact on The Forest Service's proposed Travel Management Plan. The regulations have proposed conditional exemptions for six sources of fugitive dust. The conditional exemption is contingent upon the sources not producing fugitive dust which may adversely affect human health. Exemption Number 4 is:</p> <p style="padding-left: 40px;"><u>"unpaved roadways on United States department of agriculture forest service lands or United States department of interior park service lands, if the roadways are more than one-quarter of a mile from an occupied residence. (emphasis added)</u></p> <p style="padding-left: 40px;">unpaved roadways are defined in the regulations as "an unpaved route traveled by a motorized vehicle".</p> <p>The proposed new trail north of Heatherland Hills (HHLOA) and the existing Gambles Oaks</p>

Comment #	Comment
	<p>Trail are both within 1/4 mile of occupied dwellings and therefore would not qualify for the exemption and would be subject to Bernalillo County construction permits, programmatic permits, and control measures under the proposed county regulations.</p> <p>On January 28, 2008, the same day that the Forest Service issued the Environmental Assessment for the Sandia District Travel Management Plan, the Forest Service also transmitted comments on the proposed Bernalillo County Fugitive Dust Regulations. These comments acknowledged the new county requirements. Specifically the Forest Service commented to the county:</p> <p>20.11.20.2.C.(4)NMAC: In conditional exemption 4, unpaved roadways on National Forest System lands are conditionally exempt only if the public does not have motor vehicle access to the roadways. In the existing regulations, this exemption is for all roads on National Forest System land greater than 1/4 mile from an occupied residence. There is no clear reason for the change in the exemption to include all open National Forest System roads given relatively low use on National Forest System roads and limited emission of fugitive dust. The proposed change increases the mileage of National Forest System road not covered in this exemption from approximately 12 miles to 49 miles.</p> <p>The County Responded: The committee has re-visited this sub-paragraph and has decided to retain the original language from the March 2004 version of Part 20 for Forest Service and Department of Interior park service lands. Therefore. only those roads within ¼ mile of an occupied residence would be subject to requirements for permitting (through a fugitive dust programmatic permit).</p> <p>The Forest Service Replied: We appreciate the change as this has less of an impact on the National Forest while still hopefully addressing the issue of fugitive dust in Bernalillo County. We will still have some concerns about the need for an annual fee under a programmatic permit, but we are willing to accept it as a necessary part of working with City-County.</p> <p>In light of these new regulations, HHLOA believes that the Forest Service should discuss how it will comply with the permitting and control measures required under these regulations prior to adopting Alternative 1. Mandatory control measures include application of water and/or dust suppressants or stopping the activities that are producing fugitive dust. In addition, since the proposed new trail would require a Construction Permit and both the new trail and Gambles Oak trail would require programmatic permits, HHLOA request that it be notified of any Forest Service permit applications relative to these trails.”</p> <p>Comment 18 also includes: “We would also point out that Bernalillo County exemption #4 is a conditional exemption that is contingent on not producing fugitive dust with adverse affects to human health. Therefore, if unpaved trails greater 1/4 mile from a house create adverse health impacts, then the exemption is not applicable. Particulates less than10 microns in diameter are known to travel significantly further than 1/4 mile and these are the size particles that can cause asthma attacks and other respiratory problems.</p> <p>The residents of HHS spent a great deal of money several years ago to have the roads in the subdivision paved in order to mitigate fugitive dust My wife has asthma and she cannot tolerate fugitive dust. We would not have purchased a lot in HSS if not for paved streets and resulting absence of fugitive dust. The location of the new trail to be constructed near the northeast corner of HSS is very close to our lot at 105 Edelweiss and may create a significant health issue for my</p>

Comment #	Comment
	wife.”
	<p>Response: The EA addresses your concerns about fugitive dust on a broad scale based primarily on total area impacted (pages 73-85 of the EA and the Watershed and Air Specialist Report). The Cibola National Forest is aware of the County fugitive dust control regulations as you stated and as they have been revised (effective 03/17/2008) and have changed since the version quoted in your letter (Forest Service roadways are only conditionally exempt if the route is closed to the public). We are currently working with the county on a programmatic permit which includes mitigation measures/control measures to reduce potential for particulate matter (fugitive dust). We will follow the permitting process as specified by the county. Similarly any construction permits necessary will be applied for with the County. Expected changes in particulate matter (fugitive dust) in your area are expected to be minimal as the roadways and motorized vehicle trails, in close proximity under some of the action alternatives are narrow (typically 2 feet wide or less) and have a good vegetative barrier to wind.</p>
26, 168	<p>I find the language in the document overly bias against OHV use. I will point out one of the examples of a flawed Administrative Process and the flawed analysis of a citation contained in Chapter 5. Literature Cited on page 121:</p> <p style="padding-left: 40px;"><i>Fugitive Dust Control Regulations; 20.11.20 NMAC, City of Albuquerque Air Quality Division.EA for Travel Management on the Sandia Ranger District, Cibola NF Page 121</i></p> <p>Please note that we have a flawed analysis of this citation for it addressed Bernalillo, County, not single track OHV trails. . For example section 20.11.20.2</p> <p>SCOPE:</p> <p style="padding-left: 40px;">This part is applicable to all sources of fugitive dust in Bernalillo county, including paved and unpaved roadways, rights-of-ways and lots.</p> <p>Please also note Section 20.11.20.7 which does not mention OHV vehicles but only motor vehicles and gives specific examples which does not include OHV use. The use of anthropogenic is also overly broad.</p> <p>20.11.20.7 DEFINITIONS: In addition to the definitions in this section, the definitions in 20.11.1 NMAC apply unless there is a conflict between definitions, in which case the definition in this part shall govern.</p> <p style="padding-left: 20px;">A. “Active operations” means any anthropogenic activity that is capable of generating, or generates fugitive dust, including but not limited to: bulk material storage, handling or processing; earth moving; soil or surface disturbance (e.g. discing, trenching, blading, scraping, clearing, grubbing, topsoil removal); construction, renovation, or demolition activities; movement of motorized vehicles on any paved or unpaved roadway or surface, right-of-way, lot or parking area; or the tracking out or transport of bulk material onto any paved or unpaved roadway.</p> <p>Please also note where the citation speaks of dust visible for 15 minutes or longer during any 1 hour.</p> <p>Section 20.11.20.12 GENERAL PROVISIONS:</p> <p style="padding-left: 20px;">A. Each person shall use reasonably available control measures or any other effective control measure to prevent a violation of the national ambient air quality standards and meet the objective established in 20.11.20.6 NMAC, whether or not the person has been issued a fugitive dust control permit. No person shall allow fugitive dust, track out, or transported material from any active operation, open storage pile, paved or unpaved roadway or disturbed surface area, or inactive disturbed surface area to be carried beyond the property line, right-of-way, easement or any other area under control of the person generating or allowing the fugitive dust if the fugitive dust will: 1) adversely affect the health, public welfare or safety of the</p>

Comment #	Comment
	<p>residents of Bernalillo county; or 2) impair visibility or the reasonable use of property; or 3) be visible longer than a total of 15 minutes in any one hour observation period using the visible fugitive dust detection method in 20.11.20.26 NMAC or an equivalent method approved in writing by the department. To mitigate fugitive dust, all inactive disturbed surface areas must be stabilized and maintained in stable condition by the owner, operator, or person responsible for maintenance of the disturbed surface. Failure to comply with this subsection shall be a violation of this part.</p> <p>Unmanaged Travel is very different from what the TMP proposes, which is managed travel. You looked at unmanaged travel. The TMP is managed travel which is not in place at this time.</p> <p>I am asking you to change the paragraph under Existing Condition to read.</p> <p>Motor vehicle use on the Sandia Ranger District has increased in recent years as the Albuquerque and East Mountain communities’ population continues to grow. This increased use has led to the proliferation of (user-created) routes; and the need for managed trails.</p> <p>If there are complaints of dust from OHV use from adjacent land owners please produce records with the name and address of the people who complained. If there is no record of such complaint, if you have no records, please put that in the record. If you have records please produce incident report, or if no report state that there is no record. If reports exist please list how many over how many years and compare that to the number of visitors to the Sandia Ranger District during the same time frame.</p> <p>Please also note that this study does not take into account the speed, or number of OHV vehicles on a single track trail, nor does a more accurate study of travel on an unpaved road. <u><i>Deposition and removal of fugitive dust in the arid southwestern United States: measurements and model results.</i></u>, by Etyemezian V, Ahonen S, Nikolic D, Gillies J, Kuhns H, Gillette D, Veranth J.</p> <p style="text-align: center;">Quoted for reference here PMID: 15468663 [PubMed - indexed for MEDLINE]</p> <p>“Division of Atmospheric Sciences, Desert Research Institute, Las Vegas, Nevada 89119, USA. vic@dri.edu</p> <p>This work was motivated by the need to better reconcile emission factors for fugitive dust with the amount of geologic material found on ambient filter samples. The deposition of particulate matter with aerodynamic diameter less than or equal to 10 microm (PM10), generated by travel over an unpaved road, over the first 100 m of transport downwind of the road was examined at Ft. Bliss, near El Paso, TX. The field conditions, typical for warm days in the arid southwestern United States, represented sparsely vegetated terrain under neutral to unstable atmospheric conditions. Emission fluxes of PM10 dust were obtained from towers downwind of the unpaved road at 7, 50, and 100 m. The horizontal flux measurements at the 7 m and 100 m towers indicated that PM10 deposition to the vegetation and ground was too small to measure. The data indicated, with 95% confidence, that the loss of PM10 between the source of emission at the unpaved road, represented by the 7 m tower, and a point 100 m downwind was less than 9.5%. A Gaussian model was used to simulate the plume. Values of the vertical standard deviation sigma(z) and the deposition velocity Vd were similar to the U.S. Environmental Protection Agency (EPA) ISC3 model. For the field conditions, the model predicted that removal of PM10 unpaved road dust by deposition over the distance</p>

Comment #	Comment
	<p>between the point of emission and 100 m downwind would be less than 5%. However, the model results also indicated that particles larger than 10 microm (aerodynamic diameter) would deposit more appreciably. The model was consistent with changes observed in size distributions between 7 m and 100 m downwind, which were measured with optical particle counters. The Gaussian model predictions were also compared with another study conducted over rough terrain and stable atmospheric conditions. Under such conditions, measured PM10 removal rates over 95 m of downwind transport were reported to be between 86% and 89%, whereas the Gaussian model predicted only a 30% removal. One explanation for the large discrepancy between measurements and model results was the possibility that under the conditions of the study, the dust plume was comparable in vertical extent to the roughness elements, thereby violating one of the model assumptions. Results of the field study reported here and the previous work over rough terrain bound the extent of particle deposition expected to occur under most unpaved road emission scenarios.”</p>
	<p>Response: The first citation referenced is the Albuquerque-Bernalillo County Fugitive Dust Control Regulations. The language from that publication is not from the Forest Service but is written by Bernalillo County and applies to most lands within the county including National Forest System land. These regulations were recently revised and became effective 03.17.2008. They can be found at (http://www.cabq.gov/airquality/pdf/Part20NMAC.pdf). Interpretation of the regulations by County officials indicate that off-road vehicles such as ATVs and motorcycles are included as motor vehicles and that roadways are defined to include motorized vehicle trails. Therefore these regulations do apply to roads and motorized trails within the County and have an impact on the project that needed to be assessed in this analysis.</p> <p>To date we have not received any particulate matter (fugitive dust) complaints from Forest users or local residents at the Ranger District office. However, as the City/County is the regulating agency complaints are typically directed to them at the Air Quality Division of the Health Department. As of February 13, 2008 they had not received any complaints concerning particulate matter where the potential source was from National Forest System. On April 07, 2008 the Cibola National Forest received a letter of notification of complaints regarding fugitive dust in the area of Forest and Campo roads in the East Mountain area from the City of Albuquerque, Environmental Health Department. Contact was made with Environmental Health Department officials on April 11, 2008 to discuss concerns. During meetings in the field with Environmental Health Department officials the week prior to receipt of the letter we had visited the site in question. At that time those officials were not aware of the complaint and deemed the trail and most of Forest Road to be a “no-impact” level of fugitive dust, meaning no fee would be assessed for continued use and no mitigations would be necessary. Given the field visit and the fact that the Air Quality Division is still determining procedures for handling complaints in more rural areas and for small Forest roads and trails the officials “waved” the 45-day need to address the complaint.</p> <p>Thank you for providing the additional reference on the distance potentially traveled by dust created by motor vehicles. It helps add information on the potential for dust to move off-site from vehicle traffic on unsurfaced roads.</p>
<p>48, 132</p>	<p>7. Chapter 3. Affected Environment and Environmental Consequences, pg. 76, second sentence following Table. 27.</p> <p>“Like the scale of activities presented for the cumulative watershed effects it appears that <u>past, present and reasonably foreseeable activities</u> within the Upper Tijeras Arroyo subwatershed (see figure 1) would <u>have a much greater effect on fugitive dust than open cross-country, off-road use</u> within the analysis area in the alternatives. On the other hand, the effects of <u>unrestricted cross-country travel with limited controls on increased bare soil areas would contribute proportionally more fugitive dust</u> from the analysis area than in any other alternative.”</p>

<i>Comment #</i>	<i>Comment</i>
	These statements are ambiguous and seem to be contradictory. Remove them
	Response: The intent of these sentences is to indicate that airborne particulate matter (fugitive dust) is impacted more by sources other than roads and motorized trails included in the Travel Management alternatives. Existing direction allows cross-country motorized vehicle use. Motor vehicle use may not be a large impact to the area compared to other sources; however, off-road and off-highway motorized use on unpaved routes does have an effect on fugitive dust emissions in the area.
92	The dust the motorized vehicles would create would pose yet another set of problems. Realistically there would not be a way to monitor and control the dust.
	Response: The EA addresses your concerns about particulate matter, or fugitive dust, on pages 73-85. Additional analysis is in the Watershed and Air Specialist Report. In working with the Albuquerque Air Quality Division of Environmental Health we have found several effective mitigations to reduce fugitive dust (http://www.cabq.gov/airquality/fugitivedustcontrol.html). Similarly we have several ways to monitor dust including visual monitoring similar to method used by the City/County and specialized equipment that is typically utilized to monitor smoke emissions from wildland fires.
142	20.11.20 NMAC- the Fugitive Dust Control Regulation for all Bernalillo County has been amended, and has now removed the Cibola National Forest exemption from dust control requirements. Therefore, the TMR in the CNF Sandia Ranger District must limit motorized vehicle designations only to the trails which the CNF has the funding to implement and regularly maintain dust controls. Otherwise, the CNF will be subject to citation and fines up to \$10K a day per violation. My friends and I are concerned Tablazon area residents will be regularly patrolling Lower Pine, Wildcat, Pinyon and other trails in the area for dust from any motorized vehicles and will report then via “311”.
	Response: The Cibola National Forest is aware of the Albuquerque-Bernalillo County Fugitive Dust Control regulations and is working with their Air Quality Division.

Concerns and Suggestions about OHV Recreation

<i>Comment #</i>	<i>Comment</i>						
(AE5) Recreation							
48, 132	<p>Sandia Travel Management Project-Recreation Report, Trails and Roads:, Trail Costs:, pgs 28, 29, 39, 40</p> <p>Total estimated cost to implement Alternative 1 \$518,228</p> <p>Total estimated cost to implement Alternative 3 \$584,086</p> <p>Difference - \$65,858</p> <p>From the EA, pg. 36, we get ATV mileage differences.</p> <table border="0"> <thead> <tr> <th>Route Number</th> <th>Alternative 1</th> <th>Alternative 3</th> </tr> </thead> <tbody> <tr> <td>Motorized <50 inches (ATV and Motorcycle) (total miles)</td> <td>1.56 miles Seasonal designation –open May 1-Nov. 30</td> <td>5.96 miles Designated for use all year</td> </tr> </tbody> </table> <p>An 11% increase in initial cost, gets 380% increase in ATV trails and some of that money also goes toward work in the La Madera area, this is a bargain, it should be the Proposed Alternative!</p> <p>However, much of that proposed work to widen the trails for 50 in. vehicles may not even be needed. ATVs already use most of those trails. I have ridden them on my motorcycle along with</p>	Route Number	Alternative 1	Alternative 3	Motorized <50 inches (ATV and Motorcycle) (total miles)	1.56 miles Seasonal designation –open May 1-Nov. 30	5.96 miles Designated for use all year
Route Number	Alternative 1	Alternative 3					
Motorized <50 inches (ATV and Motorcycle) (total miles)	1.56 miles Seasonal designation –open May 1-Nov. 30	5.96 miles Designated for use all year					

Comment #	Comment
	<p>Bill Falvey who was riding an ATV. According to Bill, there are portions that will need some work, but not as much as the budget implies.</p> <p>Provide a detailed accounting of the costs involved with your estimate, or delete it.</p>
<p>Response: A detailed accounting is available in the Recreation Specialist Report. While the trails may have been widened through use to the width of ATVs, drainage structures, vegetation clearing, and other needed trail features have not been constructed on those trails. It would be necessary once a single track trail has been designated for use by the wider ATV to reconstruct the trails to Forest Service trail standards for those vehicles.</p>	
<p>48, 115, 132</p>	<p>Summarized Comment: Concern about a citation to a report (Bahr, Blahna, and Fisher 2001) that surveyed OHV users about their preferences. The report found that many OHV users prefer to travel off of designated routes. The comments question the appropriateness of this citation related to the Sandia Ranger District Travel Management EA.</p> <ul style="list-style-type: none"> • <i>Comment 48:</i> “Research indicated that many motorized recreationists value the ability to travel off of roads and trails. There will likely be a perceived loss in no longer being able to travel off of the designated system. (Bahr, Blahna, and Fisher 2001)” From the EA, pg. 33 <p>The Bahr, Blahna, and Fisher 2001 report dealt with OHV use in a specific area of the State of Utah where there is not a designated trail system. Quite naturally, one would expect that people who came to that area would be more desirous of travel off of a designated system, so their comments do not apply to this study. Remove that sentence from the report....</p> <ul style="list-style-type: none"> • <i>Comment 115:</i> Most of the OHV use in Utah is on BLM land and most of it is open to cross country travel. There are very few areas with designated routes. Ms. Brunswick has made the mistake of generalizing from that survey, and making the assumption that many or most OHV users would prefer to travel off the trails and roads in the Sandia Ranger District. This is a 'set up' for the presumption that there will enforcement problems with keeping motorized users on the designated routes.
<p>Response: The existing situation on much of the Sandia Ranger District is that the area is open to cross country travel, including the Cedro area. This research indicates that there is a preference by OHV users to travel off of a designated system. It is reasonable to expect that since the current management of the Cedro and La Madera areas have been to allow cross county travel, that some users have been attracted to these areas for this reason. This is a valid consideration in this assessment.</p>	
<p>73, 75</p>	<p>It is not understood why all of the proposed plans for development of both the Cedro and Sandia Mountains (North of I-40) lack well structured and planned trail loops for the motorized vehicles, and also for all use designations. One way trails are not desirable and will cause more problems. Having trails that go one way with one type of use designation which then change into another use designation, is complicated and difficult to maintain and enforce. Motorized vehicles particularly motorcycles and ATVs may not be able to respect a one way trail, meaning a trail that goes up and stops at a point where the same trail changes use restriction, or simply ends, thus requiring the motorized vehicle user to turn around. Unless this is extremely enforced and huge bulletins and warning posters are posted, and fences with pedestrian and wildlife gates installed, most motorized vehicle users will not see the postings due to the speed of travel or if they do see the posting, will probably ignore them, since it is much preferable to make a loop of travel, rather than turn around and go back the same way. Further, the turn around point will be subject to much more traffic disturbance to soils and vegetation and will require design planning, some construction, and maintenance as well as additional enforcement. This approach which is not addressed in detail in the EA needs to be further developed and could be addressed in an EIS.</p>
<p>Response: No trails are being considered for one way designation in any alternative. The ID team did consider the desire for loops, and this was a consideration when developing Alternatives.</p>	
<p>108</p>	<p>The terminology “likely will be additional need for additional law enforcement patrols on single-</p>

Comment #	Comment
	track trails..." should be removed from the EA because there is no basis or documentation for such a statement.
	Response: This was quote on page 90 of the EA was specific to the previously designated trails west of NM 337 in Alternative 6. If Alternative 6 is selected, the only single track trails on the Sandia Ranger District designated for motorized use would be in this area. Due to the increased use that would be anticipated on those trails, it is likely that additional law enforcement patrols would be necessary.
115	<p>I want you to DELETE this statement at Page 97 of the EA</p> <p style="text-align: center;">Under this alternative, there is a need for additional patrols and enforcement by Forest Service personnel to increase compliance among motorized recreationists.</p> <p>It is unwarranted conjecture and it is prejudicial to assume or predict one user group is more likely to break rules than another group.</p>
	Response: This does not imply that one user group is more likely to break rules than any other. Generally anytime there is a change in regulations, particularly when there is controversy, additional enforcement is needed at least for the first few years while people adapt to and come to accept the change. This has been the experience of the recreation specialist who prepared the report during her 20 years of recreation management.
115	<p>I want you to DELETE the portions of the statement which I have placed in bold type. This is at Page 96 of the EA.</p> <p style="padding-left: 40px;">A number of trails would be designated for vehicles up to 50 inches wide, which includes ATVs.</p> <p style="padding-left: 40px;">These trails are currently being managed for single-track motorized and non-motorized uses.</p> <p style="padding-left: 40px;">Some of these trails have been little used by ATVs in the past, but this use would likely increase in the future. Conflicts are likely to occur between ATV and single-track users. This could include mountain bikers and motorcyclists being displaced to other area trails or leaving the area.</p> <p>Trails are not being managed for specific users. According to the forest the area is open. The EA is full of statements about ending cross country travel. It's preposterous to say cross country travel is legal, and then say that certain trails are being managed for single track. Besides, there is no such policy as 'managed for'. Trail use is either allowed or not allowed.</p> <p>Delete the statement about user conflict, because it is outside the authority of the Forest Service. Delete the statement about displacement because there is no valid impact called 'could be displaced'. The trails are currently being shared and anyone who doesn't like it can go elsewhere. It is outside the authority of the Forest Service Service to make decisions in order to placate users who object to sharing multiple use trails. The fact that some people dislike multiple use is not a criteria for decision making in Travel Management.</p>
	Response: While use by ATVs was not prohibited on the Cedro area trails, these trails were managed for single track use. The Sandia Ranger District had completed draft Trail Management Objectives that indicated the current management of the trails prior to initiating. Most of the trails in the Cedro area were being managed for single track use. This was also the level of management recorded for these trails in the INFRA database, the official data tracking process for system roads and trails. In the Trail Management Objectives guidance (USFS 2007) there are different definitions for allowable use. "Managed Use" means that there is active management to maintain the trail to standards for that use. "Accepted Use" is use that is allowed, but the trail is not actively managed for that use. An example would be a single track trail, where ATV use is accepted, but the trail is maintained to single track standards. The other category is use is "Discouraged." The use is not prohibited, but is discouraged. There are several trails in Cedro where trail crews constructed rock "pinch points" to discourage wider vehicles from traveling single track trails. We stand by our analysis of the existing trail management.
	There is additional discussion about the validity of analyzing user conflicts in the response to comments 56, 167

Comment #	Comment
	beginning on page 138.
115	<p>I want you to DELETE this statement at Page 97 of the EA. The trails are multiple use and have been for decades. It is outside the scope of authority, and would be discriminatory, for the Forest Service to make decisions based on providing 'convenience' for one user group by prohibiting another user group.</p> <p style="padding-left: 40px;">Where trail users live in nearby residences, they would feel inconvenienced if they decide that they must travel to the Sandias or other areas to participate in non-motorized recreation experiences.</p> <p>I want you to DELETE this statement at Page 96 of the EA, for the same reasons as given above. Providing convenience at the expense of others, or making decisions to placate those who object to multiple use is outside the authority of the Forest Service.</p> <p style="padding-left: 40px;">Use of this site as a trailhead may also displace some of the use that occurs as a walking or bicycling site by local residents.</p> <p>I want you to DELETE this statement at Page 97 of the EA. The existing condition is that all users are on all trails. The designation of trails for motorized use will not cause any further 'displacement' of mountain bikers than is currently occurring. Quite the contrary, it will preserve single track trails. In any case, as stated above, it is outside the authority of the Forest Service to make decisions in order to placate users who object to sharing multiple use trails. The fact that some people dislike multiple use is not a criteria for decision making in Travel Management.</p> <p style="padding-left: 40px;">Some mountain bikers would be displaced from trails designated for ATV users.</p> <p>I want you to DELETE this statement at Page 97 of the EA . As stated above, considerations of user conflict and providing discriminatory convenience are outside the authority of the Forest Service.</p> <p style="padding-left: 40px;">The general designation of motorized use on all system trails in the Cedro area is a conflict for some non-motorized trail users. This may lead to non-motorized trail users visiting Cedro trails during low use periods such as weekdays or may displace them to other areas.</p> <p>I want you to DELETE this statement at Page 97 of the EA. Seasonal restriction must not be used as a surreptitious way to benefit one user group at the expense of another.</p> <p style="padding-left: 40px;">The seasonal restrictions provide a period of use that non-motorized users could visit the area without encountering motorized vehicles. This may be especially valued by local equestrian trail riders.</p> <p>I want you to DELETE this statement at Page 9 of the EA</p> <p style="padding-left: 40px;">There may be improved bird watching and wildlife viewing opportunities where there are fewer disturbances due to noise.</p> <p>Improving bird watching and wildlife viewing is not a criteria for decisions about designating motorized routes under the Travel Management Rule.</p>
	<p><u>Response:</u> In the Forest Service Handbook 1909.15 17.1 the agency is directed to: “Express the effects in terms of changes that would occur in the physical (land, water, air), biological (plants and animals), economic (money</p>

Comment #	Comment
	<p>passing through society), and social (the way people live) components of the human environment. Consider the magnitude, duration, and significance of the changes.” The recreation analysis describes effects for the variety of recreation activities and users within the Sandia Ranger District. The effects are based on literature reviews and comments received through out the public involvement process since this project was initiated.</p>
115	<p>I want you to DELETE this statement at Page 98 of the EA. Seasonal restrictions are not a strategy for improving safety. This would be like suggesting to close Interstate 25 for five months because there would be fewer accidents each year.</p> <p style="text-align: center;">Seasonal trail restrictions would reduce safety concerns between December 1 and April 30, when motorized vehicles would be prohibited from Cedro trails.</p>
<p><u>Response:</u> Seasonal designations are being considered primarily to address soil and water concerns (see discussion in Section A8.) However, there are other benefits and impacts to be considered when addressing seasonal designations. One of these is fewer safety concerns on Cedro trails.</p>	
188	<p>From page 5: More trail heads are needed to accommodate the number of trail users. This is a curious statement to find in an analysis that appears to present no information whatsoever on the number of recreation visitors to the Sandia RD. In the draft EA, we find no mention of traffic counters, no mention of the number of visitor contacts, and not even any estimates of how many people visit each year. There appear to be no numbers whatsoever to enlighten the Deciding Officer.</p> <p>This is a critical omission. The reason is as follows:</p> <p>If we limit our discussion to motorized activities, that is "OHV's" using the trails, we need to know:</p> <ul style="list-style-type: none"> How many miles of OHV trail is open for use How many vehicles use the trails How many miles are traveled, on average, in each year. That is, how many vehicle passes does any given trail segment sustain? <p>Examining the data supplied by the EA, it appears that the FS has accounted for approximately 77 miles of routes. A GIS analysis using transportation data layers from other credible sources (ESRI, for example) reveals that there are a number of other low speed, unnamed routes in the study area. It appears that if we include this mileage we could have as much as one hundred miles of routes available for ORV travel. However, we will use the 77 miles to stay consistent with the EA.</p> <p>Now, how to calculate the number of OHV passes these trails must sustain?</p> <p>One more piece of key information we do not have due to the omission of any description of the activity under study, is how long or how far the average OHV visitor travels during each visit to the Cedro area.</p> <p>To show why this is important to the analysis, we will use estimates, based on background material for this analysis provided by the Sandia RD staff. The average number of miles ridden by a recreational trail rider (the type of visitor most likely to go to the Cedro area) is 25 to 40 miles.</p> <p>According to the 2006 NVUM,. the Cibola NF received 2,639,000 visits. *</p> <p>*We realize that these are the official numbers provided, using the approved methods of counting and extrapolating, but if you were to take the nearly three million visits and work backwards to</p>

Comment #	Comment
	<p>the site carrying capacities for the Cibola National Forest, you would immediately see that this number cannot possibly be true. However, that is not the subject of this comment.</p> <p>According to the recreation report for this EA, OHV use accounted for 1.4 percent of that. So, Forest-wide, there may be as many as 36,946 OHV visits per year. What percentage of that number visits the Cedro Peak area? If all 36,946 do, that would populate our estimated 77 miles of trails at the rate of one OHV every 11 feet if everybody showed up on the same day. Since we know that does not happen, and that most recreational use occurs on weekends, we can divide the 36,946 number by 110, to account for every 2-day weekend of the year. That would populate the trails at a rate of 335 people per day per weekend, or, 4.3 people per mile per weekend day. Each of the three existing trailheads would be serving over one hundred people. At the standard VUD calculation of 2.5 people per vehicle, there would be 40 to 50 vehicles at each trailhead, assuming everyone drove to the site and no one rode their OHV directly from their house.</p> <p>This is a very crowded area indeed, if that is actually how many OHV visitors ride the Cedro Peak trails. A professional recreation manager would very likely say that it exceeds the carrying capacity of the trail system.</p> <p>The point here is, the present analysis of the effects of this activity is not fully informed without these numbers. If almost 40,000 people are allowed to operate their OHV's in any manner they please, of course the area will become degraded-and this would have an enormous effect upon the perception of OHV impacts. When 40,000 people are allowed to do anything they want in a limited area, there will always be dramatic changes in the indigenous vegetation and wildlife. And, in fact this analysis is not examining those impacts. It is examining the impacts of restricting all those OHV's to a designated trail system.</p> <p>By the same token, if 40,000 people do participate in OHV recreation, but they constitute only one-point-four percent of the total visitation, the claim of "conflicts" is suspicious, because the probability of other visitors encountering an OHV user is about one percent per year. 99 percent of the time, no other forest visitor would ever see or hear an OHV.</p> <p>Two conclusions, leading to two potential solutions, may be drawn from this observation:</p> <ol style="list-style-type: none"> 1) The proposed mileage lacks the carrying capacity for the present demand for trail based OHV recreation. If segregation of user type is the desired goal, the Sandia District must consider adding mileage to this system. Without any proposal for expansion, the goal in the Purpose and Need, "<i>Minimize travel and recreation impacts to the environment (e.g., water quality, wildlife, riparian and wetland areas, etc.)</i>" cannot possibly be met. In other words, the proposed action does not meet the need stated in the P&N statement. Even in the Proposed Action, the present OHV opportunity is reduced by well over 50% because of the proposed six-month closure. <p><u>OR.</u></p> <ol style="list-style-type: none"> 2) Segregation of uses as a management strategy could be abandoned, because if OHV was dispersed Forest-wide, the odds of motor-nonmotor visitor contact are very, very small, and the entire interaction lasts about 30 seconds.
	<p>Response: A necessary point of clarification is that the NVUM survey is a forest wide survey, and the statistics</p>

Comment #	Comment
	<p>represent the four mountain districts of the Cibola National Forest. The Sandia Ranger District has approximately 43,110 acres outside of the Sandia Mountain Wilderness and DOD and DOE withdrawals. This represents approximately 3% percent of the total non wilderness acres represented on the four mountain districts of the Forest (1,455,686 acres.) Assuming that there are approximately 40,000 OHV visits to the Cibola, that use is distributed more broadly than just the Sandia Ranger District.</p> <p>In the case of the Sandia Ranger District, the Cedro area has been the primary location for OHV recreation. Based on observations from district and law enforcement personnel, the estimate of 40 to 50 vehicles (many with trailers) does represent the parking needs on a busy weekend. Currently there is not sufficient parking. However, depending on the alternative selected, additional parking would be available. In Alternatives 1, 3, 4 and 5, the additional trailhead on NFSR 462 would add ten spaces. Designating Oak Area of the Oak Flat Picnic site to be used as a trailhead in Alternatives 1, 3, and 4 would add approximately 70 spaces.</p> <p>Two measures quantify and qualify the carrying capacity of OHV use on the Sandia Ranger District, natural resource impacts that have been observed and are anticipated based on review of the scientific literature and the recreation use conflicts that have been submitted through public comment and those observed by district staff.</p> <p>The natural resource impacts are addressed in the EA, supporting specialist reports and the TAP. While we do not have a detailed study of the number of recreation users specific to the Cedro area, this project has included an extensive public involvement. From the first meetings non motorized users who frequently use the Cedro area have submitted concerns and complaints about conflicts with OHV users (available in the project record and in this document.) We have also received concerns and conflict comments between motorcycle users and ATV users, as outlined in the EA. Since OHV motorized recreation has been concentrated in the Cedro area, and this area is also popular for non motorized trail uses, the chance of encountering motorized recreation trail users is higher than other parts of the district.</p>
188	<p><u>Examples of the types of corrections that must be made</u></p> <p>After the omitted information has been appropriately placed and utilized, the corrections that we want made to the analysis would include, but not be limited to, the following:</p> <p>Page 2: Add the statement that <i>"the overarching objective of the NEP A process is to find a balance between the benefits of the human activity and the effects (if ~) on the natural environment."</i></p>
	<p><u>Response:</u> The objective of NEPA is outlined in the “National Environmental Policy Act of 1969, as amended, Sec. 2 [42 USC § 4321]:</p> <p>“The purposes of this Act are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation”</p>
188	<p>Page 9: The number of miles designated will very likely be revised upward.</p>
	<p><u>Response:</u> This statement was not part of the proposed action as released in the scoping letter sent on June 19th, 2007. The alternatives consider variations on the miles designated by class of vehicle and time of year.</p>
188	<p>Page 11: Delete <i>"Which uses will be allowed on specific roads and trails;"</i> because it automatically limits the scope of potential solutions. When this type of language appears in the P&N statement, any investigation into a diversity of trail use solutions is precluded.</p>
	<p><u>Response:</u> In the Travel Management Rule § 212.51 Designation of roads, trails, and areas directs that:</p> <p>“(a) General. Motor vehicle use on National Forest System roads, on National Forest System trails, and in areas on National Forest System lands shall be designated by vehicle class and, if appropriate, by time of year by the responsible official on administrative units or Ranger Districts of the National Forest System.” (emphasis added)</p>

<i>Comment #</i>	<i>Comment</i>
	The use referenced on Page 11 is reference to which vehicle class or classes will be designated on specific roads.
188	Chapter Two in its entirety: Changes to the proposed alternatives in Chapter Two will have to be made after the Environmental Consequences have been corrected.
	<u>Response:</u> FSH 1909.15 directs the Forest Service to: “Conduct environmental analyses to assess the nature, characteristics, and significance of the effects of a proposed action and its alternatives on the human environment.” The environmental consequences is the evaluation of each of the alternatives. The alternatives were developed to address the significant issues that were identified during scoping as directed in NEPA and Forest Service policy. The alternatives do represent a full range of reasonable alternatives and there is not a need to revise Chapter Two in its entirety.

Concerns and Suggestions Regarding OHV Recreation

<i>Comment #</i>	<i>Comment</i>
<i>(AB4) Cedro Area – Management of Motorized Recreation</i>	
89, 173	<p>The SRD has chosen to add a number of illegally created routes, called “unauthorized routes,” to the already unmanageable system of legal motorized vehicle routes. Given that the Forest Service cannot maintain and/or enforce its current system, the addition of illegal routes is unnecessary and irresponsible. Over time, an even larger system of routes and trails will develop and rewarding this behavior will provide no incentive for users to recreate within the limits of the law in the future. A policy of endorsing even small incremental route increases due to “management difficulties” on illegal routes will result in a complete penetration and/or erosion of the forest.</p> <p>We believe that any routes lacking documentation (including routes which were constructed or came into being before NEPA was enacted) should be analyzed as new unauthorized routes, in recognition of the fact that there is no record of administrative decision or analysis addressing the environmental impacts of motor vehicle use on these routes. Therefore, we believe the SRD should develop an EIS to justify its proposed action and to properly analyze the action alternatives. While we recognize the challenges associated with locating adequate supportive documentation given a past history of poor recordkeeping, we reject the position that justification for a specific route can be established based on a route’s mere existence on the ground.</p> <p>Unauthorized, user-created routes may increase the overall number of routes and increase route density in some areas. A minimum footprint must be identified as required by Executive Order 11644 (designation of areas and trails must “minimize damage to soil, watershed, vegetation, and other resources of public lands” and “minimize harassment of wildlife or significant disruption of wildlife habitats[]”) to assure that designated routes do not exceed the minimum route system pursuant to 36 CFR § 212.5, or conflict with resource and management objectives such as route density standards and habitat protection.</p> <p>We are especially concerned about the repeated statement in the Recreation Specialists Report that motorized use has been “accepted” on several routes in the Cedro area.</p>
	<u>Response:</u> There is a difference between “illegal” and “unauthorized” routes. Because off-route travel has not been restricted in most of the areas included in this project, many users used the same routes, eventually making them unofficial or “unauthorized” routes. These are not illegal routes, but were never specifically authorized by the Forest Service in any official designation. The proposed action (and all of the alternatives except No Action) provide for fewer of these routes designated for motorized travel than currently exist. Since no off-route travel would be allowed, there would be no legal way for an “even larger system of routes and trails” to develop.

The effects of including these “unauthorized” routes on the physical and biological resources, as well as social and economic conditions as appropriate, are included in the EA. The EA was prepared to determine whether or not there are significant effects associated with the proposal and whether an EIS is needed. Because the significance of the effects was unknown, the EA was prepared in accordance with the Council on Environmental Quality NEPA implementing regulations and the Forest Service NEPA procedures.

All of the alternatives (except for No Action, which provides for no change from existing management) would result in fewer routes available through designation for motorized use than currently exist. These alternatives were designed to be consistent with Executive Order 11644 and the Travel Management Rule.

The term “accepted” is based on definitions for allowable use in the Trail Management Objectives guidance (USFS 2007). “Managed Use” applies to areas where there is active management to maintain the trail to standards for that use. “Accepted Use” applies to areas where a use is allowed, but the trail is not actively managed for that use. An example would be a single track trail, where ATV use is accepted, but the trail is maintained to single track standards. The other category is use is “Discouraged.” The use is not prohibited, but is discouraged. There are several trails in Cedro where trail crews constructed rock “pinch points” to discourage wider vehicles from using single track trails. “Accepted” in the Recreation Specialist Report was used to define OHV management of the trail system, including unauthorized trails. OHV use was accepted on all trails in the Cedro area but many have not been maintained to the standards for specific vehicles.

<i>Comment #</i>	<i>Comment</i>
<i>(AC2) Impacts from Motor Vehicle use</i>	
14, 17, 21, 23, 35, 39, 68, 76, 106, 110	<p><u>Summarized Comment:</u> Comments express concerns related to impacts from motorized recreation on other resource areas. Several commenters share irresponsible behavior they have observed in the Cedro area that they attribute to motorized recreationists. Examples of comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 14:</i> Operating motorized vehicles in the forest can do nothing but harm what currently exists...For example: Pollution from exhaust, noise, human trash, safety, forest fires, damage to the forest by exploring areas that are not authorized. • <i>Comment 35:</i> As a hiker, I am acutely aware of the damage that the 4 wheelers cause in this area. This winter, they have driven 'off road' throughout the Chamisosa/Delbert trail area and are significantly destroying the vegetation and creating new 'roads' throughout these sensitive meadows.

Response: Your concerns related to the impacts of motorized recreation use have been noted. The EA, TAP and specialist reports analyze the potential impacts of motorized vehicle designation throughout the Sandia Ranger District.

On page 68266 of the Travel Management Rule is a response to similar comments nationally regarding OHV use on National Forest lands:

“Comment. Some respondents stated that OHVs should not be allowed on National Forests at all. These respondents suggested that National Forests should be managed primarily for preservation of natural values, water quality, wildlife habitat, endangered species, biological diversity, quiet, and spiritual renewal.

Response. The Department disagrees. National Forests are managed by law for multiple use. They are managed not only for the purposes stated in these comments, but for timber, grazing, mining, and outdoor recreation. These uses must be balanced, rather than one given preference over another.”

Cross country travel (off road or trail use) is not considered in any of the action alternatives. Implementing a designated system will provide the enforcement tool to take legal action against individuals traveling off of

designated roads or trails.	
144	<p>I do not believe that motorized use does “damage” yes there are some plants, and animals that are disturbed or even killed, yes there is erosion caused by OHV’s, but wouldn’t these things happen eventually even if no one was there. All the “damage” can happen naturally this called “change’ it is the only constant in any ecosystem.</p> <p>You need to recognize that as long as these are “public” lands the public has the right to use it. Trying to stop “damage” is the same as trying to stop “change”- change is ok. If roads or trails are damaged, we can fix them, they shouldn’t be closed because of it.</p>
<p>Response: There are impacts from motorized vehicle use, which are analyzed in the EA. The comment about the public’s right to use public lands is similar to comments about unrestricted public access addressed in the publication of the final Travel Management Rule. The response states, in part, “National Forests belong to all Americans, but Americans do not have a right to unrestricted use of National Forests. Congress established the Forest Service to provide reasonable regulation of the National Forests so that future generations can continue to enjoy them.” (Federal Register, page 68266)</p>	
164	<p>Secondly, photographic evidence of resource degradation would be very useful in illustrating why the Travel Rule is necessary.</p>
<p>Response: Many of the resource specialists have photographed resource impacts that have been observed due to motor vehicle use. They are available in the project record.</p>	

<i>Comment #</i>	<i>Comment</i>
(AB7) Law Enforcement	
6, 39	<p>Summarized Comment: Concern that penalties for OHV violations be substantial enough to deter violations of the MVUM. Comment 6 suggests that “I believe penalties should be spelled out for violations on designated non-motorized routes that are commensurate with the costs of repairing the environmental damages.” Comment 39 recommends “Implement serious fines and real enforcement to keep ORV use under control and restricted to designated areas.”</p>
<p>Response: Penalties are set by the Federal judicial system in New Mexico, and are beyond the scope of this analysis. If it is determined that damage was done to natural or cultural resources or signs and facilities, the agency can pursue recovering the cost of repairing damages.</p>	
14, 19, 21, 23, 24, 25, 54, 70, 88, 89, 173, 164	<p>Summarized Comment: Comments recommend that more intensive law enforcement will be needed to implement the MVUM. Examples of comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 19:</i> It is highly unlikely that motorized vehicle traffic can ever be effectively restricted to marked trails and routes. It is the very nature of such activity to blaze new trails and there is seldom anyone of any authority to manage or restrict such activities. • <i>Comment 21:</i> In all the years I have been in this area, different times of day and evening, different days of the week, all months of the year, I have NEVER seen forest service personnel patrolling the area... How can the citizens trust you to monitor these lands once you allow vehicles onto them? • <i>Comment 23:</i> From what I have hear you and others say, there really isn’t any money for policing and patrolling... That is part of the reason I am a volunteer.... • <i>Comment 25:</i> We feel that presently there are not enough rangers to adequately supervise the Cedro Peak area, let alone Cedro Peak and La Madera, two sections of the Forest that are significantly distant from one another. • <i>Comment 54:</i> To think that hiring one person and using volunteers to patrol is going to enforce anything, is beyond my comprehension. From my experience and observations of smoldering campfires and frozen tracks, it seems that the vast majority of the cars/trucks use the trails during the evening hours... A very viable, logical solution would be to place gates at entrance points that could be locked and unlocked at specific times of day and night.

	<ul style="list-style-type: none"> • <i>Comment 89:</i> Effective closures are necessary, as is enforcement – both of which have been lacking. The SRD has failed to develop a TMP that emphasizes mechanisms for enforcement, including patrolling and heavy fines, as well as strategic placement of fencing and locked gates, and obliteration of closed routes... We believe that ORV users are not the only groups that need to be educated regarding the new rules and restrictions for motorized travel. As the Sandia RD develops its plan for displaying the MVUM, we recommend including clear instructions on what to do if you see someone acting illegally, including a phone number or hotline to call, what descriptions are important, what activities are prohibited, etc... We are very concerned that none of the action alternatives present a plan for enforcement of these new and highly controversial rules. We have heard off-road vehicle groups and enthusiasts state that they will not follow the MVUM if they are not allowed to use their favored areas. This alone speaks to the critical need to have a strong law enforcement presence during implementation of the MVUM.
<p><u>Response:</u> As analyzed in the Law Enforcement report in the EA on pages 89-91 and the Law Enforcement specialist report, the MVUM will improve the ability to respond to OHV recreation management concerns. The MVUM provides an enforcement tool for management of motorized recreation. As mentioned in the reports, volunteers will be an important part of education, compliance, and enforcement. Volunteers have been utilized in many areas of support within the Sandia Ranger District. In the past year volunteers spent 34,383 hours supporting the district in recreation, heritage, fire, interpretation, and office/front desk assistance. Recreation volunteers constructed and maintained signs, trails, trailheads, as well as patrolled on the district. There are 27 active Adopt-A-Trail groups on the Sandia Ranger District. The Friends of the Sandia Mountains provide many more services including removing hazard trees along the trails, sponsoring trail events, and assisting in maintaining mainly of the trails. Currently there are 3 Adopt-A-Trail groups for trails located south of the district office. The District has been soliciting volunteer groups to patrol and maintain the Cedro area trails.</p> <p>In addition to volunteers, there are two law enforcement officers and forest protection officers who will be patrolling the district. Members of the ID team and district recreation staff have been working with law enforcement on developing strategies for enforcement and information.</p> <p>We appreciate the suggestions to improve the information and education components of implementation. We will make note of those concerns and incorporate the ideas in our communication products.</p>	
147	<p>We have encountered 2 specific issues</p> <ol style="list-style-type: none"> 2) gated/ locked roads 3) FS roads closed <ol style="list-style-type: none"> 1) 1b) locked gates should be designated clearly on FS maps 2) 2b)When a FS road has been closed, the FS should provide signage accordingly, at the 1-way in / 1-way out intersection.
<p><u>Response:</u> The MVUM will display roads that have been designated for motorized use. Roads that are not designated will not be shown, including roads behind locked gates or private roads crossing private lands. Roads and trails that are designated for motorized use will be signed with route markers, displaying the road or trail number. It is the responsibility of road and motorized trail users to obtain a copy of the MVUM and to stay on designated roads and trails.</p>	
159	<p>On page 89 of the Environmental Assessment Draft for Travel Management: Law Enforcement</p> <p>The following analysis is based on the law enforcement specialist reports prepared by Nancy Brunswick, recreation program manager. This report is on file in the project record.</p> <p>The literature reviewed in this report is prior to the 2006 legislation. It is not specific to accidents that happened in the project area, it is either National or State.</p>

	<p>It needs to be stated that there were no statistic cited in the specialists report that were analyzed after the 2006 legislation. That the safety issues in the EA are being analyzed without the benefit of this legislation that does respond to safety issues as stated in the specialists report.</p> <p>Please change this paragraph to read: “The following analysis is based on the law enforcement specialist reports prepared by Nancy Brunswick, recreation program manager. The report is on file in the project record. The statistics that the report refer to are either National or State and does not contain any statistics that pertain directly to the project area. All statistics are prior to New Mexico legislation of 2006 that govern OHV use and registration and respond to safety concerns.”</p> <p>The original 2 line statement is very misleading and vague to someone reading this. We do NOT want the final decision to be made on assumptions.</p>
<p>Response: National and state literature and reports that are cited in these documents are applicable to this analysis and will remain in the report. All were appropriately cited as to their origin and date of publication. There is also site specific information cited through the LEMAR report and data collected by the Bernalillio County Sheriff’s office.</p>	
<p>18</p>	<p>Historically, theft, vandalism and assault events have been uncommon, but sporadic events have occurred within HHS (Heatherland Hills). The most significant deterrent for this type of activity is the very limited access to the HHS neighborhood. The creation of OHV trails would offer potential law breakers with a perfect situation for leaving the area with law enforcement unable to give chase. It is not possible for the Forest Service to keep the OHVs on the designated trails and so the entire HHS would be readily accessible by OHVs.</p>
<p>Response: There are no trails being considered that provide direct access to the Heatherland Hills subdivision. NFST 05618 Gambles Oak Mahogany is an existing trail that connects to County Road 36, and has been available for motorized use for many years. This trail is being considered for designation in Alternatives 1,3 and 4. The reroute of the Cedro Creek subdivision is on the eastern side of the ridge away from Heatherland Hills, and is considered in those Alternatives as well. In Alternative 5, NFST 05618 is rerouted away from the subdivision to the Pine Flat picnic area, and Cedro Creek trail reroute is not constructed.</p> <p>Currently, cross country travel is permitted, and there are a number of unauthorized trails that access the subdivision, or are within site distance of the subdivision. All of the action alternatives would reduce motorized access to Heatherland Hills by non highway legal OHVs compared to the current management.</p>	

Comment #	Comment
<p>(AC7) Signing and enforcement</p>	
<p>18</p>	<p>It is our understanding the trail routes will be shown on maps but they are not required to be marked on-the-ground. Illegal, off route driving would be unenforceable and multiple illegal routes are likely to be created, particularly if motorized recreation is encouraged and becomes pervasive. The Department of Agriculture (Forest Service) acknowledges in the preamble to the Part 212 regulations at 70 FR 68283 that:</p> <p style="text-align: center;"><i>"new unauthorized routes continue to proliferate even in areas closed to cross-country motor vehicle use."</i></p>
<p>Response: Route markers will be posted on roads and trails designated for motorized use, with the road and trail numbers that correspond to the road and trail numbers shown on the MVUM.</p> <p>The public will be required to acquire motor vehicle use maps, know how to read them, and follow the rules for motorized use. Enforcement may prove to be challenging due to the large area to monitor and relatively small law enforcement staff.</p>	
<p>89, 173, 138</p>	<p>Summarized Comment: Comments express concern that there are insufficient sign requirements to enforce the designated system displayed on the MVUM. Comment 89 suggests that: “The Sandia Ranger District” should be closed to vehicles except on routes designated and</p>

	<p>signed on the ground as open. Neither the proposed action nor the EA provide for a plan to establish on the ground signs designating which routes are open to motorized travel other than to indicate signs will be placed... The change from unlimited cross-country motorized travel to a system of routes closed unless designated open will undoubtedly cause considerable confusion among forest users. A well developed plan for informing the public of the changes in the rules as well as which routes are designated open is an important step in ensuring the MVUM is understood and followed and to ensure the resource protection provided for, and required by, the TMR.” Comment 139 is concerned that “we believe that the public use of just the Motor Vehicle Use maps will not be adequate for effective enforcement action.”</p>
<p>Response: The Travel Management Rule requires routes to be signed with road or trail numbers. It will be the motorized user’s responsibility to read the map, understand the restrictions, and determine their location when using motor vehicles on the Sandia Ranger District. A signage plan is not required to accomplish this. Voluntary compliance is expected to increase with the nation-wide implementation of a consistent policy for motorized travel on National Forests.</p>	

<i>Comment #</i>	<i>Comment</i>
(AG9) Information on Trail Conditions	
125	<p>Concerning trails in the Cedro area: Some trails designated for dirt bike use on Alternatives 1, 3, 4 and 5 are quite narrow and subject to erosion.</p> <p>Powerline trail from Chamisoso to the top of the hill is seriously eroded and the original switchbacks have been all but obliterated by motorized vehicles coming straight down the hill instead of making the turns.</p> <p>Dilbert trail from the Powerline trail to the clear-cut utility easement winds through the forest, is narrow, has short switchbacks, and the soil erodes easily. I do not believe this should be open to any motorized use.</p> <p>From Bear Scat at Rocky Top to Pinon two-track is a narrow trail with a steep hill and switchbacks. This should also be closed to motorized use as there is no way to avoid collisions on this trail.</p> <p>Opening Mahogany to all uses puts a major road through the area from Juan Tomas Road to Oak Flats Road. I don't see that the flat terrain would even be a challenge for 4-wheet drive vehicles and would open the area for faster use. Several years ago Mahogany was to be put back as a single track trail after being used for wood clearing. What happened to that plan.</p>
<p>Response: Your concerns about the trail conditions have been noted. Regarding NFSR 9 returning NFSR 9 to a single track trail was not reflected in the final decision for the Oak Flat project that changed the status of this road. However, Alternatives 4 and 5 consider designating this route for single track use only, and Alternative 6 considers not designating this route for any motorized use.</p>	

<i>Comment #</i>	<i>Comment</i>
(AB2) Volunteers	
5, 88, 97, 107	<p>Summarized Comments: Comments focus on opportunities for motorized recreationists to partner with the Sandia Ranger District to maintain and correct resource damage on trails designated for motorized use. Summary of comments received regarding volunteers:</p> <ul style="list-style-type: none"> • <i>Comment 5:</i> Many of us also do our part to maintain the existing trails for the non motorized users and do so without cost to the tax payers. I suggest a voluntary training program for Motorcycle riders whereby the Forest Service could make use of this resource in a way that meets Federal guidelines while minimizing overall management expense.

Comment #	Comment
	<ul style="list-style-type: none"> • <i>Comment 88:</i> Our experience is that most motorized users think maintenance is clearing vegetation to keep the trail open. Trail maintenance should be about preventing and restoring resource damage. Mostly this relates to proper drainage of the trail, which is significantly more work than clearing vegetation. As a group, motorized users need to be engaged in the maintenance of their trails. There are hundreds of volunteers between the Sandia RD and Albuquerque Open Space that work on hiking and biking trails and there is much more work to be done. If there is a significant level of trail maintenance done by motorized users, we are unaware of it. This is unfortunate given that motorized users cause more resource damage. If motorized users are more engaged in the maintenance process, perhaps they will better understand the damage they cause and develop a greater respect for staying on the proper trails. • <i>Comment 97:</i> The Tablazon Neighborhood Association and the single track users are also willing to assist the Forest Service in the maintenance and safety enforcement. There has been overwhelming support of these groups pledging \$100.00 per person to hire an employee whose focus would be on the maintenance of the Cedro trails. This is in the early stages of development. In addition, we are in the process of forming a Friends of Cedro Trails group, with a preliminary plan of pledging \$100.00 minimum per person involved. • <i>Comment 107:</i> We especially appreciate the emphasis partnerships and volunteer opportunities for proposing, constructing, and maintaining motorized road and trail routes, user education, and monitoring.
	<p><u>Response:</u> The Sandia Ranger District is committed to working with volunteers and has partnerships with a number of volunteer organizations. We have noted these suggestions, and look forward to increasing the involvement with volunteers on maintaining a motorized trail system.</p>
88	<p>We highly support the removal of routes that are environmentally damaging, especially the route in Cedro Canyon. We are happy to help with this process. NMWA has an active Service Projects program that gets volunteers out helping the land. Please keep this in mind.</p>
	<p><u>Response:</u> Thank you for your interest in volunteering. We will share your interest with the district recreation staff.</p>

Concerns and Suggestions about the Sandia RD Travel Management EA and Process

Comment #	Comment
<i>(AD4a) Suggested Additions-Possible Omissions</i>	
47d	<p>The EA neglected to acknowledge the trailhead that already exists at the northwest end of Forest Road 252 located on the map at number 26. This is an established, previously graveled, trailhead with parking and a toilet facility. As a trailhead it provides excellent access to the trails 252B (Cedro Single Track), Middle Trail, Rabbit Run, Delbert’s Trail, Power Line Trail and Forest Road 13. These trails and road all contribute to a “loop” incorporating trails and roads at the northern end of the Cedro riding area. This Trailhead is often used to lessen the traffic at the bottom of road 462 and disperses the traffic on the trail system.</p> <p>I recommend this Trailhead be incorporated in the Travel Management Plan.</p>
	<p><u>Response:</u> This trailhead does exist, and would be available for use by motorized recreationists accessing the Cedro Area trails in Alternatives 1 through 5, and would be shown on the MVUM map. No changes are proposed to this trailhead in any alternative. This trailhead will be added to the errata sheet.</p>

Comment #	Comment
(AH2) Public Involvement	
164	The first general comment is in regard to the description of the public involvement and the collaborative process. As you are well aware, the NEPA process requires a well-documented public process. Since the New Mexico Horse Council was represented on the Work Group, we know that all the user groups were well represented. Unfortunately, most people reading the EA would know nothing about the many months of work and deliberation by these dedicated individuals and could easily believe that there was little or no input from trail users.
Response: A more extensive documentation is included in the TAP document and all documents related to the work groups and public workshops are available in the project record.	

Comment #	Comment
(AF3) Issues and formulation of Alternatives	
84, 167	<p>SUMMARY: The Responsible Officer will rely on the Alternatives in this EA, to make decisions which will impact the public for many years to come, possibly decades. It is imperative that the Alternatives be properly formulated. The Significant Issues must be examined, since those drive the formulation of the Alternatives.</p> <p>DISCUSSION: On pages 23-25 of the EA, Alternatives 4, 5, and 6 state that they are responses to Significant Issues 1 and 2. Examination of Significant Issues 1 and 2 shows they are merely unanalyzed re-statements of ‘concerns’ (worries) raised by some members of the public during scoping. These ‘concerns’ have been re-stated as Significant Issues even though there is 1) no basis in fact for many of the worries, 2) some of the worries are outside the scope of the EA (housing values, trespass) and 3) some are outside the authority of the agency (user conflict).</p> <p>The ‘concerns’ are unverified, and are primarily concerns about ‘potential impacts’, not actual current conditions. The most serious error is made by importing concerns from scoping into the Significant Issues without analyzing them. Scoping raised concerns about potential impacts on noise, dust, etc. In the document, the Cibola provides no data that that noise and dust are currently problems. No measurements have been taken, or studies done, to confirm that either is a legitimate problem. One would think the Cibola would include such studies if they had any.</p> <p>The scoping concerns raised in Significant Issues 1 and 2 are that the Travel Management designations would have ‘potential impacts’, i.e. it would increase or encourage ‘problems’ . This completely misunderstands that the Travel Management would not 1) allow OHV recreation any place it is not occurring now, 2) Would not increase OHV recreation. On the contrary, even the most arguably ‘pro-OHV’ alternative greatly reduces and restricts OHV use by eliminating travel off roads and trails 3) The designations would create a legal structure .</p> <p>Under Significant Issues, page 13 of the EA, is this item: I want you to remove all of item 1, including 1a and 1b <i>(The comment includes quotes from the EA and rationale for discounting all of the significant issues identified.)</i></p> <p>It is critical that all Alternatives be accurate and relevant to real conditions, not merely responses designed to satisfy to the ‘concerns’ of particular stakeholders. While the Cibola has an obligation to consider those concerns, they also have an obligation to assess if they are valid, and within the scope of this EA, and with the authority of the USDA Forest Service. Not all concerns must or should be satisfied. Some stakeholders want travel management decisions that violate the mandate of multiple use....</p> <p>Three of the six alternatives are written ‘in response to’ Significant Issues 1 and 2.</p>

<i>Comment #</i>	<i>Comment</i>
	<p>Significant Issues 1 and 2 are deeply flawed. I want you to delete the current wording. Then revise the Significant Issues to include only real issues and real needs. Significant Issues must not include the misconceptions some members of the public have about the Travel Management planning and objectives. Once the Significant Issues are both real Issues and truly Significant, and properly within the scope of the EA, they can be the source of Alternatives which will be applicable to existing conditions. Significant Issues are useless if they aren't accurate.</p> <p>The worries, 'concerns' and misconceptions of the public are legitimately part of the Scoping. But by including them in the Significant Issues, the Cibola has elevated them to the status of being 'existing conditions', and real problems which should be addressed in the alternatives.</p> <p>The Cibola fails to disclose there is no factual evidence that these 'concerns' are real problems. There is no supporting documentation in the EA showing that trespass, dust, noise, fire or unsafe conditions originating from motorized recreation on forest land are currently inauthentic problems. There is no record of citations, or even the reporting of incidents to support the contention that trespass, safety, dust, or fire problems are legitimate issues. This is an error. The EA also fails, in the Significant Issues, to determine if these 'concerns' stem from incidents occurring in the neighborhoods and on county roads, both of which are clearly outside the authority or responsibility of the Forest Service. By restating unexamined public misconceptions as Significant Issues, the Cibola is using scoping comments to manufacture problems. Significant issues 1 & 2 are deeply flawed, as I have explained in detail in this comment, and the current wording must be deleted and the Alternatives rewritten to respond to them...</p> <p>I want you to remove the entirety of Item 5, Environmental Impacts. As shown above, the current policy allows the maximum impacts, and the designation of routes for motorized use will reduce all of them. In response to 5a, in another comment I have shown there is no justification for the accusations of habitat fragmentation and wildlife disturbance which is substantially caused by OHV use rather than the overall presence of human activity.</p> <p>Some of the items in 5 are frankly rather puzzling. Consider 5b; the Cibola would never designate a trail that would impair ecological or hydraulic functions. 5c; the designations will be on existing routes, which would already be compacted if indeed they are. The designations will end cross country travel by motorized users, eliminating the possibility of future compaction from those users (but not non-motorized ones). 5d; no evidence was presented linking OHV use to the spread of invasive weeds. Invasive weeds are a problem all over the state. It is more likely that seeds would be brought in via the droppings from horses than by OHVs. 5e; the sections on Heritage in the EA dispel this 'concern'. Any existing heritage sites or artifacts at existing routes (used by everyone, motorized and non-motorized) have already been affected, ending cross country travel will reduce the likelihood of damage to others from motorized users (but not from non-motorized users).</p>
	<p><u>Response:</u> We disagree with your analysis. Advice on identifying significant issues can be found in Unit 9 of the Forest Service 1900-1 training. This direction is drawn from the National Environmental Policy Act, CEQ regulations and Forest Service Manual and Handbook direction. “Significant issues are those issues where there is a point of disagreement, debate, or dispute over a proposed action based on environmental effects. Non issues are those general concerns received through scoping that are not related to the current proposed action’s effects, and therefore, cannot be resolved through an alternative or mitigation. If a comment or potential issue doesn’t contain all three parts of the definition of an issue (above), it’s not an issue; it’s just a comment or concern. If there is no conflict, there’s likely nothing to resolve.”</p> <p>Issues 1, 2 and 5 that are in question in Comment 84 (Comment 167 was a duplicate) meet the definition of a significant issue. Comments received during scoping expressed a point of disagreement with the numbers and</p>

<i>Comment #</i>	<i>Comment</i>
	locations of motorized road and trail designations being considered. The point of disagreement was based on potential impacts to nearby residences, non motorized recreation, and natural and cultural resources. Issues 3 and 4, which you did not address, were points of dispute with the impacts to motorized recreation. All five issues were related to the proposed action's effects, and could be resolved through an alternative or mitigation. The alternatives and mitigations were developed to address these issues.
	The project's interdisciplinary team analyzed the scoping responses and developed the issues, which were approved by the responsible official. These issues were used to formulate the alternatives following Forest Service standard procedures. Details from ID team meetings where the alternatives were developed are available in the project record.
107	Issues 1-4 are well written. Based only on our relatively small involvement in the pre-scoping planning activities, this seems to be a complete list of all of the key issues. Issue 5, "Environmental impacts," seem redundant with the designation criteria in §215.55. But it all seemed to make sense so we won't call foul on that.
<u>Response:</u> Thank you for your comment – no response necessary.	

<i>Comment #</i>	<i>Comment</i>
<i>(AD4) Need Additional Alternatives or Mitigation</i>	
18	Viable alternatives to the current proposal exist and should be given further consideration. We trust that the Forest Service will consider our comments and follow the requirements of 36 CFR 212(b)(5), and eliminate the new OHV trail adjacent to Heatherland Hills from further consideration in the Sandia Travel Management Plan.
<u>Response:</u> Alternatives 5 and 6 do not include the reroute of the trail that parallels Cedro Creek and does include a reroute of NFST 05168 Gambles Oak Mahogany where the trail joins County Road 36.	
39	Private parks should be established where ORV users pay to play with their vehicles.
<u>Response:</u> Thank you for your comment, this is outside the scope of this project.	
39	Educate, educate, educate! Public education must be a major campaign in order for the USFS to be successful in protecting these lands from ORV damage. Schools especially need to be visited. People need to be taught about the ecology of our natural lands in order to gain appreciation and respect for them, and to learn about the damaging ecological consequences of ORV's.
<u>Response:</u> Education is part of this proposal. Thank you for your suggestion to work with schools, we will share this suggestion with the Sandia Ranger District.	
54	I also think you could provide a gate at the Tablazon area as well. The few houses that use the forest road could also be provided with a key. I am sure these families would welcome keeping cars away during the night.
<u>Response:</u> It is not appropriate to provide exclusive access to National Forest Lands to adjacent land owners.	
68	The idea that a management plan designed to look at the future of motorized vehicle use in the National Forest has no proposed option for no vehicle use is clear evidence that the Forest Service is simply bowing to pressure brought to bear by the powerful ORV industry. I will not be surprised in the least when the Forest Service decides to open up the entire area to ORV use as this is obviously the direction in which they are moving. Clearly the Forest Service is inviting comments about the Travel Management plan from the public simply because it is federally mandated to do so, as there is no evidence that the time and effort many people have expended documenting damage to the forest by motorized use and pollution (noise and air), and raising very legitimate concerns about safety has been taken seriously.
<u>Response:</u> The travel management rule directs the agency to designate ALL routes open to motor vehicle use, not just those routes open to OHVs. This includes the roads in the picnic areas, and paved roads that access homes. Alternative 6 considers designating only two motorized trails, and only those primary roads needed for access and management of the national forests. National Forest system roads on the Sandia Ranger District are necessary for many reasons, including access to develop recreation sites, homes within private inholdings, and other forest	

Comment #	Comment																																										
	management activities including fire suppression.																																										
81	<p>(c) Based on the concept of balancing "trail time," I'd suggest that the mileages for the relevant alternatives look something like this (I left out 4 because its purpose was to designate for 2-wheeled OHVs, and 6 because its purpose was to eliminate motorized trails):</p> <table border="1" data-bbox="337 430 1450 674"> <thead> <tr> <th>Alternative</th> <th>MC</th> <th>ATV</th> <th>4x4</th> <th>Seasonal Closure</th> <th>Reference</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>26</td> <td>13</td> <td>7</td> <td>Dec. 1 to Apr. 30</td> <td>Table 4</td> </tr> <tr> <td>1</td> <td>32</td> <td>16</td> <td>8</td> <td>Dec. 1 to Apr. 30</td> <td>Table29</td> </tr> <tr> <td>3</td> <td>33</td> <td>17</td> <td>8</td> <td></td> <td>Table4</td> </tr> <tr> <td>3</td> <td>37</td> <td>18</td> <td>9</td> <td></td> <td>Table30</td> </tr> <tr> <td>5</td> <td>17</td> <td>9</td> <td>4</td> <td>Dec. 1 to Apr. 30</td> <td>Table4</td> </tr> <tr> <td>5</td> <td>21</td> <td>10</td> <td>5</td> <td>Dec. 1 to Apr. 30</td> <td>Table32</td> </tr> </tbody> </table>	Alternative	MC	ATV	4x4	Seasonal Closure	Reference	1	26	13	7	Dec. 1 to Apr. 30	Table 4	1	32	16	8	Dec. 1 to Apr. 30	Table29	3	33	17	8		Table4	3	37	18	9		Table30	5	17	9	4	Dec. 1 to Apr. 30	Table4	5	21	10	5	Dec. 1 to Apr. 30	Table32
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	<p>Response: The different alternatives were developed to respond to the variety of concerns and preferences that we heard during the public involvement process. We are aware that not every alternative balances the amount of trail and road mileage use for every type of vehicle, but each responds to different issues. For example, a trail may be designated for both ATV and motorcycle use. We heard during the public meetings, that many motorcycle riders will not use a trail that is designed for ATVs, because the dual track does not provide the experience they are seeking.</p>																																										
88	<p>The Forest Service should clearly state that it will close trails and keep them closed until:</p> <ul style="list-style-type: none"> • user-conflict is resolved (whether it is between different motorized users or motorized users and quiet recreationists) • damage from motorized users to straying off designated trails is mitigated • trail damage, especially where it is leading to water quality degradation, is mitigated. <p>If the Forest Service has this wording in place and follows through with it, the motorized public will quickly realize they have a vested interested in helping mitigate problems.</p>																																										
	<p>Response: Thank you for your suggestion. We disagree that these measures are needed prior to allowing use of trails. The Travel Management Rule does not require that user conflict be resolved, but that the effects on conflicting uses be considered by the Responsible Official (36 CFR 212.55). Measures have been incorporated in the various alternatives to address soil and water mitigation on the trails and roads not designated for motorized use (EA, page 27) and to address trail and road closures due resource damage (EA, page 16).</p>																																										
89, 173	<p>NEPA prescribes a process, not a result, and the analysis conducted within the NEPA process is just that – an analysis, not a plan. In our scoping comments we recommended that TMR plans, at the very least: (1) define an adaptive management strategy linked to substantive protective standards (e.g., RDS) and the TMR NEPA analysis; (2) identify and prioritize route closure and reclamation projects; (3) account for agency resources; and (4) provide the public with notice of what consequences (e.g., route and area closures) will flow from violations of designation decisions.</p> <p>By providing such a plan, line officers and resource specialists are provided with clearly-defined management direction to focus adaptive management strategies and the authority to take effective remedial action to protect Forest resources when motorized recreation exceeds the limits considered in the TMR process or violates TMR designation decisions. While the Forest Service of course, regardless of a TMR plan, retains authority to impose closures where motorized recreation “will cause or is causing considerable adverse effects” (Executive Order 11644, § 9, as amended) this authority, if decoupled from the TMR planning process, is difficult to leverage in the face of a vociferous motorized recreation community. Line officers and resource specialists deserve and need meaningful TMR plans to provide them with the authority and basis for making field-level decisions to protect Forest resources.</p>																																										

Comment #	Comment
	Public comment on the motorized vehicle route changes should be informed not only by a description of the proposed changes, but also by an adequate articulation of the management and monitoring plan for the proposed project. As it stands, the proposed ORV project is insufficiently described and should be more in-depth in the EA.
	Response: Each of the alternatives, in conjunction with the features described on pages 16-18 and mitigations on pages 26 and 27 of the EA, provide a sufficient basis upon which to make a decision on designations for motorized use and how to manage the designated system. We disagree that a separate plan is necessary to provide line officers the authority and basis to implement closures where necessary to protect resources.
89, 173	<p>We appreciate that this is a complicated area where nearly every type of recreational use, motorized and non-motorized, overlap. The degree of public input that was sought will hopefully create “buy-in” and lead to an enforceable plan. However, we believe the Forest Service should state clearly that if user-conflict becomes a problem or motorized users are failing to stay on designated trails that you will close trails and keep them closed until the problem is mitigated. We believe that articulating these “closure triggers” will encourage off-road vehicle users to follow the newly implement rules individually and will also encourage a “peer pressure” type of self-enforcement that will be crucial during the early stages of implementing the Travel Management Plan and MVUM.</p> <p>We highly support the removal of routes that are environmentally damaging, especially the route along Cedro Creek. The NMWA has an active Service Projects program that gets volunteers out helping protect the land. Please keep this in mind and we encourage you to contact NMWA for all future decommissioning projects in this area.</p>
	Response: Thank you for your suggestion. Trail closures may be one option should non-compliance lead to resource damage. This option is spelled out on page 16 of the EA. Additional actions provided for in the EA are user education and information dissemination about trail use, ethics, and interactions with other users; additional law enforcement activities in conjunction with local law enforcement agencies; and volunteer partnerships to identify and problem areas and assist in user education (EA, pages 17-18).
89, 173	The proposal to mechanically close unauthorized roads and trails “as time, money, and Agency discretion allows” is of major concern. While we understand that time and money could restrict the SRD’s ability to mechanically close motorized routes, we do not believe that the EA adequately explains how agency discretion will be utilized when route closures are determined. We believe the SRD needs to more fully explain how agency discretion will be implemented, especially given the fact that staff turn-over and political decisions could determine how agency discretion is applied. We believe that agency discretion should be applied in conjunction with a series of filters for determining which routes to mechanically close. Such filters would include: need to protect and restore threatened and endangered species habitat; need to protect and restore watersheds and water quality; and the need to prohibit continued, unauthorized travel on routes.
	Response: The closure of unauthorized trails “as time, money, and Agency discretion allows” is one of the features common to all of the alternatives as described on page 17 of the EA. This measure also states that mechanical closures “would be implemented over time, where resource damage is occurring and/or sensitive wildlife habitats are being affected.” These criteria provide the “filters” described in the comment.
89, 173	We believe that the SRD failed to consider the alternative of No Off-road Motorized Recreation in the Sandia Ranger District. In our review of the many documents related to the EA, we found a reference to off-road vehicle areas outside of the National Park. These areas are found on Bureau of Land Management, State, local and private lands and include Gordy’s Hill (BLM land), Rio Puerco and Montessa Park. (EA: 111) This alternative would have a negligible impact on ORV opportunities in the area (EA:111) and it is unlikely to impact the demand for ORVs and their parts, therefore having a limited impact on the economy. (EA:111) However, this alternative would preserve vast areas for quiet recreation that would attract forest users who have been driven away by the sounds and destruction of ORV use in the SRD

Comment #	Comment
	<p>As discussed above, the current Sandia Ranger District Travel Plan EA does not contain an adequate range of alternatives and information used to develop the Proposed Action and EA were not made public in a timely manner. We have also uncovered several major flaws in the analysis described in the EA. We look forward to seeing these flaws corrected.</p>
	<p>Response: Alternative 6 designates only one short full size trail segment for motorized use in the portions of the Sandia Ranger District covered by the project. All other motorized use designations would be on existing roads. Previous decisions designated approximately 16 miles of trails for motorized use on the district. These designations would remain in effect; these areas were not included in the project area for this proposal because they were already consistent with the Travel Management Rule direction.</p>
97	<p>We would like to see the Tablazon trailhead, which runs approximately one quarter mile inside the forest boundary, to be retained and to remain as it currently is. If possible, we are further requesting that a gate be installed somewhere between the south side of the trailhead and the beginning of the private properties. An access area next to the gate will be made to allow single track users, horseback riders, hikers and others of similar nature to enter. The homeowners and others supportive of this issue will bear the cost of a gate.</p> <p>In addition to the concerns listed below, the purpose of this gate is for the protection of private property from further damage. You will find several instances of misuses of the roadways included in the Public Comment Forms. Some of these comments include improper travel during weather conditions causing abandonment of vehicles and the tearing up of the roadways, and people being chased by vehicles. These incidents are not just due to the issues surrounding the 4 x 4's and ATV's but the frequent users of 462 for illicit purposes...</p> <p>Please consider this letter our formal request for reconsideration of the proposed Travel Plan. Many mountain biking groups, equestrian groups, and others have shared with us that they are in favor of our proposal which allows the motorized vehicle enthusiasts areas, as well as allowing the non-motorized forest users a safe pleasant forest environment.</p> <p>The consensus of Tablazon residents and the Homeowners Association's recommendation is that the trailhead in Tablazon be open to neighborhood motorized travel only and be closed to non-resident motorized travel. This will eliminate the traffic related concerns the residents share. The consensus and recommendation is to not allow any motorized traffic, local or non-local, east of 462 and east of 12 (known as Meadow 2- track). This would reserve the following trails for non-motorized vehicle usage only: Lower Pine, Wildcat, Pinion, 11, 11 -A, Pinion 2 Track, Lone Pine, Rocky Top, Poker Chip, and Bear Scat. Where 242, running east and west, intersects with Bear Scat and Bear Scat becomes Mahogany would be the southern boundary of the reserved non motorized vehicle trails. This represents less than a quarter of the proposed motorized traffic being limited to non-motorized traffic. This will eliminate the other concerns we all share including, but not limited to fire danger and ability to safely enjoy the National Forest.</p>
	<p>Response: Alternatives 5 and 6 were developed to address, in part, the concerns of local landowners such as those in Tablazon. These alternatives would not provide for motorized designations on trails near the subdivision. It would not be appropriate to designate the trailhead near Tablazon “for neighborhood motorized travel only and be closed to non-resident motorized travel”. The designations made in this process must be the same for residents and non-residents.</p>
107	<p>The decision to categorically exclude even the consideration of designating some of the existing but “unauthorized” roads and trails in the La Madera Area is flawed. (Chapter 2, pg 15.)</p> <p>In BRC’s scoping comments we included a rather lengthy reminder of NEPA’s mandatory procedural duty to rigorously explore and objectively evaluate all reasonable alternatives. Incorporating some of the existing roads and trails in the La Madera area into the classified road and trail system is consistent with the Travel Management Rule (TMR). There is nothing in the</p>

Comment #	Comment
	<p>Forest Plan or previous management decisions that preclude doing so. Nothing in the R-3 TMR Implementation guidelines precludes doing so. Considering adding some routes in the La Madera area to the classified trail system is a perfectly reasonable response to the purpose and need and was supported by many stakeholder groups and individual recreationists. At the very minimum, the agency is lawfully required to formulate and analyze alternatives, within the extent allowed by law and regulation that the public has suggested.</p> <p>We request the Cibola National Forest supplement the current planning process by adding an Action Alternative that includes designating some routes in the La Madera Area.</p>
<p>Response: Alternative 3 provides for motorized use designation of system roads and unauthorized routes closely associated with those system roads in the La Madera area. While the Travel Management Rule does allow for designation of unauthorized roads or trails for motorized uses, it does not require that these routes be included. No system roads exist in the La Madera area to consider for motorized designation other than those included in alternative 3, so there were no additional alternatives identified.</p>	
116, 119	<p>Construct an Additional Trail System for ATV use in the Cedro Area</p> <p>This alternative was suggested as an opportunity to provide additional trails for ATV use without modifying the existing single-track system to accommodate ATVs. This alternative was eliminated from detailed study because constructing and maintaining an additional trail system exceeds the forest trail budget constraints at this time. The requests for an additional ATV trail system were general in nature, and there were no proposals received during scoping that identified specific trail locations or the number of miles recommended for such a system.</p> <p>Additional ATV trails could be designated during the process and constructed and maintained with the use of volunteers from the OHV community which would have very little impact on forest budget. The general public has no means to provide the Forest Service detailed maps of purposed additional routes as the general public does not possess GIS software or the expertise to use it.</p> <p>I Request the “Construct an Additional Trail System for ATV use in the Cedro Area” Alternative added to the EA and the Forest Service devise a method for the public to communicate with the Forest Service where they would like the new routes added.</p>
<p>Response: The Travel Management Rule does not require that entirely new trail systems be constructed, but that motorized use designations be made on existing system roads and trails and, if appropriate, unauthorized roads and trails. Although each of the alternatives except alternative 2 and 6 do provide for new trail construction, this construction was designed to relocate trails that were not properly located and presented resource protection or maintenance problems.</p>	
116, 119	<p>Chapter 3. Affected Environment and Environmental Consequences Trail and Road Use</p> <p>The trail and road opportunities for full-size 4X4s are relatively unchanged from the existing condition. The two primary changes would be enforcement of trail management designations. A few full-size, 4x4 users are attempting single-track trails. In this alternative, there could be increased enforcement, and full-size use on single-track trails could be cited. There is also a “hill climb” between NFSR 462 and Chamisoso Trail that would not be designated in this alternative. This is valued as a feature that provides challenge to full-size, 4x4 users, and would reduce the level of challenge available to these users.</p> <p>As the EA gave no rationale for closing the “hill climb,” I request the “hill Climb” be added to alternative 1 to provide a challenge to 4x4 users</p>

Comment #	Comment
	<p>Response: The “hill climb” area was a user-created, unauthorized route that was evaluated in developing the proposed action. Due to resource management concerns it was not identified for inclusion in the proposed action. During scoping, a number of comments requested that the hill climb into Chamisoso Canyon be considered. The hill climb is included and analyzed in Alternative 3 and will be considered by the responsible official when making a decision.</p>
<p>131</p>	<p>This comment is in reference to the reroute proposed to avoid Cedro Creek in Alternatives 1, 3, and 4. You mentioned how important it is for us to offer alternatives. Several were mentioned at the meeting including:</p> <ul style="list-style-type: none"> ○ By far our 1st preference is that you don't add a new motorcycle trail in this area; and instead rely on the existing Mahogany trail, which is already open to motorized vehicles, to connect the existing motorcycle trails to the north and south of this area (Please see Option A map <i>available in the project record</i>). If someone wants a short ride they could ride either the north loop or south loop. If they want a longer ride they could basically do a figure 8 by starting on the north side loop or the south side loop and then connect to the other via the Mahogany Trail. ○ If a trail must be added to the area, then we recommend you place it between the Mahogany trail and the creek bed (See Option B map <i>available in the project record</i>). We understand there is a concern about the trail density in this area. However, maybe there are ways to construct the trail to alleviate these concerns. ○ By far our least favorite choice is for a trail to be added between the creek bed and the Heatherland Hills neighborhood. We understand the desire to not cross the meadow. However, we request that if a trail is added in this area, it be placed as far to the east toward the meadow as possible instead of bordering our neighborhood. Perhaps it could start on the west side of the dry creek and then cross over to the east side of the dry creek (See Option E map <i>available in the project record</i>.) We recently noted the addition of the flags in the area to indicate the proposed trail location. These flags currently run very close to the Heatherland Hills fire break. If it is decided that a new trail must be added to the area, we respectfully request that the trail be moved significantly further to the east in the wooded area next to the meadow (See Option C map <i>available in the project record</i>). <p>A separate but related topic is the Gambrel Oaks trail and trailhead. The Forest Service had notified HHLOA in the past that it had been decided to move the trailhead to Pine Flats. And yet a sign still exists at the old trailhead and forest service maps of the area have never been modified to show the moved trailhead. We respectfully request that this previous decision be honored and properly implemented on forest service maps. And of course then the old section of Gambrel Oaks trail would then be closed to motorized vehicles. Note that there is no parking located at the existing trailhead off of Edelweiss which may have been part of the reason that the trailhead was to be moved.</p> <p>We suggest that whatever trails are eventually built for single-track motorcycle use that they be specifically designed and constructed to have sufficient turns and corners so as to slow down the motorcycles. And that it preferably run through the trees, rather than in open spaces. This will slow the motorcycles down and help limit erosion of the land and aid in enforcement, i.e. 4 wheelers that will widen the trail and lead to more traffic and the loss of single track as is so prevalent in the Cedro Area. Two people in our Association, Rob Lee and John Franklin are very familiar with the area trails and off-trail terrain as they regularly hike and bike in the area. Rob has taken the time to develop an alternate path for the proposed motorcycle trail that avoids both meadows in the area and takes into account drainage and the desire of motorcycle riders for a more varied, enclosed course. He will be sending his suggested route(s) to you separately. If it would be helpful to you, both Rob and John have volunteered to help your staff in finding an</p>

Comment #	Comment
	alternate location to the west of the dry creek that would be exciting for motorcycle riders, acceptable environmentally, and more palatable to the people living in the area. Furthermore, Rob, John, and others have volunteered to help clear a new trail if a new path requires significantly more cutting/clearing to construct.
	<p>Response: In reference to your Option A, Alternative 5 does consider using the Mahogany trail (NFSR 9) and does not propose the Cedro Creek reroute section.</p> <p>The ID Team did consider Option B. However, there are proximity concerns having the NFSR 9 road and the trail so close together, and having both routes near the Cedro Creek drainage. Option E creates similar concerns to Option B, and includes crossing the creek drainage that the reroute is designed to avoid.</p> <p>The trail alignment being proposed in Alternatives 1, 3 and 4 is designed to address the concerns that you suggest. The trail is located in the trees, on the other side of the ridge from the Heatherland Hills subdivision, while avoiding the meadow. The trail would be constructed with turns to slow down the motorcycle use.</p>
148	<p>None of the alternatives keep a ¼ mile buffer between a trails network and adjacent residential areas, private land, city or county open space.</p> <p>I endorse Alternative 5 with the following comments:</p> <ol style="list-style-type: none"> 1) preserve the ¼ mile buffer mentioned above 2) allow dispersed camping off Juan Tomas (3242) and add a mid-area trailhead where the single track crosses 9 3) add Oak Flat as a trailhead in the south.
	<p>Response: We have noted your preference for a 1/4 mile buffer between a trail system and neighboring lands. Alternative 6 does not proposed any motorized trails within ¼ mile of private lands and this is analyzed in that alternative. Dispersed camping adjacent to Juan Tomas and Oak Flat is considered for trailhead use in Alternatives 1 through 4.</p>
158	<p>Especially at FR 462, put an iron fence up that only the residents who live up there can access, along with the Forest Service, (Emergency Service vehicles) and not- recreational 4 x 4 vehicles can access. ATV's, equestrians, and mountain bikers can access the trail FR 462 on the side of the fence. Or make forest trailhead access routes that are within neighborhoods and quiet places of residences only available to legal living vehicle usage, and, do not "improve" the northeast end of FR 462. Pine Hill access route with picnic tables, a bathroom, and paved roads, leave it as pristine as it is now due to its close proximity to houses.</p>
	<p>Response: Since the national forests are public lands, would not be appropriate to fence off an area so that "only the residents who live up there can access, along with the Forest Service, (Emergency Service vehicles) and not-recreational 4 x 4 vehicles can access." The designations made in this process must be the same for residents and non-residents.</p>
188	<p>Based on the above new information. and due to the somewhat disingenuous nature of much of the narrative and tables, we want the following specific changes made to the EA:</p> <ol style="list-style-type: none"> 1. Add the description of the climate in the study area. 2. Add the "Description of the Activity, physical and social." 3. Add the visitor-use numbers these trails are expected to sustain. 4. Abandon the proposed seasonal closure in any alternative or combination of alternatives. With the omissions corrected, there is no rational connection between the data and the conclusion. 5. Add to the Final EA a professional DHV manager's evaluation of the system design and carrying capacity, and use this professional evaluation to revise the proposed action. 6. Use this professional evaluation to expand the diversity of OHV opportunity, for example, the Proposed Action is predominantly singletrack; the lack of A TV opportunity needs to be corrected by adding ATV mileage to the system (Alternative 3 would be a good

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	<p>example). The professional evaluation would show the Sandia recreation staff how to resolve both the safety and the resource concerns of mixed OHV traffic.</p> <ol style="list-style-type: none"> 7. At a minimum, please make the corrections specified earlier in this comment. The above list is not a complete description of the changes that will be needed, but it is representative of the effect on this analysis that the new information will have. 8. Further correct the soil, watershed, and erosion analysis chapter as the new information dictates. 9. In particular, we want the names of the soil types that are found in the Sandia Peak area instead of one individual person's interpretation. 10. Remove from the discussion of the watershed the relentless use of "stream" to describe dry washes. Instead use the term "dry wash," in order to be consistent with the ongoing research into these washes. 11. Flowing from the above, correct the Environmental Consequences to account for the changes in outcomes that incorporating the new information will cause (i.e. the tracks of a 250 pound motorcycle will be inconsequential when hit by a 24-ton wave front). 12. And, flowing from the changes in the Environmental Consequences, please revise the Alternatives, including the Proposed Action.
<p>Response: Thank you for your suggestions – we see no need to change the EA. The responses to requests to discuss the specific issues are located under Comment 188 on pages 46, 97-107, 118-121, 136, 142 and 151 elsewhere in this document.</p>	

Comment #	Comment
<p>(AE3a) Purpose and Need Statement</p>	
<p>48, 132</p>	<p>1. Purpose and Needs Statement, Purpose of and Need for Action, pg. 2, 6th bullet item:</p> <p>“Identify a system of trail-based motorized recreation. This opportunity is measured most simply in miles of routes open for motorized travel, but is also assessed in terms of loops offered to riders, the scenic quality and diversity of settings through which routes pass, and the challenge offered in terms of rider skills;”</p> <p>Reducing the ATV mileage to 1.56 miles cuts off several loops for ATV riders as noted in the <i>Cedro Area – Map Alt 1 – South</i>, pg 31, below:</p> <p>“However, there would only be one trail loop available to ATVs, so it is unlikely that this trail would attract a major increase in use. There would be limited variety for ATV users, and riding all of the trails and roads designated for ATV use in this alternative would probably be about a 4 hour opportunity. NFSR 9 would also be available for ATV use, but since there is not a loop opportunity, it would likely receive little use from ATV riders.”</p> <p>This does not do the job of fulfilling the Purpose and Needs statement above. Make Alternative 3 the Proposed Action.</p>
<p>Response: The Proposed Action does fulfill the purpose and need for action described on page 2 of the EA. Loops offered to riders, scenic quality, and challenges to riders were identified on the purpose and need statement as ways to assess the alternatives. The key point of this part of the purpose and need was stated as “identify a system of trail-based motorized recreation.” Once a proposed action has been identified it remains the proposed action. Alternatives may be developed based on the issues that arise. This does not mean that the proposed action is required to be the selected alternative when a decision is made.</p>	

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48, 132	<p>2. Purpose and Needs Statement, Purpose of and Need for Action, pg. 2, 7th bullet item:</p> <p>“Reduce recreation user conflicts;”</p> <p>As I understand it, the Council on Environmental Quality in Title 40, Section 1500, specifies that the Forest Service is not charged with resolving ‘User Conflict’.</p> <p>Remove all references to, and discussion of “User Conflict” from the documents and citations.</p>
<p>Response: The CEQ implementing regulations for the National Environmental Policy Act (40 CFR 1500-1508) provide the framework for compliance with NEPA. The regulations require for the agency to identify the purpose and need for action. Addressing user conflicts as part of the purpose and need comes from 36 CFR 212.55, where it is listed as one of the factors the responsible official shall consider in designating trails and areas for motorized use. User conflict was also identified as a concern during the public collaboration process that preceded the development of the proposed action and in responses to scoping of the proposed action.</p>	
56, 167	<p><i>(The original letter is contained in the project record, below is a summary of the comments received :)</i></p> <p>I want to point out errors in the Purpose and Need Chapter of the <i>Environmental Assessment for Travel Management on the Sandia Ranger District</i> (EA). Please refer to page 2, seventh bulleted item:</p> <p style="text-align: center;"><i>“Reduce recreation user conflicts...”</i></p> <p>Conspicuous by its absence in the Purpose and Need chapter or anywhere else in this Environmental Assessment is any definition of “conflict.” Leaving this out enables the Forest Service to declare that management action is necessary in even the most specious situations. If there were indeed, documented “conflicts” between users, it can be assumed the information would be contained in the Affected Environment and Environmental Consequences chapter of the EA. The fact that there is absolutely no supporting documentation in that chapter or in the law enforcement specialist report referenced in that chapter proves that there has not been any actual conflict requiring Forest Service law enforcement intervention. “User conflicts”, as a category, does not even appear in the listed “Violation Type” in the specialists’ report. The lack of a category listing for “user conflict” indicates that the Cibola Law Enforcement Officers and Forest Protection Officers understand something the staff crafting the EA apparently does not: The Forest Service is not authorized to regulate based on emotional distress, philosophy, culture, or value systems...</p> <p>Please refer to the Travel Management Rule (TMR) 36 CFR § 212.55 (a): “...<i>the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands,...</i>” (emphasis added)</p> <p>In other words, the Forest Service management regulations and more specifically, the TMR is not and never has been the instrument which resolves conflicts and relieves tensions between users. The Forest Service has no authority to “resolve” values or philosophical differences between lawful public lands visitors. The phrase “reduce recreation user conflicts” does not appear in the language of the Multiple-Use Sustained Yield Act or in its over-arching functions and goals, nor does it appear in the TMR...</p> <p>The Forest Service’s responsibility is clearly spelled out by the TMR, and it is not by accident or</p>

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	<p>coincidence that any type of regulation in the realm of values, philosophies, or cultural differences between different people engaged in lawful activities on Forest Service land is not within that clearly spelled out authority...To state it again, the Forest Service is limited to offering trail experiences based on the trail type, not the trail user attitudes. It is compelled by its management regulations and the TMR to provide unique trail experiences based on the type of trail and not user's attitudes, values, or belief systems.</p>
	<p>Response: We stand by our statements in the EA. Conflicts between different types of users were identified during the public involvement conducted prior to development of the proposed action and in subsequent public involvement for the project. The discussions in the EA are consistent with the legislation enabling the Forest Service. Use conflicts are to be considered by the responsible official in designating a trail system (see the response to the previous comment in this section). Conflicts are discussed in the Recreation Resources section of the EA on pages 91-109.</p> <p>On page 68281 in the "Public Comments on Proposed Rule and Department Responses" of the Travel Management Rule clarifies the use of the term "conflicts among uses:"</p> <p style="padding-left: 40px;">"The references to use conflicts in this section are taken from E.O. 11644. In issuing this E.O., President Nixon directed agencies to take conflicts among uses into account in designating trails and areas for motor vehicle use. The Department believes that some trails can accommodate both motorized and nonmotorized uses. However, the Department also believes that some trails are better managed for one use or the other, and that providing separate trail systems can sometimes result in better recreational experiences for all users."</p> <p>Our use of the term "user conflicts" in the purpose and need and subsequent analysis of the effects is consistent with this definition.</p> <p>The Travel Management Rule trails and areas on National Forest System lands directs that "the responsible official shall consider effects on the following, with the objective of minimizing: conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands." (CFR§ 212.55.3) The direction is clear that user conflicts between motor vehicle use and other recreation uses be considered by the responsible official when making decisions on designations.</p>
69, 77	<p>Alternative 5 does not satisfy the Purpose and Need stated on Page 2,</p> <ul style="list-style-type: none"> -Designate a motorized route system that provides for public access and recreation travel on the district from available routes.' -Identify a system of trail-based motorized recreation. This opportunity is measured most simply in miles of routes open for motorized travel, but it also assessed in terms of loops offered to riders, the scenic quality and diversity of it settings through which routes pass, and the challenge offered in terms of rider skills;
	<p>Response: We disagree with your assessment of Alternative 5. Alternative 5 does satisfy the purpose and need by designating a motorized route system that provides for public access and recreation travel and includes a system of trail-based motorized recreation. However, to respond to issues raised by non motorized recreationists and area residents it is a reduced system compared to Alternatives 1 through 4.</p>
82	<p><i>(The original letter is contained in the project record, below is a summary of the comments received :)</i></p> <p>The Cibola National Forest is directed by the Travel Management Rule (§ 212.55) to consider "conflicts among <u>uses</u>". Many people, forest staff and public alike, believe this is the same as "conflicts between <u>users</u>", but that is a misconception. The Cibola National Forest itself has confounded the two in the Purpose and Need of the EA. Please refer to page 2, under 'Purpose and Need', to the seventh bulleted item:</p> <p style="text-align: center;">"Reduce recreation user conflicts..."</p>

Comment #	Comment
	<p>As demonstrated later in this comment, the Cibola National Forest has no statutory authority to reduce or attempt to reduce recreation user conflicts. Including 'reduce recreation user conflicts' under the Purpose and Need encourages misunderstandings in the forest staff, and between the Cibola and the public. An expectation of 'reduced user conflict' will give some recreationists the false hope that the Forest will make travel management decisions to benefit their type of use, at the expense of other users. Our first task is to correct the wording in the Purpose and Need.</p> <p><i>(The comment cites references in the document where the term “user conflicts” is used, and asks that the EA be revised to change or delete this terminology.)</i></p> <p>Here are the relevant sections from statutes which define Forest Service authority. Also included is the directive in the Travel Management Rule which defines the criteria the responsible official shall use in making decisions.</p> <p>The Travel Management Rule does not instruct or authorize the Forest Service to consider the philosophical, cultural, or value preferences of any group of users as criteria for its decision-making in the designation of road, trails and areas for motorized use. It does specify the criteria the Forest Service SHALL use to make the decisions, at Section 212.55.</p> <p>The statutory authority of the USDA Forest Service is defined by Congress. 16 U.S.C 528 states:</p> <p style="padding-left: 40px;">'...the forests that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.'</p> <p>There is no directive to resolve, reduce, mitigate or manage user values or conflicts in user values in either 16 U.S.C. 528 or 36 CFR § 219(1)(b).</p> <p><i>(The comment letter requests for revision or deletion where user conflicts are discussed.)</i></p> <p>To support my request that Cibola National Forest delete 'user conflict' from the EA, I am providing a citation from the field of user conflict research showing that user conflict is clearly a sociological-psychological issues. As such it is beyond the ability of the Forest Service to resolve.</p> <p>In an unpublished Master's Thesis, THE RELATIONSHIP BETWEEN PAST EXPERIENCE AND MULTIPLE-USE TRAIL CONFLICT (Debra Jo Bradsher, North Carolina State University, 2003), the author reviews the literature in the field of research on user conflict. The thesis was supported by USDA Forest Service, Bridger-Teton National Forest (Acknowledgements, page iii)</p> <p>Nancy Brunswick has a copy of the thesis in her research library on recreation. The full text is available on the internet at http://www.lib.ncsu.edu/theses/available/etd-06092003-134354/unrestricted/etd.pdf.</p> <p>The generally accepted theory of user conflict is that the person who complains of conflict with another user, has an unmet expectation, and/or philosophical, cultural, or value differences with other users. Research opinion varies as to its causes. But there is general agreement that user conflict stems from personalities and opinions, and has less connection to actual experiences with other users. (Indeed, there is evidence that attitudes against another user group are worse when a person <u>has not</u> encountered the type of user he professes to dislike.)</p>

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	<p><i>(Excerpts from the Badsher Thesis were included in the original comment letter, available in the project record.)</i></p> <p>By including goals in the EA to 'reduce user conflict' you are setting a precedent and an impossible goal for the agency and its staff. Attempting to reduce user conflict would be a 'tar-baby', embroiling the agency in people's emotions and irrational opinions which are very resistant to change. It would be a mistake for you to encourage the public to believe that user conflict is the agency's problem. The public would be led to expect that you should, can or will reduce user conflict.</p> <p>I'm sure you recall how the non-motorized participants in the collaboration expressed dislike for each other. The horse riders and hikers disliked the motorcycles because of the sound. They disliked the mountain bikers because they are silent and give no warning of their approach. The hikers didn't like the horse manure on the trails and the churned up mud from the hooves.</p> <p>The most basic underlying reality of recreating on public land is that it IS public. When someone goes on public land, the 'public' is likely to be there too. If being with other members of the public is so intolerable to someone, they should stay on their private property where they have the right to control who is there. It's long past time that the Forest Service stop acting as if it is obligated to fulfill everyone's fantasies that public land is their private paradise, and that public land should be managed just to satisfy them.</p>
	<p><u>Response:</u> The EA accurately portrays the information the Forest Service received in the public involvement process regarding "user conflict". The purpose and need for the proposal and the analysis of effects are consistent with the Travel Management Rule and other Forest Service policy. There is no need to change the EA. For more discussion on the use of the term "user conflicts" see the response to comments "56, 167" above.</p>
96, 100	<p>On page 90, under Cumulative Effects, the EA states: "There will likely be additional need for law enforcement patrols on the single-track trails that were designated for motorized use in the area west of NM 337 in a previous decision." After checking the EA and the underlying referenced specialists' report, there is no basis for this statement in the form of data or even any attempt to make a logical inference for this statement. The only data presented in the specialists' report is a summary extracted from the Law Enforcement Management Attainment Reports Systems (LEMARS) database. The LEMARS database does not make any distinctions between enforcement actions taken against motorized recreation versus other types of motorized activity (accessing the Crest, picnic grounds, etc.). It also does not even make any distinction between motorized and non-motorized for some of the included line items (A violation of a fire closure restriction could just as easily be written for a mountain bike as it could be for a motorcycle). None of the referenced data supports the statement on page 90. In fact, there is not even any unsubstantiated statements in the specialists' reports that supports the statement on page 90. Please remove the unsubstantiated statement on page 90.</p>
	<p><u>Response:</u> This section of the EA discusses effects related to law enforcement. Although not clearly stated in the EA, the elimination of cross-country travel and restriction of motorized travel to designated roads and trails would likely lead to the need for additional patrols to ensure compliance. The LEMARS data would be of limited use in estimating the future need for patrols since the motorized recreation use would change in the future (elimination of cross-country travel).</p>
108	<p>Mention of User Conflicts should be removed from the EA. The Forest Service (FS) does not have any statutory authority to reduce, or attempt to reduce, user conflicts. They are almost entirely perceived rather than real. Several research papers have shown this. You have been given the specific citations by other responders. This use of user conflicts as a method of restricting motorized use is a well-known weapon of extreme environmental groups, and it appears the EA in question has succumbed to this influence. References to user conflict in the EA should be removed.</p>

Comment #	Comment
<p>Response: See the responses to previous comments related to “user conflicts”.</p>	
<p>188</p>	<p>Page 2: Remove bullet item 7: <i>Reduce recreation user conflicts</i></p> <p>The insertion of user conflict as a serious issue is not credible, because the percentage of motor visitors accounts for only 1.4% of the total visitorship to the Cibola NF.</p>
<p>Response: As discussed in throughout the EA, motorized recreation on the Sandia Ranger District has been predominantly concentrated in the Cedro area. Through concerns and complaints that have been received during the public involvement process there have been conflicts between non motorized and motorized users, and between users of different classes of motorized vehicles, especially motorcycle and ATV riders. See further discussions on user conflicts in this section.</p>	
<p>111</p>	<p>Please refer to page 3 of the draft EA: Motor vehicle use on the Sandia Ranger District has increased in recent years as the Albuquerque and East Mountain communities’ population continues to grow. This increased use has led to the proliferation of unauthorized (user-created) routes; increased conflict between motorized and non-motorized recreationists; complaints about noise, trespass, and dust from adjacent landowners; and concerns about degraded soil, water, vegetation, and wildlife habitat conditions.</p> <p>This is a government document making very strong accusations of illegal behavior by a large segment of the public. If these allegations are true there will be a record of the misbehavior. If there is no record, it is illegal and defamatory for you to make these statements.</p> <p>Therefore, I want you to provide the following in the draft EA before continuing with this analysis:</p> <p>The term “unauthorized (user-created) routes” insinuates illegal behavior by a large segment of the public. Please explain in the draft EA that these routes are not documented in the current Forest Road Atlas and are not in the system of official routes. Under current policy, the areas being analyzed are open to cross country travel and in no way are these routes unauthorized. The term unauthorized routes is used throughout the draft EA. Please replace each occurrence with the term “Non-System routes”.</p> <p>If in fact OHV/recreationists are causing complaints about noise, please place the administrative record of each case in an appendix to support this claim. These records should include USFS LEO reports and Sheriffs Office reports, and other sources where there is a confirmable “incident.” If no such records are available, please state that “there is no evidence that these incidents have actually occurred.”</p> <p>If in fact OHV/recreationists are trespassing, please place the administrative record of each case in an appendix to support this claim. These records should include USFS LEO reports and Sheriffs Office reports. If no such records are available, please state that “there is no evidence that these incidents have actually occurred.”</p> <p>If in fact OHV/recreationists are causing complaints about dust, please place the administrative record of each case in an appendix to support this claim. These records should include USFS LEO reports and Sheriffs Office reports, and other sources where there is a confirmable “incident.” If no such records are available, please state that “there is no evidence that these incidents have actually occurred.”</p> <p>If there are increased conflicts between motorized and nonmotorized uses, please cite the analysis proving that “OHV” is always the origin of the “conflict” and that the “non-OHV” activity is</p>

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	<p>never the source of the conflict; please cite the authority set forth by Congress that provides for the preservation of the “nonmotorized” user’s pleasure at the expense of the motorized user’s pleasure. If no records of such conflicts are available, please state that “there is no evidence that these incidents have actually occurred.” If those records do reveal any supporting evidence, be reminded that in this management scenario it is perfectly legitimate; in fact you are obliged, to suggest that the non motor user should consider utilizing the Wilderness and other set-aside areas.</p> <p>Therefore, in the event that no records supporting the accusations are available, I want you to delete the entire passage, and state that the actual and the only reason for this EA is to satisfy the Court and to comply with 36 CFR designated route regulations.</p> <p>The purpose and Need has nothing to do with any of the above statements because there is no evidence provided to support them.</p>
	<p>Response: Page 3 of the EA describes the existing conditions in the project area related to motor vehicle use. There was no attempt to portray one or more user groups as lawbreakers or the “source of the conflict”. The term “unauthorized route” is the proper term for any route that is not part of the Forest Service system and inventory. The EA accurately portrays the purpose and need for action.</p>
<p>153, 170</p>	<p>Purpose and Need Not Adequately Defined. - The Pueblo does not believe that the Environmental Assessment adequately defines the purpose and need for the proposed action. Off-road vehicle use is currently occurring in the National Forest. The current failure by the Forest Service to adequately regulate the impacts caused by the current use appears to be directly related to a lack of resources and manpower delegated to individual forests in the federal budget. This shortage could be more appropriately addressed by an increase in budget funding and the collection of additional revenues through the implementation of fees for individuals using the National Forests for off-road recreational vehicle use. Similar revenues are already being raised through the levying of fees on automobiles using established road systems in day-use recreational areas. The fees should be adequate to fully support the U.S. Forest Service's efforts to adequately regulate this use of the national forests within the U.S Forest Service system. As stated in the EA, the Travel Management Rule specifically states that motor vehicle use is a legitimate and appropriate way for people to enjoy their National Forests-in the right places, and with proper management." While the Pueblo does not feel that this statement implies that motorized vehicles should be allowed throughout all areas of the National Forests, it also believes that the key point in this statement is "... in the right places, and with proper management." Throughout the Environmental Assessment, the feasible of actions are discussed against the backdrop of a "limited budget." If motorized travel is to be allowed in the Nation Forests, this situation cannot exist even when reference is made to the stated intent of the Travel Management Rule, itself. The EA states that there are features common to all action alternatives. One of these features is that, "Partnerships and volunteer opportunities for proposing, creating, and maintaining motorized road and trail routes would be emphasized." While this is a noble goal, the Pueblo of Sandia does not believe that the U.S. Forest Service can ensure that an all-volunteer force can adequately provide management and enforcement of ORV use.</p>
	<p>Response: We disagree that the Purpose and Need is not adequately defined in the EA. As far as management and enforcement is concerned, the EA does not state that an all-volunteer force would be used. Volunteers and partners would be key players in assisting the Forest Service in implementing any alternative. However, they would supplement Forest Service law enforcement and recreation personnel.</p> <p>On page 68270 of the Travel Management Rule Public Comments on Proposed Rule and Department Responses, it states:</p> <p>“The Forest Service utilizes a mix of agency personnel, contractors, volunteers, and cooperators to accomplish many elements of its mission. Without the support of cooperators and volunteers and the services of contractors, the agency would be unable to provide the same level of service to the public or</p>

<i>Comment #</i>	<i>Comment</i>
	care for the lands entrusted to it within its current budget. Like all law enforcement agencies, the Forest Service depends on citizen reports of violations as a critical component of its enforcement program.”
165	In the Purpose of and Need for Action section the first item states "Designate a motorized route system that provides for public access and recreation travel on the district from available routes". I cannot find in the notice for the Travel Management Rule where it refers to "available routes". This is incorrect and needs to be changed to "Designate a motorized route system that provides public access and recreation travel on the district". This more accurately reflects the rules directive.
<p><u>Response:</u> The Purpose and Need as written is consistent with Forest Service policy.</p> <p>On page 68269 of the Travel Management Rule Public Comments on Proposed Rule and Department Responses, it states:</p> <p>“Some respondents asked the Forest Service to include potential future routes in the inventory and designation process, and to make provision for including additional user created routes discovered after designation is complete...Long-term planning may identify potential corridors suitable for consideration for future construction. However, the agency does not intend to designate routes on a motor vehicle use map until such routes actually exist, have been analyzed and evaluated, and are available for public use. Section 212.54 of the final rule provides for revision of designations as needed to meet changing conditions. New routes may be constructed and added to the system following public involvement and site-specific environmental analysis. Such revisions may also include closures or changes in designations.”</p>	

<i>Comment #</i>	<i>Comment</i>
(AD8) Existing Condition	
26	Specifically in Chapter 1 Purpose and Need Page 3 Paragraph One; Existing Condition “Motor vehicle use on the Sandia Ranger District has increased in recent years as the Albuquerque and East Mountain communities’ population continues to grow. This increased use has led to the proliferation of unauthorized (user-created) routes; increased conflict between motorized and non-motorized recreationists; complaints about noise, trespass, and dust from adjacent landowners; and concerns about degraded soil, water, vegetation, and wildlife habitat conditions” How did you get that data? I am sure the analysis of the data is wrong and Existing Condition and the citation cited does not mention OHV, ATV or dirt bikes anywhere in the citation.
<p><u>Response:</u> The description of the existing condition comes, in large part, from the information the public provided during the extensive public involvement process that preceded the development of the proposed action.</p>	

<i>Comment #</i>	<i>Comment</i>
(AE3) Cumulative Effects	
47A	The Environmental Assessment (EA) for Travel Management on the Sandia Ranger District incorrectly attempts to mitigate restrictions on off-road vehicle travel by suggesting use of private lands and motocross tracks as a replacement. Such verbiage is highly misleading. Private lands and race tracks are NOT a suitable substitute nor replacement for the off-road trail experience. Page 94, Recreation Resources, Cumulative Effects Area, cites several riding areas that are either on private lands and/or tracks established for financial gain and generally support racing activities. It is not appropriate for the Forest Service to suggest through the EA that these activities are a replacement for the OHV trail experience or that they provide cross country travel.

	<p>Here the EA fails to recognize that it is not cross country travel that the OHV traveler seeks out, but the basic trail system.</p> <p>There is no guarantee that private lands will remain available for OHV use as they are subject to the whims, desires and legal action of the owners. I, personally, have been challenged by employees of the land owners to the west of Rio Rancho and Bernalillo that the EA lists as other riding areas. Here also, the EA fails to differentiate the differences between trail riding and riding in the desert areas such as those to the west of Rio Rancho. There is no comparison. It is totally inappropriate for the Forest Service to suggest private lands as a replacement for any of the experience lost as a result of the Travel Management Rule</p> <p>The Montessa Park area is essentially a small area of sandy hill climbs and bears no resemblance to the trail riding experience one enjoys in the Cedro area.</p> <p>To suggest that motocross tracks are a substitute is completely erroneous. Motocross tracks are established for competitive racing venues and are generally not frequented by the OHV community. Motocross racing is a dangerous, high speed form of motorcycle racing that has no bearing whatsoever on the experience that the typical trail rider seeks. These tracks are set up for financial gain and may disappear based on the level of participation or other financial considerations. The J-Five track near Say Ysidro went bankrupt and closed in the past and is now attempting to be revived pending issues such as water rights/availability.</p> <p>The EA should not attempt to influence the decision process by suggesting there are private lands and race tracks available that are suitable substitutes for lost trails or seasonal closures. Such references will lead to erroneous conclusions regarding availability of off-highway vehicle trail riding areas. All such references and inferences should be removed completely from the EA.</p>
	<p><u>Response:</u> The description of the cumulative effects area on page 94 of the EA provides information about other riding opportunities within a 3-hour drive of the project area. It makes no attempt, either explicitly or implicitly, to “mitigate restrictions on off-road vehicle travel by suggesting use of private lands and motocross tracks as a replacement”. The purpose of this section is to lay the foundation for the analysis of cumulative effects displayed for each alternative. The direct, indirect, and cumulative effects are addressed in subsequent sections of the EA.</p>
<p>79</p>	<p>There is no mention of what efforts the Forest Service had taken or not taken to notify the public to the fact that they were entering a multi-use area where cross country travel is allowed by all user groups including motorized vehicles. <u>It needs to be stated in the document that the lack of management and communication by the Forest Service has lead to much of the conflict between user groups.</u></p> <p>Many activities that have been allowed by permits by the Forest Service has contributed to some of the conditions in the Draft EA statement above, degraded soil, water, vegetation and wildlife habitat. Hundreds of Wood cutting permits have been issued over the years. Many wood gatherers have gone off exiting roads, down wide portions of single track trail, or went cross country during muddy conditions, legally, but none the less changed the smooth tread of the single track to a deep rut that continued to erode over the years. <u>Please include a statement that the current condition in the affected scoping area is not attributed to any user group, and that the forest service has allowed commercial activities that have also contributed to what is now being evaluated.</u></p> <p>Clearing areas because of fire danger has also caused great changes in the scoping area. What once was a pristine single track trail off of Juan Thomas road is now rambling roads with ruts over a 20 acre area caused by the forest service. <u>This needs to be mentioned in the Draft EA. That Forest service is responsible for this area. No user group is responsible for what may be the worst case of resource and wildlife Habitat damage in the scoping area.</u></p>

	<p>Is the OHV community being held to the same standards when it comes to wildlife and wildlife habitat? Noise disturbance and human presence during winter months has been cited for the need of seasonal closures. Sandia Ski area which operates during the winter months and the summer months has a much larger foot print and is inside a Wilderness area. The amount of human impact in a ski area dwarfs the amount one would see in the Cedro area on a very crowded day with all user groups combined....</p> <p>Chapter 3 Page 54 This needs to be removed from the Draft EA. The below statements are either, false, or misleading. The Statements below have no place in the decision process. (references the <i>Recreation Cumulative Effects Area discussion on pages. 94-95.</i></p>
	<p>Response: The emphasis in this proposal is on management of the motorized route system. The intent of pages 3-6 of the EA and the resource sections in Chapter 3 of the EA is to provide a description of the existing conditions in the project area. While it is possible that the factors described in the comments played a role in the development of the existing condition, including discussion of them in the EA would merely amass needless detail. It is not clear to what the final comment refers – seasonal closures in the alternatives are designed to limit effects on soils.</p>
89, 173	<p>NEPA requires extensive consideration of cumulative effects. (40 C.F.R. 1508.7; 1508.8). The Forest Service Environmental Policy and Procedures Handbook sets the standard for analysis of cumulative effects:</p> <p>"Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions, when added together, may have collective or cumulative impacts, which are significant. Cumulative effects that occur must be considered and analyzed without regard to land ownership boundaries. Consideration must be given to the incremental effects of past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals."</p> <p>The Council has extensively described the minimum requirements for analysis and mitigation of cumulative impacts on Environmental Quality in its publication "Considering Cumulative Effects Under the National Environmental Policy Act (1997), by the CEQ regulations implementing NEPA (40 C.F.R. 1508.7; 1508.8), and by the Forest Service's Environmental Policy and Procedures Handbook (FSH 1909.15.15.1). Specific examples of quantitative information to be addressed by cumulative effects analyses are identified by these sources as well as other regulations or rules for specific resources, such as threatened, endangered, and sensitive wildlife. FSM 2620.3; 2620.44; 2621.3.</p> <p>At minimum, an adequate cumulative effects analysis must:</p> <ol style="list-style-type: none"> (1) identify the past, present, and reasonably foreseeable actions of Forest Service and other parties affecting each particular aspect of the affected environment; (2) must provide quantitative information regarding past changes in habitat quality and quantity, water quality, resource values, and other aspects of the affected environment that are likely to be altered by Forest Service actions; (3) must estimate incremental changes in these conditions that will result from Forest Service actions in combination with actions of other parties, including synergistic effects; (4) must identify any critical thresholds of environmental concern that may be exceeded by Forest Service actions in combination with actions of other parties, and; (5) must identify specific mitigation measures that will be implemented to reduce or eliminate such effects.

	<p>We do not believe the SRD completed the cumulative effects analysis properly. For example, the Cumulative Effects Analysis for all alternatives only <i>generally</i> addresses the impacts to wildlife. There is no reference to the impacts on non-motorized recreationists’ experience, there is no quantitative information provided, incremental changes in conditions are not estimated, synergistic effects are not addressed, impacts to other resource values are not addressed, and no critical thresholds of environmental concern that may be exceeded are identified other than to state “[m]any of the species on the MIS list are not endangered or threatened under the [ESA], but are seeing a decline over time due to habitat loss and human disturbance[,]” and that over time, pressure will be put on “these areas” as refuges from human impacts. (EA:71)</p> <p>Similarly, the Cumulative Effects Analysis for the alternatives addresses only the impacts associated with Wildland Urban Interface treatment and increased recreation pressure (addressed only in Alternative 1), future development and ORV use on the designated routes (all alternatives).</p> <p>Given the scant analysis of cumulative effects, it is notable that the only alternative presented in the EA that would reduce cumulative effects to wildlife habitat is Alternative 6. Based on the SRD’s own cumulative effects analysis, the only plausible alternative for the SRD to proceed with would be Alternative 6. Should the SRD determine that Alternative 6 is not the alternative it will proceed with, we believe the SRD must take a step back and complete a proper cumulative effects analysis that would take more than a cursory look at the impacts on just one of the aspects of the cumulative effects requirements. Given that the SRD has decided to proceed through the Travel Management Planning process via the environmental assessment rather than the more thorough environmental impact statement, the SRD should at least make an attempt to thoroughly address cumulative impacts. This would afford the public the ability to evaluate the cumulative effects of each alternative and anticipate the consequences of each alternative on the natural environment and their own recreational experience.</p>
	<p><u>Response:</u> The EA addresses cumulative effects in compliance with Forest Service procedures and considers those effects relevant to the resources within the project area and the issues identified as important for the proposal. Appendix B of the EA contains a list of the past, present and reasonably foreseeable future actions and thresholds as defined in the Forest Plan. Existing conditions for resources are reflective of past and present actions and uses in combination with natural events such as fire, rainfall and drought. Where available quantitative information is provided, for other resources qualitative information is used. Since most of the area under consideration with this project has been opened to cross country travel and trails in the Cedro area have been open to most motor vehicle uses for over 20 years, there is not baseline data to compare against less motorized use. The cumulative effects analysis provides qualitative and quantitative assessments of the impacts by resource.</p>
<p>113</p>	<p>I am an environmental geologist for ASCG Inc. in Albuquerque and the environmental assessment did not fully address groundwater contamination generated by increased usage of the Tablazon trail head. Groundwater is shallow at the trail head, approximately twenty feet below ground surface in an area of fractured bedrock. Additional usage of the trail head could lead to spillages of gasoline and diesel fuels that will eventually end up in the groundwater. In addition, illegal dumping could lead to greater groundwater contamination. All of the homes in Tablazon all supplied with groundwater - the life blood of the neighborhood. This natural resource must be protected.</p> <p>Another concern is that the New Mexico Environment Department is requiring that Tablazon residents associated with the failing waste water treatment system to fund the construction of a new waste water treatment system that could cost up to a million dollars. So any increase of usage in the area endangers this fragile environment.</p>
	<p><u>Response:</u> We have noted your concern for the groundwater resources in the Tablazon area. Spills have not been a problem with the existing trailheads. The trail system is relatively small and therefore refueling on-site is rare. The potential for illegal dumping is minimal and is potentially decreased with increased use with trail users</p>

frequenting the area. Illegal dumping tends to take place in isolated areas rather than at a designated site such as a trailhead.

The watershed and air specialist completed an analysis on the effects of the trails and roads in the watershed above the treatment plant and it is in the Watershed and Air Specialist report. As the treatment plant is located outside of the immediate floodplain the risk is minimized and the effects of trails and road on National Forest land are masked by the effects of the development and roads on adjacent private land within the Tablazon subdivision from a surface hydrology standpoint.

Increased use at the Lower Pine trailhead is not anticipated compared to the use since the trailhead was established. There is easier access and more parking available for most individuals traveling from Albuquerque and other east mountain communities from NM 337. There has not been any evidence of these types of problems to date at the Lower Pine trailhead.

<i>Comment #</i>	<i>Comment</i>
(AG6) Forest Plan Amendment	
107	<p>Regarding Cibola Forest Plan Amendments, we have a small suggestion: Recreation, pg. 59-1 – 60</p> <p>Current Direction: Designate roads and trails open to motor vehicle use and sign closed areas on the ground. Use positive signing and regulatory techniques. Maps of ORV closure areas are available to the public.</p> <p>Proposed Direction: Roads and trails open to motor vehicle use will be designated by vehicle class and, if appropriate, by time of year pursuant to 36 CFR 212.51. Designated roads, trails, and areas shall be identified on a MVUM that is available to the public pursuant to 36 CFR 212.56. (Chapter 2, pg. 20 – underline emphasis added)</p> <p>We see no reason to eliminate direction to use positive signing and regulatory techniques. Please consider leaving that in the plan.</p>
<p>Response: The Forest Plan direction for “positive signing” would require posting of all routes as either open or closed to motorized use. The Plan Amendment would make the Motorized Vehicle Use Map (MVUM) the primary designation tool, which would be in compliance with the Travel Management Rule. Route numbers will be posted along roads and trails that correspond to the MVUM designations.</p>	

<i>Comment #</i>	<i>Comment</i>
(AD7) Decision	
23	<p>I am certainly not trying to demonize anyone here, but from the first meeting I attended it seemed to me that the decision had already been made, and the "public input" was just something you had to get through.</p>
<p>Response: The deciding officer has reviewed the EA, and the comments received throughout the process. The decision will not be made until after a throughout review of the comments, concerns, and preferences. There was a far more extensive public involvement process on this project than many environmental assessments because the deciding officer recognizes the importance of this decision to many people who use the area for both motorized and non motorized recreation and live near and within the district boundary.</p>	
89, 173	<p>While meeting NEPA requirements is a necessary part of travel planning, doing so does not necessarily meet the Executive Order requirements. The Executive Order requires responsible officials to choose the alternative that minimizes impacts.</p>
<p>Response: Each alternative has measures included that would minimize the impacts to resources as described in E.O. 11644.</p>	
109	<p>I was unable to locate the USFS responses to specific comments/concerns brought up by the Public during scoping. Specifically, I could not find justification in the proposed alternative why</p>

<i>Comment #</i>	<i>Comment</i>
	<p>existing 4x4 motorized recreational access should be minimized or eliminated in the Gamble Oak/Mahogany Trails areas.</p> <p>It appears that the USFS decision had already been made prior to entertaining the legally required comments from the Public. This proposed Travel Management Plan is woefully lacking in arguments by the USFS to justify its decision.</p>
<p><u>Response:</u> The Forest Service developed the Proposed Action to meet the purpose and need described in Chapter 1 of the EA. It was based on information exchanged with the public during the many open houses and work group meetings, the direction contained in the travel management rule, and discussions among the Forest Service resource specialists about the conditions on the Sandia Ranger District. The scoping process began when we shared the Proposed Action with the public; the public's responses during this stage of the process were used to identify the issues. This information is summarized in Chapter 1 of the EA.</p> <p>There is full size 4x4 access being considered for designation in Alternative 3 in the EA in the Gamble Oak/Mahogany Trails areas.</p>	

<i>Comment #</i>	<i>Comment</i>
<i>(AD6) Monitoring</i>	
21	<p>I understand that you are considering a plan to include travel in the lands by vehicles, but based upon your past record, seriously doubt your ability to monitor any of the actions you are proposing.</p> <p>Once you designate an area for vehicles, how are you going to monitor the area, and protect and preserve the land and the wildlife which is the purpose of The Forest Service?</p>
<p><u>Response:</u> See the response to the first comment under section AC7 on page 125. Enforcement is part of the monitoring process. In addition, the Sandia Ranger District plans to increase its use of volunteers to monitor the use and conditions, particularly of trails, and assist with maintenance. After a decision is made that selects an alternative to implement, a more specific monitoring plan will be developed.</p>	
73, 75	<p>According to the USFS there are four threats to the health of the Nation's forests and grasslands. Two of these threats are related to the current USFS CNF SRD TMP.</p> <p>Threat #2 – Unmanaged recreation, this refers to the unmanaged use of off-highway vehicles (OHV) as a form of recreational use of forest land. EA proposes the establishment of designated trails for OHV but does not provide a detailed plan for mitigation, maintenance, enforcement, and specifically for monitoring. Without such detailed plans, it is impossible for anyone to make a solid judgement and decision about the costs and impacts from OHV use in the CNF SRD.</p> <p>The mitigation, maintenance, enforcement and monitoring plans are of particular importance for the proposed TMP in the CNF SRD due to the fact that much of the project area has sensitive soils, (severe erosion potential, easily damaged by vehicles , tire gouging and rut formation.).</p> <p>As noted above, a monitoring plan is required for the project area. The EA document does not include a Monitoring Plan. Final decisions about, and acceptance of the proposed actions can not be made without a Monitoring Plan. Why has a Monitoring Plan not been prepared? And provided to the public? The public has the right to review the monitoring plan prior to acceptance of the alternatives. This information is necessary to make a decision of the best alternative related to the associated impacts.</p>
<p><u>Response:</u> A detailed monitoring plan that identifies all the actions to be taken does not need to be included in the EA. The elements included in the monitoring plan would depend on which alternative is selected for implementation. A monitoring plan is included in Appendix C of the EA, and will be referenced in the decision document.</p>	

Comment #	Comment
89, 173	<p>Section 212.57 of the Travel Management Rule requires the forests to monitor effects of motorized use. The SRD should have developed a clear monitoring plan that includes annual field monitoring of environmental and social impacts. The monitoring plan should be tiered to the transportation program and its standards and guidelines so that when threshold values are met the appropriate management actions will be undertaken.</p> <p>The SRD plan to enforce, monitor, and maintain a motorized vehicle route system is inadequate. The newly adopted travel rule mandates that the Forest Service consider “the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration.” The rule also states that the responsible official must “monitor the effects of motor vehicle use on designated roads and trails and in designated areas.” The designation of motorized vehicle routes, therefore, must be compatible with the ability of the agency to monitor, enforce, and maintain that system.</p> <p>We support the SRD’s plan to monitor motorized vehicle use and impacts for all action alternatives. However, we believe the SRD should make explicit how it plans to block routes not designated for motorized use. The SRD should also make explicit how they plan to monitor and assess the implementation and effectiveness of mitigations and best management practices. We do not believe it is necessary for the SRD to await the decision on travel management to develop and make public a plan to monitor mitigation. However, a vague description of a “plan” is not in fact a plan and makes it impossible for the public to effectively comment upon such a plan.</p>
97	<p>We are also concerned that a monitoring plan has not been completed. A monitoring plan is required for the project action and project area. The EA document does not currently include one. Final decisions about, and acceptance of the proposed actions cannot be made without a monitoring plan.</p> <p>There are multiple reasons for these specific requests, including, but not limited to:</p> <ul style="list-style-type: none"> ○ Danger to horseback riders; ○ Danger to bicyclists/mountain bikers; ○ Hikers, and all others using the trail system; ○ Safety; ○ Increased pollution; ○ Disruption of wildlife; ○ Damage to trails, ○ Increased security concerns; ○ Damage to soil, watershed, vegetation, and other forest resources; ○ Harassment of wildlife and significant disruption of wildlife habitats; and ○ Fire danger.
<p>Summarized Comment: Commenters request that a detailed monitoring plan be included in the EA.</p>	
<p>Response: Section 212.57 provides for monitoring the effects of motor vehicle use “as appropriate and feasible.” The actions identified in the EA represent the appropriate and feasible actions needed to monitor the effects of motorized use. A formal plan need not be incorporated into the EA; many of the specific elements of a monitoring plan depend on the alternative selected. When an alternative is selected, a formal monitoring plan can be formulated. This plan would incorporate monitoring specific to the requirements listed in Chapter 2 of the EA plus standard monitoring activities that are a part of normal management. For example, road and trail condition surveys are a standard monitoring requirement that are not part of the proposal but would provide information valuable for monitoring the effects of motorized use. Additional monitoring may be identified at a later time – it would not be necessary to identify these actions in the EA, as they would likely depend on the information gathered during early monitoring.</p>	

<i>Comment #</i>	<i>Comment</i>
<i>(AH3) Requests for a Revised EA</i>	
165, 188	<i>Summarized Comment:</i> Comments express an expectation to review a final EA. Comments 165 states: “This document takes into consideration too many nonmotorized comments, such as some of the reasons given for the “seasonal closures” issue. Please revise to address the concerns of the motorized community as the rule was written for.” Comment 188 suggests that: “Time is very limited, and prohibits this comment from providing to the ID Team a detailed list of revisions of every chapter, alternative, and outcome. We expect the ID Team to do a thorough and ethical job, and produce a fully informed and accurate Final EA.”
<i>Response:</i> Under the CEQ regulations it is not required to prepare a final EA. An errata sheet has been prepared to address necessary corrections that were identified during the EA comment analysis. This “Response to Comments document is an appendix to the EA, and provides additional clarification as well.	

<i>Comment #</i>	<i>Comment</i>
<i>(AE7) Requests for an EIS</i>	
66	The subject EA needs to be upgraded/amended to explicitly address how fugitive dust will be adequately mitigated now that Bernalillo County has gone on record that it will not provide an exemption to the Clean Air Act for dust associated with any of the proposed Alternatives in the EA. Fugitive dust as well as actions to mitigate such dust, represent impacts that are not adequately addressed in the current EA, and may well represent significant impacts precluding a Finding of No Significant Impact (FONSI). That is, if fugitive dust cannot be demonstrably shown to be of no significant impact, then an EA (with its associated FONSI) cannot be used under the National Environmental Policy Act (NEPA) to justify any proposed action. Instead Draft and Final Environmental Impact Statements (EISs), with their associated Record of Decision (ROD), must be developed/pursued to proceed with any proposed action. Therefore, at a minimum, the current EA must be upgraded/amended to explicitly address fugitive dust and its mitigation, with a supportable conclusion that it does not represent a significant impact. If such a conclusion cannot be supported, a Draft EIS must be developed, offered for public comment, and subsequently updated to a Final EIS; with a formal ROD issued based on the Final EIS. It appears that a fugitive dust mitigation plan is needed to upgrade/amend the current EA, and determine whether a FONSI ultimately is justified.
<i>Response:</i> Bernalillo County has been delegated the responsibility to comply with the Clean Air Act relative to “fugitive dust”. The Forest Service will comply with the applicable regulations	
The Fugitive Dust Control regulation for Albuquerque-Bernalillo County does not change the actual potential for fugitive dust from motorized vehicle use. The recent changes in the regulations increase the scope of purview of the Albuquerque Air Quality Division to include all roadways (includes motorized vehicle trails) open to public use. There is no expectation of a significant impact from fugitive dust created as a result of motorized vehicles use or as a cumulative effect of the use and other activities within the airshed. Fugitive dust mitigations will be addressed with the Air Quality Division Staff through their permit processes.	
73, 75, 89, 153, 170, 173	<i>Summarized Comment:</i> Concern that an EIS or revised EA should be prepared. Examples of comments include: <ul style="list-style-type: none"> • <i>Comment 73:</i> I believe I will be more supportive of MVUM in the forest particularly the Cedro area, if more planning is done, perhaps via a modified EA or a final EIS. At this time, I do not see that the USFS has enough resources, (information, funding, enforcement, controls, and management) to implement the existing proposed action. • <i>Comment 89:</i> The SRD has failed to do an adequate analysis of the environmental impacts of the proposed action and alternatives in the Environmental Assessment and we believe the SRD should complete an Environmental Impact Statement for any alternative developed for the Travel Management Plan and Motor Vehicle Use Map. Developing an

Comment #	Comment
	<p>EIS would ensure the SRD was in compliance with environmental laws including NEPA, NFMA, CWA, and others. Assuming that the SRD fails to prepare an EIS, we believe that only Alternative 6 would offer the most resource protection, is the best option to reduce user conflicts and is the only legally justifiable alternative. In short, the SRD EA is not an analysis, but merely a report of the negative environmental consequences ORV use will have on the forest ecosystem....</p> <ul style="list-style-type: none"> • <i>Comment 152:</i> Evaluation of Impacts is Inadequate. The Pueblo does not believe that the impacts of off-road vehicle use on watersheds, vegetation, soils, wildlife, and neighboring communities were adequately evaluated by the U.S. Forest Service in the Environmental Assessment for Travel Management on the Sandia Ranger District (EA). The level of evaluation put forward in the EA only provided cursory information for public review and comment and did not adequately address the full range or magnitude of potential impacts for any of the proposed alternatives. A full EIS would afford the Forest Service the opportunity to fully address this vitally important issue... The Pueblo views a Forest Service Travel Management Plan that affects lands forest-wide on a national forest that abuts and includes the T'uf Sur Bien Preservation Trust land as a major Federal action significantly affecting the quality of the human environment.
<p><u>Response:</u> The significance of effects would be determined by the responsible official based on the significance factors in the CEQ regulations at 40 CFR 1508.27. The responsible official will make the determination whether to prepare an Environmental Impact Statement or a Finding of No Significant Impact considering the context and intensity of the effects disclosed in the EA relative to the criteria. This determination will not be made until the responsible official reviews the record (including the comments received during the 30-day comment period).</p>	
<p>97, 120, 130</p>	<p><u>Summarized Comments:</u> Concerns that fugitive dust issues imply a level of significance that warrant preparation of an EIS. Excerpts from comments received include:</p> <ul style="list-style-type: none"> • <i>Comment 97:</i> We know the US Forest Service has completed the EA with the findings of no significant impact. However the Fugitive Dust Control Determination demonstrates that the current EA is inappropriate because it has now been determined by a government body that a significant impact does exist that is not being addressed by this EA. • <i>Comment 120:</i> Please also know that we know the CNF's Sandia District TMR Environmental Assessment does not come even close to addressing any specifics in how the CNF will control (fund, maintain, patrol, etc.) fugitive dust emissions on trails designated for motorized use. In light of the removal of the Forest Service's and DOI's former exemption from dust control requirements on unpaved roads and motorized trails in 20.11.20 NMAC, dust control on motorized trails is now a requirement for the CNF in Bernalillo County... Issuing a FONSI without doing this would be a NEPA violation. • <i>Comment 130:</i> Procedural issue – Fugitive dust mitigation likely. Have not addressed how the Forest Service is going to mitigate dust. People believe there is a significant issue. Need a mitigation plan that demonstrates how fugitive dust will be mitigated or can not sign a FONSI and should prepare an EIS.
<p><u>Response:</u> The Fugitive Dust Control regulation for Albuquerque-Bernalillo County does not change the actual potential for fugitive dust from motorized vehicle use. The recent changes in the regulations increase the scope of purview of the Albuquerque Air Quality Division to include all roadways (including motorized vehicle trails) open to public use. There is no expectation of a significant impact from fugitive dust created as a result of motorized vehicles use or as a cumulative effect of the use and other activities within the airshed. Fugitive dust mitigations will be addressed with the Bernalillo Air Quality Division Staff through their permit processes.</p> <p>The EA addresses concerns about particulate matter, or fugitive dust, on pages 73-85. Additional analysis is in the Watershed and Air Specialist Report. In working with the Albuquerque Air Quality Division of Environmental Health we have found several effective mitigations to limit fugitive dust (http://www.cabq.gov/airquality/fugitivedustcontrol.html). Similarly we have several ways to monitor dust including visual monitoring similar to procedure utilized by the City/County and specialized equipment that is</p>	

<i>Comment #</i>	<i>Comment</i>
	typically utilized to monitor smoke emissions from wildland fires. The Fugitive Dust Control Regulations do not specify mitigations to limit fugitive dust but rather establishes a permitting process. The goal of mitigation is to limit potential fugitive dust and by doing so reduce the level of impact. Reducing the level of impact reduces the associated permit fee. Based on discussions with the Air Quality Division the Forest Service will likely not need to implement additional mitigation measures to limit potential for fugitive dust on roads and trails open to public use.

<i>Comment #</i>	<i>Comment</i>
<i>(AF5) Potential Future Actions</i>	
88, 89, 173	<p><i>Summarized Comment:</i> Concern related to the potential for future construction of motorized trails in the Cedro area. An example of the concern expressed is:</p> <ul style="list-style-type: none"> <i>Comment 88:</i> We note that there was interest in additional ATV trail construction in the Cedro area. We feel there are already a large number of motorized trails throughout this area. In to the foreseeable future, the Sandia RD should direct any funds it has for motorized trails toward mediation of problem sections of existing trails and/or increased enforcement. Any effort to increase ATV trails should be tied directly to how well motorized users have operated without conflict under the new plan.
<i>Response:</i> Future development is outside the scope of this proposal. Any new designations will need to meet the requirements of the Travel Management Rule and will be subject to the appropriate level of environmental analysis.	
107	We agree with the decision not to “Designate Trails for Specific Non-Motorized Uses” except it may give rise to the creation of additional user created mountain bike trails. It may be that additional mountain bike trails are needed. If that is the case, the agency should consider ‘getting out in front’ of the situation by designating new mountain bike trails in the near future. Doing so may further reduce recreational user conflict in the Cedro area.
<i>Response:</i> Designation of mountain bike trails, as well as other non-motorized trails, is outside the scope of this proposal.	

<i>Comment #</i>	<i>Comment</i>
<i>(AE1) General Notes</i>	
39	This comment letter included photos of damage observed from OHV use in the Cedro area that are available in the project record.
<i>Response:</i> The photos were reviewed by the ID team, and have been filed in the project record. The commenter had also submitted the same photos to Mary Bean, Former District Program Manager, in 2006. The ID team had an opportunity to review at that time as well, and consider in the analysis.	

<i>Comment #</i>	<i>Comment</i>
<i>(AE4) Terminology</i>	
48, 108, 132, 156, 165	<p><i>Summarized Comment:</i> There is a concern that using the term “unauthorized” to categorize roads and trails not included in the Forest Service system inventory creates a negative impression of motorized recreationists and may influence the decision making process. Examples of comments received include:</p> <ul style="list-style-type: none"> <i>Comment 48:</i> The use of the term “unauthorized roads/trails” as used throughout this document has an inherent implication that, when combined with the use of the term “user created”, gives the perception to the reader that OHVs solely created these “unauthorized roads/trails”. In reality, the “user” who originally created the road/trail could have been an animal, a hiker, a mountain biker, a motorcyclist, an atv rider, or any number of others, even Forest Service personnel. Without any documentation that indicates who created these trails, no bias should be shown toward any group, as this can, and will likely, bias the final decision.

	<p>In order to remove bias from the EA, review the document and citations and replace the term “unauthorized” with ‘not in FS inventory’. If no documentation can be produced that shows who created the trails, eliminate the term “user created” from the entire EA and any supporting documentation. If documentation can be produced, identify the actual creator of the trail.</p> <ul style="list-style-type: none"> • <i>Comment 156:</i> It was during these public meetings that it was verbally requested to the Forest people that they stop using the word "unauthorized" when referring to trails that were not on current maps. Our verbal requests were ignored. We are now making an official comment - we do not want the word "unauthorized" to appear in this Environmental Assessment!!!... The word "unauthorized" appears in this document 69 times. Please change to "non-system" in the areas identified on the following pages of this comment. • <i>Comment 165:</i> I found the words "unauthorized routes" some sixteen times throughout this document. This term does not agree with the 1986 Forest Plan which allows for cross-country travel. Therefore, the use of "unauthorized route" is incorrect.
<p>Response: The term “unauthorized” is defined in the Travel Management Rule. On page 68277 Federal Register / Vol. 70, No. 216 / Wednesday, November 9, 2005 in the Travel Management Rule <i>Public Comments on Proposed Rule and Department Responses</i> Section there is a discussion on the direction to use the term “unauthorized.” “</p> <p>“The Department believes that the term ‘unauthorized or unclassified road or trail’ is cumbersome and that ‘unauthorized’ more accurately captures the nature of these routes than ‘unclassified.’ Accordingly, in the final rule, the Department is changing ‘unauthorized or unclassified road or trail’ to ‘unauthorized road or trail.’ The definition for unauthorized road or trail (a road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas) makes clear that unauthorized roads and trails are not part of the forest transportation system and are not officially recognized by the Forest Service... As stated in the preamble to the proposed rule, user-created roads and trails may be identified through public involvement and considered in the designation process. After public consideration and appropriate site specific environmental analysis, some user-created routes may be designated for motor vehicle use pursuant to § 212.51 of the final rule. These routes would become NFS roads or NFS trails and would be included in a forest transportation atlas and reflected on a motor vehicle use map.”</p> <p>In 36 CFR Part 212.1 the following is the definition of an unauthorized road or trail:</p> <p>“Unauthorized road or trail. A road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas.”</p> <p>Through the Rule the agency has been directed to use the term “unauthorized” to define roads or trails that are not part of the forest transportation atlas. This was also explained in the public meetings when the issue was raised.</p>	
<p>165</p>	<p>Overall, I was dissatisfied with the document as there are numerous references to ‘may’ and ‘might’ which are not scientific terms as required by the CEQ regulation governing the content of this type document. These types of references need to be stricken from the document and replaced with scientific evidence of the subject matter.</p>
<p>Response: The terms “may” or “might” convey the relative uncertainty of the some of the effects of implementing the alternatives. In the case of wildlife, the terms were used when habitat for a species existed in the area but species presence in the habitat was unverified. In another instance, the terms were used when discussing effects on recreational use patterns that are dependent on personal preferences. These terms were used appropriately.</p>	

Comment #	Comment																																																												
(AE6) Requests for Clarification																																																													
52	I did want to clarify that a "state" licensed vehicle is referring to any states and NOT just N.M. state. Las Cruces, Farmington and other areas of this state have numerous trails and OHV areas where out of state vehicles partake in recreational opportunities. I'd hate to turn these folks away!																																																												
Response: The term "state" licensed highway legal vehicles refers to any vehicle that is licensed by any state to operate on public highways. If a vehicle is legal to travel on an US Interstate Highway (for example, I-40) then this vehicle would be permissible to travel on roads designated for highway legal vehicle only routes.																																																													
79	<p>Page 3, 1st Paragraph: <i>Motor vehicle use on the Sandia Ranger District has increased in recent years as the Albuquerque and East Mountain communities' population continues to grow. This increased use has led to the proliferation of unauthorized (user-created) routes; increased conflict between motorized and non-motorized recreationists; complaints about noise, trespass, and dust from adjacent landowners; and concerns about degraded soil, water, vegetation, and wildlife habitat conditions</i></p> <p>The User conflicts and complaints cited in this document have no references to documentation. Were any conflicts or complaints documented? Are the Conflicts and complaints reported, if any, legitimate in nature?</p> <p>Please provide this information.</p>																																																												
Response: There are references throughout this document that user conflicts and complaints have been received during the public involvement process and are contained in the project record. Comments received in response to the proposals outlined in the EA and included in this document include numerous references to conflicts encountered between motorized and non-motorized recreationists. There are also records of complaints received at the district office and by district staff in recent years.																																																													
81	<p>I'm having a little difficulty evaluating the alternatives because it is not clear to me what the actual trail miles are. The single-track mileages in Table 4 do not appear to be consistent with the mileages in Tables 29-32. Here's a summary of the trail miles in those tables, rounded to the nearest mile:</p> <table border="1" data-bbox="332 1205 1479 1871"> <thead> <tr> <th><i>Alternative</i></th> <th><i>MC</i></th> <th><i>ATV</i></th> <th><i>4x4</i></th> <th><i>Seasonal Closure</i></th> <th><i>Reference</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>24</td> <td>8</td> <td>14</td> <td>Dec. 1 to Apr. 30</td> <td>Table 4</td> </tr> <tr> <td>1</td> <td>34</td> <td>8</td> <td>14</td> <td>Dec. 1 to Apr. 30</td> <td>Table 29</td> </tr> <tr> <td>3</td> <td>16</td> <td>20</td> <td>22</td> <td></td> <td>Table 4</td> </tr> <tr> <td>3</td> <td>22</td> <td>20</td> <td>22</td> <td></td> <td>Table 30</td> </tr> <tr> <td>4</td> <td>30</td> <td>1</td> <td>11</td> <td></td> <td>Table 4</td> </tr> <tr> <td>4</td> <td>44</td> <td>1</td> <td>11</td> <td></td> <td>Table 31</td> </tr> <tr> <td>5</td> <td>19</td> <td>1</td> <td>10</td> <td>Dec. 1 to Apr. 30</td> <td>Table 4</td> </tr> <tr> <td>5</td> <td>25</td> <td>1</td> <td>10</td> <td>Dec. 1 to Apr. 30</td> <td>Table 32</td> </tr> <tr> <td>6</td> <td>0</td> <td>0</td> <td>9</td> <td>Dec. 1 to Apr. 30</td> <td>Table 4</td> </tr> </tbody> </table> <p>16 miles of single-track West of NM 337 (?)</p>	<i>Alternative</i>	<i>MC</i>	<i>ATV</i>	<i>4x4</i>	<i>Seasonal Closure</i>	<i>Reference</i>	1	24	8	14	Dec. 1 to Apr. 30	Table 4	1	34	8	14	Dec. 1 to Apr. 30	Table 29	3	16	20	22		Table 4	3	22	20	22		Table 30	4	30	1	11		Table 4	4	44	1	11		Table 31	5	19	1	10	Dec. 1 to Apr. 30	Table 4	5	25	1	10	Dec. 1 to Apr. 30	Table 32	6	0	0	9	Dec. 1 to Apr. 30	Table 4
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<i>Comment #</i>	<i>Comment</i>
	(b) A caveat: I hunted around on the travel management section of the Cibola web site, but I haven't seen a map of the "16 miles of single-track West of NM 337" and I've generally only seen vague references to some "previous decision," so I'll ignore those for now.
	<p><u>Response:</u> Tables 29-32 were based on a tabular database that the agency uses for recording road information. Table 4 was based on the spatial roads data in our GIS database. Since there were inconsistencies, both data sets have been reviewed to determine the reason for the variation. The roads specialist report has been supplemented with a revision to reflect the mileages in the GIS database.</p> <p>The 16 miles of single-track were designated as part of the 1996 decision for the "Ecosystem Management Plan for National Forest Lands In and Adjacent to the Military Withdrawal." This decision complies with the Rule, and is not being revisited with this project. The 16 miles will be shown as designated for single track vehicles (motorcycles) on the MVUM. The decision notice is available on our web site at:</p> <p>http://www.fs.fed.us/r3/cibola/travel-management/tm_sandia/dnfonsi_military_withdrawl1296.pdf</p>
88	We assume there will be a more detailed plan developed for the construction of additional trails. We are cautiously supportive of this if the overall motorized travel network remains manageable. We will, of course, want to be part of the development of any plan that changes on-the-ground conditions for motorized travel.
	<u>Response:</u> At this time there are no plans for construction of additional trails beyond the short segments considered in the alternatives. There may be additional trails considered in the future, and would require the appropriate public involvement and analysis.
125	Here is a nitpick – for future reference, trail names should be consistent throughout: Gamble Oak without the "s" on Gamble; Pinyon should be Pinon.
	<u>Response:</u> Thank you for your observation. For the purposes of our record keeping, the most important element is the system number (for example NFST 05607 for Pinon or Pinyon trail.)
139	We direct you to the following inconsistencies in the EA: <ul style="list-style-type: none"> ○ p.. 31, Poker Chip (0512) Alternative 5 states that the trail is open for motorcycles (single track) and seasonal designation for May I – Nov.30. However, the Alternative 5 map indicates that Poker Chip (0512) is not designated for motorized use. ○ p. 108, Meadow Ridge (05252C) is designated for motorized use in the Cedro area. However, the Alternative 6-South map indicates that this trail is not designated for motorized use.
	<p><u>Response:</u> Thank you for pointing out these inconsistencies. Please note that we would like to correct the EA:</p> <ul style="list-style-type: none"> • Page 31, The table should show that in Alternative 5 that NFST 0512 Poker Chip is not designated for motorized use. • Page 108, Meadow Ridge (05252C) the statement for Meadow Ridge is correct, and this route would be designated under Alternative 6. The map will be corrected.
150	Grannys trail do not exit onto Pinon trail. If exits on Wildcat, near the Wildcat/Pinon trail junction.
	<u>Response:</u> Thank you for bringing this to our attention. This route has been recorded with GPS on site, and the decision map will be updated to reflect the change, and this will be added to the errata. The revised route has been reviewed by the ID team specialists and there is no change to the analysis.

Comment #	Comment
(AE9) Request for Extension of the Comment Period	
73, 75, 79, 85, 126, 129	<p><u>Summarized Comment:</u> Requests for an extension of the EA comment period. Excerpts from the requests for extensions include:</p> <ul style="list-style-type: none"> • <i>Comment 73:</i> This is a Request for an Extension of the Comment Period for a period of 30 days. The statement made in the comment form distributed by USFS, stating that regulations prohibit extending the comment period is not understood. A justification and explanation is requested, listing the regulations that prohibit such an extension. A blanket prohibition can not be made prior to full disclosure of all issues, comments, and responses to those comments. Furthermore, this prohibition may be inconsistent with the new Planning Rule which is based on more public involvement. In fact the new planning Rule states that one of its purposes is to engage the public in the development, implementation and monitoring of forest plans. • <i>Comment 79:</i> I would like to request some additional time for the comment period. All the documents supporting the Draft EA are not available at the web site. The length of the document and the complexity is over whelming to the general public with very long term effects on the OHV community. If this area is lost or diminished the recreational opportunities for people in the Albuquerque area will be permanently effected. We at least need a comment period to see how our comments are addressed in the next Draft EA. • <i>Comment 85:</i> On January 29, 2008 the Cibola National Forest started a thirty day public comment period for the Sandia Ranger District Travel Management Environmental Assessment. We request that the Cibola National Forest reinstate the comment period and extend it to forty-five days, for the following reasons: <ul style="list-style-type: none"> <u>1. Size of Document:</u> At 122 pages with over 180 additional pages of underlying material and more than 24 pages of citations, this is not an average EA. NEPA regulations state the CEQ advises that EA's be no more than 10-15 pages, and "In most cases, however, a lengthy EA indicates that an EIS is needed." <u>2. Responsible Official:</u> Supervisor Nancy Rose has decided that she will be the responsible official and not Sandia District Ranger Cid Morgan. This indicates an atypical EA. <u>3. Level of Controversy:</u> The Cibola National Forest engaged in a lengthy collaborative process facilitated by an outside consultant from the Institute for Environmental Conflict Resolution. They clearly anticipated controversy. The collaborative process was conducted from October 2006 to July 2007. Public workshops were held on October 26, 2006, January 24, 2007, May 8 & 9, 2007 and July 10 & 11, 2007 (dates as stated on Cibola web site). The collaboration was made up of twenty participants from the following groups: (source: Cibola web site) <u>4. Length of Public Process:</u> The public participation process went on for ten months. NEPA regulations advise "For cases in which only an environmental assessment will be prepared, the NEPA process should take no more than 3 months, and in many cases substantially less, as part of the normal analysis and approval process for the action." While the collaboration and public meetings technically took place in the 'pre-NEPA' period, the length and complexity of the meetings suggest this is not a typical EA. The release of the draft EA was delayed from its originally announced Sept 2007 date to Jan 29, 2008.

<i>Comment #</i>	<i>Comment</i>
	Response: The regulations at 36 CFR 215 govern the length of the comment period and do not allow for extensions. There has been no “selected” alternative so the comments relative to inadequacies about final conclusions are premature. The EA and supporting documents made available to the public provide sufficient detail to submit meaningful comments. The determination on whether or not to prepare an EIS has not been made as of the comment period – if a Finding Of No Significant Impact (FONSI) is made, then an EIS would not be prepared. A monitoring plan has been developed and is included in Appendix C of the EA and will be incorporated into the decision.

<i>Comment #</i>	<i>Comment</i>
(AF1) Travel Management posted on SOPA	
73, 75	Why is this Action, the implementation of the Travel Management Plan not included in the USFS Schedule of Proposed Actions (SOPA)? It would seem that this action should have been included and published in the category: Projects Occurring in the Southwestern Region – Cibola National Forest and Occurring in the Sandia Ranger District in 2008.
	Response: The project was first published on the SOPA on July 1, 2007 with the 3rd quarter report. This publication came approximately 2 weeks after the beginning of scoping, which was initiated on June 19, 2007. The project has been published on every SOPA report since then.

<i>Comment #</i>	<i>Comment</i>
(AF2) Travel Management and Forest Plan Revision	
73, 75	<p>The Final Environmental Impact Statement for the 2008 Planning Rule for the USFS was published on February 12, 2008. The Record of Decision is expected in 30 days, March 12, 2008. This refers to the USFS’s new planning rule that will engage the public in the development, implementation and monitoring of forest plans.</p> <p>This 2008 Planning Rule requires improved monitoring and sustainability standards for wildlife protection as well as the requirement for an Environmental Management System to be in place prior to the implementation of approved projects. The 2008 Planning Rule also establishes a <i>process</i> by which social, economic values and environmental protections are recognized and documented. The Planning Rule directs what information is included in a forest plan and how the plan is prepared.</p> <p>What is the relation of the new TMP proposed by the USFS CNF SRD to this new Planning Rule?</p> <p>Why is the USFS CNF SRD pushing for a final decision on the TMP prior to the release of the 2008 Planning Rule?</p>
	<p>Response: The Planning Rule provides direction for the creation, revision, and amendment of forest land and resource management plans required by the National Forest Management Act. The Travel Management Rule provides direction to the national forests to designate the roads, trails, and areas designated for motorized use on the forests. It is not necessary to delay completion of travel management projects until the Planning Rule is in place. When the final travel management rule was published, the agency expected to complete the designation process within four years, or by the end of 2009. The Sandia Travel Management Project needs to be completed to comply with the Chief’s direction to complete the designation process by 2009. Other units on the Cibola will follow the Sandia Ranger District – these analyses will require many of the same personnel to complete.</p> <p>The 2008 Planning Rule will not apply until the forest plan revision process has been completed and a decision has been signed. In addition the language requiring an EMS states that it must be in place prior to the implementation of approved projects under a revised plan. The Cibola National Forest Plan has not yet been revised and therefore this language does not apply to this decision.</p>

<i>Comment #</i>	<i>Comment</i>
88	Looking ahead to Plan Revision, we encourage a process similar to Travel Management Planning for non-motorized uses. As the Albuquerque region continues to grow, demarcating when and where particular uses are allowed will aid in protection of resources and reduce user conflict. We look forward to working with you in this regard.
<u>Response:</u> We will forward your comment to the forest plan revision team.	

<i>Comment #</i>	<i>Comment</i>
<i>(AF6) Compliance with Executive Orders 11644 and 11989</i>	
89, 173	<p>All current direction and authorities that allow, restrict, and prohibit vehicle use off roads on National Forest Lands are derived from Executive Order (EO) 11644, signed by President Nixon in 1972, and modified by President Carter’s EO 11989, signed in 1977. These executive orders should be the guiding principles for all decisions related to ORVs. The orders state that the route designation procedures “will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among various users of those lands.” In accomplishing this goal, the executive orders specifically require the designation of motorized areas and trails shall be in compliance with the following:</p> <ol style="list-style-type: none"> 1. Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. 2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption to wildlife habitats. 3. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or existing conditions in populated areas, taking into account noise and other factors. 4. Areas and trails shall not be located in officially designated Wilderness Areas. <p>We agree with the strong language above that ORVs should be permitted only where they do not excessively interfere with other recreational use or damage natural resources. However, it appears the Sandia Ranger District (SDR) has a flawed understanding of the requirements of the Executive Orders and implementing regulations. Simply mentioning the Executive Orders does not equate with compliance. The SDR must also acknowledge their obligations to minimize the impacts associated with routes and explain how that will be accomplished.</p> <p>The EA displays the impacts of alternatives and the risk-benefit method used in the Transportation Analysis Report (TAP) to assess the risks and benefits of each route in deference to the National Environmental Policy Act (NEPA), but this alone does not satisfy the Executive Order requirements. The EA must not merely report the possible impacts of routes and areas designated for motorized travel, it must also provide a plausible reasoning that the decision resulting from the reports generated by the forest in fact minimize impacts. We do not believe the SRD provided even cursory rationale for the alternatives presented in the EA.</p>
<u>Response:</u> We disagree with the comment. The EA displays the effects of the alternatives. It includes measures that will be incorporated in each of the alternatives to minimize the impacts. The alternatives are consistent with the direction in the Executive Order.	

Comment #	Comment
<i>(AF7) Compliance with National Forest Management Act</i>	
89, 173	<p>The National Forest Management Act requires the Forest Service to prepare a land and resource management plan (LRMP) for each unit of the National Forest System. 16 U.S.C. §§ 1604(a). As the Forest Service manages the Forest, the agency must fulfill Congress’s mandate found in 16 USC 1604(e):</p> <p style="padding-left: 40px;">Required assurances</p> <p style="padding-left: 40px;">In developing, <i>maintaining</i>, and revising plans for units of the National Forest System pursuant to this section, the Secretary shall assure that such plans—</p> <p style="padding-left: 40px;">(1) provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use Sustained-Yield Act of 1960 [16 U.S.C. 528–531], and, in particular, include <i>coordination</i> of outdoor recreation, range, timber, <i>watershed, wildlife and fish, and wilderness</i> . . .</p> <p>Motorized trails without the proper analysis, maintenance, and monitoring in "coordination" with watershed, wildlife and fish, and wilderness constitutes a violation of NFMA. The SRD fails to include an analysis of the impacts of adding motorized routes to its current system of roads and trails and does not address the maintenance or monitoring of motorized trails in coordination with range, timber, wildlife and fish</p> <p>The Multiple-Use Sustained-Yield Act, section 531, defines multiple use as:</p> <p style="padding-left: 40px;">“the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.</p> <p>We believe this definition would allow the SRD to restrict or eliminate ORV use from the SRD because doing so would make judicious use of the land for most of the resources over large areas of the forest. As the land healed from decades of ORV abuse, the SRD could reevaluate the need to include ORV recreation within the SRD, allowing the periodic adjustment provided for in the definition of multiple use. This definition also allows that some of the land will be used for less than all of its resources, which could include deciding against using the land as an ORV recreation resource.</p> <p>The SRD EA analysis of sensitive species and wildlife generally does not satisfy the requirement of the National Forest Management Act that the Forest Service must ensure that a diverse population of wildlife will be maintained in the planning area. (See 16 U.S.C. § 1604(g)(3)(B)). There is no indication by the analysis presented that a diverse wildlife population will be maintained. Also, there is no discussion in the EA about how the proposed actions and Travel Management Plan will coordinate with the revision of the 1985 Cibola Forest Plan, other than to</p>

<i>Comment #</i>	<i>Comment</i>
	suggest amendments to the plan, which is currently undergoing revision.
Response: The EA includes analyses required by the National Forest Management Act for project-level documents. We disagree that the EA does not analyze the effects of the motorized use designations on the various applicable resources.	

<i>Comment #</i>	<i>Comment</i>
(AF8) Compliance with the Cibola Forest Plan	

89, 173	The average road density across the Cibola National Forest recommended in the Forest Plan is 1.5 miles per square mile. The existing road system is within the Forest Plan recommendation, at 1.38 miles per square mile. However when all motorized routes are included the route density increases to 2.08 miles per square mile. Significantly, this route density does not appear to include maintenance level 1 roads, roads converted to trails, or decommissioned roads. With the EA, the route density will be reduced only in Alternatives 1 and 6, while there are no alternatives that would reduce the route density by any significant amount. Therefore, we do not believe the SRD has established a baseline travel network.
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Response: The 1.5 miles per square mile applies to Management Area 2 (the non Wilderness portions of the Sandia Ranger District) in the Cibola Forest Plan. This 1.5 miles guideline is in the Travel and Transportation section on page 94 of Amendment No. 8, November 1996.

The road density guideline is met by all alternatives and complies with the Forest Plan. The following chart provides the road density averages by alternative:

Alternative	Highways and other public roads	Open System Roads	Western Refining Pipeline road	Road Density (mi/sq mi)	Closed/Admin - Single Use Roads	Road Density w/ Closed Roads (mi/sq mi)
1	27.05	41.61	0	1.04	4.42	1.11
3	27.05	43.57	1.7	1.10	4.42	1.16
4	27.05	41.61	0	1.04	4.42	1.11
5	27.05	41.14	0	1.03	4.8	1.11
6	27.05	38.8	0	1.00	4.8	1.07

Management Area 2 = 66 square miles

No action road density from tap = 1.38mi/sq mi

There is no requirement in the Travel Management Rule or the Forest Plan to establish a “baseline travel network”. We are assuming that the reference is to the identification of a minimum road system in 36 CFR 212.5 (2) b. Alternative 6, with the addition of the Level 3 and 4 roads where there are no changes being considered, represents the minimum road system. This was based on the assessment completed in the Travel Analysis Process, where the each road was considered for the benefits to management of the system.

<i>Comment #</i>	<i>Comment</i>
(AG7) Compliance with the Travel Management Rule	

116, 119	Areas; none of the alternatives include areas for OHV use. Chapter 1. Purpose and Need 2 EA for Travel Management on the Sandia Ranger District, Cibola NF Background On November 9, 2005, the Forest Service published the final regulations governing off-highway vehicles (OHVs) and other motor vehicle use on national forests and
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Comment #	Comment
	<p>grasslands (Travel Management; Designated, Routes and Areas for Motor Vehicle Use, Federal Register / Vol. 70, No. 216/36 CFR Parts 212, 251, 261, and 295). This Travel Management Rule requires each national forest and grassland to designate those roads, trails, and areas open to motor vehicle use. Designation will include class of vehicle and, if appropriate, time of year for motor vehicle use. Designated routes and areas will be identified on a motor vehicle use map (MVUM).</p> <p>There are segments of the OHV community that require areas to enjoy there chosen form of motorized recreation on forest lands, namely trials riding and 4x4 rock crawlers.</p> <p>The intent of the TMR is to manage motorized recreation, not eliminate it, I consider your lack of areas in travel management planning to be discriminatory in nature as certain segments of the OHV community will be eliminated from recreating on the forest.</p> <p>I recommend the entire EA be removed for consideration until such time that areas are added to the preferred alternative.</p>
	<p>Response: There is no requirement that areas must be designated on a unit. Areas may be designated if the appropriate conditions exist on the ground. None were identified as appropriate during the process of developing the Proposed Action and Alternatives. On page 68274 in the Travel Management Rule’s “Public Comments on Proposed Rule and Department Responses” states that “under the final rule, no administrative unit or Ranger District will be required to designate an area.” This EA and subsequent decision will apply only to the Sandia Ranger District. A decision for the Sandia Ranger District does not preclude areas from be identified and designated on other districts on the forest.</p>
<p>116, 119</p>	<p>Features Common to All Alternatives Forest Service personnel would be allowed limited administrative use of any route for the protection or management of resources. This “feature” is inconsistent with the TMR</p> <p>From the TMR § 261.13 Motor vehicle use. After National Forest System roads, National Forest System trails, and areas on National Forest System lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a Ranger District of the National Forest System, and these designations have been identified on a motor vehicle use map, it is prohibited to possess or operate a motor vehicle on National Forest System lands in that administrative unit or Ranger District other than in accordance with those designations, provided that the following vehicles and uses are exempted from this prohibition:</p> <ul style="list-style-type: none"> (a) Aircraft; (b) Watercraft; (c) Over-snow vehicles; (d) Limited administrative use by the Forest Service; <p>I request the EA be amended to add the word “limited”, the feature should state:</p> <ul style="list-style-type: none"> • Forest Service personnel would be allowed limited administrative use of any route for the protection or management of resources.
	<p>Response: The omission of the word “limited” in the EA was an error. This has been corrected to include the wording as written in the rule. This will be included in the errata for the EA. The errata will be posted with the EA on our web site, and is available upon request.</p>

<i>Comment #</i>	<i>Comment</i>
<i>(AF9) Compliance with the Travel Analysis Requirements</i>	
89, 173	<p>In a letter sent to the Cibola National Forest January 23, 2008, we indicated our interest in the TAP report and stated our belief that travel analysis is a critical early step in the travel planning process. The draft directives for implementing the Travel Management Rule indicate that this report falls under the agency’s “left-side” analysis responsibilities (proposed FSM 7712, exhibit 01). Proposed FSM Section 7715.03 states that the agency should “[u]se the results of travel analysis to develop proposed actions and inform environmental analysis for travel management decisions.”) The Travel Analysis Report should identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of NFS lands. (36 CFR 212.5(a) and proposed FSM Sections 712.1(6) and 712(4)(5)). It is our understanding that these directives, while not yet final, represent the Agency’s current thinking on the appropriate level of “pre-NEPA” analysis that should be undertaken prior to developing proposed actions for travel management plans</p> <p>Therefore, this report should have been completed prior to the initiation of formal scoping, and should have been made available to the public prior to the release of the notice to prepare an EA or EIS, and certainly should have been available to the public prior to the release of the EA. However, email correspondence from the SRD on February 4, 2008, reveals that the TAP was neither completed, nor publicly available before the scoping process began. We believe this is a violation of the Region 3 Guidelines and the intent of the Travel Management Rule to engage in a cooperative effort to designate motorized routes necessary for a sustainable motorized system with the public. It is our position that the Sandia Ranger District has failed to properly conduct Travel Analysis and therefore cannot have properly conducted the Travel Management Process. Without first identifying the minimum route system needed, the SRD has an impossible task in developing a plan to sustainably manage travel.</p> <p>We requested the TAP January 23, 2008 (copy attached) and we appreciate that the SRD made every effort to get us the TAP in a timely fashion. However, the SRD was unable to deliver the TAP to us until after February 8, 2008 (email attached). The TAP was posted to a Forest Service FTP site on February 8, 2008 according to correspondence between the SRD and the Center for Biological Diversity (email attached). However, we were unable to access the TAP from a variety of computers (office, home, library, laptop) for several days. We requested that the SRD send us the TAP via ground mail which was postmarked February 13, 2008. Also, the Forest Service web site (all forests) was not in operation for at least part of two days – February 17 and 18, 2008. We attempted to access the TAP several times via the internet and were unsuccessful. We greatly appreciate that the SRD sent us the TAP via ground mail, however, this delay hindered our ability to make a timely analysis of the TAP, a lengthy and highly technical document, and a timely preparation of comments in response to the EA was thus hindered as well. While there is no requirement that the TAP be made publicly available, the collaborative nature of TMP would indicate that the documents used in preparing the proposed action and environmental assessment should be made publicly available during the preparation of those documents.</p> <p>We believe that any geographic information system (GIS), mapping, spatial analysis data, Transportation Analysis Reports (TAPs), and other scientific reports the Forest Service uses in the route designation process should be available to the public at the same time the agency is using this data for analysis. The information should be provided to the public so that all analyses are transparent and repeatable. Making this information available to the public would represent a long overdue marriage between comprehensive travel management and the use of robust GIS decision-support technologies while providing the public transparency into the arcane process of</p>

<i>Comment #</i>	<i>Comment</i>
	<p>travel planning.</p> <p>The Sandia Ranger District developed the proposed action in 2007. However, the TAP was not made publicly available until 2008, as described above. This, coupled with confusing deadlines for comments published in the paper of record (see Appendix A), does not allow the public to develop the necessary confidence that the Forest Service is making decisions based on credible data and science. The forest service is well aware that the public is acutely interested in Travel Management Planning. By making as much information publicly available as possible, the public will better understand the process and the need to reduce route densities throughout the Cibola National Forest and the SRD.</p>
	<p><u>Response:</u> The Travel Analysis Process (TAP) is a requirement of directives that are still in draft form and have not been finalized at this time. We did complete a TAP, using the Roads Analysis Process (RAP) adding trails that have been managed to accept motorized use. (Trails that were managed for motorized use were not included in the original RAP process.)</p> <p>The TAP is a “living” document, reflecting the conditions of the analysis area at a fixed time. Thus, the document can be updated as the need arises and conditions warrant. It is used to develop the Travel Management proposed action along with public involvement. The TAP was released when all public and internal comments were finalized and incorporated. The recommendations from the TAP along with the public input from all the public meetings were used by the IDT to develop the proposed action not the TAP alone.</p>

<i>Comment #</i>	<i>Comment</i>
<i>(AG8) Compliance with State OHV Laws</i>	
116, 119	<p>Features Common to All Alternatives</p> <ul style="list-style-type: none"> • There are no changes being proposed to any maintenance level 3 and 4 National Forest System roads (NFSR) on the Sandia Ranger District. These roads are currently open only to motorized vehicles licensed for highway use. <p>NM law allows ATVs to cross and ride parallel to public highways Section 66-3-1011 (Effective January 1, 2006) Operation on streets or highways; prohibited areas.</p> <p style="padding-left: 40px;">A. A person shall not operate an off-highway motor vehicle on any:</p> <p style="padding-left: 80px;">(1) limited access highway or freeway at any time; or</p> <p style="padding-left: 80px;">(2) any paved street or highway except as provided in Subsection B of</p> <p>(a) this section.</p> <p>B. Off-highway motor vehicles may cross streets or highways, except limited access highways or freeways, if the crossings are made after coming to a complete stop prior to entering the roadway. Off-highway motor vehicles shall yield the right of way to oncoming traffic and</p> <p>(b) shall begin a crossing only when it can be executed safely and then cross in the most direct manner as close to a perpendicular angle as possible.</p> <p>i.e. By default, Ohm’s can operate on gravel & native surfaced roads in NM.</p> <p>Section 66-3-1012 (Effective January 1, 2006) Driving of off-highway motor vehicles adjacent to highway.</p> <p>A. Off-highway motor vehicles issued a validating sticker or nonresident permit may be driven adjacent to a highway, yielding to all vehicles entering or exiting the highway, in a manner so as not to interfere with traffic upon the highway, only for the purpose of gaining access to or returning from areas designed for the operation of off-highway motor vehicles by the shortest possible route and when no other route is available or when the</p>

Comment #	Comment
	<p>area adjacent to a highway is being used as a staging area. Such use must occur between the highway and fencing that separates the highway from private or public lands.</p> <p>B. When snow conditions permit, an off-highway motor vehicle may be operated on the right-hand side of a highway, parallel, but not closer than ten feet, to the inside of the plow bank.</p> <p>This “Feature” is inconsistent with NM law. I request that this feature be removed from the EA</p>
<p>Response: As stated on page 68278 of the Travel Management Rule “Public Comments on Proposed Rule and Department Responses:”</p> <p>“Traffic on roads is subject to State traffic laws where applicable, except when in conflict with the Forest Service’s prohibitions at 36 CFR part 261. If there is a conflict, the agency’s prohibitions preempt State traffic laws. To ensure that the agency’s intent with respect to designation of roads, trails, and areas is fully effectuated, the proposed and final rules also provide for preemption of State traffic laws when they conflict with those designations. No other preemption of State laws is authorized. Section 212.5(a)(2)(ii). This section of the rule contains specific traffic rules.”</p> <p>Travel designations on National Forest Lands and roads and trails under National Forest jurisdictions preempts the state law. This sections feature is appropriate to the decision being made.</p>	

Comment #	Comment
<p>(AE6a) Pipeline Service Road in La Madera</p>	
<p>57, 108, 116, 119, 153, 154</p>	<p>Summarized Comment: Comments question the accuracy of the statement that the Western Refining pipeline service road and corridor in the La Madera area is a single use road with restricted public access, and should be analyzed as routes that where motorized use has been accepted and considered for designation.</p> <ul style="list-style-type: none"> <p><i>Comment 57:</i> On page 4, under Sandia Mountains (North of I-40), 2nd paragraph, the document states: “The primary access to this area is a single use road that is under special use permit for a crude oil pipeline, and is not open to public use...”</p> <p>On the contrary, the subject road is open to public use. From the point where the subject road crosses the southern Forest Service boundary to the point where the pipeline makes a pronounced turn to the west, there is no indication whatsoever that there are any restrictions to public travel. The EA references no previous decisions or documentation that supports the assertion that the road, or indeed the entire pipeline easement width, is closed to public use... Please correct the document to read as: “The primary access to this area is a road that also serves as the pipeline maintenance road for the pipeline that runs through the area.”</p> <p>An additional issue with the current EA exists on page 15, under Alternatives Considered and Eliminated from Detailed Study, Additional Roads and Trails in the La Madera Area, the reason for eliminating this particular alternatives states “The Western Refining pipeline corridor is under permit as a single use road that is not supposed to be available for public use. This is to maintain the soil cover over the pipeline from erosion and potential exposure of the line.” You have omitted any documented evidence that exposure of the pipeline is linked to the use of the pipeline road by the general public.</p> <p>The EA is omitting pertinent and obvious factual information. The pipeline permit was issued in 1957. The pipeline has been there for fifty (50) years. The statement in the first bullet opines: “Steep unconfined slopes along the route will experience accelerated erosion...” This is unfounded conjecture with no supporting data within this document or</p>

Comment #	Comment
	<p>the referenced specialists’ report. In fact, the current condition of the pipeline cover in the area after fifty years is two short areas of exposure (referenced in an email from District Ranger Morgan to James Gormally dated 11/13/08). Both exist where the pipeline crosses historic arroyos and are not even on the section of the pipeline proposed for Forest Service maintenance in Alternative 3. Please correct the inaccuracy caused by this information omission by removing the first bulleted item.</p> <p>The 2nd bulleted item also contains baseless speculation with no supporting data within this document or the referenced specialists report. Please provide corroborating data that directly links traffic on the pipeline access road to damaged DOT warning signs or correct this bullet to read: “Department of Transportation regulations require warning signs along the route which would provide information to the public.”</p> <p>The 3rd bulleted item is so egregious in its content that one can only surmise that its intent was not malicious and that it was merely written by someone who had never visited the area. The pipeline runs in a 60-foot easement that is essentially flat in cross section. An onsite inspection of actual conditions or an even cursory review of a topographical map of the area will confirm the impossibility of “rock falls” or “landslides” in the subject area of the pipeline. Please correct this item by removing the 3rd bullet in its entirety.</p> <p>After correcting the three previous items, it would be more accurate to drop any reference to safety issues on page 88 as the lone remaining bullet deals strictly with maintenance costs.</p> <ul style="list-style-type: none"> • <i>Comment 116:</i> Although the Western Refining pipeline corridor is currently a single use road it could be designated a public use road during travel management planning. The NMDOT requires petroleum pipe lines to be buried very deep 6 to 8 feet, the chance of an OHV removing the soil cover are very rare, as OHVs are used by the pipeline owner to patrol and repair the pipe line soil cover over the pipelines cannot be an issue. I request the “Additional Roads and Trails in the La Madera Area” Alternative be included in the EA as the rational for eliminating the alternative is unfounded.
	<p><u>Response:</u> During the course of analyzing access issues for the La Madera area, a review of the right-of-way for that pipeline road was completed. On July 19, 1957 an easement was issued by the Bureau of Land Management to the Texas-New Mexico Pipe Line Company for the length of that pipeline across federal lands, including approximately 4 ¾ miles through the Cibola National Forest. Unlike a special use permit which is a license to conduct an activity on the Forest but does not confer an actual property right, an easement did bestow a property right on the pipeline company. When that easement was issued the federal government retained a very limited right of use on that 60 foot wide strip of property and included the right to use the pipeline service road: “the Forest Service is to have access to and use of the road for official business”. Forest Service employees may access that road to conduct official activities such as fire control, range management, fuel treatment, etc. There was also specific retention by the Government to cross the pipeline with fences or other road rights-of-ways. That retention of the access for official business, however, did not retain access for the public. In fact, the easement specifically states the pipeline service road is to be designated and signed by the Forest Service as a “Special service road closed to public travel”. Regardless of whether the Forest Service has failed to maintain closure signage over the past 50 years does not negate the original intent and legality of closing the road to public use. The Forest Service does not have the legal authority to arbitrarily change the provisions of that property right already given.</p> <p>It may be possible for the Forest Service to negotiate with the current holder of that pipeline easement to allow public access by essentially formally transferring that right back to the Federal Government. However, it would only be done with the condition the Forest Service would assume the responsibility of maintaining the road and</p>

Comment #	Comment
	<p>preventing and repairing any erosion damage to the road and pipeline. With that maintenance responsibility also goes any liabilities for damages that may occur to the pipeline, any interruption of pipeline service, and potential liability in the event that the public is harmed by a pipeline breach. As was pointed out in the public comments there have been past incidents of erosion that the Forest Service did not want to be nor could afford to take on the responsibility for maintenance. The Forest Service would also be in an untenable position to assume any potential liabilities for pipeline damages or public harm.</p> <p>Regarding the comments on page 88 of the EA. These four safety concerns were sent to the Forest Service by Western Refining, the current owner of the pipeline, following a field review of the pipeline corridor. This letter was sent to the Forest Service on October 2, 2007, and is available in the project record.</p>
88, 93	<p>Summarized Comment: Comments questioning how the Sandia Ranger District plans to discourage motorized use of the Western Refining pipeline service road. Comment 88 suggests that: “The CNF states the main access road in to this area is not supposed to be available to public use to protect the pipeline from exposure. Further, we were told the owner of the pipeline has an exclusive-use permit. We would like to how the Sandia RD plans to keep motorized uses out of the area.” Comment 93 questions: “I could not find a mention in the EA of how the access into La Madera would be stopped...In Alt. 3, it was mentioned that the Forest Service would assume maintenance of the first mile of road into La Madera. Are you presumptuous in assuming that right of way holder would relinquish control of this stretch of road?”</p>
	<p>Response: The Forest Service has been working with Western Refining representatives regarding this road. If Alternative 3 is selected, there are a number of methods that may be used to discourage motor vehicles from traveling beyond the designated route onto the pipeline corridor, including gating and/or fencing. If another alternative is selected, the district will consider methods to manage the single use nature of this route, including possibly gating the road at the Forest boundary.</p>

Comment #	Comment
(AF4) Budget Analysis	
88	<p>The EA is lacking in one very important area: budget analysis. In the Proposed Action (PA, Alternative 1) as well as Alternatives 3 - 6, the CNF proposes some combination of installing gates, closing and rehabilitating roads, constructing new routes, and installing new trailheads. The CNF provides no analysis showing the minimum motorized road / trail network that it can afford to properly maintain and enforce given its current budget. Without this, there is nothing to measure if the PA is economically feasible. It makes any suggestion that the CNF will mitigate problem routes or build new facilities suspect and sets the CNF up for failure, nullifying the long process and hard work leading to the EA...</p> <p>With the notable exception of Alternative 6, this plan essentially makes the Cedro a motorized use area. Off-road vehicles have powerful engines pushing tires that are designed to grip the land. They can quickly damage even well-designed trails. This means the damage per motorized forest user is significantly higher than non-motorized users. Again, without a proper budget analysis, we fail to see how the CNF will make any of the motorized intensive alternatives work.</p>
	<p>Response: The costs of implementing each of the alternatives are discussed in the Recreation Resources section (pages 91-109) and transportation section (pages 85-89 of the EA. The discussion on page 93 includes information about trails funding on the district. Budgets were not identified as an issue requiring the level of analysis described in the comment.</p> <p>The Sandia Ranger District total road system is only 1.8% of the Cibola NF road system. Most of the maintenance level 4 roads (approximately 70%) are located in the Sandia Ranger District and all these roads provide access to picnic areas, trailheads, and other recreation facilities. A separate economic analysis is being performed to analyze the Forest road system’s financial feasibility. We do not expect this will have an impact on the Sandia Ranger District’s road system since it is a small percentage of the total roads on the Cibola National Forest.</p>

Comment #	Comment
89, 173	<p>The Transportation Analysis Report (TAP), as referenced in the EA (p. 86), indicates that none of the action alternatives will result in an increase in planned maintenance costs. While this news is encouraging, this analysis does not consider the fact that the CNF and the SRD can only afford to maintain 29-31% of the current road system.¹ The TAP indicates that federal funding for road maintenance in the CNF has ranged from \$800,000 to \$950,000, while annual maintenance funding needs exceed \$3.3 million dollars.² For the Sandia Ranger District, road maintenance costs are estimated at over \$166,000.³ The costs for maintaining trails for the Sandia Ranger District are estimated at over \$124,000.⁴ While we find it disingenuous that the addition of new routes will not increase planned costs, additions will in fact decrease the funds available for backlogged maintenance and the inevitable unexpected maintenance costs associated with an increase in motorized travel. We believe it is irresponsible, and arbitrary and capricious for the SRD to consider additions to the current route system with such substantial maintenance needs looming.</p> <p>The TAP identifies the minimum road system necessary for administration and safety as a reduction from 3,692 miles to fewer than 1,150 miles.⁵ We believe, therefore, that the SRD is unable to consider additions to that minimum system in the Sandia Ranger District within the financial realities of Forest Service funding expectations. However, as described above, we do not believe the SRD determined a minimum road system, meaning the SRD has not performed a critical first step in Travel Analysis and Travel Management Planning.</p> <p>Most of the routes in the Sandia Ranger district were classified as “medium risk/medium benefit,” while no roads were classified as “low risk/low benefit” or “low risk/high benefit” and only a fraction of roads were classified as “low risk/medium benefit” or “medium risk/low benefit.”⁶ Nearly 12% of the roads were classified as “high risk/low benefit” and all of these roads are located in the area of Old Pipeline Road, which will not be designated in any action alternative.</p> <p>Of the trails analyzed in the TAP, most are classified as medium to high risk with high to medium benefit.⁷ The recommendation from the TAP is that these trails be maintained but mitigation of damage is important. Given the lack of funds available for trail maintenance, it is unlikely that mitigation will be fiscally possible. We detail below specific routes which will be designated open under all alternatives that are classified as high risk/medium benefit that fail to include any plan for mitigation. We believe this is a violation of the TMR and does not minimize the impacts to the environment as required under the Executive Orders cited above.</p> <p>The TAP indicates that 7,889 acres of the Sandia Ranger District with previously designated motorized use were not included in the TAP analysis.⁸ We believe that this may have led to an underestimate of the route density and an overestimate of the percentage of the current route system that the SRD can afford to maintain and will likely have resulted in an under-calculated route density within the SRD.</p> <p>As previously mentioned, the TAP reveals that the SRD can only afford to maintain 29-31% of its current motorized system. Therefore, it is fiscally irresponsible to consider the addition of motorized routes to an already overburdened system. Considering that in the EA, the Cedro area is described as having few areas more than 0.25 miles from any motorized route,⁹ we are surprised to see so few route closures in that area.</p> <p>The chart below indicates that only Alternative 6 provides a fiscally rational plan for motorized recreation in the SRD. The chart also reveals that the EA prepared by the SRD does not present an adequate range of alternatives given that 4 of the 6 alternatives vary in fiscal impact by less than \$1,000.</p>

Comment #	Comment																								
	<table border="1" data-bbox="332 262 1214 573"> <thead> <tr> <th colspan="3" data-bbox="332 262 1214 331">Sandia Ranger District Route Maintenance Costs Derived from Transportation Specialist Report</th> </tr> <tr> <th data-bbox="332 331 630 367">Alternative</th> <th data-bbox="630 331 922 367">Miles Maintained</th> <th data-bbox="922 331 1214 367">Annual Cost</th> </tr> </thead> <tbody> <tr> <td data-bbox="332 367 630 403">1</td> <td data-bbox="630 367 922 403">35.6</td> <td data-bbox="922 367 1214 403">165,029</td> </tr> <tr> <td data-bbox="332 403 630 438">2</td> <td data-bbox="630 403 922 438">40.3</td> <td data-bbox="922 403 1214 438">166,999</td> </tr> <tr> <td data-bbox="332 438 630 474">3</td> <td data-bbox="630 438 922 474">40.3</td> <td data-bbox="922 438 1214 474">166,999</td> </tr> <tr> <td data-bbox="332 474 630 510">4</td> <td data-bbox="630 474 922 510">35.7</td> <td data-bbox="922 474 1214 510">203,074</td> </tr> <tr> <td data-bbox="332 510 630 546">5</td> <td data-bbox="630 510 922 546">35.6</td> <td data-bbox="922 510 1214 546">165,029</td> </tr> <tr> <td data-bbox="332 546 630 573">6</td> <td data-bbox="630 546 922 573">35.7</td> <td data-bbox="922 546 1214 573">150,171</td> </tr> </tbody> </table> <p data-bbox="332 604 1446 709">¹ Transportation Analysis Report, 2007: 33 and 62. This number assumes the Sandia Ranger District will receive a proportional share of the CNF’s road maintenance budget. The TAP also indicates the CNF expects a reduction in the transportation budget.</p> <p data-bbox="332 709 850 745">² Transportation Analysis Report, 2007: 32.</p> <p data-bbox="332 745 850 781">³ Transportation Analysis Report, 2007: 33.</p> <p data-bbox="332 781 850 816">⁴ Transportation Analysis Report, 2007: 34.</p> <p data-bbox="332 816 1446 921">⁵ Identification of the minimum road system needed for the safe and efficient travel and for administration, utilization, and protection of NFS lands. 36 CFR 212.5(a) and proposed Forest Service Manual sections 712.1(6) and 712(4)(5). Transportation Analysis Report, 2007: 63.</p> <p data-bbox="332 921 850 957">⁶ Transportation Analysis Report, 2007: 50.</p> <p data-bbox="332 957 850 993">⁷ Transportation Analysis Report, 2007: 59.</p> <p data-bbox="332 993 1468 1050">⁸ Transportation Analysis Report, 2007: 13. Note however that the description of this area in the TAP is not clear and references a DOD/DOE withdrawal.</p> <p data-bbox="332 1050 808 1077">⁹ Environmental Assessment 2008: 100.</p>	Sandia Ranger District Route Maintenance Costs Derived from Transportation Specialist Report			Alternative	Miles Maintained	Annual Cost	1	35.6	165,029	2	40.3	166,999	3	40.3	166,999	4	35.7	203,074	5	35.6	165,029	6	35.7	150,171
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	<p data-bbox="139 1077 1446 1182">Response: The Sandia Ranger District’s total road system is only 1.8% of the Cibola NF road system (see table below.) Approximately 70% of the maintenance level 4 roads are located in the Sandia Ranger District and all these roads allow for public access to picnic areas, trailheads, and other recreation opportunities.</p> <p data-bbox="139 1213 1446 1318">The roads and motorized trails with a ranking of a high risk/medium benefit may need to be mitigated for route designation. The type and cost of each mitigation measure will be determined on a case by case situation at a project level scale. Available funds may come from appropriated funds, grants or other sources.</p> <p data-bbox="139 1350 1401 1413">Road Densities are based on all road miles from the Transportation System and the total acres of the Sandia Ranger District which includes all previous decisions.</p> <p data-bbox="139 1444 1479 1686">Table 28 is an updated Summary of <u>Road Miles</u> and Maintenance Costs for the Alternatives (does not include motorized trails) the previous table in the EA (Table 28 page 87) only showed the roads within the analysis area not the entire district. The Sandia RD Transportation System has a total of 65.1 miles of roads within the district. Alternative 2 is the no action alternative with an annual maintenance cost of \$164,401, therefore, based on the route designation for each alternative (except Alternative 2) the miles for maintenance level 2 roads decreased which decreased the maintenance cost for each alternative. This table will also be added to the errata sheet for the EA.</p> <p data-bbox="139 1717 1053 1749">Table 28 Summary of Road Miles and Maintenance Costs for the Alternatives</p>																								

Comment #	Comment					
		1	2	3	4	
1	12.4	27.5	8.1	9.5	57.5	161,209
2	12.4	35.1	8.1	9.5	65.1	164,401
3	12.4	31.6	8.1	9.5	61.6	162,931
4	12.4	27.1	8.1	9.5	57.1	161,041
5	12.4	27.5	8.1	9.5	57.5	161,209
6	12.4	24.7	8.1	9.5	54.7	160,033

Please refer to the updated Transportation Specialist Report for responses to the comments above. All the necessary changes to the Sandia Ranger District TAP has been completed, and posted on the Cibola National Forest web site. A detailed estimate of the trails costs associated with each alternative are included in the Recreation Specialists report.

93 I do think the EA is weak in its anticipation of future demand for motorized use such as ATV use in the Cedro Peak area. The price of gas will certainly affect the recreational motorized vehicle use. It might even slow the growth of the use, but the most resounding affect will be that user will seek places close to home, Albuquerque in this case. So Cedro will be in peak demand.

The 1985 Forest Plan did not anticipate the resounding increase of motorized use in the Cedro Peak or the impact of the use was underestimated. You document that the “Cedro Peak Cedro area contains many unauthorized (user-created) roads and trails” (Chapter 1 Existing Situation) which implies you have no idea how many trials are actually in the area. This demonstrates that the 1985 Forest Plan and subsequent Amendment did fore see the future. The failure to accommodate for future use of the Forest and inadequate resources available for the Cibola Forest to enforce the land use plan decisions has allowed for the expansion of an undetermined number of miles of illegal motorized vehicle trails particularly in the Cedro Peak area.

Our concern is that the EA also fails to adequately anticipate the future demand for use in the Cedro Peak area. Will there be funding available for the intensive management like that identified in Table 3 Mitigation and motoring requirements for each alternative? In addition, if the funding is not adequate, the user created trails will again increase over time in response to demand and lack of enforcement. The situation will be worse in the future and increasingly harder to manage.

Response: Future use levels may differ from those estimated in the EA. As stated in 36 CFR 212.54, “Designations of National Forest System roads, trails, and areas on National Forest System lands... may be revised as needed to meet changing conditions.” If there is a need to re-visit the motorized use designations because of the effects of increased use levels or difficulties in meeting maintenance needs, this can be done.

95, 99 We want to point out some inaccuracies and conflicts in the Environmental Assessment for Travel Management on the Sandia Ranger District (EA).

On page 86, Under Environmental Consequences, General Road System Effects, the EA states: ”None of the alternatives result in an increase in planned maintenance costs, considering that

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	<p>alternative 2 (no action) represents the status quo.” This fact is verified by the figures in Table 28 on the following page. Alternative 2, the existing condition, shows an annual maintenance cost of \$166,564, the highest of any alternative.</p> <p>A few pages later, on page 88, under Alternative 4, this statement appears: “The designated motorized routes for highway legal vehicles, ATVs, and 4x4s will continue to see an increase in use, which will impact the roads and increase the need for road maintenance on the existing system. Road maintenance dollars will need to be increased to entertain this alternative.”</p> <p>On page 87, Table 28 summarizes the amount of road miles and associated maintenance costs for each alternative. This table resides in the Roads System section of the Affected Environment and Environmental Consequences. Directly after the heading, the EA states: “The following analysis is based on the roads system specialist reports prepared by Mike Gurule, transportation engineer. This report is on file in the project record.” Yet none of the road miles or annual maintenance costs in Table 28 match the associated information in the tables contained in the Roads System specialists’ report. While the discrepancies themselves may not be material in some of the alternatives (as they are relatively small), the errors bring into question how road lengths were measured and how maintenance costs were calculated. Please reconcile the differences and state the accurate figures in both the EA and the supporting specialists’ reports.</p> <p>Of particular interest is the 24% discrepancy between the annual maintenance figure for Alternative 4 in the EA at \$163,372 and the Roads specialists’ report (Table 4) at \$203,074. In reading the Road specialists’ report for Alternative 4, it states: “The designated motorized routes for highway legal vehicles, ATVs, and 4x4s will continue to see an increase in use, which will impact the roads and increase the need for road maintenance on the existing system. Road maintenance dollars will need to be increased to entertain this alternative, due to the increased use of the adjoining motorized trail system and road system.” Not only do the dollar figures not match, the contention that road maintenance for Alternative 4 will increase doesn’t correspond to the statement on page 86 of the EA: ”None of the alternatives result in an increase in planned maintenance costs, considering that alternative 2 (no action) represents the status quo.” The cost differential appears to be in the use of a 1.5 ‘Annual Maintenance Frequency’ factor (in Table 4) in calculating the annual cost. Since the selection of the 1.5 factor does not have any data or other supporting information, please address this discrepancy by aligning the method used to calculate Alternative 4 with the other Alternatives (i.e. do not use the Annual Frequency Factor to adjust the costs).</p> <p>On page 7 of the Roads specialists’ report, under alternative 6, this ‘Annual ‘Annual Maintenance Frequency’ factor is changed to 0.8 for the Class 2 and 3 roads. The rationale given is that: “By designating these seasonal closures it will reduce maintenance costs and the need for maintenance once the roads have been brought to standard.” In addition to no data or supporting information to support the use of the 0.8 factor, the application of the factor due to the seasonal closure is inconsistent with the Table listed in Alternative 1 which also includes a seasonal closure. It has no 0.8 factor associated with Annual Maintenance Frequency. While there are additional roads associated with the seasonal closure in Alternative 5, there is no clear and documented link between the amount of roads affected by seasonal closures and the use of the reduced ‘factor’. Please correct these inconsistencies by removing the use of the 0.8 factor on Alternative 5 as there is no data substantiating a need for reduced maintenance with seasonal closures.</p> <p>The roads specialists’ report states on page 7: “Sandia Ranger District is the first district within the Cibola National Forest analyzed for Travel Management. Until other nearby districts and Forests are analyzed, and their road and trail systems designated for motorized use, it is difficult</p>

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	<p>to determine what cumulative effects there will be in the future.” Mr. Gurule makes a good point and one that is clearly appropriate given the lack of data on neighboring road systems and their influence on cumulative affects due to their later schedules. This is inconsistent with the statement in the EA on page 89 that states: “Seasonal closures under any of the alternatives will help to improve the roadway system and reduce maintenance costs.” Please remove this obvious inconsistency by removing the unsubstantiated statement on page 89 of the EA.</p>
	<p>Response: In alternative 4 the maintenance level 2 road miles decrease from 35.1 to 27.1, therefore the maintenance cost decreases- refer to Table 1.1 of the revised Transportation Specialist Report.</p> <p>Due to road maintenance funding the frequency for annual maintenance will be once per year. However, if a health and safety concern is present additional work may be required on a case by case situation.</p> <p>Initially the maintenance costs in the Transportation Specialist Report were based on miles of roads being considered for designation in the proposed action and alternatives not the total miles in the Sandia Ranger District. This includes Level 3 and 4 roads where no changes are being considered. The referenced tables have been revised to include maintenance estimates for all roads on the Sandia Ranger District. Please refer to the revised Transportation Specialist Report.</p>
<p>116, 119</p>	<p>Under purpose and for action need the EA states “• Designate a road and motorized trail system that can be maintained to standard within anticipated budget constraints.”</p> <p>The Forest Service has no method to anticipate its future budgets Congress dictates the size of the budget from year to year, the travel planning on the Sandia should be based on use and need.</p> <p>As it is unclear what motorized routes were eliminated due to “anticipated budget constraints” I recommend the entire EA be removed for consideration until such time the Forest Service produces an EA that designates a motorized route system that is based on use and need not on unknown future budgets.</p>
	<p>Response: Although budgets do vary from year to year, we disagree that the Forest Service “has no method to anticipate its future budgets.” Page 93 of the EA describes recent budget trends related to trails. Existing routes that were not proposed for motorized routes were not eliminated based on budget constraints. Routes were proposed after extensive public involvement to make recommendations to the Forest Service. Information about the routes that were not proposed for inclusion in the motorized system is not relevant to the analysis and disclosure of effects in the EA.</p>

Comment #	Comment
(AG2) Forest Product Gathering	
<p>89, 173</p>	<p>We are greatly concerned that the EA does not adequately address the need to restrict cross-country motorized travel to gather forest products. The EA simply states: “Access for permitted activities...on NFS lands is independent of general public access. Individuals or groups with written authorization would be allowed to conduct their business according to their authorization; however, the Forest Service reserves the right to control when and how access is achieved such as through the approval in the permits or through annual operating plans.”</p> <p>We believe the SRD should implement a series of filters for the authorization of permits that include cross-country travel for forest product gathering. Such filters should include: time of year and weather conditions affecting on the ground conditions; need for motorized travel to gather the forest product; threatened and endangered species habitat in the area(s) covered by permits; watershed and riparian protection; soil conditions and erodibility; and need to use wilderness and roadless area buffers to prevent the inevitable motorized intrusions into these sensitive areas.</p> <p>The ability to gather forest products such as firewood and acorns for personal use is important to</p>

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	<p>many people in this region. We do not however, feel that cross-country travel is necessary for users to perform these activities. People have been gathering forest products for thousands of years without using motorized vehicles to do so, therefore there should be very little need to authorize cross-country motorized travel for this purpose. The Forest Service should issue permits for the gathering of forest products sparingly. Such activity is not effectively monitored or enforced and there is no reason to believe that more permits will change this fact. We are once again concerned that a lack of enforcement will allow for cross-country travel to run rampant thereby damaging resources.</p> <p>The only way to ensure implementation of the rule is to improve enforcement significantly. Thus, we again recommend limiting the extent of this use by designating areas along routes for fuelwood gathering. If designed to meet habitat or ecosystem management objectives, these areas would likely limit environmental damage. The SRD has failed to justify any exceptions to the ban on motorized cross-country travel for the gathering of forest products and therefore these activities should be prohibited.</p>
	<p><i>Response:</i> The Recreation Resources section briefly discusses firewood gathering, which is one of several activities that currently includes some off-road use. The Travel Management Rule provides for permits to authorize motor vehicle use off of the designated system. Firewood permits may be written to allow vehicles to leave a road where necessary to gather wood. The permits would include any restrictions to which the permittee must comply. The permits would address the “filters” that are suggested by the comment where they are applicable. If the permit holder is out of compliance (such as not in a designated area) they would be subject to citation. The permit would not allow unrestricted access off of the designated system, which would be a marked change from the current situation.</p>

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<i>(AG5) Heritage Resources</i>	
97	Residents have questioned whether the environmental impact study has fully explored the cultural heritage and native sites.
	<p><i>Response:</i> Approximately 8,730 acres, or around 26%, of the 33,025 acres currently being analyzed within the Sandia Mountains and the Cedro Peak area of the Manzanita Mountains of the Sandia Ranger District have been surveyed for heritage resources. To date, 223 heritage resource sites have been located and recorded within the area currently being analyzed on the Sandia Ranger District, during the process of systematic survey. The Southwestern Region (R3) of the Forest Service in consultation with the New Mexico State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation has developed Appendix I, Standard Consultation Protocol for Travel Management Route Designation, of the First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities. This protocol covers the designation of roads, trails, and areas for motor vehicle use which will be included in a Forest or Ranger District’s motor vehicle use map. Management activities such as road maintenance, repairs, closures, or decommissioning, will require separate Section 106 compliance. In that protocol the Forest Service and the SHPO agreed that designation of existing system roads and trails and their associated constructed features that are already open for motor vehicle use will have little or no potential to affect historic properties. In each of the alternatives that proposed designation of user created routes, new route construction, and areas proposed for motorized dispersed camping that where not located in areas previously surveyed for heritage resources were surveyed 100 percent by systematic pedestrian survey. One new heritage resource site was located during the surveys. The potential exists for trail users (as well as others) to damage heritage resources through vandalism and illegal artifact collecting.</p> <p>Numerous past projects have been located within the analysis area. These projects include recreation developments, special uses, road development and maintenance, hazardous fuels reduction projects, lands projects, wildlife habitat improvement projects, timber projects, and watershed improvement projects. All undertakings (projects) that involve ground disturbing activities with the potential to affect significant heritage resources will be surveyed by systematic (100 percent) pedestrian ground surveys. If new, undocumented, sites</p>

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	are discovered they would be avoided or mitigated to prevent effects to the heritage resources.
152, 170	ORV Use at La Madera or Bernalillo Watershed Area. The Pueblo is opposed to the use of the La Madera and Bernalillo Watershed Study areas for any use by off-road vehicles because of the archaeological and cultural significance of these areas.
Response: National Forest System Road 445 is the existing travel route within the Bernalillo Watershed Research Natural Area. This route would be designated for Highway Legal Vehicles under all of the Alternatives identified in the Environmental Assessment. Off road use of the area would not be permitted under the Alternatives. No Significant Cultural Resource Sites have currently been identified within the road corridor of NFSR 445. Only Alternative 3 of the Environmental Assessment identifies travel routes open for motor vehicle use in the southern part of the La Madera Area. Three routes NFSR 62AB, 62B, and 63C along with approximately 2.17 miles of user created routes would be designated for motor vehicle travel. There are known Cultural Resource Sites located adjacent to these travel route corridors. However, under the Travel Management Rule off road vehicle use off of the designated routes would not be authorized.	
152, 170	Evaluation of Archaeological Significance is Inadequate. The Pueblo of Sandia is opposed to Alternative 3 based on the archeological and cultural significance of areas included in this alternative. This significance is related to historical use of this area, its vegetation, and its significance to wildlife and their movement. The Pueblo should have been directly consulted on archaeological resource protection matters. Access to protected sites by plunderers is wholly unacceptable to the Pueblo. Archaeological Resources Protection Act, (ARPA), 16 U.S.C.A.§§470aa-47011.
Response: The Pueblo of Sandia was consulted on the potential affects of implementing the Travel Management Rule on the Pueblo’s Traditional Cultural Properties. Consultation on specific cultural resource sites has not been conducted. All sites within the proposed route corridors designated for travel under Alternative 3 of the Environmental Assessment, that have been determined significant, will be avoided and protected during the implementation of the Travel Management Rule if this Alternative is selected.	

Comment #	Comment
(AHI) Tribal Consultation	
153, 170	Tribal Consultation. The Forest Service is required to consult with Tribes affected by major federal actions. The Forest Service failed to include the Pueblo of Sandia, despite its proximity to and its co-management with the Forest Service over a portion of the Sandia National Forest lands, on the Task Force established to review Forest travel management issues. This is a violation of NEPA. 42 U.S.C.A. §4332©. The Pueblo of Sandia does not feel that tribal interests were adequately represented on the Sandia Travel Management Workgroup. Although individual consultation was conducted by the U.S. Forest Service with some Pueblos and Tribes, there was no opportunity for Pueblos and Tribes to be part of the groups responsible for the formulation of recommendations for a designated motorized route and trail system on the Sandia Ranger District. True consultation involves meaningful participation in the decision-making process. The lack of a tribal representative, or tribal representatives, on the workgroup was exclusionary of tribal interests in the formulation of recommendations.
Response: The Sandia travel management work group was convened by the third-party facilitators with the Institute for Conflict Resolution, and was intended to be made up of a variety of motorized and non motorized recreation public users and others with an interest in Sandia RD travel management in order to solicit input specifically regarding recreational uses, values and concerns. The Forest Service did not intentionally exclude the Pueblo from participating on the work group, but felt that the work with the Pueblo would be best accomplished through direct consultation. Based on this advice from the Forest Service, the facilitator did not invite the Pueblo to participate in the work group. As a federally recognized Indian tribe, the Pueblo of Sandia has a unique relationship with the Forest Service. The Forest Service engaged the Pueblo in government to government consultation in keeping with the agency’s legal responsibilities. It was important to the Forest Service to be able to hear the concerns of the Pueblo and integrate that information into the analysis, rather than dilute their involvement into a public work group that has no legal standing. The Forest Service did not understand how	

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	strongly the Pueblo desired to be involved with the work group, and feels that the input the Pueblo provided regarding potential impacts to traditional cultural properties and traditional use areas was understood and represented fully in the development of the six alternatives.

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(AH4) Bernalillio Watershed NFSR 445	

89, 173	<p>These alternatives would prohibit motorized travel on National Forest System Roads (NFSR) 445C and 445H in the Bernalillo watershed area. We support the closure of these currently open routes because it will prevent the negative off-road vehicle affects to wildlife through direct harassment and displacement and reduced security of areas between roads, including the affects of noise, which many studies show, and the SRD acknowledges, cause wildlife displacement and avoidance several hundred meters from routes. (EA: 46.) This closure would ensure the SRD would thereby be in compliance with Executive Orders 11644 and 11989.</p> <p>However, these alternatives would keep open NFSR 445, which circles the Bernalillo watershed area. This route is classified as high risk/medium benefit (TAP Map 11 and 13). The risks associated with this route include fire, wildlife, watershed, and cultural resources, and are of the highest risk classification. (TAP Appendix A.) The TAP recommendation is to mitigate the risks of keeping this route open or restrict motorized use of this route (TAP Map 15). We note that no alternative would close this route and no rationale is given for keeping this route open. We believe the SRD must go beyond the mere disclosure and comparison of impacts, but must provide a plausible rationale for the decisions it reaches based on that disclosure and comparison. It is clear that for NFRS 445, the risks and benefits associated with this route were disclosed, but no alternatives were considered and no rationale was presented in the EA. The result is a failure to comply with the Executive Orders that require locating routes to minimize risks to watersheds and wildlife.</p>
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Response: NSFR 445 is an important access to trailheads that provide access to the Sandia Mountain Wilderness from the northwest side of the district. There are two developed trailheads, with vault toilets, Piedra Lisa (North) and Strip Mine. There are also three small less developed parking areas providing trail access. During public involvement including scoping, there were never any concerns raised regarding not designating this road for motorized use. There were concerns raised from both Sandia Ranger District personnel and local residents about OHV vehicles leaving the road and traveling across country. As a result, the road is being considered for designation for highway legal vehicles only, to reduce the number of vehicles with off road capability.

<i>Comment #</i>	<i>Comment</i>
(AG3) Wilderness	

89, 173	<p>We support the SRD’s determination to prohibit motorized routes through Wilderness Areas. According to Executive Orders 11644 and 11989 and the revised travel management rules, “areas and trails shall not be located in officially designated Wilderness Areas or Primitive Areas.” In addition, Congress bars the existence of any “temporary route” and the use of motor vehicles within wilderness. We applaud the SRD’s decision to protect the 37,232 acre Sandia Mountain Wilderness.</p> <p>Additionally, allowing a large network of routes to border these areas will put wilderness areas that are supposed to be closed to motorized use at risk for trespass by motorized users and will threaten the values associated with both wilderness and wildlife areas. The SRD should identify and plan for decommissioning any routes that breach congressionally designated Wilderness areas and develop a buffer in which any routes that will bring motorized vehicles close enough to breach the Wilderness boundary are identified for decommissioning.</p>
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	<u>Response:</u> The project area does not include the Sandia Wilderness Area. None of the motorized trail route designations in any of the alternatives border the wilderness. The only level 2 road near the wilderness that would be designated for motorized use would be Forest Road 455, the Bernalillo Watershed Road, and this road is only being considered for highway legal vehicles. The other roads near the Wilderness boundary are level 3 and 4 roads that are open to highway legal vehicles only and terminate at trailheads that provide access to Wilderness trails. No roads are being considered for motorized designations that breach the Wilderness boundary.
116, 119	Features Common to All Alternatives Motorized vehicle use would not be permitted in the Sandia Mountain Wilderness areas This “feature” is outside the scope of the travel management process, Federal law dictates how wilderness areas are managed. I request this feature be removed from the EA as it is a moot point.
	<u>Response:</u> This statement has been included in the EA to emphasize that none of the alternatives allow for motorized use in the wilderness – during the public involvement process there was some confusion about whether the project affected the wilderness.

<i>Comment #</i>	<i>Comment</i>
<i>(AG4) Snowmobiles</i>	
89, 173	We strongly support the SRD’s decision to close more than 10,000 acres to snowmobile use.
	<u>Response:</u> The Travel Management Rule does not address designations to snowmobiles over snow. The reference in the EA is from the Cibola Forest Plan Amendment No. 8, November 1996, which closed areas on the Sandia Ranger District to snowmobile use.