Monday Creek ORV Trail Extension EA Response to Comments Notice and Comment Period Ending 11/27/02				
NO	**DATE**	**SUBJ**	**COMMENT**	**RESPONSE**
1 3-4 5- 11 12 14 15 17 18 22	9/27/02	PRO	Favor expansion; inclusion of bridge, appreciate trail system	Additional trail devebpment was considered including more miles of trails on ridge tops and across Little Monday Creek. These alternatives were not analyzed further due to heritage concerns and access problems across the Little Monday Creek bottomland. See page 20-21 in the EA.
2	9/27/02	NEI	Land is bordered on 3 sides by WNF; are bird watchers; interests not always compatible with ORVs	P 6: cites Forest Plan designation of 2 mgmt areas for ORV use;
6	10/07/02	BOT	Half of users ignore existing trails and build new trails; WNF needs to "lean on" illegal trail riders on erosive terrain; every well-used bike trail represents the obvious destruction of tree seedlings and forest plants; trail destroys ferns, trillium, blood root, hepatica – none of which can legally be dug; rare plant communities found on Forest during planning process have not been designated, but we allow destruction of other plants	Illegal trails are a problem on the Forest and the enforcement process is one of the highest priorities on the Athens District. Wayne National Forest Protection Officers patrol the trails as the recreation budget allows. Cooperative agreements have been established with local law enforcement agencies to add enforcement hours. There are long range plans to close and restore more miles of illegal trails. The proposed actions will designate official trail in an area with heavy rider use, which should decrease illegal use in this area. While individuals of some plant species mentioned in the comment are lost, it is unproven that any populations are affected.
7	10/26/02	WLD	ORV trails would disturb mating rituals of the Pickerel Frog; noise and dust would weaken feeding routines and reduce	Existing condition for amphibians is described on pg 22; inventories and mitigation measures are

			feeding grounds; disturbance is weakening the gene pool (mating calls) of the spring peeper; this will also affect raccoon hunting habits; ORV trails will disturb mating habits of the Eastern Tiger salamander and the common gray tree frog; ORV trail construction inhibits raccoon and bobcat territorial habit; favors ALT A.	discussed on p 24; effects are on pg 25-26. The analysis discusses what impacts may occur, but concludes that the trails do not affect the viability of these species. There is better amphibian habitat in other places on the Forest, i.e. Greendale Wetland, for which a species list is included on pg 24. Off-road vehicle use occurs during daylight hours, decreasing the impact on nocturnal amphibian and predator activity.
8	10/29/02	PRO	ORV riders pay for their use, so should have more than 5-10% of the Forest; new parking lot needs more than 10 add'l spaces; roadside parking is not acceptable; restrooms are not in good condition; broken porta-potties; favors ALT E; wants all 6.1 miles.	The designated ORV areas comprise approx 15% of the Wayne. Vandalism is high, particularly in the northern end of the designated trail area. As damage occurs, plans are made to replace agency facilities. We work with contractors of rented facilities to install protective structures and to replace damaged units.
9	10/31/02	PRO	Uses trail system extensively; parking lot is very crowded; wants more than 2 miles of trail; more legal miles mean fewer rogue trails;	Comments represent purpose and need for this project including parking lot expansion, development of a maximum amount of miles in project area, and the issue of illegal trails.
10	11/3/02	PRO	Favors ALT D for safety; need bridge; wants expansion; wants the trail system linked to local businesses; Camp Ohio has been in use for 40 years; campground owner does not benefit because campers are already there; FS should benefit private owners; trail maintenance has been significantly improved in the past 2 years; offers assistance in getting trail grants for bridge	Comments represent user concerns and project's purpose and need. Camp Ohio provides services not provided by the national forest. There is an increased emphasis on trail maintenance on the Forest.
13	11/7/02	PRO	Impact to Forest would be minimal in short term; long term benefit would be to improve the environment; expansion meets Forest Plan goals;	Implementation of D should improve water quality and the aquatic ecosystems of Little Monday Creek and Monday Creek and affected tributaries, p 29.
16	11/13/02	PRO	Wants to see gated roads open	Comment Noted

20	11/27/02	REC	By stating that illegal ORV trail are outside the scope of this decision because they are primarily a law enforcement issue, the FS is neglecting to address the largest environmental impact of ORV use on the Wayne.	P 10 discusses illegal use. Illegal trails are a problem on the Forest and the enforcement process is one of the highest priorities on the Athens District. Wayne National Forest Protection Officers patrol the trails as the recreation budget allows. Cooperative agreements have been established with local law enforcement agencies to add enforcement hours. There are long range plans to close and restore more miles of illegal trails. The proposed actions will designate official trail in an area with heavy rider use, which should decrease illegal use in this area. Trail closures beyond the project area are outside the scope of this decision. While some plants mentioned in the comment are lost, it is unproven that any populations are affected.
20	11/27/02	REC	The Annual Plan of Work for law enforcement and the Annual Recreation Season Work Schedule should be included in the EA as mitigations measures for preventing user-developed trails because user-developed ORV trails have greater impacts to the soil, herbaceous understory, and stream quality than the designated trails	See discussion of illegal trails on pg 10 in the EA. Forest law enforcement is guided by the Code of Federal Regulations (CFRs) and the Forest Closure Orders. See page 6 for a discussion of Forest Closure Order 14-07 for ORVs (36 CFR 261.56, 55(d), 54(a), 54(a), and 55(b). Closure Order 14-10 prohibits vehicles on forest development roads (36 CFR 261.56) open to the public and prohibits vehicles and horses in Special Areas, including Paine's Crossing. The seasonal closure for ORVs, horses and bicycles is Order 14-13, citing 36 CFR 251.55(c). In addition, all action alternatives close illegal trails in the project area. The District Soil and Water Program closes and/or rehabilitates at least one

				problem area per year. The Recreation program installs signs and rehabs illegal trails within the ORV area each year. Schedules for enforcement and protection officer coverage are dynamic and are also sensitive information not for public review, therefore, are not included in the EA or project file.
20	11/27/02	NEPA	An alternative to add the connector trail and close all illegal, user-developed trails should be analyzed.	Alternatives C and E consider the connector trail without the loop trails and closure of illegal trails, p 17 and 18 in the EA.
20	11/27/02	NEPA	Alternative to allow the area to rehabilitate after so many disturbances was not considered.	An alternative to close all trails is discussed on pg 21 (not analyzed further). The No Action alternative, Alt B, would allow the area to rehabilitate.
20	11/27/02	NFMA	Project violates NFMA which directs that off-road vehicle use be planned and implemented to minimize adverse effects on the land and resources, promote public safety, and minimize conflicts with other users. This project does not minimize adverse effects on the land.	Adverse effects on the land are addressed in Chapter 3. The proposed action includes soil and water mitigation measures (or construction standards) to minimize impacts to the land (pg 19). Mitigations for other resources are on pg 18. Impacts to soil and water are discussed on pgs 26-30. In addition, a monitoring plan for soil and water resources is attached to this document.
20	11/27/02	HYD	The planned construction of an ORV trail in the floodplain of Monday Creek will adversely affect the land. Not only is a flood plain particularly susceptible to erosion, but it is likely to encourage ORV users to ride in the creek. It is the FS's duty to allay, not exacerbate the problem by directing ORV users away from the waterways.	The floodplain is being crossed within a powerline easement in an area which has been disturbed repeatedly in the past. Vegetation adjacent to the trail location in the floodplain is brushy and should discourage illegal trails. The profile of Monday Creek at the bridge crossing site is not conducive to crossing without a bridge – banks are steep, 10 feet high, water has an unknown depth of possibly 3 or more feet during

				low water. The trail will be hardened, reducing the potential for erosion during flood events. Monitoring and signage (p 18) will be used to control use on the floodplain.
20	11/27/02	REC	The conflict between developing a Watchable Wildlife Area in the wetlands near the project site and the new trail has not been adequately addressed.	Development of the Watchable Wildlife area at Greendale Wetland has been delayed because ODOT has not approved access to the proposed parking area due to inadequate site distance on State Route 595. An alternative parking area was found, but funds are not available to develop the parking lot or the connector trail. Development of the new ORV trail does not preclude development of the Watchable Wildlife area.
20	11/27/02	REC	The safety of non-ORV users has not been addressed.	NEPA focuses on substantive issues with the proposed action. There is no evidence that the safety of non-ORV users is impacted by the proposed action. 15% of the WNF is set aside for designated off-road vehicle trails. 85% is available for other types of uses (p. 10)
20	11/27/02	BOT	FS did not carry through analysis the impact on forest canopy fragmentation	The impact of the project on forest canopy fragmentation is discussed on p 10. No canopy trees will be cut in this project therefore no canopy fragmentation will occur.
		ROAD	FS should undertake a roads analysis because we refer to mineral access roads	A roads analysis was completed and can be found in Appendix A. It is also discussed on p 10 of the EA.
		WILD	FS did not carry through analysis on wildlife chased by ORVs	Wildlife chased by ORVs is discussed on p 12. There is no evidence that wildlife is chased by ORVs in Ohio forests.
		WILD	FS did not carry through analysis of vehicle noise on wildlife	The impact of vehicle noise on wildlife is discussed on p 12.
		SOIL	FS did not carry through analysis of the impact of compaction on	The impact of compaction on soil micro-

			soil micro-organisms. Reference to the condition of vegetation as an indicator of soil health and the normal pattern of litter fall are vague and do not take into account the vitality of the herbaceous layer which can be more indicative of the soil conditions than trees	organisms is discussed on p 12. It would take a catastrophic event to cause a disturbance large enough to impact the number of micro-organisms in the project area. The proposed action would not create a significant impact.
		AIR	The EPA's exclusion of ORV emissions checks does not negate the FS from considering this environmental impact in this EA.	The impact of this project on air quality is discussed on pg 13. There is no evidence to indicate that ORV emissions are impacting the forest in the trail area.
		NEPA	EA is deficient (devoid of substantial analysis) in its assessment of cumulative impacts on wildlife, aquatic systems, botany, and soil	Cumulative Effects of the Action Alternatives is discussed on p 26, 30, 31, 32, and 34. Cumulative effect of past, present and future activities are discussed on pg 32. Botany cumulative effects are discussed on pg 34. Effects on RFSS are discussed on pg 37. Impacts to Endangered species are discussed on pgs 38-39.
		NEPA	Cannot justify the proposed project by stating that the area has been disturbed previously be resource extraction and ORV use and therefore it cannot be further impacted	The purpose of the project and the need for safe and legal access are discussed on pg 4. The foundation for development of the trail system is described on pg 8. Impacts to the area and benefits from the project are discussed in Ch 3.
		REC	FS bias for increasing ORV trails is impeding its objectivity in determining if the site can feasibly handle the proposed project.	The proposed action was reviewed by biologists, hydrologist, fisheries biologist, soil scientist, archaeologist, and botanists. No objections were raised which would indicate the area cannot handle the proposed project and that we should select the no action alternative.
		WILD	FS admits ORVs will kill amphibian eggs, larvae, and adults, and does not adequately mitigate these effects.	Impacts to amphibians are discussed in Table 2-4 on pg 20, and in effects on pgs 22-24. Mitigation measures are discussed on pg 24, 25 and 26. Better habitat for amphibians is found outside the project area.

23	11/23/02	PRO	Consider flexibility in closure dates to accommodate hunting seasons; utilize and enforce BMPs for soil erosion control in aquatic habitats; recommend use of large boulders and earthen berms to close illegal use areas; fence can be expensive and easily damaged;	The current closure date was set to accommodate the fall deer hunting season. BMPs for soil erosion control are incorporated in the construction standards which appear as mitigations for all action alternatives on pg 19. Boulders are often used to close illegal trails.

BOT – comment concerning vegetation
WILD – comment concerning wildlife
NEPA – process comments
NEI – comments from neighbors
REC – Recreation comments
PRO – Comments favoring development of the trail