

FINDING OF NO SIGNIFICANT IMPACT
BACKCOUNTRY/WILDERNESS MANAGEMENT PLAN
AND ENVIRONMENTAL ASSESSMENT
ROCKY MOUNTAIN NATIONAL PARK

The Backcountry/Wilderness Management Plan for Rocky Mountain National Park (RMNP) was developed to address issues and provide guidelines for managing the non-developed areas of the park that are defined as backcountry or as designated, recommended, or potential wilderness. Park management proposed this new plan because the 1984 Backcountry Management Plan mainly addresses overnight use in the backcountry/wilderness and is inadequate for addressing management direction, consistency, and needs. The new plan details a wide array of issues and identifies specific standards for managing administrative actions and visitor use. The plan formalizes many current backcountry/wilderness management practices that have been in effect for the past twenty years. It does not affect developed areas, roads, or frontcountry park uses.

The new plan supercedes any direction or guidance set forth in the 1984 Backcountry Management Plan. The adoption of this plan is not part of the recommendation before Congress to officially designate a large portion of the park as wilderness.

An Environmental Assessment (EA) was conducted to examine plan alternatives. The EA involves detailed analysis of two alternatives and describes the potential impacts associated with implementing the proposed plan (Alternative A), or maintaining the current status of backcountry and wilderness management with no written standards (Alternative B). The EA was available for public review and comment beginning on January 19, 2001, and the review period was extended to April 6, 2001, which provided an opportunity for public input on the alternatives. Alternative A was identified in the EA as the preferred alternative.

After a careful review of resource and visitor impacts and public comments, the preferred alternative, with minor changes based on the public's suggestions, has been selected for implementation. Topics of concern identified during scoping and evaluated in the EA include education, recreational use, trails and trailheads, overnight permit system, camp areas, appropriate facilities, administrative actions, research activities, resource impacts, and social impacts.

PREFERRED ALTERNATIVE (ALTERNATIVE A IN THE EA)

The preferred alternative provides for a written plan with standards or recommended actions for such elements as day use and overnight group size limits, private stock use, administrative minimum requirements (tools), aircraft use, the Backcountry Permit System, campsite standards and management, climbing management, trails management, and facilities in the backcountry and wilderness. The preferred alternative also provides for an enhanced wilderness interpretation and education effort and establishment of a Wilderness Steering Committee.

Under the preferred alternative, all backcountry/wilderness areas will be officially designated in one of four management classes, based on the following:

- Type and amount of use
- Accessibility and challenge
- Opportunity for solitude
- Acceptable resource condition
- Management use

Each management class has associated desired social, resource, and managerial conditions for that area with different use standards. The plan endorses and often requires the use of the Minimum Requirement Concept (MRC), which enables managers to examine and document if a proposed action is appropriate in wilderness, and, if so, what is the “minimum tool” needed to achieve the objective.

Another feature of the plan is the backcountry permit and reservation system and associated standards. Climbing management guidelines and requirements are presented in detail, and six different trails maintenance levels (A through F) are explained. Specific indicators or standards that may vary among the four management classes are provided for bare ground and barren area sizes, group size limits (overnight and day use, including stock groups), campsite size, tent pad numbers and size, distance of campsite to water sources, vegetation cover, tree/shrub damage, root exposure, number of social trails, access trail tread, and cleanliness.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is the same as the preferred alternative. The preferred alternative minimizes environmental impacts and addresses the main issues that were identified during scoping and planning. It provides a formalized plan that would help to ensure that decisions regarding wilderness use would be consistent and would be subject to protective standards. It also promotes the use of the minimum tool concept (where appropriate) and wilderness education. All of these attributes contribute to the minimization of environmental impacts on park resources and values.

OTHER ALTERNATIVES CONSIDERED IN THE EA AND RECOMMENDED DURING THE PUBLIC REVIEW

Alternative B, No Action / Current Management Alternative – This alternative was considered in the EA. Under this alternative, the current status of backcountry and wilderness management at RMNP would continue, and there would be no comprehensive backcountry and wilderness management plan in effect. Proposed activities in the backcountry and wilderness would be reviewed and approved on a case by case basis, based on policies and guidelines that are not formalized, but generally followed. There could be a lack of continuity with changes in staff and/or administrations, and there would be no documented process that would ensure the most consistent protection of backcountry and wilderness values.

OTHER ALTERNATIVES CONSIDERED DURING THE PLANNING PROCESS BUT REJECTED FOR CONSIDERATION IN THE EA

In formulating the proposed plan, a variety of management options were considered that met the purpose and need in different ways. These included different management designations for various areas, different numeric standards for campsite use, and different levels of desired visitor use. However, an examination of these options showed that many were either: (1) essentially duplicates of less environmentally damaging or less expensive alternatives; (2) not raised as important issues during scoping; and/or (3) not within the authority of this planning action (e.g., would require changing current regulations). Based on these considerations, these options were not developed in an official alternative, and two alternatives were ultimately considered.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse

The preferred alternative includes many provisions and standards for resource protection that would result in long-term benefits to natural and cultural resources, as well as a consistent review process that would have beneficial effects on the administration of operations in wilderness areas. There may be some adverse impact on park operations, due to limitations that will be placed on some management options, as well as the continuation of cumulative adverse impacts related to the intrusion of human visitors into wilderness. However, none of these impacts, adverse or beneficial, would be considered to be significant.

Degree of effect on public health or safety

The preferred alternative would have a positive effect on public health and safety in many ways, since it provides standards that were derived in part due to concerns for visitor safety. For example, standards for human waste management will help limit the spread of disease, and provisions for trail maintenance will help to eliminate unsafe hiking conditions. Possible adverse health or safety effects could occur if the new procedures required by use of the MRC result in needing to use unfamiliar equipment or not having a means of rapid transport readily available for all operations. None of these effects is expected to be significant.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

As described in the EA, no major adverse effects to natural or cultural resources were identified for the preferred alternative. The entire area subject to the plan contains historic and cultural resources, wetlands, and ecologically critical areas. As described in the EA, none of these would be adversely affected by the preferred alternative. The entire length of the Cache La Poudre within the park is a Wild and Scenic River.

Degree to which effects on the quality of the human environment are likely to be highly controversial

Approximately 300 copies of the draft combined plan and EA (Plan/EA) were distributed to organizations, government agencies, and individuals identified during the scoping and planning processes. Copies were also available on the RMNP Internet site and in local libraries. Press releases were issued to local media informing the public of the availability of the document. During the extended review and comment period, 38 e-mail and written comments were received, including comments from several groups focused on environmental and access issues. A total of 34 commentors were in favor of Alternative A, many of which commended RMNP for developing a plan that establishes guidelines to protect the park's resources. One commentor did not favor the plan, but did not specify another alternative, and the remaining four commentors provided comments or requested information with no alternative preference expressed.

Some commentors expressed disagreement with the standards or limits contained in the preferred alternative, stating that there should be no limits on use of a public resource. Some expressed concern about standards or limits for climbing activities and equipment. These may be somewhat controversial issues, since other users expressed support for the standards and/or limits. However, none of these issues or potential effects on the quality of the human environment is likely to be highly controversial or result in significant impacts. The letters and e-mails received reflected a variety of concerns, and each substantive concern is addressed in the NPS responses in the errata sheets.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks

The preferred alternative places a high emphasis on protecting wilderness and provides for limits on equipment or facilities that can assist users and minimize risk, but that may be visually intrusive. These include certain climbing aids, signage, and new developed facilities. These provisions would be beneficial to those users seeking a true wilderness experience, but could increase risks to those users who need more developed facilities or assistance in navigating the park. However, none of these is a highly unique or unknown risk, and this does not represent a significant impact.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The action for this project will not set any NPS precedent. The preferred alternative will not have significant effects and does not represent a decision in principle about any future consideration elsewhere in the National Park System.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

Impacts resulting from implementation of the preferred alternative would contribute to existing impacts from the current use of the RMNP wilderness, plus impacts from the use of other wilderness areas and private lands adjacent to the park. The cumulative, minor, adverse impacts that already exist due to the intrusion into wilderness by human visitors would continue under this plan. However, the provisions in the plan and its consistent implementation would not result in cumulatively significant impacts. The plan would mitigate intrusions above and beyond the restrictions placed on private lands outside the park and on some adjacent U.S. Forest Service wilderness, resulting in a cumulative benefit to wilderness resources because of the increased resource protection and preservation of the wilderness character of the area.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

To date, over 500 prehistoric and historic archaeological sites have been recorded in RMNP, but few have been evaluated for the National Register of Historic Places (NRHP). The park contains 146 historic structures that are eligible for listing or enrolled in the NRHP, and 18 of these are in the backcountry/wilderness. The McGraw Ranch is the only area that has been documented as a cultural landscape.

Under the preferred alternative, direct adverse impacts to cultural resources from use of the wilderness can occur if visitors accidentally or intentionally disturb, vandalize, or remove artifacts or features associated with an historic or archaeological site, or a traditional cultural property. Some trails or campsites in RMNP provide visitors access to the proximity of various cultural resources whereby use or visitation of these resources may have a direct adverse impact on the site. Vandalism can occur if visitors move, remove, or rearrange rocks from prehistoric sites, or logs at the remains of historic cabins. Park staff conducting routine ground disturbing activities during maintenance of trails or campsites has the potential to disturb cultural and archaeological resources. Because the entirety of RMNP has not been surveyed for cultural resources, there are cultural resource sites that have not been identified. Therefore, visitors or park staff working in the wilderness may unknowingly discover or disturb a previously undocumented cultural resource site.

Provisions formalized in the preferred alternative address protection and research measures for preserving cultural resources. Protection measures as outlined in the plan include the rehabilitation, reconstruction, and restoration of archaeological and historic sites, objectives, and features. The plan also establishes guidelines for cultural resource inventories and research that may include monitoring, remote sensing, surveying, documentation, and data recovery. Guidelines for commercial service and restrictions on new trails and bridges would also serve to limit visitor access into wilderness and possible adverse impacts on cultural resources in the area. The proposed recommendation on day use group sizes, along with the limits currently set on other group sizes, would serve to reduce adverse impacts from large groups on unprotected resources. The planned wilderness education and interpretation programs would serve to educate park visitors and employees about the importance and sensitivity of cultural resources.

With these measures in place, impacts to significant scientific, cultural, or historical resources should be kept to a minimum.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat

There are 69 endangered, threatened, or rare species known to occur within RMNP. Although impacts to these and other species and habitats could result from the use of the wilderness by visitors and park staff, no significant adverse impacts are envisioned under the preferred alternative. Implementation of the plan will help limit adverse impacts on park wildlife, including those species and individuals that are threatened, endangered, or of special status, resulting in long-term, benefits. The plan includes provisions that help to preserve and protect habitat, such as temporary or permanent area closures, restrictions on new trails, site rehabilitation, control of non-native species, and limits on campsite sizes and number of visitors in camps and on trails at any one time. Guidelines for proper food storage and garbage handling would provide the information needed to help reduce wildlife encounters. The listed recommendations for group size limits of day use visitors, stock groups, and overnight campers would also help to reduce negative encounters between wildlife and humans. Smaller group sizes would also mean fewer adverse impacts to wildlife from unnatural sounds and lights in the wilderness. The restriction on pets in wilderness would continue which eliminates one source of conflict between domestic animals and wildlife.

Several provisions are also in the plan that would serve to minimize impacts to wildlife from climbers. Vocal calls between climbers would be discouraged, and power drills would not be allowed. The spring raptor closure program would continue. There would be increased monitoring of raptor activity in high use climbing areas, which would be temporarily closed if the monitoring indicates that adverse impacts would occur if these areas remained open.

Application of the Minimum Requirement Concept and minimum tool requirements may likely result in less use of mechanized equipment and vehicles, which would eliminate many sources of noise and lights from motor vehicles, aircraft, chainsaws, and other mechanized tools. Also, less use of off-road vehicles (ORVs) or other mechanized equipment for trail or facility maintenance would result in less chance of an unintentional taking of (running over) small, non-mobile species. However, with extended stays in the wilderness to accomplish the required task, there may be more, but negligible, impacts to wildlife from lower level (human) noise as opposed to aircraft noise. Most species will temporarily avoid the area used by the work crews and return when the disturbance is gone and any adverse impacts to the habitat would be short-term and localized.

Finally, the education and interpretation programs in the plan would most likely include information on preventing and minimizing disturbance to all wildlife, thereby reducing the number and severity of impacts to wildlife or threatened or endangered species from visitor use.

Whether the action threatens a violation of federal, state, or local environmental protection law

This action violates no federal, state, or local environmental protection laws.

Impairment

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the proposal will not constitute an impairment to Rocky Mountain National Park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in *the Backcountry/Wilderness Management Plan and EA*, the public comments received, relevant scientific studies, and the professional judgement of the decision-maker guided by *NPS Management Policies* (December 27, 2000). Although the plan has some minor negative impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in major benefits to park resources and values, and opportunities for their enjoyment, with no impairment.

PUBLIC INVOLVEMENT

The plan and associated EA were made available for public review and comment during a comment period that extended from January 19 to April 6, 2001. Approximately 300 copies of the Plan/EA were distributed for public review to various government agencies, private organizations, and individuals identified during the scoping and planning processes. Copies were also available on the RMNP Internet site and in local libraries. Press releases were issued to local media informing the public of the availability of the document. During the extended review and comment period, a total of 35 comments were received via e-mail and regular mail. Of these, a total of 29 comments were in favor of Alternative A. Some comments resulted in minor changes to the text of the plan and/or the EA. Substantive comments are addressed in the Errata Sheets attached to this FONSI. The FONSI and errata sheets will be sent to everyone who commented on the EA.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor and

temporary in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Approved:

Karen P. Wade 7/17/2001

Karen P. Wade
Director, Intermountain Region

Date

Errata Sheets

Backcountry/Wilderness Management Plan and Environmental Assessment

Rocky Mountain National Park

Comments received during the extended public comment period centered around the following topics: camping and backcountry permits, wilderness definition and standards, climbing management, fish and wildlife, visitation and visitor use, figures and maps, range of alternatives, and miscellaneous policy issues.

Major comments needing further clarification are summarized below by topic followed by a response from the NPS. The majority of comments listed below resulted in no text changes to the draft document; however, those comments that did result in changes to the text are indicated with an initial asterisk (*) and explained in the response. Further, minor comments including typographical and grammatical errors, minor rewordings, and minor factual corrections are not addressed below, but have been changed in the text of the Plan/EA accordingly.

Some of the comments received were outside the scope of the Plan/EA. These comments were distributed to the appropriate NPS parties at RMNP who will respond to these comments on an individual basis, as needed.

Camping and Backcountry Permits

***Comment:** Some existing campsites do not meet the current standards set forth in the plan and should be relocated. Further, there should be a plan developed for the evaluation of campsites. (2 comments)

Response: Text changes in the plan have been made to indicate that there are a few campsites that may have met previous standards, but do not meet the standards outlined in this plan. However, there would be potentially greater impacts and resource damage if these sites were moved to a new location. Relocation can be considered, but the decision must be based on site-specific conditions and a case by case basis. This has been clarified in the text in *Section 2.1.4.5, Camp Area and Site Management*. RMNP does have a program in place currently whereby campsites are evaluated on a routine basis and rehabilitated or relocated if necessary. This is described in *Section 2.1.4.5.6, Monitoring*.

Comment: Not in favor of standards being relaxed on campsites with animal stock under Management Class 3. (1 comment)

Response: The new standards are based on user data that RMNP has collected and are reasonable guidelines that meet both visitation and resource needs. The standards are based on one pack animal for every three riders. This increases the number of stock at individual stock campsites however reduces the number of stock at group stock campsites. Stock campsites can accommodate the new standards without any modifications.

Comment: Why is group size increased for winter use? (1 comment)

Response: The group size limit of 12 during the winter is because the environmental conditions, particularly snow cover, allow more visitors to use the backcountry/ wilderness with less impact to the resources. The winter group size of 12 is consistent with the group size of 12 allowed at designated group campsites during the summer. In 1992, winter group sizes of 15 and summer group sizes of 20 were reduced to 12 based on resource protection issues, increased visitor awareness of backcountry/wilderness values and ethics and trends in smaller group sizes.

Comment: Backcountry permit limits are not reasonable. (3 comments)

Response: The limits placed on backcountry permits and overnight stays in the backcountry/wilderness have not changed for many years and will not change with the implementation of this plan. Because RMNP is a highly visited park, these limits were established and are employed to protect the park's resources and to allow equal opportunity for visitors to enjoy the backcountry/wilderness.

Wilderness Definition and Standards

*Comment: The total acreage of RMNP that is covered by this plan should be clarified. Is the current wilderness recommendation the same as the original recommendation, and if not, what is the difference? (4 comments)

Response: The current official total area of RMNP is 265,769.14 acres. The number of acres of wilderness has changed since the original 1974 recommendation due to park boundary changes and updates of the recommendation to Congress. This has been verified for consistency in the text throughout the document.

*Comment: Clarification is needed on the history and current status of the wilderness recommendation. (2 comments)

Response: The text in the plan describing the history of the wilderness recommendation at RMNP is accurate and outlines the major events that have taken place with regards to recommended wilderness areas. However, the plan has been expanded in *Section 1.3.1, History of Wilderness and Backcountry Management/Wilderness Recommendation* to incorporate recent activities that have taken place since the Draft Plan/EA was published, including the latest submission of recommended wilderness areas to Congress in April 2001.

*Comment: The definitions of non-wilderness backcountry are unclear. (1 comment)

Response: The definitions of wilderness and non-wilderness backcountry have been clarified in the text in *Section 1.1, Scope of the Plan*.

Comment: What is the wilderness setback from roads? (1 comment)

Response: Generally, the wilderness setback from roads is 200 feet from the centerline of paved roads and 100 feet from the centerline of dirt roads.

Comment: The use of chainsaws, rock drills, or motorized equipment should not be allowed at all in wilderness areas. (3 comments)

Response: The Wilderness Act prohibits the use of motorized equipment, except as necessary to meet minimum requirements for the administration of the area for the purpose of the Act. It is not the intent of NPS to use any types of motorized equipment in the backcountry/wilderness, except under exceptional circumstances. The use of traditional and primitive tools is emphasized throughout the Plan. In all cases, park crews will seek to avoid, minimize, or reduce the use of motorized equipment and mechanical transport, or their effect, in wilderness by searching for workable hand tools and techniques compatible with wilderness environments.

The Minimum Requirement Concept sets forth stringent requirements used to analyze the need, if any, for the NPS to use motorized equipment during management actions in the wilderness. Each situation is evaluated on a case by case basis and the effectiveness of the Minimum Requirement Concept will be evaluated each year as part of the annual review of the Plan/EA. The only exception to evaluating tasks on a case by case basis is that of opening trails in the spring, which is a programmatic approval to allow the efficient opening of trails in order to reduce the overall impact to wilderness resources (e.g., trail braiding, vegetation damage, soil compaction).

Comment: The plan is lacking indicators and standards for all resources that can affect the wilderness experience. Further, the plan should specify what type and scope of management actions will be implemented should standards be violated. (1 comment)

Response: The plan establishes both general and specific standards for maintaining and protecting wilderness, which are based on data collected by RMNP. Because there is not sufficient information or data to identify specific standards for every resource in RMNP at this time, and this plan is dynamic by nature, the annual review of the plan will allow the NPS to evaluate the effectiveness of regulations and guidelines and maintain flexibility where needed.

*Comment: Regulations are too stringent regarding the construction of new trails. (1 comment)

Response: This plan does not preclude the construction of new trails under certain circumstances. Trails may be constructed or rerouted if critical to protect natural or cultural resources. The management goal is to maintain existing trails that currently meet visitor use and to revisit the need for additional trails on a case-by-case basis when necessary to balance visitor use and resource protection. Text changes have been made in *Section 2.1.4.7.3, Trail Work and Maintenance*, to indicate this more clearly.

Climbing Management

*Comment: The policy regarding fixed climbing anchors should be strengthened. (4 comments)

Response: Currently, the NPS is analyzing its policies regarding climbing management and hopes to establish nationwide protocols for climbing-related issues in the near future. The NPS is also currently working with other agencies including the U.S. Forest Service (USFS), U.S. Fish and Wildlife Service (USFWS), and the Bureau of Land Management (BLM) in an attempt to establish standardized interagency guidelines for climbing. Therefore, this plan establishes general climbing guidelines until more specific policies are developed at the national level. Text changes have been made as shown in *Section 2.2.4.5, Climbing Management*.

Comment: Are the bivouac site guidelines new, why are there different standards for Bivouac and Crosscountry areas and why can't climbers use tents? (1 comment)

Response: No, the bivouac site guideline as discussed in this plan is not new and has been in place for some time. Different standards apply to bivy sites since they are above treeline in more sensitive areas than crosscountry camping areas which are below treeline. Climbers can not use tents and must only establish the bivy between dusk and dawn due to physical and visual impacts where bivouacs are located.

Comment: The analysis of climbing management in this plan seems to outweigh other resource analyses. Is it necessary to establish an individual plan for climbing management? (1 comment)

Response: NPS policy currently allows each park to address the issue of climbing management in either a Wilderness Plan or an individual Climbing Management Plan. Because standard guidelines for climbing management are currently being established at a national level, RMNP decided to include climbing-related issues in this plan, as opposed to developing an individual Climbing Management Plan. Once standard protocols have been established for climbing at a national level, RMNP may choose to review the need for developing an individual Climbing Management Plan.

Comment: Are bottom-to-top fixed anchor routes appropriate in the wilderness? (1 comment)

Response: Climbing is a widely practiced activity in RMNP, and fixed anchors in the wilderness are acceptable according to wilderness guidelines and NPS policy.

Comment: What is that status of the rockbolt inventory, and should it be included as an appendix to this plan? (2 comments)

Response: The current rockbolt inventory for RMNP is not included as an appendix to this plan because it is not complete at this time. Plans to update the rockbolt inventory are in progress.

Fish and Wildlife

Comment: This plan and EA should include more information regarding impacts on wildlife including threatened and endangered species. Further, the plan does not mention how exotic fish are handled. (2 comments)

Response: The intention of this Plan/EA is to evaluate potential impacts to resource areas in relation to the management of wilderness. Because no specific impacts to wildlife are anticipated as a result of implementing the preferred alternative, a more in-depth analysis is not provided. *Section 2.2.2.2, Fish and Wildlife* sets the overall direction with regards to fish and wildlife management in wilderness. The *Resource Management Plan* provides more specific information and management actions pertaining to fish and wildlife, both native and non-native, in RMNP.

Comment: Hunting would be a good control of the number of elk and should be allowed in RMNP.

Response: Per federal regulations, hunting is not permitted in any National Park including RMNP.

Visitation and Visitor Use

Comment: There should be restrictions placed on the number of visitors allowed in RMNP during the summer because of problems including pollution, littering, and natural resource destruction. (1 comment)

Response: Pollution and air quality is closely monitored in RMNP, and most air quality degradation is due to pollution from external sources. If, however, it is noticed that pollution from cars within RMNP is endangering natural resources, management will revisit its air quality policies. The number of cars allowed in RMNP is outside the scope of this plan and EA. Management also closely monitors visitation and resource damage. Limiting visitation to the park at this time is not being considered, because visitation numbers are not excessive to where RMNP resources are being significantly damaged. Areas that are damaged by overuse are temporarily closed off to visitors until the area has been restored.

*Comment: How will limits placed on visitor group size affect visual quality? (1 comment)

Response: Limits placed on group size are anticipated to enhance the visual quality and experience of the wilderness because fewer individuals and tents will be seen, particularly in large groups. This statement has been added to *Section 4.2.8, Visitor Use and Experience*.

*Comment: The plan and EA does not clearly state whether or not motor vehicles can be used by Native Americans to access wilderness areas. (1 comment)

Response: Native Americans are permitted to access the backcountry/wilderness for sacred and religious purposes, however it is not the intent of the plan and EA to permit Native American access to these areas by motor vehicle. Because Native American access is not an

administrative use of the wilderness, the statement regarding the Minimum Requirement Concept located in *Section 2.1.3.3.13, Native American Access* has been deleted.

Figures and Maps

Comment: The figures and maps in the plan and EA should be more detailed. (5 comments)

Response: The figures provided are designed to provide the reader with a basic understanding of wilderness boundaries, management classes, and RMNP resources. More detailed information is provided in the text of the document or can be obtained at RMNP.

Comment: Figure 2-1 shows the south half of Twin Sisters with no designated Management Class. (1 comment)

Response: In Figure 2-1, Twin Sisters is shaded by light gray with no cross-hatching, which indicates Management Class 1.

Comment: What is the wilderness acreage for each of areas identified on Figure 1-2 (Mummy Range, Never Summer, Trail Ridge, and Enos Mills)? Does RMNP intend to have these areas known by those names? (1 comment)

Response: The wilderness acreages for the areas identified in Figure 1-2 are as follows: Mummy Range Unit = 84,006; Never Summer Unit = 9,824; Trail Ridge Unit = 6,310; Enos Mills = 148,324. All acreages are approximated from the Rocky Mountain National Park Recommended Wilderness Boundaries Map # 121-60,403a dated June 1999. The specific names were used in RMNP's the original Wilderness Recommendation in 1974 to identify individual units within the wilderness area. The official name of the recommended wilderness is Rocky Mountain National Park Wilderness.

Range of Alternatives

Comment: The range of alternatives considered for this plan and EA is not sufficient. (2 comments)

Response: Scoping efforts were conducted and a number of management options were considered prior to the development of the alternatives considered for this plan and associated EA. Management options that did not meet the Purpose and Need or that may have resulted in more extensive environmental impacts or unreasonable costs were eliminated from further consideration. Other options were eliminated if there was no support expressed by the public during scoping. Those options that were found to be reasonable and met the Purpose and Need were carried forward and combined to create the Action Alternative A/Preferred Alternative. During the alternatives development process, it was discovered that there were not enough distinct management options to create additional discrete action alternatives. Therefore, Alternative A and the No-Action/Current Management Alternative were the only two alternatives ultimately carried forward for detailed analysis.

Policy Issues

*Comment: There is no reference in the plan to NPS-77, NPS guidance for recreation and management. (1 comment)

Response: NPS-77 has been added to the list of regulations in *Section 1.4.1, Federal and General Provisions* of the Plan/EA.

Comment: Will the plan impact the right of Grand Ditch to exist and continue? (1 comment)

Response: The plan recognizes pre-existing conditions including the Grand Ditch, and acknowledges that these uses will continue to exist, subject to RMNP oversight and applicable regulations that protect the park's resources and values.