United States
Department of
Agriculture

Forest Service

Nez Perce
National Forest

Nez Perce National Forest Plan

Final Environmental Impact Statement

APPENDICES
Volume 2

APPENDIX E

All comment letters received during the public comment period for the Draft Nez Perce Plan are included in this appendix with the following exceptions. Each letter was given a reference number as it was received.

Listed below are letters that are not included in Appendix E:

Federal and Agency Responses included in Chapter 6 of the Final Environmental Impact Statement:

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List of Forest Plan Respondents

1. Idaho Wildlands Defense Coalition
   Don Crawford, Tom Robinson, Bill Leisi, Ron Mitchell, Wendy Wilson, Alan Hausrath, Jack Trueblood
2. Glenn Compton
3. William Engstli
4. James R. Tefft
5. Dennis Baird
6. Gertrude Maxwell
7. George Wuerthner
8. Joseph C. Schott
9. Donald F. Morrow
10. George Calvin
11. J. Perry Tefft
12. Gabe Dahlman
13. Ted & Phyllis Gold
14. Alvin C. Marks
15. Stacy Gold
16. Bradley W. Rice
17. John Lewinski
18. Robert G. Hunter
19. Char Roth
20. United Gold Corporation
21. Michael Frome, University of Idaho
22. David H. Wright
23. James Bruder
24. Duane Horstmeier
25. Kenneth D. Stockard
26. Mary E. Stockard
27. Drexel Schilling
28. Morton R. Brigham
29. Alan G. Wimer
30. Derl Hollenbeak
31. James D. Wassmuth
32. George Wuerthner
33. John W. Fisher
34. Barry L. Ross
35. Thomas J. Ash
36. Mike Medberry
37. Harmon Fansler
38. Dave Seyer
39. Tom C. Warden
40. Raymond Gortsema
41. Doug Sego
42. David R. Andruss

List of Forest Plan Respondents (con't)

43. Ethylee Kryns
44. Adam G. Kryns
45. Paul Hanson
46. Linda Mergliano
47. Bernie A. Lougee
48. Kelly Kelso
49. Greg Kelso
50. Tom Schumacher
51. Verla Duffy
52. Gladys Vaughan
53. Joe Vaughan
54. Mrs. Cindy Schumacher
55. Bill Leisi, Idaho Wildlife Federation
56. Mark Johnson
57. Michael Dunning
58. Ronald Tillery
59. John R. Swanson
60. Glenna R. Heminger
61. Brian K. Wilkes
62. Glen R. Foster, State of Idaho Outfitters & Guides Board (See Chapter 6 of EIS)
63. Olin Gardner
64. Vernon Rabel
65. Walter C. Minnick
66. Donna Peterson
67. Debra L. Allen
68. James Tucker
69. Rick & Sheryl Rice
70. Gary D. Cash
71. Marv Hill
72. Lewis-Clark Wildlife Club
73. Connie Grant
74. Vernon Kennedy
75. Carl E. Young
76. Richard Swanson
77. Raye Swanson
78. Dick Johnston
79. Bob & Carol Smith
80. Randal W. Fults
81. Kenneth J. Bacon
82. Lynn & Glenda Erb
83. Robert Knutson
84. Gary D. Gill
85. George S. Newby

List of Forest Plan Respondents (con't)

86. Margaret Lea Newby
87. Mike Murphy
88. Lyle Rowan
89. Wayne L. Dave
90. Art Learn
91. Mrs. Dutch Sego
92. Wayne H. Stickney
93. Sam Rowson
94. Pat Jerald DeBorherman
95. Mrs. Richard Swanson
96. Carl Milton
97. Richard Swanson
98. Paul Garai & family
99. Doug Sego
100. Chuck Wells, Idaho Dept. Parks & Recreation, (See Chapter 6 of EIS)
101. Kent Henderson & Larry Grant, Nezperce Forest Monitoring Team, Idaho Wildlife Federation
102. Darlene Cannon
103. Rick Pearson
104. Ronald D. Pierson, Pierson Enterprises
105. Mr. and Mrs. I. C. Jordan
106. LeRoy A. Blankenship
107. Patricia Hart, Solstice Press
108. Sam Bruegeman
110. R.A. Meyer
111. Lester Cash
112. Mark Rasmussen, Policy & Program Analyst, National Forest Products Assn., (not included as comment)
113. Don Fischer
114. Duke K. Parkening
115. Joseph W. Harrell, Policy & Planning Officer, Federal Aviation Admin. (See Chapter 6 of EIS)
116. Jacey Nygaard
117. E.A. Knivla
118. Kenneth Riersgard
119. Jack Waldemarson
120. Douglas A. Droz
121. Jennie Nuxoll
122. Vicki Wolkenhaver
123. Marilyn B. Carlson
124. City of Stites (See Chapter 6 of EIS)
125. Brad Carlson
126. Bernard F. Bruegeman
127. Pete Hansen

List of Forest Plan Respondents (con't)

128. Rhoda L. Bacon
129. Ray A. Kaufmann
130. Ivar Nelson, Publisher, Palouse Journal
131. Nick L. Hasselstrom
132. C. A. Wellner
133. Idaho Conservation League
134. James & Beverly Seymour
135. Bob Moseley, The Nature Conservancy
136. Robert H. Krogh, Idapine Mills
137. Donald D. Wassmuth
138. Pam Keller
139. Anthony N. Wassmuth
140. Angela Heustis
141. James S. Heller
142. Scott Ploger
143. Earl W. Cost Trucking
144. Jerry D. Triplett
145. Marilyn Deardorff
146. Ray Moss
147. Gailen Roberts
148. Claudia Roberts
149. Sierra Club, Northern Rockies Chapter
150. Teresa Kamerrer, Asotin County Bd. of Realtors
151. Sandy Grant
152. Darrell Adams
153. Karen J. Williams
154. Bob Lamm
155. Donald E. Fairley
156. George D. Deardorff
157. Hope and Milton Honeyfield, et al.
158. Paul Rieger
159. Kiele Brothers Logging
160. Hal K. Smurthwaite
161. Bill Stolz
162. Darrell E. Cox
163. Glen Deasy
164. Gary Swift
165. Pat Ford
166. Hadley B. Roberts
167. Harold R. Hoover, Jr., M.D.
168. Craig Norris
169. Ron Jackson
170. Linda P. Bergerson
171. Karen A. Buxton

List of Forest Plan Respondents (con't)

172. Gregory L. Saue, M.D.
173. Gale A. Palmer
174. Bill Voxman
175. Wesley G. Rose, O.D.
176. Kenneth L. Robison
177. Harvey Laufenberg
178. Jack Blewett
179. Jerry Jayne
180. Alan R. Hausrath, Idaho Environmental Council
181. Associated Logging Contractors, Inc.
182. Eugene E. Reed
183. Vern E. Ziegler
184. Jerry and Joanne Pavia
185. R. R. Hornbeak
186. Don Millen
187. Michael D. Myhre
188. W. F. Moody
189. Daniel J. Downey, M.D.
190. J. A. Kittrick
191. Orvis C. Burmaster
192. Bernard F. Brown
193. John Osborn, M.D., Spokane Resident Physicians Action League
194. Tom P. May, Attorney at Law
195. Emanuel Scherr
196. Emmett and Zona Smith
197. Malcom M. Renfrew
198. Robert J. Golden, M.D.
199. Fred W. Rabe
200. Julia A. Jose
201. Everett Hagen
202. Larry S. Freeman
203. Richard Fredericks
204. John Oltman
205. Michael Henneberry, M.D.
206. Pat Henderson
207. Ronald Z. Milot
208. Marlin Clausner
209. Dennis McMenamin
210. Fred Sotin
211. Gerry Snyder
212. Mary E. Lyons
213. Harry M. Lyons
214. Bob Shells
215. Tonda Mager

List of Forest Plan Respondents (con't)

216. Boise Valley Fly Fishermen
217. Lisa and Kirk Thompson
218. Stephen Hackney
219. Stella McAuley
220. April Kennedy
221. Dick Geary
222. James W. Borowitz
223. Tina K. Grant
224. Mark R. Swanson
225. Jerri Swanson
226. Russ Woodworth
227. Andy Goodwin
228. Rick Johnson
229. Dean A. Lydig
230. Richard Meyers
231. Colleen R. Carey, M.D.
232. David Simmonds
233. Cindy J. Grant
234. Shann and K. Scott Beard
235. William R. Osebold, M.D.
236. Robert M. Kennedy
237. L. John Gunter
238. Jim D. Hardin
239. George K. Elliot
240. Judy Kaye Elliot
241. Dave Seyer
242. Wilma Oltman
243. John H. Dimke
244. Ron and Mimsi Wise
245. John Kennedy
246. Leroy & Oliva Stevens
247. Wendell H. Goldsworthy
248. Dale & Marge Rose
249. Ted Nuxoll
250. E. I. Robertson
251. Yvonne Kaufman
252. Thomas J. Ash
253. Ken Cox
254. Tommy Lee Stockton
255. Rhonda Stockton
256. Frances Forrest
257. Ed Bottum
258. Ray Brady
259. Alvin Blankenship

List of Forest Plan Respondents (con't)

260. Vickie Cannon
261. Robert Aiken
262. Scott C. Wasem
263. Anthony L. Dolphin
264. Melinda Crawford
265. Sally Wassmuth
266. Idaho Outfitters' & Guides' Association, Inc.
267. Bugle Point Outfitters
268. Nezperce Grazing Advisory Board
269. Don Heckman, Heckman Ranches, Inc.
270. Dennis M. Hoene
271. Roger and Janice Inghram
272. Donna Spencer
273. Robert Spencer
274. Toivo Pottala
275. Mr. & Mrs. Michael Edmonds
276. Dennis L. Cox
277. Gregg L. Bailey
278. Kenneth T. Kolar
279. Ron Schaffer
280. Vickie Schaffer
281. Kathy A. Heitzman
282. Betty L. Heitzman
283. James E. Morley
284. Anne Kolar
285. Dalphine Reyburn
286. James W. Reyburn
287. Catherine E. Morley
288. Andy W. Rose
289. Gary Ridenour
290. Penny Ridenour
291. Timothy and Debra Heitzman
292. Dee Brown
293. Dorothy J. Lovell
294. Robert Lovell
295. Jerry Rape
296. David Smart
297. Ralph O. Crocker
298. Harold C. Bell
299. Marshall Crocker
300. Con W. Olsen
301. Eric Nitz
302. Wayne D. Nitz
303. David Bryant

List of Forest Plan Respondents (con't)

304. Stephen P. Baker
305. Joy Cox
306. Janet Cox
307. Robert D. Heitzman
308. John R. Heitzman
309. Lee Wilsey
310. Verla Wilsey
311. Hilton Lee Haddon
312. Robert B. Glasson
313. Penny Baldwin
314. Bonnie Rose
315. Vincent J. Hayhurst
316. Bill Horn
317. Linda Wilsey
318. Dale E. Wilsey
319. John Clarke
320. Penny Barbee
321. Mike Osgood
322. Steve Busch
323. Lisa Ostermiller
324. John W. Wagner
325. William H. Gortsema
326. Wayne Claar
327. Darlene Altman
328. Glen Altman
329. Donald Branstetter
330. Cathy Robison
331. Roger E. Robison
332. Western Wood Products Association
333. Wildlife Management Institute
334. Pam Woodworth
335. Janet Linnemeyer
336. Eric L. Jensen
337. Scott Andrews
338. Michael D. Ebel
339. A. R. Wilkes
340. Robert K. Revel
341. Paul Winkleman
342. Shirley J. Wilkinson
343. Carl M. Melina
344. Misnumbered, not included in comments
345. Roscoe & Anita Smith
346. LaVerne Grusing, USDI-BLM (See Chapter 6 of EIS)
347. John L. Simmons

List of Forest Plan Respondents (con't)

348. Donald M. Gustin
349. Raymond Gortsema
350. Leo and Virginia Crane, Clearwater Outfitters
351. Lois L. Geary
352. Glenn Schoo
353. W. Travis & Beverly York
354. John Kerrick
355. Peter Grubb
356. Dennis & Karen Aslett
357. Jerry D. Smith, Sr.
358. Charles P. Roberts
359. Tom Pomeroy
360. Ed Learn
361. Lorraine Learn
362. Shirley Torkelson
363. Patricia Pierson
364. Potlatch Corporation
365. Michael L. Fish
366. Cindy Mann
367. William R. Swagerty
368. Richard J. Hallisy
369. Guy Bennett, Bennett Lumber Co.
370. Sandra L. Haines
371. Mrs. Pauline M. Pierson
372. Floyd C. McCarty
373. Marilyn L. McCarty
374. Robert M. Daley
375. Susan K. Daley
376. Dave Hake
377. Betsy Bowen
378. Peter R. Wyman
379. Mark Egger, Washington Native Plant Society
380. Jerry Conley, IDF&G (See Chapter 6 of EIS)
381. Fred Lackaff
382. Edith Wilson
383. Leslie Laranger
384. Dan R. Brauner
385. Art Hittoe
386. R. E. Newell
387. Jana Buckwell
388. Peggy Lynn Ott
389. Linda Martin
390. Paul F. Evans
391. William L. Bird

List of Forest Plan Respondents (con't)

392. Nick Jose
393. Margot D. Crabtree
394. B. J. Sullivan
395. Kathleen E. Austin
396. Robert Saint Stockton
397. Stephanie Schrimshire
398. Mary Kay Hughes
399. Beatrice Lackaff
400. Greg (?)
401. Pete Krueger
402. Todd VanDyke
403. David H. Fortier
404. Bennett Lumber Products
405. H.A. and Mary L. Amesbury
406. Vince and Lynn Murray
407. Bill Millar
408. Bruce Bowler
409. Edwin W. Stockly, Idaho Natural Resources Legal Foundation, Inc.
410. Barbara E. Wilton
411. Linda J. Fitch Warren
412. B.M. Wolfe
413. Joe Wearden
414. William A. Warren, Jr.
415. James B. Pacholke
416. Ron Laycock
417. Jeffrey D. Kent
418. Petition, Elk City General Store
419. Gail Z. Eckwright
420. John Lyons
421. Don A. Essig
422. Donald N. Kaufman
423. Jan Dimke
424. Charles E. Pace, Dept. of Economics, Idaho State Univiversity
425. Leonard McAuley
426. N. H. Gunning
427. Tom P. May, Sierra Club - Northern Rockies Chapter
428. Alan and Bonnie Schonefeld
429. Eddie Sue Judy
430. Carolyn S. Bowler
431. Sue Willhite
432. William A. Hepworth
433. Harold J. Brady
434. Dennis Baird
435. Burel Schulz

List of Forest Plan Respondents (con't)

436. Norman M. Nethken
437. Dr. Robert B. Stephan
438. Mark Keller
439. Melvin Teats
440. Thomas S. Robinson, The Wilderness Society, Northern Rockies Region
441. John Crawford
442. George A. Bettas, Whitman County Sportsmen's Association
443. Kay Graham
444. James M. Palmer
445. Laura Woodward
446. Russell W. Heughins
447. Mel Lane
448. Janet Ward
449. Harold E. Thomas
450. Kevin Boling
451. Bob and Charlene Christenson
452. Paul Fritz, American Wilderness Alliance
453. Robert and Linda Owen
454. Mike Kerttu
455. Ted Epley
456. Michael R. Best
457. Chester Prall
458. Morris A. Skiles
459. Clifford D. Kleer
460. Tom Miller-Tomczyk
461. John R. Blaine
462. Leo Musselman
463. Conrad Fourney
464. Linda R. Stephan
465. L. DeHaas
466. Harold Lyons
467. Cliff Gallaugher
468. Sue Henderson
469. Donald Jensen
470. Thomas Hodgson
471. Ansel Jason Sears II
472. Department of Wildland Recreation Mgmt Faculty, University of Idaho
473. Wendy L. Wilson, Idaho Conservation League
474. Michael H. Luque
475. Kathleen Weisenburger
476. John Napiar
477. Daniel A. Baldwin
478. Gerald J. Cathey
479. Archie and Eileen George, Red River Corrals

List of Forest Plan Respondents (con't)

480. William R. Meiners
481. Richard Linville, Higer & Linville
482. R.A. Anderson
483. Mel Hughes, Idaho River Expedition
484. Leo Crane, Clearwater Outfitters
485. Virginia Venning Crane
486. James Thrash
487. R.T. Leve, Sun Valley Wilderness Outfitters
488. Olin Gardner, Idaho Guide Service
489. M&M Outfitters, Mike Bishop
490. Dick Pullen, Whitewater Express
491. Jeff Bitton, Mystic Saddle Ranch
492. Don Hatch, Western River Guides Assoc, Inc.
493. Con & Tina Hourihan, Taylor Ranch Outfitters
494. Keith E. Carlson, Lewis-Clark Wildlife Club (Duplicate letter, see #72)
495. Robert L. Cole
496. S. Timothy Wapato, Columbia River Inter-Tribal Fish Commission (See Chapter 6 of EIS)
497. Wayne W. Ludeman, Inland Forest Resource Council
498. Bill DeVeny
499. Sherry Goodso
500. Ken O'Farrell
501. David C. Blish
502. Pam Lyons
503. Charles C. Yoder
504. Simon's Rock of Bard College
505. Edward I. Robertson, Jr.
506. Ernie Day
507. Kelly Courtright
508. Valley Young People's Clinic
509. Lyle Newport
510. Richard R. Borello
511. Richard J. Borello
512. Edward B. Simmons
513. Johanna M. Munson
514. Dr. Ralph Maughan, Ph.D.
515. John A. Feyk
516. Richard & Martha Ripple
517. Pete Love, Potneuf Valley Audubon Society
518. Mike Conley
519. R.J. Minter, Jr.
520. Roberta Crockett
521. Julie McQuary
522. Sam Angove

List of Forest Plan Respondents (con't)

523. Craig Gehrke
524. Hal Holte, M.D.
525. James P. Seaman
526. Donald G. Stevenson
527. Asa Chandler
528. Elizabeth Stevenson
529. Mrs. Dorothy Blunck
530. Lynne K. Stone
531. Mary Root
532. Ron Rudolph
533. Jeffrey Crook
534. T. Crawford
535. Mort Brigham
536. Bruce Wyatt
537. William S. Coleman, M.D.
538. Patsy Batchelder
539. Sue Twitchell
540. Craig S. Fisher
541. Edward Rockwell, M.D.
542. Dave Harrington
543. William & Marjorie Hayes
544. Bob Ward
545. Steve Harkrader
546. Fred Rabe
547. Doris Milner
548. Jude Hawkes
549. Russell Bonnalie
550. Roberta Bonnalie
551. Chuck Neill
552. Anthony R. Morrell, Bonneville Power Admin. (See Chapter 6 of EIS)
553. Charles S. Polityka, U.S. Dept. Interior (See Chapter 6 of EIS)
554. D. R. Hoglan
555. Stephen Mead
556. Nelle Tobias
557. Richard C. Wilson
558. Dr. John Loomis, Colorado State University
559. Art Smith
560. Ron Mitchell, The Idaho Sportsmen's Coalition, Inc.
561. Joseph H. Moline
562. Dr. and Mrs. Robert B. Kerr
563. Friends of the Columbia, Inc.
564. Dennis Baird
565. Ed McNew
566. Bill & Sharon Watson

List of Forest Plan Respondents (con't)

567. National Marine Fisheries Service (See Chapter 6 of EIS)
568. Inland Forest Resource Council
569. Kenneth Goldsmith
570. (Same as #567, w/cover letter from Washington Office, Dept. of Commerce) (See Chapter 6 of EIS)
571. EPA, Region X (See Chapter 6 of EIS)
571B. EPA, Region X (See Chapter 6 of EIS)
572. Eric Kress
573. US Fish & Wildlife Service (See Chapter 6 of EIS)
574. Dept. Health & Welfare, Division of Environment (See Chapter 6 of EIS)
575. Tom R. Sewell
576. Inland Empire Big Game Council
577. Ray L. Baker, Baker Mgt. Company
578. John Lewinski
579. Kevin T. Price
580. Waverly J. Ellsworth, M.D.
581. Nez Perce County Weed Control (See Chapter 6 of EIS)
582. Nez Perce Tribal Executive Committee (See Chapter 6 of EIS)
583. George E. Hoglund, Citizens for Environmental Quality
584. Office of the Governor, State of Idaho (See Chapter 6 of EIS)
585. Bob Krogh, R.D. Willhite, Bennett Lumber Co.
586. Nez Perce Tribal Executive Committee (See Chapter 6 of EIS)
587. Columbia River Inter-Tribal Fish Commission (See Chapter 6 of EIS)

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MAR 18 1985
FS
AO
Plng
TM,Rge,WL,
R&L,Fire
Eng
Precon
Plng & Ser
Const &
P10
Mgm
Con
B&F
Pers
Resource

#1

Chron

March 10, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nez Perce National Forest
319 Main Street
Grangeville, ID 83530

Dear Mr. Kovalicky:

As you are no doubt aware, our organizations are extremely interested in the plans that are being developed under the National Forest Management Act (NFMA) planning process. In passing the NFMA, Congress included specific provisions that are intended to bring about more efficient management of our National Forests. Foremost of these provisions is Section 6(k) which directs the Forest Service to

"identify lands within the management area which are not suited for timber production, considering physical, economic and other pertinent factors ..." (emphasis added)

in the development of land management plans.

NFMA Regulation 219.14, Timber Resource Land Suitability, describes the process and factors to be included in making this analysis.

It is clear that the Congress intended this process to provide a test (or screen) to identify those lands where economic and physical factors combined make managing the lands for timber production economically unwise. These lands are to be "designated as not suited for timber production in the preferred alternative" (219.14 (d)) and removed from timber production for a period of ten years or until the next forest plan is developed. At this point they can again be reconsidered for possible inclusion in the timber base.

We believe that effective implementation of this provision is critical to developing sound forest plans that meet the legal requirements of the NFMA and we are confident that the analysis was done in the preparation of your Draft Plan and DEIS. To insure that the public understands which lands are being managed for timber production (including those which do not earn a positive net present value) we request that you provide in the Final Nez Perce National Forest Plan and EIS a map which identifies:

(1) lands which "are not cost-efficient, over the planning horizon, in meeting forest objectives, which include timber production." and,

(2) lands where direct costs as defined in 219.14 (b) (2) exceed the direct benefits as defined in 219.14 (b) (1) but which are "necessary" to meet forest objectives.

#1

#1

These maps will provide the most direct and clear means of showing the public which lands do not meet an economic test of suitability but which the Forest feels are necessary to manage for timber production.

We believe that this process, combined with a thorough evaluation of other multiple use resource needs and capabilities on the Forest can help to determine whether the Forest is able to meet RPA timber targets. It is vital that the National Forests perform this thorough analysis required by the NFMA in order to provide badly needed feedback to the Chief's office so that it can be reflected in the "top down" planning targets of the RPA process.

We look forward to seeing this comprehensive analysis and the maps clearly depicting the economic efficiency of the Nez Perce National Forest lands considered both suitable and unsuitable for timber.

Sincerely,

Don Crawford

Don Crawford, Chair
Northern Rockies Chapter
Sierra Club

Wendy L. Wilson

Wendy Wilson, Executive Director
Idaho Conservation League

Tom Robinson

Tom Robinson, Director
Northern Rockies Region
The Wilderness Society

Alan R. Hausrath

Alan R. Hausrath, President
Idaho Environmental Council

Bill Leisi

Bill Leisi, President
Idaho Wildlife Federation

Jack Trueblood

Jack Trueblood, Vice President
Idaho Sportsmen's Coalition

Ron Mitchell

Ron Mitchell, Chairman
Habitat and Natural Resources Committee
Idaho Sportsmen's Coalition

(Idaho Wildlands Defense Coalition
Box 844
Boise, ID 83701)

LETTER 1

Response No. 1

During the planning process, each National Forest is evaluated to determine its capability to meet various sets of Forestwide objectives through a series of planning alternatives, i.e., alternative Forest plans. The Forest Planning Model (FORPLAN) is being used by each Forest as a tool to help them determine lands which are the most cost-efficient, over the planning horizon, in meeting the objectives of each alternative. These objectives can include timber production as well as other market, nonmarket, and nonpriced benefits and values. Land classified suitable or nonsuitable for various uses, including timber production, will vary by alternative within a Forest, depending upon the objectives of the alternative.

To facilitate the FORPLAN analysis, each Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Based on the inherent capability of the lands in each analysis area, a range of alternative types of management (prescriptions) is "assigned" to each analysis area. FORPLAN uses this information along with the assigned cost and yield projections to determine the optimum way of achieving the Forestwide objectives of each alternative. This is done by selecting a management prescription, from among those assigned, for all acres within each analysis area.

Each piece of land is classified, based on the intent of the selected prescription, as suitable or non-suitable for timber production in that alternative. The lands that are not scheduled for timber production in an alternative are, for that alternative, "not cost-efficient, over the planning horizon, in meeting Forest objectives, which include timber production" (36 CFR 219.14(c)(3)). The map for each alternative, displaying management areas (grouping of similar management prescriptions) or management emphases (groupings of similar management areas), can be used to determine the parts of the Forest that are not suited for timber production.

The direct costs, benefits, and present net value (PNV) associated with each possible timber prescription for each analysis area is analyzed prior to alternative formulation. The prescription and treatment schedule that would produce the highest PNV per acre can thus be identified for each analysis area. However, as indicated previously, when the alternatives are run in FORPLAN the selected prescriptions represent the most cost-efficient mix of management to accomplish the Forestwide objectives of the alternative. In many cases, the highest PNV prescription and treatment scheduling option is not selected because of the necessity to achieve other objectives or constraints, such as non-declining yield, size of harvest unit, watershed considerations, etc.

Therefore, since it is not required by the regulations, and would not be useful as a decision criterion, we do not intend to map or otherwise single out those lands in each alternative with positive and negative PNV for timber production.

RECEIVED #2
NEZPERCE NF

FEB 22 1985

Glenn Compton
5812 Nutmeg Ave.
Sarasota, Florida
33581

Forest Plan
Nezperce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

TO WHOM IT MAY CONCERN:

In response to the proposed forest plan and the draft environmental impact statement, my opinion is as follows: If the Nezperce National Forest is to continue to protect America's natural and cultural resources, certain needs must be addressed:

1. Establish systems to monitor changes in the Forest and make regular reports to threats to the resources, along with long term plans to deal with them. #1
2. Increase scientific research in the Forest. #2
3. Acquire more land into the Forest's system. #3
4. Preservation and conservation of natural resources should be a top priority. #4
5. The Forest should be managed in such a way as to emphasize wildlife habitat, improve watershed conditions, protect and preserve cultural resources, maintains or enhances aquatic ecosystems and riparian systems, improves water quality, fisheries, wildlife habitat, and visual quality.

Therefore, in my opinion, Alternative H, which maximizes the Forest's wilderness resources, should be the preferred alternative, not Alternative G. #5

Yours truly,

Glenn Compton

LETTER 2

Response No. 1

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 2

National Forests do not conduct research, but do provide the Forest Service and Universities research areas in which to work.

Areas where the scientific base of knowledge is lacking in resource management have been identified in Chapter II of the Forest Plan. These needs will be used by the research branch of the Forest Service to identify and prioritize future research projects.

Response No. 3

We are cautious when acquiring more land into the National Forest System. Putting land into the Federal landbase removes it from the tax roles and in a state such as Idaho where much of the land is currently in Federal ownership, it reduces the rights of private citizens to utilize the landbase for their needs. We have identified some acreage that realistically should be under Forest Service management. This is generally in classified areas, either wilderness, Wild and Scenic Rivers, or to square up boundaries. We feel the public wishes these to be small acreages.

Response No. 4 and Response No. 5

The overall goal of the Forest Plan is to manage the Forest in a way to maximize net public benefits in an environmentally sound manner. This has required a careful evaluation of a wide range of alternatives.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

LETTER 2

Response No. 4 and Response No. 5 (con't)

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 3

Dear Tom and Planning Team Members,

With effort, I am accepting the fateful destiny deemed appropriate for the country lying between Tenmile Creek and Johns Creek. Twentymile Meadows, Wing Creek, Otter, Basin, Snoose, Huddleson. The Blue Ridge Trail or the old Coyote and Otter Creek trails. Magic places.

I have asked before that this small segment of the forest be left alone, held in reserve as the last unroaded area between Elk City and Grangeville. A spiritual retreat for all of us who in the future may not be able to afford a week or more in the wilderness areas far from home. The area is accessible even during the winter months and well used for day trips and weekends.

Now, down to business. I call your attention to Chapter V, page V-31, para. five, sentence two. "However, road systems do not always provide the same recreation experiences or satisfaction as trails do." This is the glimmer of hope I hold onto. #1

How about giving in a little. This is what I would like to propose for this area: Perpetuation of the Johns Creek pack bridge and Trail 407 (known variously as the Lower Trail, Gilmore Ranch Trail, and Snoose Creek Trail) to its juncture with Trail 431. I realize there will be disruption of the trail at Gilmore Ranch, but marking would be posted to direct those unfamiliar with this trail course.

Also, I would like to see Trails 314, 415, 414, and 802 (from Summit Flats) perpetuated as access routes to the wilderness boundary. Similarly, Trail 431 from Sourdough Peak to Johns Creek on up to its juncture with Trail 305 and the unmarked trail into Open Creek Meadows from Sourdough Saddle Campground should be retained. This trail junctures with Trail 314 at roughly the NW corner of Section 15, T27N, R5E. #2

Leave a one-hundred yard buffer zone on each side of these trails (or on one side if only one side would be impacted, the other being undisturbed), where no development will be allowed. Call them wilderness access zones.

Overall (considering that non-use seems to be misuse), your plan has addressed about all one could expect, and more than I am capable of understanding. Congratulations.

As an afterthought, what is the probable effect on mountain goats along Johns Creek and the South Fork under this plan?

Sincerely,
/s/ William D. Engstli

LETTER 3

Response No. 1

We would certainly like to do more and better trail maintenance. However, many trails constructed for fire detection and suppression are no longer needed for these purposes, and use is almost wholly recreational. Trail reconstruction is expensive, and budgets have been declining in recent years. We'll continue to do the best we can with the money that is available, and seek out new sources of funding.

Response No. 2

The Forest Plan provides management guidance for general areas and situations. As such, management schemes for specific trails are not included in the Plan. We have contacted the three Districts who manage the trails of concern to you. The status of those trails follows. Thank you for your comments. We have passed them on to the appropriate managers.

Snoose Creek Trail #407 - (also referred to as John's Creek Trail) and John's Creek Bridge. A new bridge and trail approaches were completed in August 1987. Future improvements will be made as funds allow. The trail will remain on the forest trail system.

Trail #431 - Will continue to be maintained.

Trail #314 into Open Creek Meadows - Is maintained on a 3-year interval. This trail gets low use and so its maintenance is funded at a lower level. Please contact Slate Creek Ranger Station for additional information regarding unmarked trails in that area.

Trail #415, 414, & 802 - Will remain a part of the Nez Perce Trail System. These trails receive intermittent maintenance.

3-10-85 #4

~~James~~ R Tefft
RT 1 Box 26
Culdesac, Ida
83524

RECEIVED
NEZPERCE NF
MAR 12 1985

Forest Supervisor
Nezperce National Forest
RT 2 Box 475
Grangeville, Idaho
83530

Mr Kovalicky

I am Concerned about The Pilot Knob Area #1849. The Elk and Moose from Peasley Creek and Clear Creek have very few places To go That still have Large Timber and No Roads. Since you have plans To Butcher Clear Creek and have Already done it on Newsome and Peasley, I would Like To See one area for Natural habitat. Could This Area be Left As such an area? I have visited This area Almost every year Since 1952, Some fish Still Thrive in Silver Creek. #1

Thank you
James R Tefft.

LETTER 4

Response No. 1

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without additional roads in order to protect and preserve cultural values of the area for the Nez Perce Tribe.

Pilot Knob was one of the selected mountains used for "Weh-Ya-Kin." Young Nez Perce Indians were required to fast on these mountains to receive their vision and "spirits" to guide them through life and were considered sacred. The Forest Service, through laws developed in Congress, is required to preserve significant religious and cultural areas.

RECEIVED
NEZPERCE NF

MAR 21 1985

#5

P.O. Box 8787
Moscow, ID 83843
18 March 1985

Mr. Tom Kovalicky

Supervisor, Nezperce National Forest
Rt. 2
Grangeville, ID 83530

Dear Tom:

I have spent much of the past three days looking over the draft plan for the Nezperce. There is much to be proud of in your work. In due course, I hope to submit several pages of comments on the plan, but will wait until after your public meetings to do so.

In the meantime, let me alert you to some potential problems.

First, the plan, despite numerous requests by conservation groups that it do so, does not have a map showing where major roads will be built in the next decade, or where timber sales are expected to take place. I know of no good reason why such a map could not have been included in the plan. It is absolutely vital that the wdest possible public see such a map, since the visual impact of cartographic data is ten times as clear and influential as the same data in text format. You can remedy this probem, at least in part, by bringing such a large map to the public meetings, and then by also publishing it in the final plan. #1

Secondly, you should be aware that in east Meadow Creek, both near Slim's Camp and just NW of Green Mountain, the draft plan contains land allocations that are certain to lead to major conflict. It is a shame that no alternative allocates all of the east bank to roadless management. Many of us had asked, repeatedly, that at least one alternative do so. In any event, it appears that the numbers within the plan do in fact leave you some room to maneuver in this area. I hope that such is the case. Certainly, in all our comments on the draft, conservation groups hope to raise this particular allocation issue and we trust that such comments will help sway you. Frankly, I do not believe that after not opposing timber harvest on the west bank, we can afford to give up much on the east bank of Meadow Creek. #2

I hope that several of us can meet with you after all the comments are in and that we will at that time be able to have a full and candid discussion about the ultimate possibilities of the final plan.

Regards,

Dennis Baird

LETTER 5

Response No. 1

Based on requests, a map was prepared which showed where major roads would be located. This map was sent to those who requested it. Also, the Forest's 3-year timber sale schedule which gives locations of timber sales and estimates of the miles of road to be constructed is located in Appendix J of the Forest Plan. A map of the proposed timber sale schedule is available for review in the Forest Supervisor's Office.

Response No. 2

The predominant management areas in the area of East Meadow Creek you mention are 16, 18, and 20. The practices in these areas are designed to enhance big-game winter range, maintain high visual quality objectives, and manage riparian areas to protect the resources dependent on these wetlands. Prescribed burning will be the most frequently used management technique to accomplish the big-game habitat objectives.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#6

ELK HEAD RANCH

Elk City, Idaho 83525

March 18, 1985

Forest Plan
Nezperce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

To Whom it May Concern:

I am very upset about your road building plans on the west side of Meadow Creek in Sections 16A and 16. #1

I feel qualified to criticize your adoption of Plan "G" instead of "C" because I am very well acquainted with existing physical features of this region because I have frequented the area all my life, first as a private individual roaming the big back woods and later during thrity years as an outfitter for big game hunting. My first trip to Anderson Butte and Meadow Creek was as a child of one year, 75 years ago. I feel it should be maintained in its pristine state as the west side of Meadow Creek is the natural habitat of big game animals. The Forest Service acknowledges this fact in their 1977 study of Meadow Creek and Meadow Creek environs. It contains the most extensive stand of yew wood thickets in the Nezperce Forest according to information in Forest Service surveys. When an area like this is timbered the yew soon dies out. The steep slopes have very fragile soil - much decomposed granite which will silt the creek and destroy the endangered anadromous fish habitat. High construction costs and high maintainance costs will make it deficit road building for which taxpayers will have to shoulder. #2

I see the Running Creek area is to be maintained favoring wildlife and fisheries. This is very good but what would be the use of maintaining it as such when the first nine miles from the mouth of Meadow Creek is to be roaded and timbered in a decade or two. Meadow Creek will be silted in spite of all the engineering. How will the fish get to Running Creek? #3

It must look good on paper when officials say that logging helps manage the big game range. The fact it puts brouse where animals can reach it is sound enough if you did not have to take into consideration other factors. We, who live here and have seen it all our lives know, whether it is admitted by the powers that be or not, that when an area is roaded and timbered the animals are harassed, frightened and forced to flee and hide from human intrusion. Mortality rates rise and birth rates fall because of stress. The Forest Service looks at the board feet harvested and likes to ignore the subsidies it engages in which actually makes this type of logging a "welfare" industry. The market values for wildlife are not so clear and the actual dollar worth #4 #5

can be and often are manipulated if considered at all. People are becoming exceedingly aware that our treasury monies are being increasingly used for deficit road building instead of areas which are becoming lean because of no money. I mean they are cutting down on personnel, trail expendatures, etc. #5

Since road building and extensive planning for road building was accelerated over six hundred percent in 1984, into areas where little merchantable timber exists, it doesn't appear to me there would be any other reason than to protect it from threatened wilderness status. Am not in complete agreement with all phases of wilderness status; I would just like to see it left roadless. Of late it seems to me there has been little regard for laws and enacted regulation and attitude by the forest that they will push their decisions regardless of the will of the people whether we like it or not. They try to appease us a bit by conducting meetings for public imput when decisions are already made. They tell us in a subtle manner - decisions have been made - what are you going to do about it. #6 #7

I favor Plan "C" and absolutely dis-favor the Plan "G" you have quite apparently adopted. I have no "axe to grind" nor am I involved in any political manouvers but surely hate to see the expensive despoilment of our big back country. #8

Thank you,

Gertrude Maxwell

Gertrude Maxwell

cc: Congressman John Seiberling, Washington D.C.
Jerry Conley, Director, Id. Dept. F.&.G., Boise, Id.
Walt Browne, Regional Supr. #2, Id. F.&.G., Lewiston, Id.
Bill Liesi, President Idaho Wildlife Federation
Keith Carlson, IWF District #2, Lewiston, Id.
Idaho Outfitters and Guide Board, Boise, Idaho.
Ron Hunter, Missoula, MT.
Tom Kovalicky, Forest Supervisor, Nezperce Forest, Grangeville

Response No. 1 and Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3

Running Creek lies east of the hydrologic divide between Meadow Creek and the Selway River and is a tributary to the Selway. The drainage was classified in Rare II as a roadless area and identified as a part of East Meadow 1-845C. The Forest Plan recognizes the unique and significant values of the East Meadow Creek roadless area and recommends that the area be managed without additional roads.

Response No. 4

Many differences in opinion are generated with the road/elk issues. The only consistent opinion is that motorized vehicles harass wildlife during early spring, calving periods, and during hunting season. This is mitigated by road closures throughout the management direction within the Plan.

Access management will eliminate motorized vehicle access in most cases during periods of harassment and allow for access during timber harvest or wood gathering periods. Most new timber harvest roads will have seasonal or permanent road closures in place at completion of the harvest schedule, and during periods of no activity the road will remain permanently closed.

Response No. 5

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 6

The reasoning behind the original proposal in the Draft Plan to enter West Meadow Creek for timber harvest in the first decade, and the decision in the Final Forest Plan to delay entry for 10 years, but maintain the classification of timber management, had nothing to do with foreclosing any future management options including possible wilderness designation. The decisions were the

Response No. 6 (con't)

result of an analysis to try to produce a balanced program, Forestwide, that could produce resource outputs that maximized the total benefit to the public. In addition to the existing Wildernesses, the Preferred Alternative will manage 126,846 acres without road construction. Based on input received from people such as yourself during the public comment period, we reassessed the necessity of initiating harvests in the first decade in West Meadow. Based on the combination of high development costs and relatively young, thrifty, timber stands in this area, the timber harvest schedule for the first decade was revised to delay entry into this area.

Response No. 7

The Forest Plan will not be in effect until 30 days after the Record of Decision is signed. Public comment on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS) have been considered in finalizing the Final Plan and Final EIS. Chapter VI of the Final EIS describes the public involvement activities carried out in developing the Final EIS and Forest Plan.

Response No. 8

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

Response No. 8 (con't)

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#7

RECEIVED
NEZPERCE NF
MAR 2 0 1985

George Wuerthner
Box 7192
Missoula, Mt. 59807
3-15-85

Forest Supervisor
Nez Perce National Forest
Grangeville, Idaho

Dear Nez Perce:

I would like to comment on your proposed Forest Plan.

First, I don't find any of your alternative attractive. I support alternative H as it proposes the most wilderness, but then it also proposes maximun timber harvest which I disagree with. I think you should consider an alternative which proposes maximun wilderess for current roadless country, at the same time calls for dramatically reduced timber harvest. #1

The reason for this is two fold.First, timber harvest over much of the Nez Perce can not be accomplished without impacting other forest values such as watershed, fisheries, wildlife, etc. This is admitted in your plan. Thus a reduction in logging will benefit these other resources. Though, the Forest Plan does call for mitigating impacts on other forest resources when ever possible, I feel that citizens should not have to accept this environmental degradation. #2

In addition, wilderness protects these other values, although some elements can not be predicted. For example, elk habitat will be protected, but if fires fail to burn in the wilderness, then elk habitat and hence numbers will be reduced. That's fine in my book, because other wildlife numbers will increase as a result- for example martin numbers might increase as timbr becomes old growth.

Lastily, wilderness would cost little to administer. Logging on the other hand is a money losing proposal. And if all costs would properly assessed such as impact on fisheries, wildlife, cost of road maintenance,ect.then I believe that the cost of logging would be found to prohibitive. Unfortunately, the F.S. seldom presents an accurate economic picture of logging costs. #3

I think you should include an alternative that maximize wilderness on all existing roadless areas, then calls for enhancing non timber resources such as wildlife. Your alternative F does this part but without formally protecting wilderness. #4

I would like to see much less roading than all your proposal calls for, but alternative A has the best road proposal. #5

#7

So what is needed is a combination of A for roading, F for wildlife, and H for wilderness. I believe such a proposal is realistic. The Forest Service should be protecting all resources, not eliminating some at the expense of others.

What is particulary disturbing about your current proposal is the idea that pine beetles are somehow unnatural. No where does the F.S. explain why pine beetles are suddenly a problem. The pine doesn't need the kind of help the F.S. proposes. If the Nez Perce allowed fires to burn, or did a great deal more controled burning, then pine beetles would not be a problem. What happens is that the lodgepole forests reach maturity. Normally, they would likely burn by this time, or at least some of the lodgepole forests would have burned. Instead due to fire suppression, the trees grow older and become suceptable to pine beetles. A completely NATURAL process. I could understand logging lodgepole forests if the trees were particulary valuable as timber, but lodgepole forests are usually overstocked with small trees. Almost all timber sales n lodgepole forests will be below cost. There is no logical sense in spending taxpayer money to harvest trees at a loss to "save" them from dying. I oppose any timber sale just for this reason.

I personally would like to see both East and West Meadow Creek recommended for wilderness. The area is outstanding and a natural addition to the Selway. I also oppose timber sales in the Rapid River roadless area. Both of these areas support spawning runs of salmon or steelhead. Logging could jeopardize both of these resources. There is no good reason to log them. I also support wilderness designation for the Jersey Jack area. This is adjacent to the Salmon River country and should be added to the River of No Return Wilderness. Along side of the Jersey Jack is the Mallard roadless area. For much of the same reasons I support wilderness for this area. Finally I support wilderness designation for the Rackliff-Geney area. All 90,000 acres on both forests. This is immediatly adjacent to the Selway Wilderness and a natural addition to this area. It is steep and rugged country and generally not suitable for timber harvest except at great economical and environmental expense.

I disagree with your proposed alternative in that it has very little acreage allotted to the protection of old growth dependent species. 4 % is a small amount of the F.S. lands. A recent study done by Elk City shows that old growth is important to moose, as well as other species such pileated woodpeckers.

Please let me review your final draft Forest Plan and any proposed changes. I hope you will consider alternatives that increase wilderness and wildlife values. Thank you.

Sincerely:

LETTER 7

Response No. 1, Response No. 4, and Response No. 5

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 7

Response No. 2

Timber harvesting does impact other Forest resources, just as the management of these resources impacts timber. A reduction in logging, as you suggest, could result in higher outputs of some resources, but would reduce others besides timber. Timber harvests can be planned that will improve wildlife habitat, increase opportunities for domestic grazing, and increase some types of recreation activities. Opportunities to mitigate negative impacts of any single resource program on others have been included in the management standards. The Forest Plan has attempted to find the best total mix of resources that can be produced by the Forest. We agree that citizens should not have to accept environmental degradation on the National Forests. We believe that the management programs, the standards for implementing these programs, and the process for monitoring the results outlined in the Forest Plan will prevent this from occurring on the Nez Perce National Forest.

Response No. 3

Agency costs were estimated for the 150-year planning horizon for all benchmarks and alternatives. Costs were developed by Forest Service personnel in conjunction with developing standards and guidelines for management prescriptions. Agency cost estimates were determined for all management activities, classified for management activities, and classified according to FSH 1309.11, Management Information Handbook (MIH) codes. These individual MIH costs were further combined to define management practices for recreation, wilderness, wildlife, soils, facilities, and protection.

Costs were divided into four broad expenditure categories. One such category was Variable (Allocation) Costs. This cost category was calculated in FORPLAN and includes the costs of Forest Service management practices that vary in amount and timing, as well as in response to different land types and management objectives. These are the costs associated with assigning a particular set of management activities (prescription) to a given analysis area. Each management prescription has a unique set of variable costs. Variable costs directly influenced land assignments and scheduling of resource outputs. Variable costs of each alternative and benchmark were calculated per planning period and are contained in the FORPLAN Economic Reports filed in the Forest Planning records. The costs include: road, site preparation, sale prep and silvicultural exam, timber stand improvement, reforestation, and nontimber resource management costs.

For more information on costs used in the FORPLAN model and outside the model, refer to Appendix B in the EIS.

Response No. 6

Insects and diseases are not an unnatural part of the Forest ecosystem and we did not intend to convey that idea in either the draft Environmental Impact Statement (EIS) or the Forest Plan; nor do we intend to suggest that the mountain pine beetle infestation is sudden or unexpected. Based on mountain

Response No. 6 (con't)

pine beetle epidemics throughout the western United States over the past decade, we are aware of the potential for similar consequences in our lodgepole pine stands. In the past, wildfires probably did play a role in regulating the size or extent of mountain pine beetle infestations by creating more variation in stand size and age. Large contiguous areas of the host species do favor rapid build-ups of pests and this type of condition has been encouraged by several decades of fire protection. These are the conditions we have to deal with at this time, however, and it is necessary to determine which management actions will minimize resource damage and are economically efficient. As mentioned in the EIS, none of the suggested treatment options will eliminate the beetle, they only temporarily reduce the risk in individual stands. The basis of our long-term approach to the beetle is to duplicate, through timber management, the conditions created by fire; a mosaic of stand ages and conditions across the lodgepole pine areas on the Forest. Any actions taken to address the mountain pine beetle problem will be within the overall context of the Forest's goals and objectives for all resources; fishery and wildlife objectives will not be reduced simply to "save" losses from the beetle infestation.

Response No. 7

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 8

We considered a variety of alternatives, ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Response No. 8 (con't)

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Approximately 38,000 acres of Rackliff-Gedney (Nez Perce portion) will be managed to meet wildlife objectives using prescribed burning.

Response No. 9

Approximately 60,000 acres of old-growth grand fir/Pacific yew stands exist on the Forest. They have been identified as key winter habitat for moose. The Forest is planning to manage all 60,000 acres as habitat for moose. About half of the acreage has been removed from the timber base. No timber harvest is scheduled on these lands. The remainder has been assigned to management for moose winter habitat. Timber harvest is allowed on these lands. Specific guidelines for harvesting timber on these lands have been developed to perpetuate Pacific yew and other habitat characteristics that make the habitat suitable for moose. All prescriptions for harvesting timber on these lands will follow these guidelines.

The National Forest Management Act of 1976 states that Forests are to "provide for a diversity of plant and animal communities" and requires that National Forests "maintain viable populations of all existing native vertebrate species". In order to comply with these regulations, standards were developed to maintain minimum viable populations of old-growth-dependent species. These standards were based on the most current literature and may change as new information becomes available.

Appendix N of the Proposed Plan establishes the standards and management direction for old growth and snag management. The Forest is planning to maintain at least 10 percent of the total Forested acres as habitat for old-growth species. On non-Wilderness lands at least 5 percent of the forested acres will be managed as old growth within each prescription watershed or combination of watersheds totalling 5,000 to 10,000 acres.

LETTER 7

Response No. 9 (con't)

Age of trees is not necessarily a good criterion for old-growth habitats; however, for planning purposes we are using an age criterion of 160 years or older until a better definition based on field data can be developed for the Nez Perce Forest. Only stands that meet this age criterion are designated as existing old growth. Existing old-growth stands are not scheduled for any silvicultural treatment, including harvest, until at least the tenth decade. Therefore, existing old-growth stands will be at least 260 years old before any silvicultural treatments are applied.

Although 10 percent of the Forested acres has been designated for management as old-growth habitat, our analysis shows that at 50 years approximately 59 percent (about 632,000) of the potentially suitable timber (1.06 million acres) will be in an age class 160 years or older.

Because we have little knowledge of the characteristics of old-growth habitats on the Forest, we contracted with Dr. Robert Pfister in September 1985 at the University of Montana to develop a definition and classification system for old-growth habitats specific to the Nez Perce Forest. This work is completed. We fully expect to modify and improve our old-growth standards and monitoring plan based on this work.

Because existing research on old-growth-dependent species was not designed to specifically assess minimum viable populations and the requirements to maintain them, we recognize that the percentages of old-growth habitat and its dispersion that we have identified may not be adequate. We therefore identified in Chapter II of the Plan, the research need to investigate and validate the minimum habitat requirements for management indicator species. We can only hope that the Congress, State legislatures, and wildlife interest groups place a high priority on this type of research and fund it accordingly.

8588 GLENCOE DR
RIVERSIDE, CA 92504
14 MARCH 85

DEAR SIR:

THE PURPOSE OF THIS LETTER IS TO COMMENT ON THE PROPOSED FOREST PLAN FOR THE NEZPERCE NATIONAL FOREST. #8

AFTER READING THROUGH THE DOCUMENTS YOU SENT ME IT IS CLEAR ALOT OF WORK HAS GONE INTO THE PLAN AND THAT A GREAT DEAL OF THOUGHT WENT INTO FORMING EACH OF THE ALTERNATIVES.

THE PROPOSED ACTION ALTERNATIVE IS A GOOD ONE AND IS SOUND. HOWEVER, I FAVOR ALTERNATIVE F OVER G. AS YOU WELL KNOW, ALTERNATIVE F WOULD KEEP MORE OF THE NEZPERCE IN A ROADLESS CONDITION. BECAUSE OF THE SUPERLATIVE WILDLIFE VALUES ON THE NEZPERCE I FAVOR ALTERNATIVE F BECAUSE IT WOULD BETTER PROTECT THESE VALUES. I UNDERSTAND ALTERNATIVE G IS DESIGNED TO MAINTAIN FISH & WILDLIFE POPULATIONS BUT I FEEL ALT F. WOULD BETTER PROTECT WILDLIFE RESOURCES. #1

I RECOMMEND YOU CONSIDER MODIFYING YOUR PROPOSED FOREST PLAN TO RETAINING A BIT MORE ROADLESS ACRES.

THANK YOU.

Joseph C. Scott

LETTER 8

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Rec'd 3/21 #9

SR Box 24
Grangeville, Idaho
March 22, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho

To whom it may be concerned:

I appreciate your interest in my comments about the plan "OVERVIEW".
Would like to say that the trend to move in the direction of a full Multiple Use management is certainly a move in the right direction.
I have noticed a large decline of foot traffic into the back country, this substantiates my belief that our wildernes area is far to large to yield maximum potential usage. #1
Following items are areas of concern:

Less burning of Forest Wood products that could be used for fuel in the private sector. #2

Do not always comply with State Fish and Game proposals on road closures. You close the roads and they extend the season another 30 days- this does not set well in minds of those who know that the Dept. is exploiting our Game to raise more funds. #3

Provide more access to Scenic areas. #4

Allow more use of motorcycles and three wheelers on Forest trails-- I own neither, but these people have been unfairly dealt with. A string of pack stock with corked shoes disturbs far more soil than twenty motorcycles and all of them together create less erosinn that a herd of Elk moving around a hillside. #5

I oppose any wild fire left burn anywhere in our Forest. History tells us that any fire burning in the forest in August is apt to be fanned by the winds and carried to the Montana. I well remember the 1934 fire on the Lochsa and the Sundance fire up north which was the result of a clearcut burn and extended to Canada. We have no means of combating wild fire in a high wind. Why take a chance. I do favor burning areas to improve winter range in some areas, but only in the spring when the snow line stops its progress, don't think there is a shortage of summer range so we shouldn't be burning the top of the mountain. #6

Allow more privately operated facilities within our Forest boundaries. #7

There is too much emphasis on stream and channel improvment. In one thought we want to keep things natural and the next we are trying to improve on nature. #8

Far to large of a percentage of management is allocated to Wilderness, this should be adjusted to more fairly represent other sectors. I would favor only 6% for Wilderness. #9

There is too much concern or emphasis placed on the environment, more decisions should be made by the Supervisor with no studies involved. #10

I thank you

Donald F. Morrow

LETTER 9

Response No. 1

As you have observed, foot traffic into the backcountry has decreased in recent years. However, horse use has increased to offset it. Further increases in recreational stock use are anticipated.

Response No. 2

We are also concerned with increasing the utilization of wood products from the Forest and are continually looking for ways to do this. We welcome any specific suggestions for utilizing more of the "unmerchantable" wood that is left on the site.

Road closures are frequently necessary to protect the game herds from harassment and to prevent disturbing critical habitats; however, efforts are made to either provide access to these areas before the closure is made or provide seasonal access depending on the need, in order to allow opportunities for gathering firewood.

Response No. 3

Compliance with Idaho Dept. of Fish and Game proposals is not mandated by law. The Idaho Fish and Game Dept. is chartered with management of the animal resource and the Forest Service is responsible for the lands under their jurisdiction. Evaluation of Idaho Dept. of Fish and Game proposals is consistent with any other land management decision, weighing all resources affected. It is the policy of the Forest Service to strive for cooperation in the management of fish and wildlife issues.

Response No. 4

Road construction over the past 30 years has been closely related to timber management, and this will likely continue to be the case. In some cases, this may provide some access to previously inaccessible areas.

Response No. 5

Opportunities are provided for motorcycle and three-wheeler travel where their use is compatible with the other resource objectives for the area. These areas are shown on the Forest Travel Plan Map which is available to you from this office.

There are good reasons for excluding motorized vehicles in some areas where pack animals are allowed. For example, vehicle noise creates a significant disturbance to some wildlife species and may be objectionable to back packers and hikers in some recreational settings.

LETTER 9

Response No. 6

Fires are not allowed to arbitrarily burn on the Forest. Each fire must meet strict prescriptions before it is allowed to burn. Suppression action is taken when fire does not meet prescription. Fire can be a cleansing of the forest. Because of past suppression action, dead woody material has accumulated in amounts that could cause serious fire problems. Prescribed fire can clean up these accumulations. We do have browse burning projects in the spring. We also burn in summer and fall. A burn must be hot enough to kill old mature browse which is unavailable to wildlife and aid in the germination of certain plant species. Spring burns seldom accomplish both of these objectives.

Response No. 7

We encourage private sector participation in Forest recreation development. With such participation, the Forest Service can divert its own funds to other needed but less profitable recreational activities and facilities.

Response No. 8

The Forest Plan calls for high levels of direct habitat improvement. This emphasis on improvement of habitat is needed to bring many important fishery streams back up to the objectives set for their production. As an example, Red River is now functioning at about 40 percent of its capacity to produce fish. This reduced production was caused by excess sediment from past logging and roading, and by habitat removal from past dredge mining. The management objective for Red River is 90 percent. In order to meet this high objective, the habitat must first be improved. Once the habitat potential is reached through habitat improvement, we propose to maintain this high level by restricting sediment yields (fish/water quality objectives) of future Forest management activities.

Response No. 9

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

The Forest Service does not establish or decide wilderness. This is the role of Congress, as established in the 1964 Wilderness Act. The Forest Service role is to provide data, analysis, and recommendations for consideration by Congress.

Response No. 10

The overall goal of the Forest Plan is to manage the Forest in a way as to maximize net public benefits in an environmentally sound manner. This has required a careful evaluation of a wide range of alternatives and possible

Response No. 10 (con't)

impacts on the social and economic, as well as the biological, components of the environment. The complete rationale for the decisions made concerning management of the Nez Perce is outlined in the Record of Decision.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.-

  Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 10

Remove all gates till damage will be done. Open area near private ground to heavier hunting to lessen the game damage to private ranchers. Release Salmon from Riggins to Long Tom Bar for mineral entry. Is Forest Service going to implement same plan as BLM? Why does Forest think just because they are bigger, they don't have to manage the Forest like small timber owner? (Same rules do not apply.) #1 #2

It seems like the truth in this came quit time not have to work later cause pay quit. Personnel get less done than any private plans.

/s/ George Calvin
Lucile, Idaho

RESPONSE TO LETTER 10

Response No. 1

A major concern raised by many people during the comment period was the current and planned road system on the National Forest. Many felt the number of roads was excessive and would cause damage to many forest resources including wildlife, fish and water quality, and opportunities for primitive types of recreation. One method of addressing these concerns while still providing access for timber and mineral development is to control the use of the roads by closing some of them at different times. Gates may not be the best means of accomplishing these closures, but are the only option in some cases.

Very few Nez Perce National Forest system roads near private ground are closed or restricted to vehicle use. The Forest seeks the advice of the local landowners regarding management of roads adjacent to private property.

Regulations regarding hunting season dates, number of permits issued, and type of hunting that is authorized on National Forest lands adjacent to private ground is under the authority of the Idaho Department of Fish and Game.

Response No. 2

National Forest land on the north side of the Salmon River between Riggins and Long Tom Bar is currently open to mineral entry, and there are no plans underway to change this. (BLM land on the south side of the River, however, is closed to mineral entry.)

The Nez Perce Forest Plan only addresses land managed by the Nez Perce National Forest.

Comment No. 11

March 28, 1985

J. Perry Tefft
2081 E. Riverside Dr
Post Falls, ID 83854

Ref: Silver Cr.-Pilot Knob, 1849

Forest Supervisor
Nezperce National Forest
Rt 2 Box 475
Grangeville, ID 83530

Attn: Tom Kovalicky

Dear Sirs:

I am opposed to any plan to log and build roads in this area using current logging practices. #1

This is high country and trees grow very slowly. If clearcuts are used it would be 30 years before you could see a tree over the top of the brush.

I've been visiting this area for 40 years, the clearcuts made 30 years ago are still clearcuts. Where are the trees?

If you really feel compelled to go in and gut this beautiful area, I would suggest select removal of logs by helicopter and build trails, not roads. Future generations will be eternally grateful. #2

This is practically the only area left in the Nezperce NF which hasn't been the victim of irresponsible logging and road building practices. Where else can one go to see forests as they once were? There are trees in this area which are probably over 400 years old. You and I can't afford to wait around until another grows to this age.

These large trees have survived many forest fires and could survive many more. Young trees are vulnerable to fire. If you don't preserve the big trees you have nothing as far as I'm concerned.

These forests were centuries in the making--they have made their peace with nature.

Roads and contemporary logging practices will destroy it forever.

Very truly yours,

/s/ J. Perry Tefft

LETTER 11

Response No. 1

The Nez Perce Indian Tribe identified the Silver Creek-Pilot Knob roadless area as an area of cultural significance to the Tribe. Timber harvesting and road building activities will not be scheduled in approximately 13,300 acres of the area in order to preserve its cultural values.

Response No. 2

Helicopter logging is one of the logging systems considered in the Forest Plan. Helicopter logging does have some drawbacks, a significant one is the cost. Also, helicopter logging cannot be done in large expanses of roadless areas. Roads are required to make helicopter logging a feasible option, although the density is significantly less than with conventional systems.

Comment No. 12

Forest Supervisor
N.P. National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky,

I am writing to state my objection of the Forest Service policy on clearcutting at higher elevations. I refer to the Clear Creek drainage, Silver Creek drainage, and Meadow Creek drainage. #1

I have hunted in those areas for 10 years. Every year while on the way to hunting camp we pass clearcut areas that have been in existence, as far as we can determine, for more than 30 years and there is no sign of trees growing, only brush. The growing season in that area must be very short, which doesn't allow much tree growth over a season. I am not sure of the soils in that area, but have heard that it is not the best.

On our hunting trips, we blaze trees to mark trails. The blaze marks take years to change, they never seem to grow over as the trees at lower elevations do.

I would like to have the Forest Service leave those areas alone rather than clearcut them. Thank you for your time and consideration.

Gabe Dahlman

LETTER 12

Response No. 1

You have a valid concern about the effects of clearcutting on high elevation lands. Several high elevation forest types on the Forest have been classified as unsuitable in the Forest Plan because of regeneration difficulties and very low growth productivity. Generally these forest types occur above 6,000 to 6,500 feet and have whitebark pine as significant component in the overstory. However, some of the less harsh sites at the higher elevations may be managed for timber production if there is reasonable assurance that they can be promptly regenerated. Past treatments were often prescribed with little understanding of the site conditions and silvics of the species involved. Altering the size of the openings, using cutting practices to modify the site conditions, and using additional planting techniques are some of the methods that can be used to improve regeneration success.

The timber harvest plans for the next 3 years are listed in Appendix J of the Forest Plan. This should provide you with information on activities planned for specific areas on the Forest that you are interested in.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement, it was decided to manage approximately 13,300 acres in the Silver Creek-Pilot Knob roadless area with no additional roads. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

#13

We would like to see the timber quota set at 120,000,000 board feet. #1

Respectfully
Ted & Phyllis Hill
State Id.

LETTER 13

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 14

After reading all alternatives, my first choice is Alternative D; second, I. If either could be met anywhere close to their proposals, I'd as well as many others with varied interests would be satisfied. #1

My honest opinion is mismanagement from all is apparent and environmentalists are able to grab on. A stronger answer to the public and an end to quibbling once and for all of ten years would be a dream come true. #2

/s/ Alvin Marks
Box 8
Kooskia, ID

19 years seniority at PFI Kamiah Plant and 1 year at CFI Kooskia Sawmill.

LETTER 14

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 14

Response No. 2

We understand your frustration with the seemingly endless controversies concerning management of the National Forests. The fact is, however, that the users of the Forests are a diverse group and want the Forest to produce many different kinds of resources. We realize that differences of opinion will continue to exist, but hope that the Forest Plan will provide a sound basis for multiple-use management of the Nez Perce over the coming decade.

Comment No. 15

I would like you to set your timber quota at 120,000,000 board feet. Thank you. #1

/s/ Stacy Gold
Box 172
Stites, ID 83552

RESPONSE TO LETTER 15

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Bradley W. Rice #16
3610 N. McDermott Rd.
Meridian, Idaho
83642

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National forest

I have hunted Elk in the Nezperce forest for the past six years. Each of these years I have seen less and less sign of Elk, but particularly of white tail deer. They used to be so plentiful that each day we observed at least 10-15 head. this past year I saw a total of 15 head in a week and a half.

As you must assume, I am writting this in opposition to any more building of roads in the Nezperce forest. I think we can maintain enough with the present roaded areas, particularly with the down turn of lumber sales in Idaho. I as a tax payer do not want to continue to subsidize lumber operations. I also believe as a public funded operation such as the U.S.F.S. your plans should be publicized before they are made final. And I mean in every paper in every city, not just in Grangeville. #1 #2

I have hunted and cut wood on private land, belonging to lumber companies, that is managed better than a lot of national forest lands. They cut all operations during bad weather, not just that of sportsman. I would like to see the U.S.F.S. pay #3

#16

more attention/allegence to we who pay the bill than those who profit from our tax bill. I realize that many of your policies are set because of political obligations, etc. that are not under your controll, so please be assured that I am also sending a letter to our US senators & representatives as well as the gov. of our great state of Idaho. #3

Regards

Bradley W. Rice

RECEIVED
NEZPERCE NF
APR 17 1985
TS
AO
Plng
TM,Rec WL,Min
R&L,F
Eng
Precon
Plng & Ser
Const & Mtce
P10
Mgmt Infor
Cont & Proc
B&F
Pers
Resource

Response No. 1

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 2

In preparing the Forest Plan, we have followed a process which required a great deal of public input. See Appendix A of the Draft and Final Environmental Impact Statement (EIS). We will continue to involve the public as we implement and monitor the Forest Plan.

Response No. 3

Not every individual will be completely satisfied with the Plan or the expenditures of funds necessary to accomplish this Plan and its direction.

Relationships between priced and nonpriced outputs illustrate the interaction of attempting to resolve various issues. Competitive public issues, management concerns, and resource opportunities exist, making it impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues.

Comment No. 17

Box 596
McCall, ID 83638
April 14, 1985

Dear Mr. Kovalicky,

As a former resident of Grangeville, a frequent user of the Nezperce Forest, and a U.S. taxpayer, I would like to express my outrage at the proposed forest plan for the Nezperce Forest.

Building roads into roadless areas is simply not economical in most instances. I have been to many Forest Service presentations and they try to hide this fact with phony discount rates for the value of future access and timber. The rates they use are way below market rates and when market rates are used even the best sales come out losers. Another tactic is to argue that roads are actually benefitting other users-yet what other lobbyists besides timber lobbyists are asking for more subsidized roads? Six weeks ago, at a public presentation, the Payette Forest economist admitted that the Payette Forest lost money in two out of the last 5 years in prep and management costs before road building costs were even taken into consideration. When I questioned him about road costs, he dismissed them by saying that road values equalled road costs and were therefore removed from economic analysis. With that kind of thinking, absolutely any road cost may be justified. I do not expect that conditions are radically different on the Nezperce than they are on the Payette. #1

The timber industry and the Forest Service have developed a sickening symbiosis. The timber industry needs subsidized roads in order to make a profit and the Forest Service needs to develop roadless areas in order to provide job security for foresters, engineers, and planners. My taxes and my hunting and fishing territories are paying for this game of charades. With two hundred billion dollar deficits, when is this crap going to end?

Sincerely,
/s/ John Lewinski

LETTER 17

Response No. 1

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Comment No. 18

I would like to see the forest industry increased from 104 to 120 million board feet a year. I am in favor of the increase plan. #1

Thanks,

/s/ Robert G. Hunter
Star Rt 2 Box 236A
Kooskia, Id 83539
Clearwater Forest Ind

RESPONSE TO LETTER 18

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 19

I attended the public meeting held at U of I concerning the Nezperce Forest Plan and would like to list a few of my concerns.

It's apparent that the desires by the public for recreation considerations and wildlife protection in the plan are very much alive!

There are some big assumptions made by the F.S., that being the need for an increase from 102 million to 206 million board feet when in the past 5 years we've seen a decline in timber need and an increased interest in tourism and recreation! To suggest that "Recreation is not an issue" is a gross understatement. I wonder what kind of measures were taken to obtain public comment on this issue. #1 #2

Another factor that needs to be addressed is the issue of small hydro projects. As far as I understand this has not been considered. With the increased demand of small hydro projects and their effects on all aspects of ecological concerns, this must not be overlooked. #3

I understand that this plan is a timber accommodation plan and places the priority on timber harvest, however, I question the value system of the F.S. Who has the right or the power to say that timber harvest holds precedence over fish, wildlife, and recreation? I protest! Please consider a few things before the final draft is released. The public's priorities have changed from timber to tourism in the past few years and lots of people who don't have the authority to protect our resources nor do they hold the same values as does the F.S. need to be heard and their requests given equal consideration. Thanks for your interest in our views. #4

/s/ Char Roth

LETTER 19

Response No. 1

The projected increase in timber harvest of 102 MMBF to 206 MMBF annually over a 50-year period in the Proposed Forest Plan was the result of several assumptions as mentioned in your letter. Assumptions of timber demand assumed there would be a market for all of the timber that the Nez Perce could supply. Other assumptions were that the increased harvest, when spread out over 50 years could be accomplished without compromising the Forest objectives for other resources such as fish, water quality, wildlife, and recreation. Since the Proposed Plan was released for review, we have completed further analysis to identify the impacts Nez Perce management will have on the increasing recreation and tourism industry and have made some adjustments based on this analysis. We have also tried to develop better ways of modeling the interactions of fish, wildlife, and timber 30 to 50 years in the future. We have been able to refine our predictions to some extent, but it is still difficult to predict responses of resources like wildlife and fish that far in the future. It is important to remember that by law, the forest plans must be updated every 10 to 15 years. This will allow scientists, managers, and the public opportunities to refine and, if necessary, redirect the course of forest management in the future.

Response No. 2

Many participants in our planning effort have suggested that the sections of the Draft Environmental Impact Statement (EIS) and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use has been developed, and additional analysis has been done on the economic contribution of outfitters and guides who operate on the Forest. This information has been incorporated in the Final Environmental Impact Statement.

Response No. 3

The issue of small hydro development was slighted in the analysis of our Draft. This was due to many unknown facts about what was proposed in the drainages we manage. Since the writing of the Draft EIS, several significant events have transpired regarding the Federal Energy Regulatory Commission and the hydro development of the upper Salmon Basin. The Final EIS has been revised to cover this issue in more detail. Also, additional standards that speak to the issue of small hydro development have been added to the Final Plan.

Response No. 4

Hopefully, through the public meetings and written comments we have received concerning the Proposed Forest Plan, the people you refer to have been heard from. We have carefully reviewed these comments and acted on many of them. Additional analysis of some issues has been done and some adjustments made to the Preferred Alternative.

LETTER 19

Response No. 4 (Con't)

The overall goal of the Forest Plan is to manage the Forest in a way to maximize net public benefits in an environmentally sound manner. This has required a careful evaluation of a wide range of alternatives.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#20

UNITED GOLD CORP.

APR 19 1985
ELK CITY DISTRICT

INFO
4/19 District Ranger
EMA
TMA
Silv.
Minerals
Biologist
APMC

15 April 1985

United States Department of Agriculture
Forest Service
Nezperce National Forest
Elk City Ranger District
P.O. Box 416
Elk City, Idaho 83525
U.S.A.

Attn: Bob Castaneda

Dear Sir,

We have recently reviewed the Proposed Nezperce National Forest Plan and wish to convey our support for the Forest Service's choice of Alternative G. The goals and objectives of this alternative appear to support well planned development of the mineral resources potential within the Nezperce National Forest. #1

The benefits accrued from the mining industry, from the employee level through to the national level, are often overlooked. A clean, well run mining operation will bring steady local employment and can significantly benefit the local economy.

United Gold Corporation supports any Forest Service initiative that will assist in the efficient and well planned development of those natural resources over which it has jurisdiction.

If we can be of any assistance in the further acceptance and implementation of these initiatives, please contact us.

Yours truly,

Gordon Ellis

GE/bjc

LETTER 20

Response No. 1

Thank you for your comments in regard to the Proposed Nez Perce Forest Plan. We are pleased that you support our choice of Alternative G as the Preferred Alternative. We certainly agree with your comment that clean, well-run mining operations can significantly benefit the local economy by bringing employment opportunities to local communities. These are exactly the types of operation we want to encourage on the Forest, and we welcome any ideas on how best to accomplish this objective. Experience seems to indicate that better managed operations also have better records in terms of environmental protection and reclamation.

Thank you again for your comments. We look forward to working with you and your company in the future.

Comp #21

Department of Wildland Recreation Management

University of Idaho
College of Forestry,
Wildlife and Range Sciences
Moscow, Idaho 83843
(208) 885-7911

April 19,1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Tom:

Thank you for the invitation to comment on the Nezperce forest plan.

This document is very disappointing. It denies the public a fair chance to participate in the process of decision-making. It is thoroughly skewed to commodity production, based on outworn syndromes. #1

I expected something better and forward-looking. This type of programming, which appears to be widespread in the Forest Service, invites ill will, confrontation, add litigation. Unless the agency chooses to reverse course, I foresee bitter hostility of the type that characterized the late 60s and early 70s. #2

I appreciate the opportunity to provide point-by-point comments, but that would be an exercise in futility. My advice is simple: scrap the entire plan and start all over.

With best wishes.

Sincerely,

Michael Frome
Visiting Associate Professor

LETTER 21

Response No. 1

The regulations in the National Forest Management Act (36 CFR 219) give clear direction to the Forest Service to involve the public in the land management process. Public meetings were held and newsletters were distributed to the public once the Draft Environmental Impact Statement (EIS) and Proposed Forest Plan were published.

After evaluating all public comments on the Proposed Forest Plan and Draft EIS, and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area

Response No. 1 (Con't)

for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Relationships between priced outputs (timber, range) and nonpriced outputs (wilderness, visual quality) illustrate the interactions of attempting to resolve various issues. Competitive public issues, management concerns, and resource opportunities exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers (including the public) decide which alternative maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues which are discussed in Chapter I and Appendix A of the EIS.

Through this land management planning process which included public involvement in the decision making, we believe that the Preferred Alternative is a balanced approach to the management of this Forest for the next 10 to 15 years.

Response No. 2

Public needs and demands for National Forest resources are diverse, frequently conflicting, and continue to increase. Because of this, we do not believe that the Forest Plan will resolve all conflicts on the Forest nor end all confrontations. However, the Forest planning process has allowed many opportunities for public input in the decision-making process. Based on this input, we feel the Forest Plan does provide a sound, balanced program for natural resource management in the coming decade.

#22

April 19, 1985

Mr. Tom Kovalicky, Supervisor
Nez Perce National Forrest
Rt 2, Box 475
Grangeville, ID
83530

Dear Mr. Kovalicky,

I am writing to you on behalf of the proposed roading projects in the areas of the Nez Perce National Forest now under consideration. I wish to give you my views as to why I feel these areas that include West Meadow Creek, Clear Creek, and other areas surrounding Elk City should remain roadless until there is both a definite need for more lumber and that these areas will actually yield proper lumber sales. (Even in the case of logging in these areas there ought to be wise forestry harvesting practices which will do no damage to the overall condition to the watersheds affected). #1

I have spent many hours of hiking and fishing in the areas designated for roading in the Nez Perce National forest, and I happen to be rather fond of these areas. My best summer was spent in the Selway River drainages and the surrounding forests. If I have the opportunity of living for fifty years, I would ideally like to see the same areas and others remain roadless, and designated as wilderness for many more years to come. Maybe I will take my own kids up there someday (when I have them).

All 16 areas now being considered for roading ought to remain roadless for several reasons other than recreation and sporting uses. The foremost reason is that these areas of pristine forest habitat are the cornerstones of our own environments in the areas where we live. The Elk, Deer, Rocky Mountain Grey Wolf, Grizzly and Black bears, and other magnificent denizens of these forests are very shy of man, and rightly consider us to be a threat to their very livlihood. The animals named all play a vital part in the ecosystems of these lands, and indirectly affect our own ways of life. Any part of the web of natural ecosystems we touch and tear out, affects the whole web. The bears and wolves play a part in keeping certain populations down to a balance fit for a particular habitat, and the elk and deer help keep certain plant communities in balance, as well as become food for predatory animals. These animals must be allowed to live in a state of mutual support, symbiosis. One can always judge the health of a watershed by looking at the general health of the fish populations, their numbers, physical conditions, etc.. The fish need high quality water with plentiful oxygen supply in the water. The fishes also provide food for other predators, give off CO_2 for plant communities, and help recycle nutrients back into the earth and river systems. The salmon (now already seriously depleted) brought back vital nutrients from the oceans to the mountain streams and the inhabitants of the streams when they come back to their spawning grounds and die! A circle, or cycle is completed in most ecoloagical relationships, and the disruption of these cycles can lead to reverberations throughout these web-like relationships, leading to the ultimate effect on our own health. Indeed we are dependent utterly upon the health of our natural environments, and therefore ought to regard the "wilderness" as part of our own souls. #2

Fifty years from now I would like to see these areas as they are now, even with a few less roads, and more healthy wildlife populations. I would like to know that the natural environments were allowed to go through the natural homeostatic rythms of maintaining balance within ecosystems. The animals of the forests are like us in that they require a certain amount of space to live comfortably, and grow in size and number. Should trees be removed and roads be cut in to the habitats of these animals, the size of the living quarters of elk is shrunk, forcing them to migrate or be concentrated in areas too small for their numbers, leading to the diminishing of the population. Likewise the bears are forced into tighter corners of their biomes, forcing them to compete, now not only for room to breathe and move, but for food. The land will only provide enough resources for a specific number of inhabitants within certain confinements. Human beings are also subject to this rule, no less than other animals. There is always a breaking point beyond which certain species never return, and, please, let's not have this happen to our wild lands, which really are not as dispensible as we once belived. Let's keep our roadless areas roadless.

Thanks a lot.

David H. Wright

David H. Wright
1802 1/2 N. 18th

LETTER 22

Response No. 1 and Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Comment No. 23

Dear Sirs:

I feel that if the logging companies can log in an area without damaging it, they should be allowed to log timber to stay in business. #1

Sincerely,
/s/ James Bruder
Rt 2 Box 692
Kamiah, ID 83536

RESPONSE TO LETTER 23

Response No. 1

Our intent is to practice timber harvest activities that will not damage the Forest; however, even with the best logging practices, there are impacts on other forest resources such as wildlife and fish. Because of this, the Forest Plan puts limits and constraints on when, where, and how much logging can take place. By carefully scheduling the timber harvest, it is possible to continue harvesting near historical levels and maintain or improve the fish and wildlife situation.

Comment No. 24

Dear Sirs:

I hope you will consider more logging to take place in our forest. To keep our children educated and our towns and roads maintained we need the logging. We can't turn the whole area into a wilderness wonderland for a few people that won't ever get out of their rig to see it anyway. We need at least 120 million board feet of lumber to stay as we are in this area, let alone trying to improve our lifestyle. #1 #2

Thank You,

/s/ Duane Horstmeier
Star Route
Kooskia, ID 83539

LETTER 24

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative. Maintenance of a viable economic base (Community Stability) to ensure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest-related economic sectors (timber, Outfitters & Guides, and other recreation). Refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

LETTER 24

Response No. 2 (Con't)

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

#25

I SUPPORT THE PROPOSED FOREST PLAN.] #1

SINCERELY,

Kenneth W. Stakland

LETTER 25

Response No. 1

We appreciate your comment in support of the Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#26

I SUPPORT THE PROPOSED FOREST PLAN] #1

SINCERELY,

Mary E Stockard

LETTER 26

Response No. 1

We appreciate your comment in support of the Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

#27

I Think they Should try to harvest ~~[illegible]~~ 122 million feet of Timber a year. And also open up some So called wilderness areas #1

Thank You

LETTER 27

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

The four wildernesses on the Forest have been designated by Congress and management is dictated by the Wilderness Management Act. Any change in the status of these areas would have to be directed by Congress. The roadless but nonwilderness areas on the Forest are managed according to the direction in the Forest Plan. Several of these areas will be developed for timber management in the next 10 years.

Rec'd 4/26

#28

#28

3519 13th St.
Lewiston, Idaho 83501
April 24, 1985

Mr. Tom Kovalicky, Supervisor
Nez Perce National Forest
Grangeville, Idaho 83530

Dear Tom:

I have reviewed your proposed plan for the Forest, and have the following comments and suggestions to offer:

1. You are to be commended for proposing to leave the Coolwater Ridge, East Meadow Creek, and Rapid River without roads. However, your chosen alternative still includes too many roads ~~the~~ for Meadow Creek. I see no way you can log large areas in the headwaters without a serious reduction in water quality, and I can see no justification for logging such large areas as you show in the bluffs on the west side of Indian Hill and below Falls Point. #1

In all the mountain areas I have visited over the last half century, Meadow Creek as it was about 30 years ago came the closest to being an outdoor paradise. Why it should be torn up for the pittance of timber there is a mystery to me.

2. I object to the program of advance roading included in the plan. This is poor economics and is not biologically sound. #2

3. The allowable cut of 200 million feet annually that you propose 50 years from now sounds like something that had been cooked up by the politicians in Washington. One of the critical points in forest planning is that an allowable cut should be arrived at at the forest level rather than being handed down from Washington by some politician who never saw the forest. #3

The allowable cut on the Nez Perce should be about 70 million annually, or about the amount it takes to operate one modern, efficient, diversified operation. After about 45 years designing mills of this type, I see no other way to maintain a permanent operation that will not be forever dependent on government handouts.

4. You need to plan a realistic budget that will build far fewer roads than the 850 miles planned in the next decade. The 4000 miles you suggest for the next decade would effectively ruin all hopes of diversity on the forest. #4

5. You ought to keep roads out of lower Noble Creek and the Mallard Creek Falls areas. #5

6. You ought to improve monitoring and added data sections of the plan. Too often in the past, monitoring has been little more than a post-mortem survey of the damage; something like locking the barn after the horse is gone. #6

7. You should include more basic information on what you call suitable forest lands. When you present your conclusions rather than the data they are based on, something is lacking. #7

8. You should include a better evaluation of your plans on outfitter operations. At the present time, the annual allocation of 9,500 non-resident deer tags is exhausted. By the first of June, it is anticipated the allocation of non-resident elk tags will all be sold. Officials of the Fish and Game Department are now considering a cutoff date on sale of resident deer and elk tags. In short, the game resource right now is the bottleneck in a huge and growing recreation business while mill operators have logs coming out their ears. #8

9. You should include a map showing the main roads you intend to build. You have this information, and you should make it available to the public if you want to avert suspicions the public has that you are holding back on a large part of the pertinent information involved in your planning. #9

Very truly yours,

Morton R. Brigham

Response No. 1

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. Rackliff-Gedney will be available for timber harvest, but approximately 38,000 acres will be managed to meet wildlife objectives.

Response No. 2

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

Response No. 3 (Con't)

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

The long-term sustained yield capacity of 210 million board feet in the proposed plan was arrived at by using a computer model that considered the acres of forest land available, the existing timber volumes, future timber growth, constraints to meet the stated objectives for fish and wildlife, costs of timber management, and the expected benefits. This level of timber is the maximum sustained yield that can be produced based on the assumptions listed above. This level would not be reached until 50 years from now, if no revisions were made to the Plan or the planning assumptions. The long-term objective of the National Forest Management Act is that the resource outputs, such as timber, will be aggregated from Forest-level analysis to produce regional and national plans.

With the recent changes in the local woods products industry, it is possible that more of the modern, efficient mills you refer to may appear in this region.

Response No. 4

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process

Response No. 4 (Con't)

allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Road construction on the Nez Perce is not substantially increased during the first decade, as implied in the Plan with the Preferred Alternative's 830 miles. From 1975 to 1984, the Forest constructed 813 miles, while reconstructing 191 miles. We presently have 2,053 miles of access roads, of which 45 percent or 924 miles have restrictions of use. This is further broken down with 419 miles with yearlong closures and 505 with seasonal closures.

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation to most resources is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Response No. 5

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness, which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas, with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 7

The basic process used to determine suitable lands is in the regulations promulgated under the National Forest Management Act, 36 CFR 219.14 (Federal Register, Vol.47, No. 190, September 30, 1982). Additional information on how suitable lands were determined has been added to Appendices B and D in the Final EIS. This information summarizes the process set forth in the regulations and explains how it was applied in developing the Nez Perce Forest Plan.

Response No. 8

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use was developed. Additional analysis was done to estimate the impacts from each alternative on jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 9

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road scheme shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor does it specify the closure scheduling that will be developed with initial entry.

LETTER 28

Response No. 9 (Con't)

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed, leaving the system totals to remain near-constant throughout the planning cycle.

Timber planning is scheduled on a 10-year planning cycle with at least the first 5 being data collection and additional analysis periods. During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and generally a copy can be reviewed at any District office.

Comment No. 29

Please do not tie up any more timber. The timber industry plays a big part in Idaho, and keeps the lumber mills in operation. This means more jobs for people and less unemployment. #1

/s/ Alan G. Wimer
P.O. Box 153
Cottonwood, ID 83522

RESPONSE TO LETTER 29

Response No. 1

The Forest Management Plan contains a variety of land assignments. Many of the currently nonwilderness forest lands (approximately 80 percent) will be managed for timber harvest. The other areas will be managed to produce quality wildlife habitat, fish, high water quality, and roadless recreation opportunities. Harvest will be delayed in a few areas to protect water quality and wildlife values. All of the areas will be reevaluated after 10 to 15 years to see if the conditions have changed and if adjustments are needed in the plan.

The Forest Plan recommends that no additional acres be added to the wilderness system at this time.

Comment No. 30.

In general agreement with Forest Plan except for:

a. Road closures and gates are adversely affecting the mobility of senior citizens. Distance that game must be hauled or dragged discourages the use of these areas by senior citizens. Can the F.S. somehow make accommodations to open gates to allow for retrieval of down big game? #1

b. Would request that the planning team review the Cooper River Sediment Study by the Alaska Dept. of Game & Fish in regards to claim that sediment in creeks will adversely affect salmon. Do not agree with statements in Plan which state that sediment is bad. #2

c. Do not feel that increased roading would adversely affect big game, especially elk or elk calving grounds. #3

Derl Hollenbeak
Box 39
Riggins, ID

LETTER 30

Response No. 1

Competitive public issues, management concerns, and resource opportunities exist and it is impossible to fully meet all wants and desires at the same time. The road closure policy was developed to meet multiple resource objectives that were established by the Forest Plan. Conflicts between various user groups or interests will be resolved under the guidance of the Plan.

Response No. 2

We are aware of the study you have mentioned. The relationship between excess sediment and fish habitat used in our planning process is well documented in regard to the sediment/fish habitat relationship in Northern Idaho. Although the Alaska study did not detect impacts from sediment in their particular situation, that does not mean that negative effects do not exist in other streams, geologies, or other parts of the country.

Response No. 3

Numerous research efforts on elk and timber management throughout the northwest since the early 1970s have demonstrated two general principles:

1. Removing timber by logging or by any other means, such as fire, results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily totally eliminated, disturbances caused by traffic significantly reduce use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Comment No. 31

4-25-85

Dear Planner's,

I would like to comment on the proposed "Nezperce National Forest Plan." Basically I feel that the proposed action alternative G & G1 is not a bad choice. In fact, I was somewhat surprised that you were able to pick such an economically sound package in view of some of your recent decisions. #1

As an employee of the wood products industry, I would like to say that if I have any thing which I would like changed it would be a slight increase in the volume of timber of which is annually put up for sale. I feel this could be increased through small salvage sales or through inclusion of some of the areas intended to be left roadless, such as Rapid River and East Meadow. As your "Overview" shows, 41% of the Nezperce is already wilderness and I feel this is already an excessive amount of acres for our area. Allowing for no timber harvest in these areas in a sense only enlarges the existing wilderness areas which these areas adjoin, even though your Overview proposes no new wilderness. #2

Another item I would like to express my feeling on is road construction in reference to big game. I would like to see roads closed through the use of gates upon the completion of logging activities, especially during the hunting season. In certain areas gates could be left open for firewood removal during the summer season if at all possible. Environmental groups love to use road construction as a means of preventing timber sales from taking place, but with proper planning, I know both the big game and the wood products industry can prosper. #3

Thanks for the opportunity to comment.

/s/ James D. Wassmuth

LETTER 31

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other Forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation to most resources is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.

Response No. 3 (Con't)

4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Road closures will be utilized to control activities. Firewood cutting is a use of this landbase and will continue as long as the timber base is being manipulated. Removal of firewood is an activity that must be scheduled in with timber harvest activities. Gates and seasonal closures will control access, but allow for activity scheduling.

#32

George Wuerthner
c/o Science Comm.
Crown UCSC
Santa Cruz, CA. 95064

April 26, 1985

Tom Kovalicky
Forest Supervisor
Nezperce N.F.
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Tom:

Thanks for the little personal note with the reply letter for the Forest Plan comments.

As you can see I'm still in California. I'm teaching two photography classes and taking some graduate coursework in writing. I enjoy the teaching, like the classes, but I'm not too crazy about California. Just too crowded and I'll be sorry the day that Idaho, Montana and that country, is like this. Hopefully it won't be in our lifetime.

I'm heading up to Alaska for part of the summer. I may be in Wyoming in late August to teach an ecology, and photography workshop - but that depends upon enrollment.

If all goes well I'll be back in Missoula next fall trying to carve a niche out for myself in the local economy. I look forward to seeing you again.

I don't know how much of the Nezperce Forest Plan you agree with or whether you have much say over its over all content. But I would like to make a plee for more wilderness and less logging. Especially of the lodgepole pine beetle areas. My comments cover most of my reasons. But one more request. Meadow Creek. God, that's got to be the Selway's little brother. I know that the Nezperce proposes logging part of it. It's one of the largest raodless areas left on the forest outside of formal wilderness designation. It's location, adjacent to the Selway, seems to make it a natural addition. As you know the larger the wilderness the less need there is for strict wilderness management controls. Someday, in the not too distance future, all we're going to be left with is these small pieces of undisturbed land. But I think wilderness preservation for myself and others is more of a question of ethics than simply looking for a place to backpack. I view the way we relate to land, an indication of our over all maturity and consciousness level. Right now land doesn't rate very high except in terms of how we can use it. And use is alright, but it can't be everything. I would not be surprised if you disagreed with my views, but I write you because I also know you're an intelligent person with a sympathy for wilderness.

#1

#2

Take care. Give a good word for Meadow Creek.

Geo.

LETTER 32

Response No. 1

We considered a variety of alternatives, ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nezperce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

Meadow Creek has been considered several times by Congress for wilderness classification, but has never been so designated. The east side was recommended for wilderness by this Forest in 1979, but Congress rejected the recommendation.

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. The East Meadow Creek roadless area will be managed in an undeveloped state with no scheduled timber harvesting or road construction activities. The West Meadow Creek roadless area will be managed with no timber harvest or road construction during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Comment List. #33

I was impressed with the candid presentation In Lewiston.

- I strongly urge the preservation of archeological cultural and historical values on the Forest. #1
- The preservation of the highly valued and continuing renewable economic values of roadless areas and outfitters businesses. #2
- All areas logged should have every possible road closed barricaded ditched obliterated etc to maintain and increase "roadless" lands and present road system should be obliterated & reduced if possible. #3
- Roads should be built to minimum possible width standards to reduce impacts on watershed. #4
- Maximize Game habitat where ever possible esp for protected rare & endangered sp & Sheep. #5

John W Fisher
Bio, Env Sci, Wildlife Ec. Teacher
Lewiston H.S.
Prof. River Guide 10 yr. ret.

MR JOHN W FISHER
312 6TH AVENUE
LEWISTON, ID 83501

746-1570
Member of almost all envir. organiz.

LETTER 33

Response No. 1

Our commitment to the protection of prehistoric and historic archaeological resources is identified as goal number 11 in Chapter II of the Plan, and is addressed in Management Area 3 of the Plan. The goals of this particular Management Area are to ensure that prehistoric, historic, and paleontologic sites are studied, preserved, or protected in accordance with the National Environmental Protection Act, the National Historic Preservation Act, and various implementing regulations.

Response No. 2

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use was developed. Additional analysis was done to estimate the impacts from each alternative on jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 3

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Response No. 3 (Con't)

The Final Forest Plan sets Management Direction for the development, implementation, and enforcement of road closures.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 4

Road standards on the Nez Perce Forest have gone through the complete evolution of extremely wide roads to very narrow road systems. The Forest has completed many research projects on the effects of roads such as the Horse Creek Administrative Research Project. The findings of these studies are incorporated into our road standards to mitigate negative impacts to the environment.

Response No. 4 (Con't)

Through a cooperative effort with Intermountain Research and the University of Idaho, we have modified the standards that are presently being used on our road systems. We are learning with each new project and we incorporate all positive findings where applicable. An Area Transportation Plan is prepared during the timber sale process to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives. The Forest Service has been directed through laws and regulations to build only the road necessary and to the standard required to remove the timber volume on the timber sale. The main concern is to build the least-impact facility to safely serve the necessary uses.

Response No. 5

A goal of the proposed Forest Plan is to provide habitat to contribute to the recovery of threatened and endangered (T&E) species in accordance with approved recovery plans. After reviewing our Plan, the U.S. Fish and Wildlife Service wrote that it is not likely to jeopardize the continued existence of T&E species on the Forest. The Service also wrote recommendations on how we might promote the conservation of these species. The Forest will continue to work closely with the Fish and Wildlife Service to revise and implement the recommendations.

The Forest also has a well-established policy of working informally with the Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service to provide habitat for these species and to promote their recovery.

The fire management program both within and outside wilderness will significantly improve the quantity of forage for elk, big horn sheep, and deer. Mountain goat habitat is located primarily within wilderness. No proposals for management of wilderness is expected to affect goat habitat. Elk and big horn sheep are identified as species that we plan to monitor closely to determine the effects of implementing the Forest Plan.

#34

Treasure Valley
REALTY

208-378-8000

355 N Orchard, Suite 250 • Boise, Idaho 83706

April 26, 1985

Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky:

This is to let you know that I am opposed to your recommended Forest Plan for the Nezperce Forest.

Your plan is directed toward subsidizing a dying forest industry. I can see no reason why we should road areas that have never been screwed up just to save the lumber jack, anymore than I can see why we should give the farmers more subsidies so they can bring more unneeded land into production. It would seem to me that the free enterprise system is telling the forest industry that it has too much timber already. #1

Your time would be better spent managing the forest for recreation, fish, and wildlife habitat. That is an industry that is growing in our area and doesnot need subsidies.

Sincerely,

Barry L. Ross

BLR/mp

LETTER 34

Response No. 1

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

The issues are complex and there are no easy answers. Competitive issues such as road building/timber harvests, big-game (elk) habitat, and outfitter/guide operations exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (acres of wildlife habitat improvement) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach and maximizes Net Public Benefits.

For more information on these issues and the tradeoff analysis, see Chapter II, Section 16, in the EIS.

Comment No. 35

I support Alternative G, but with 120 million board ft. per year instead of 102 million board ft. per year. #1

Thomas J. Ash
314 Harrison
Grangeville, ID

LETTER 35

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 35

Response No. 1 (Con't)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 36

Dear friends:

The economic value of recreation and tourism needs to be more seriously considered in the Forest Plan. We are moving from a timber and grazing economy to a recreation-based economy in Idaho's National Forests. The plan doesn't deal with this fact. If inappropriate assumptions are handed down from the regional or national level, they should be questioned. #1

For example -- does the Nezperce Forest have to produce (and have harvested) the maximum "sustainable yield" simply because such yield is possible and because outdated regulations request it? Will there be enough demand to justify timber harvests of up to 206 MBF in the future? At what prices? Can some of this demand be better met by private forests? Is demand for lumber truly inelastic? Recent trends seem to suggest not. Please update your data as much as possible to reflect the current situation.

Please do not build roads into presently roadless (or RARE II) areas unless the associated timber sales are highly profitable and there is strong demand at reasonable prices (marginal cost prices) for the lumber. We don't need to subsidize roads on logging operations, especially in roadless areas. If lumber is not needed, why log? #2

Why are elk population goals (and those for other game and non-game animals?) given lower priority than timber goals? You speak of "resource balance" and "multiple use," but what I see is static imbalance with timber harvesting weighted more heavily than all other values. Is this a problem with the FORPLAN program or with the Forest Service more generally? Can't assumptions be updated to reflect current trends and value systems? #3

Please consider more wilderness in the Nezperce. I am especially concerned with the Rapid River area and coordination with the Payette Forest. Whatever happens, please coordinate with the Payette to manage the Rapid River drainage with the whole ecosystem in mind. #4

Finally, please do not consider any special use permits for small hydro plants inside the forest until a Forestwide plan and basinwide studies have been completed to address individual and comulative impacts. Also, and this is crucial, do not approve any small hydro permits until need for the power is firmly established. #5

Thank you for consideration of these requests.

/s/ Mike Medberry
413 N. Jefferson
Moscow, ID 83843

LETTER 36

Response No. 1

After the public review period for the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), it was decided to do additional analysis on the resource values used in the economic analysis. Also, it was decided to look at the impact of alternatives to Forest-related industries such as timber, outfitters and guides, and other recreational businesses.

For the analysis of the resource values, it was decided to revise the timber base value and demand projections as well as recreational values associated with hunting and fishing on the Forest. The purpose of revising these values was to perform a sensitivity analysis on land assignments, scheduling activities, and present net value (PNV).

Summarizing the results of the analysis, the revised value and real price (demand) projections for timber do have a significant effect on the contribution of timber to present net value. With these revised values, wildlife and recreation opportunities contribute more to PNV than timber. Still, the land assignments and activity schedules did not change significantly due to the revision of these values. For more information on this sensitivity analysis of resource values, see Appendix D in the Final EIS.

The impact of various alternatives in the Final EIS on jobs and income related to Forest-dependent industries indicates that the timber industry is significantly impacted by the fluctuation of resource outputs. This is particularly evident in the Plan period (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and employment.

The importance of the tourism/recreation industry, of which outfitters/guides are an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on this additional analysis and tourism/recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 2

The issues raised here are complex and there is no easy answer. Competitive issues such as timber harvests and road construction vs. roadless area management, big-game habitat, below-cost timber sales, and projected timber demand exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (roadless areas, acres of wildlife habitat improvement) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach and maximizes net public benefits. For more information on tradeoffs between alternatives and other issues raised here, see Chapter II, Sections 16-19; Appendix B, Section IV; and Appendix D of the Environmental Impact Statement.

Response No. 2 (Con't)

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 3

We agree that the philosophy represented by statements in the Proposed Plan and Draft EIS such as "...summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the Preferred Alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of

Response No. 3 (Con't)

fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. Secondly, the ratio of elk summer habitat located within the Forest's nonwilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

The elk management objectives will be met. Elk objectives and timber objectives will be monitored as discussed in Chapter V of the Plan. If monitoring these resources indicates a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made through an amendment to or revision of the Plan.

Response No. 4

The Nez Perce Forest Plan assigns the Rapid River roadless area to Management Area 11. Under this Management Area, the land will be managed without roads in order to meet water quality objectives. We have coordinated with the Payette National Forest in not recommending this area for wilderness classification.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

In addition, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the system.

Response No. 5

The issue of small hydro development was slighted in the analysis of our Draft. This was due to many unknown facts about what was proposed in the drainages we manage. Since the writing of the Draft EIS, several significant events have transpired regarding the Federal Energy Regulatory Commission and the hydro development of the upper Salmon Basin. The Final EIS has been revised to cover this issue in more detail. Also, additional standards have been added to the Final Plan.

Comment No. 37

4/25/85

Dear Sirs,

I feel you should get the allowable harvest up to somewhere near the 1972 level. #1

Thank-you,

Harmon Fansler

RESPONSE TO LETTER 37

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 38

Dear Mr. Kovalicky:

Read your Nezperce National -overview- proposed forest plan - draft environmental impact statement, since I work at Idapine Mills, and this may affect my job and others in future years.

I pretty much agree with your Alternatives G-G1. I would like to see more annual timber harvest, such as 120 million board feet, since I'm sure the so-called environmental groups will get this figure cut back. If we ask for a little more, maybe it will stay at the current level of 102 million. #1

Was very glad to see that no more wilderness was proposed.

I also believe that people or groups outside of this area that do not depend on the forest for their livelihood should not be allowed to influence a decision such as this. #2

Sincerely,

/s/ Dave Seyer

LETTER 38

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 38

Response No. 1 (Con't)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, as mentioned above, the economic health of the local communities dependent on the Forest resources was a major consideration in the land management planning process.

Comment No. 39

I would like to see allowable cut increased to 120 million board feet per year over next 5 years, as opposed to 102 million per year. I am not anti-wilderness, but I love North Idaho and like living here. Living here means working in the timber industry. I think we can have both. #1

/s/ Tom C. Warden

LETTER 39

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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To Whom it May Concern #40

I would like to have the allowable Timber harvest to be increased up to a Hundred and twenty million board feet instead of the hundred and two proposed. #1

LETTER 40

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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#41

TO whom it may concern

I believe Alternative D would be better for Idaho County. We need to emphasize more lumber production, and the use our natural resources. #1

Doug Sego

APR 9 ? 1985

LETTER 41

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 1 (Con't)

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#42

April 23, 1985

Forest Plan
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Forest Supervisor:

I just spent a long afternoon at the library studying the Proposed Forest Plan and Draft Environmental Impact Statement for the Nezperce National Forest. In the Overview you sent me you closed by requesting comments. I have a few.

First, I'd like to compliment the Forest Service for the depth of the studies undertaken to formulate future plans. The material was both interesting and thorough. Every serious user of the Forest ought to make the publications mandatory reading.

As an individual who has spent a lot of time on the Forest I do take exception to several of your statistics, though. The growth in recreational use as projected in the Proposed Forest Plan, for instance, isn't collaborated by actual growth I have observed. 113% in the next fifty years? I've witnessed that in little more than ten in many of the places we hunt, fish, and hike. Tourism is expected to mushroom at the rate of nearly 6% per year in Idaho. The Nezperce will certainly receive their share. #1

Another statement that seemed difficult to support indicated that "wilderness supply is expected to exceed demand for several decades". Again, particularily in the areas we pack into during the fall, many of us feel demand already exceeds supply. I realize that "supply" as applied here is difficult to define. Everyone has a different tolerance for crowding. But, I'd bet most hunters and outfitters would agree that there is no shortage of users in your wilderness/roadless areas during hunting season. #2

I spent some time studying your alternative plans. It was hard to narrow my choices to only one. I am concerned about the further loss of roadless areas and increasingly concentrated use of those that remain. I also worry about the loss of quality elk habitat free of harassement, poaching and overhunting that many of your alternatives would implement. #3

I support the maintainence of a maximum amount of roadless (not necessarily wilderness) inventory even though it requires increased cutting in areas now under harvest. Alternatives H thru I are acceptable from that point of view but I would like to see elk habitat improvement measures included in those plans. The total and permanent closing of logging roads after cutting would also win you friends among the ranks of serious hunters and fishermen. Seems like it would save money too. #4 #5

Recreational use ought to be given additional weight in any Forest planning decisions. It is an endlessly renewable resource and costs the taxpayer relatively little to maintain. With a continuing decline in Idaho's timber industry it doesn't seem realistic to always plan for increased harvest. #6

On the positive side you are to be commended on your decision to preserve East Meadow Creek and Rackliff-Gedney in a roadless state. This is prime game habitat and marginal timber (as is most of Meadow Creek). I strongly support this kind of logic applied Forest-wide.

Sincerely,

David R. Andruss
5930 N. Locust Gr.
Meridian, Id. 83642

Response No. 1 and No. 6

As you say, our projections on recreation use may be conservative. Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use was developed. Additional analysis was done to estimate the impacts from each alternative on jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 2

Trend analysis, based upon current and projected use figures, indicates that current wilderness meets the projected demand. As the Plan is monitored in the next 10 years, this use projection will be field-proofed to determine its validity. With the roadless area assignment, the Forest maintains the option to recommend additional acres for inclusion in the Wilderness System.

Response No. 3

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 3 (Con't)

With the acreage already in four wildernesses and three Wild and Scenic Rivers, the special treatment of the roadless areas discussed above, and the planned road closures, concentrated use in "roadless areas" should not be a problem.

Response No. 4

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area

Response No. 4 (Con't)

for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 5

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Response No. 5 (Con't)

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Comment No. 43

My husband works for Idapine Mills and I believe that the mills should be allowed at least 120 million board feet per year. I also believe that Idaho has enough wilderness area closed off. However, any logging done should be done selectively. #1

/s/ Ethylee Kryns

LETTER 43

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Selective harvesting, also referred to as uneven-aged management, was considered as an option for timber management. Although this type of harvesting may be the best to use in limited situations, such as in riparian areas or visually sensitive areas, overall even-aged management using clearcuts or shelterwood cuts is more appropriate. Many factors were considered in determining this: physical site conditions, biology of the trees, impacts on other Forest resources, and the economic implications. For more information, refer to Chapter II of the Final Environmental Impact Statement and Appendix F in the Forest Plan.

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Comment No. 44

I believe we should have at least 120 million board feet going to the mills each year, with selective logging. #1

/s/ Adam G. Kryns

RESPONSE TO LETTER 44

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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#45

Dear Tom

I THINK THIS IDEA STINKS!!

I am just now at the Age to hunt I am 13 years old. I have been going to the woods for about 12 years. And seen Elk + Deer Killed. I think it is my turn. And with these new roads I won't get a chance to get a first Elk or Deer. I would rather see trees than each other at 3 miles away. And with all these roads the next thing they will want to do is log every hill side in Idaho and somthing else, like build a city. #1

Right now you are doing the same thing you did to the Indians take their land and their life away, and you are not going to now, because all the true born woods lovers are going to fight.

If you want my real opinion I am going to have to right a different letter, witch my teacher will not see. (If you catch my drift)

From Paul Hanson 13 years old
842 Eisenhower
Moscow, Idaho
83843

1-208-882-3384

LETTER 45

Response No. 1

An Area Transportation Plan is prepared during the timber sale process to assure that the transportation system meets the long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber from the sale area.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation to most resources is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Comment No. 46

1. There needs to be public assurance that the roadless areas were considered for wilderness and didn't meet the criteria. Just because wilderness areas have already been designated on the Forest does not mean more areas don't exist. Areas should be preserved where the resources for a particular use exist. #1

2. Please state where and when data was obtained for Plan. Show that data has been updated if conditions have changed significantly. If there are major gaps in the available data, outline how the needed data will be obtained. #2

3. It is disappointing to see so little of the remaining roadless areas staying in a roadless condition. By providing for only two categories--wilderness and roaded--all of the increasing recreation use will be placed on wilderness areas. The middle ground (roadless) is critical to make wilderness management easier and provide for nonwilderness dependent dispersed recreation use. Demands for wilderness values and recreational use should not all be placed in same area. #3

4. Please justify why timber harvest is the #1 priority. #4

5. The assumption that all timber offered for sale will be sold, may not be valid. Your plan should reflect the rapidly changing market demands and timber economics. #5

6. Don't assume community stability is based only on support of local sawmills. Especially with the high recreational values on the Nezperce, tourism economics should play a major role. The opportunity to support a growing tourist industry must be addressed in this plan. #6

7. I would like to see an alternative run where timber isn't given top priority. #7

8. In wildlife emphasis areas, maximize habitat objectives and relax timber cut. #8

9. Monitoring is critical to success of the Plan and public acceptance. The monitoring section should be one of the strongest sections in the Plan. Detailed, specific, measurable objectives must be provided. #9

/s/ Linda Merigliano

LETTER 46

Response No. 1

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Response No. 2

A great deal of data was collected and analyzed in preparing the Forest Plan and Environmental Impact Statement (EIS). Timber base values, timber demand projections, and recreational values associated with fishing and hunting were updated and used in a sensitivity analysis to determine any significant changes in land assignments, scheduling of activities and present net value (PNV). The results of this analysis can be found in Appendix D of the Final EIS. The updating of data is considered a major element during the monitoring phase of the Forest Plan. For more details on the data collected and how it was used, see Appendix B of the Draft or Final EIS.

Response No. 3

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 4

Timber harvest is not the number one priority of the Forest Plan. The overall goal of the Forest Plan is to maximize "net public benefits" in an environmentally sound manner. When the issues that the Forest Plan must respond to were identified, the maintenance of the timber harvest level was identified as a major issue. Also, providing for other resource outputs, primarily anadromous fish, water quality, and big game is an important component of the Forest Plan. It is the interaction of these objectives which constrains the timber harvest levels.

The term "resource outputs" includes more than timber harvest. Approximately 42 percent of the Forest will be managed for sustained timber production. This represents 86 percent of the land that was tentatively suitable for timber production.

Response No. 5

The data and assumptions used to develop the Preferred Alternative and the other alternatives are based on the most reliable information that was available at the time. The assumption that the allowable sale quantity of timber offered will be sold is based on the theoretical assumption of a horizontal demand curve. Due to a lack of data and time, no local demand curve (representation of the price-quantity relationship) was developed. At this time, none of the available techniques for developing a Forest level demand curve has a strong enough theoretical basis. What available evidence has shown is that if a forest level demand curve could be constructed, it would indicate that the Forest's timber volume offered would not have a significant impact on the overall price-quantity relationship. Therefore, as specified by the Forest Service Washington Office letter (1920 to Regional Forester) the demand curve is assumed horizontal. That is basically saying that the level of timber offered for sale will be sold.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Response No. 6

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Additional analysis was done to estimate the impacts from each alternative of jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 7

The overall objective of Forest planning is to produce a package or mix of resources (besides timber) that maximizes Net Public Benefits. The mixes of priced (i.e. timber, range, and special uses) and nonpriced (i.e. roadless areas and fish/water quality) outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues which are discussed in Chapter 1 and Appendix A of the Final EIS.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

Response No. 7 (Con't)

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 8

In wildlife emphasis areas, such as big-game winter range, habitat improvement is the primary objective. Improvements are accomplished either by using fire that is controlled to produce quality forage or by using timber harvests and methods.

In addition, no timber sales are scheduled within significant portions of the Forest, at least for this decade, in order to provide quality habitat for some species of wildlife, for anadromous fish, and for nonmotorized recreational opportunities. On lands that receive a timber management emphasis (on most elk summer range), road closures are used to control access by motorized vehicles in order to maintain high quality habitat for elk.

Response No. 9

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

#47

I am for the proposed Forest Plan
On the Nez Perce National Forest #1

Bernie Sayer

LETTER 47

Response No. 1

We appreciate your support for the Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#48

I am for the proposed Forest Plan on the Nez Perce National Forest #1

Kelly Kelso

LETTER 48

Response No. 1

We appreciate your support for the Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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#49

I am for the proposed Forest Plan on the NezPerce National Forest #1

Greg Kelso

LETTER 49

Response No. 1

We appreciate your support for the Nez Perce Forest Plan.

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

#50

To Tom Kovalicky,

I am in favor of raising the timber to be cut to 120 million feet, instead of a lower limit. Education in Idaho County needs the Forestry Funds. #1

I don't believe that logging necessarily endangers the ~~be~~ habitat. #2

Thank you,

Tom Schumacher
Rt. 1 Box 132
Cottonwood, Idaho
83522

Tom Schumacher

LETTER 50

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

LETTER 50

Response No. 2 (Con't)

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines, we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

#51

I'm for the proposed Forest Plan on the Nez Perce National Forest #1

Verla Duffy

LETTER 51

Response No. 1

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

#52

I am for the proposed Forest Plan on the Nez Perce National Forest #1

Gladys Vaughn

LETTER 52

Response No. 1

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#53

I am for the proposed Forest Plan on the Nez Perce National Forest #1

Joe Vaughan

LETTER 53

Response No. 1

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(Tom Kovalicky) May 4, 1986 #54

To Whom It may Concern:

I am in favor of raising the lumber cut to 120 million feet instead of a lower limit #1

As an educator/teacher in Idaho County our district depends on Forest Funds as a major source of income; and cutting the amount of timber to be taken, limits our resources, too. #2

As it is now, educational funding suffers somewhat in the State of Idaho and we are quite dependent on the Forest Funds.

Thank you,

Mrs. Cindy Schumacher
Rt. 1 Box 132
Cottonwood, Idaho 83522

LETTER 54

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

The 25-percent return of Forest Service receipts to the county is also an important part of the Forest's role in the county for both schools and roads. It is important to remember though, that these receipts are based on the actual volume of timber cut and paid for in any year and not on the volume offered for sale. The proposed timber sale level is approximately the same as what has actually been purchased and harvested annually over the past 10 years.

#55

In reviewing the Nezperce Forest plan, one of my greatest conserns is that you give timber the total consideration and wildlife is not given enough value. The cost of timber is figured on several years past and not the present. Considering anadromous fish cost on today's market- each fish would be worth more than a tree!! #1 #2

Bill Leisi

Bill Leisi, President
Idaho Wildlife Federation

LETTER 55

Response No. 1 and Response No. 2

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values based on an actual comparison of the benefits and costs for the prescription, are selected because of the allowable cut effect and the scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but are not as positive as with the original timber values and real price increases.

Relationships between priced and nonpriced outputs illustrate the interaction of attempting to resolve various issues. Competitive public issues, management concerns, and resource opportunities exist, making it impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues.

#56

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May 6, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Subject: Proposed Forest Plan

Dear Mr. Kovalicky:

Being employed in the timber industry here in Idaho, I am deeply concerned about the future management of the Nezperce National Forest. As you are well aware the plight of the timber industry and therefore a large number of people here in Idaho has not been good in the last decade. While there are numerous reasons why lumber mills have been closing down, one of the chief is the continued shift of the timber supply from federal timber to private timber. This long term timber supply shortage has resulted in increased reliance on fast disappearing private timber and is a direct factor in the closure of at least one area mill (Potlatch Corporation in Kamiah). In light of this we all must do our part to turn things around. The management of the Nezperce N.F. should reflect this goal, attempting to rescue the sagging economy of the region, provide additional stable employment while protecting our natural resources and providing recreation. #1

Considering all of the alternatives presented, the selection of G as the preferred alternative does not adequately address the problems facing our timber industry. A strong case can be made to increase the annual timber harvest, increase the annual dollar benefit to the forest, and increase forest-related employment while considering other forest goals and uses. Alternatives D, E, F, I and J all would satisfy this emphasis. However Alternative J seems to give the required balance for other uses and goals while substantiallly increasing timber supply. #2

Consider the following points:

Timber Supply and Economics

The number one goal of the overall management direction of the Nezperce N.F. is to "provide a sustained yield of resource outputs at a level that will help support the economic structure of local communities and provide for regional and national needs." Achieving this goal becomes quite difficult and requires intensive management considering only 29% of the forest land is managed for timber production. In fact, this task becomes near impossible when current management policies dictate that less than one half of the forest land is available and suitable for timber harvest. When 53% of the forest is locked up with absolutely no timber available for harvest this dictates keeping all of the remaining acreage available, productive and intensively managed. #3

The current annual timber harvest is 102.0 MMBF. At that level timber companies have gone out of business, woods workers have become unemployed, and the economy of North Central Idaho is extremely depressed. Alternative G would retain that harvest level for the first decade. However, Alternative J would increase the harvest level to 137 MMBF or 34% more than the current level. This increase in harvest level results in benefits in other areas. The total annual benefits in decade 1 are currently projected at 17.2 million dollars, Alternative G would only increase that by 37%, while Alternative J would show a benefit of 27.1 million dollars or a 58% increase in benefits for the forest in the first decade. The resulting increase in employment is also dramatic; the proposed alternative increases employment only 4% while Alternative J shows an increase of 26% annually in jobs during the first decade. This is a substantial improvement to people of Idaho compared to the proposed alternative.

New Roads

Much concern exists today over Forest Service roading policies and plans. In order to intensively manage the 47% of forest land available for harvest a strong road network is a necessity. Alternative G proposes 4400 miles of new road while Alternative J adds only 300 additional miles to this to harvest 34% more timber in the first decade.

Wilderness and Roadless Areas

There is no reason to believe that we do not need and would not use Wilderness/Roadless areas. Timber production goals and economic stability can co-exist with Wilderness/Roadless needs. Approximately 43% of the forest land is now designated Wilderness or Wild and Scenic Rivers and forever will be. An additional 11% is de facto wilderness due to Forest Service policy decisions. The time has come to manage the remaining lands for the other multiple use items mandated by the Forest Service.

The proposed Alternative G would add 173,000 acres to the Wilderness/Roadless classification increasing it to 48% of the total forest. Alternative J would add even more acreage, 218,000 acres, and would result in a total of 50% Wilderness/Recreation.

Wildlife and Fish

Alternative J shows a 9% increase in total elk with range carrying capacity in the first decade. In comparing the total anadromous fish habitat potential in decade 1, Alternative G shows a reduction of 1% while Alternative H shows a slightly greater reduction of 4%. The residential trout habitat potential actually shows less reduction in Alternative H than the proposed Alternative G (-2% compared to -4%). Overall Alternative H shows an increase in elk winter range carry capacity and is overall equal to Alternative G in its reduction of fish habitat potential.

In summary it appears that there is a more appropriate alternative than the one selected. In view of the welfare of the local industry and people Alternative J shows that it is possible to substantially increase timber

(56)

harvest, benefit to the forest, and increase forest related employment while increasing wilderness acreage and improving fish and wildlife habitats.

One additional comment I have on the plan is the need to insure that the timber sales that are put up for harvest are economically viable. At whatever level the harvest is fixed at, that amount of timber must be located and put up in a sale package that will return a profit to the prudent operator. There has been a continuing trend, due to wildlife and environmental constraints, to locate sales in geographically difficult areas, steep terrain, and far from manufacturing plants. In addition the timber designated for harvest is usually small in size and scattered throughout the unit. Just because the forest puts up 102 or 137 MMBF of timber annually does not insure that the timber will be sold. If the timber is not sold then the multiple use concept the forest is managed under is not being met and more importantly the depressed economy of the area continues to be adversely affected. Only through putting up an increased volume of viable sales will the forest realize these goals. #7

While no one can blame the Nezperce Forest solely for the ills of the timber industry or the economic conditions in Idaho, we each have a part in returning to stability. The Nezperce Forest through its Forest Plan, can begin to do its part. It is possible to make more, viable timber available while still protecting our wilderness, environmental and fish and wildlife needs.

Sincerely,

Mark Johnson
802 Preston
Lewiston, Idaho 83501

MJ:ar

LETTER 56

Response No. 1, Response No. 2, and Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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Response No. 1, Response No. 2, and Response No. 3 (Con't)

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 4

The Forest is directed by this Plan to build only those roads necessary to serve all resources with the least impact on the environment. Some of the people commenting on the Plan wish to see fewer roads which would mean lower timber harvest and reduced volumes available to maintain the local timber market.

Response No. 5

We agree with and appreciate your recognition that the goals of timber production and economic stability are not incompatible with the demands for wilderness and minimum development areas. We intend to manage all of the nonclassified lands on the Forest under the concept of multiple use. Multiple use does not mean that all resources can or must be produced on every acre. In the Final Preferred Alternative, we have attempted to design a resource management program that strikes a reasonable balance among all resources. Some lands will be managed without roads which necessarily precludes timber harvesting, but these lands will still be managed for a variety of other resources. The remaining lands that are available for timber management will sustain an annual allowable sale quantity of 108 million board feet.

Response No. 5 (Con't)

We considered a variety of alternatives, ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nezperce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

Neither Alternative J nor Alternative H would increase winter elk habitat carrying capacity sufficiently to support existing populations. Neither alternative proposes any big game habitat improvement by prescribed fire and only a slight amount of timber harvest on big-game ranges that would result in increased forage for big game.

Response No. 7

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Comment No. 57

As an employee of a local sawmill, I am very much concerned about the future of my job. Please do no allow another mill in this area to go down the tubes. I feel we have enough of our public lands set aside for wilderness. I would like to see enough of the remaining roadless areas opened up for logging to assure a sustained yield of at least as high as suggested in the proposed Forest Plan. #1

/s/ Michaell Dunning

LETTER 57

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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The Forest Plan does not recommend any additional lands on the Nez Perce National Forest to be added to the National Wilderness System.

#58

The Public lands our for the use of everybody we don't need any more wilderness. #1

The allowable cut should be between 110 to 25 million board feet per year #2

The Mill our having enough trouble making it without having to fight with pecial Interest Groups

Please open up more of the Roadlers areas imber harvesting #3

Ronald Tulery

LETTER 58

Response No. 1

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

Of the 503,162 acres in roadless areas, only 126,846 acres will be managed for uses other than timber harvesting. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Comment No. 59

John R. Swanson
P.O. Box 922
Berkeley, CA 94701

May 6, 1985

Nez Perce National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Sirs:

Please accept my comments, as follows, concerning the DEIS and Proposed Forest Plan for the Nez Perce National Forest.

I have been acquainted with this area of Idaho for many years, and regard the Nez Perce National Forest as containing outstanding wilderness, scenic, wildlife, fish, botanic and cultural resources of certain national significance, an area that provides a vital and, as all Americans hope, a lasting refuge for man, and for all life, on this endangered planet.

An area, then, that fully benefits man, and fully benefits all life on this damaged earth.

I wish to advise of my opposition to the proposed Plan-proposed action as such will decimate surface and sub-surface resources, thus will destroy the Nez Perce National Forest. #1

I, then, strongly recommend that we concerned American citizens actually save this Nez Perce National Forest as a permanent dedicated preserve.

With all such units of the National Forest System established as permanent dedicated preserves.

As the purpose of the Forest Service, U.S. Department of Agriculture, is to preserve all wilderness, scenic, wildlife, fish, botanic--all biological resources--and cultural resources located on the National Forest system.

With each such preserve to protect ecosystems, preserve watersheds, save and enhance wildlife, fish and botanic habitats-areas, protect and promote all biological resources and their diversity, preserve rivers and streams-creeks, recover and restore all used-damaged areas to their natural environmental condition, and to preserve, protect strengthen and expand wilderness.

As wilderness is the foundation of all land and water resources.

With the purpose of all land and water resources planning and management to preserve, protect strengthen and expand wilderness.

I, then, strongly urge that the following areas-acres located on the Nez Perce National Forest --only--be classified and permanently protected as wilderness; #2

Comment No. 59 (Con't)

as each such unit features superb wilderness attributes, and be included in the National Wilderness Preservation System--at this time:

Gospel Hump	Wilderness additions, only.	126,000
Hells Canyon	Wilderness additions, only.	6,000
Frank Church-River of No Return	Wilderness additions, only.	14,000
Selway-Bitterroot	Wilderness additions, only.	31,000
O'Hara Falls Creek	29,000	
Lick Point	9,750	
Dixie Summit-Nut Hill	14,000	
Middle Fork Face	12,000	
Rackliff-Gedney	51,000	
Clear Creek	18,000	
Meadow Creek	206,000	
Mallard	22,000	
Silver Pilot	28,000	
North Fork Slate Creek	15,500	
Little Slate Creek	23,000	
John Day	18,000	
Big Canyon	17,500	
Klapton Corral	27,000	
Salmon Face	11,000	
Kelly Mountain	825	
Jersey Jack	41,000	
Rapid River	28,000	
Goddard Creek	12,000	

*Plus an additional 105,000 acres

*To secure a total of some 1,800,000 acres of wilderness to be located on this Nez Perce National Forest-only-and included in our National Wilderness Preservation System-at this time.

To include rivers and streams-creeks in the National Wild and Scenic Rivers system.

To classify this National Forest as a National Wildlife-Biological Preserve. To save all life including, grizzly bear, peregrine falcon, gray wolf, bald eagle, mountain lion and river otter. And as a unit of the proposed grizzly bear, gray wolf National Sanctuary system, from Canada to Mexico. #3

With the entire Nez Perce National Forest dedicated as permanent established National Wilderness Wildlife Biological Preserve. And to select the following planning and management alternatives for this National Forest: Alternative preservation, wilderness, wildlife, biological resources.

To eliminate clearcutting, oil-gas and geothermal activities as they damage surface-sub-surface resources and to remove roads so as to return to a necessary natural environment. #4

Comment No. 59 (Con't)

Also to ban hydro developments as such destroy water-wildlife-fish resources. #5

To permanently ban all forms of surface and sub-surface development on all current, proposed and potential wilderness with no release of any roadless areas.

To acquire all inholdings on all public lands. With no disposal of any public

For when we save our natural lands and waters including wilderness and wildlife, biological resources, we save the world!

Sincerely,

/s/ John R. Swanson

LETTER 59

Response No. 1

Approximately 45 percent of the Forest is classified as either wilderness or wild and scenic rivers. In addition, the Forest Plan calls for 126,846 acres in three separate roadless areas to be managed with no additional roads and no scheduled timber harvests. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas will be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, as mentioned above, 126,846 acres will be managed without additional roads.

Response No. 3

A goal of the proposed Forest Plan is to provide habitat to contribute to the recovery of threatened and endangered (T&E) species in accordance with approved recovery plans. After reviewing our Plan, the U.S. Fish and Wildlife Service

Response No. 3 (con't)

wrote that it is not likely to jeopardize the continued existence of T&E species on the Forest. The Service also wrote recommendations on how we might promote the conservation of these species. The Forest will continue to work closely with the Fish and Wildlife Service to revise and implement these recommendations.

The Forest also has a well-established policy of working informally with the Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service to provide habitat for these species and to promote their recovery.

Response No. 4

Clearcutting and road construction are activities that will be continued on the Forest as described in the final Forest Plan. They will be implemented according to the management standards identified in the Plan and monitored to assure that the effects are within the bounds described in the monitoring section of the Plan and Chapter IV of the EIS.

To date, this Forest has not had any oil, gas, or geothermal development, and it is highly unlikely that there will be any such activity here in the forseeable future.

Response No. 5

The issue of small hydro development was slighted in the analysis of our Draft. This was due to many unknown facts about what was proposed in the drainages we manage. Since the writing of the Draft Environmental Impact Statement (EIS), several significant events have transpired regarding the Federal Energy Regulatory Commission and the hydro development of the upper Salmon Basin. The Draft EIS has been revised to cover this issue in more detail. Also, standards have been added to the Final Plan.

#60

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

I am writing in response to the new Forest Management Plan. The recent plan shows 102 million feet for allowable cut. It should be raised to a minimum of 120 million. #1

We presently have far too much timber going to waste in Wilderness and similar areas that are excluded from proper multiple use. With the new methods of logging, all land could be managed for better utilization and be much more beneficial to the needs of our economy as well as the wildlife. #2

Because the farmer has cleared his land and tilled his soil for better harvest the elk herds are becomming a problem. The deer herds are getting larger each year. They have also moved more into populated areas because there is better feed. The people that have been educated in other than this area on how to manage the lands in Idaho will one day realize that there are methods that are much more effective than locking up all this land. I am in agreement with good management but I feel the Government has gone too far and allowed too much control from the environmentalists. Intsead of all these groups and clubs working together for the betterment of our country they all try to see who has the most power and control. In the meantime, everyone pays the consequences.

Let's get everyone working as hard to get something accomplished as they are trying to stop progress.

Glenna P. Heminger
Glenna Heminger
Kooskia, ID

LETTER 60

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

The Wilderness Act specifically states that timber harvesting is prohibited in wilderness. Also, may of the lands currently designated as wilderness are not highly productive timber growing sites. No additional wilderness is recommended in the Forest Plan.

Multiple use does not mean that each acre on the Forest can or will be managed to produce all resources. The goal of the Forest Plan is to define a package or mix of resources to be produced from the Forest as a whole, that is responsive to all resource needs. In certain areas, some resources may be favored over others to produce an optimal, total resource package.

May 10, 1985
#61

Dear Sirs,

I am writing about your proposed plans of roading more land. I would like to ask that you wouldn't put any more roads into the prime elk habitat that your national forest holds. #1

If you must road it, then please consider closing the roads from September until spring so hunter access won't be so easy and the elk and deer population will remain high.

I would also like to ask for a summary of the proposed plan for roading your area.

Thank you,

Brian K Wilkes
Box 176
Dubois, Idaho 83423

LETTER 61

Response No. 1

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. In addition, the Rapid River, Silver Creek-Pilot Knob, and East Meadow Creek roadless areas will continue to be managed with no additional roads. Therefore, all elk summer range within these roadless areas, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the 188,000 acres of elk summer range within areas to be developed, that will be managed at 75 percent of potential. In addition, all elk summer range within the four Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan contains explicit Forestwide standards and management direction to develop, implement, and enforce road closures.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation for most resources is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

LETTER 61

Response No. 1 (Con't)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

#63

FOREST SUPERVISOR
NEZ PERCE NATIONAL
FOREST

IDAHO GUIDE SERVICE inc.

WHITEWATER & OUTDOOR ADVENTURES

MAY 5, 1985

RE: NEZ PERCE NATIONAL FOREST PLAN

Dear Sir,

In regards to the above plan, I find it very distressing that the Forest Service does not even acknowledge the Outfitting business as a legitimate use of the public lands. Having lived in Idaho all my life, and seen the developments of the Recreation business the last 10 years, I find it deplorable that the Forest Service will and does support the timber, mining, ranching and ect. industries, but will still not reconize a growing industry based on renewable resources, and adopt a workable Plan that deals with our industry and protects the roadless areas where we operate. #1

In addition to the areas protected in the "preferred alternative" the following roadless areas should remain roadless and should be managed to emphasize wildlife habitat and water quality: #2

1845C- West Meadow Creek
1847- Big Mallard
1921- Jersey Jack

These areas should be excluded from the Nez Perce National Forest timber base. The harvesting of trees on public lands for personal or corporate profit, at the expense of me the taxpayer is not in anyones best interests, except the timber companies. I am also sending a copy of this letter along with some other comments to my State and Federal Representatives. Thank You for hearing me out, and hopefully in the near future the Forest Service will revise it Plan and deal with the Outfitting Business in Idaho. #3

Sincerely,

Olin Gardner
Owner-Managing Agent
Idaho Guide Service Inc.

OG/sa
cc: James McClure
Steve Symms
Richard Stallings
Larry Craig
John Evans

P.O. Box 1230 ... ny, Idaho (208) 7

LETTER 63

Response No. 1

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use was developed. Additional analysis was done to estimate the impacts from each alternative on jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage.

The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

LETTER 63

Response No. 3

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

#64

617 Preston
Lewiston Idaho
83501
May 11, 1985

Forest Plan
Nez Perce Nat'l. Forest
Grangeville, Idaho

Dear Sirs:
As a member of the Lewis Clark Wildlife Club and Concerned citizen, I am writing to express my prefferance for alternative C. #1

I might add that emotionally I object to more cutting timber until harvested timber has been replaced. I hope in some way I may support your efforts in reforestation. #2

Yours Truly
Vernon Rahel

LETTER 64

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 64

Response No. 2

Your concern for the reforestation of National Forests is appreciated. We are continually striving to improve our knowledge of reforesting cutover lands to assure that new stands of trees will exist. The long-term success of reforestation on the Nez Perce is over 85 percent. Most of the areas harvested in the past 20-30 years are well stocked and growing at or above acceptable rates needed to assure a continuing supply of timber. Standards for reforestation are established in the Forest Plan and adjacent stands of timber will not be harvested until cutover areas are successfully reforested.

#65

WALTER C. MINNICK
P.O. BOX 60
BOISE, IDAHO 83707

May 8, 1985

Mr. Tom Kovalicky
Supervisor
Nez Perce National Forest
Route 2, Box 475
Grangeville, ID 83570

Re: Proposed Nez Perce Forest Plan

Dear Mr. Kovalicky:

I am discouraged in the extreme at your apparent intent to recommend adoption of alternative "G" as the management plan for the Nez Perce National Forest. It makes no sense. #1

No rational person would propose to double the timber cut and more than double the miles of taxpayer subsidized roads at a time when industry is awash with timber. Particularly so, when that timber, if it can be sold at all, returns to the government far less than what it costs the taxpayer to build the access roads, administer the sales and finance reforestation. In the process you will be destroying irreplaceable big game habitat and risking through siltation substantial degradation of the entire Main Salmon anadromous fishery, the core of the region's fastest growing new industry, back country recreation. As a professional forestors with a legal oblication to manage a public resource for its highest and best use, you and Tom Coston know better. #2 #3

The alternative you should adopt is Alternative "H" combined with a proviso that no roads will be built nor timber sales made except where the proceeds of the proposed sale <u>with all costs considered</u> yield the taxpayer a profit. This is the way Potlatch or Boise Cascade would evaluate a proposed timber sale even if they had no concern for wildlife or other non timber management objectives. #4

#65

For the Forest Service to adopt a pro timber harvest bias even more extreme when wood is in oversupply and in an era of runaway budget deficits is absolutely irresponsible.

Very truly yours,

Walter C. Minnick

WCM:pks

cc: Max Peterson, Chief U.S. Forest Service

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2 and Response No. 4

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 3

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation among all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

#66

May 10, 1985

NezPerce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Attn: Tom Kovalicky

Dear Tom,

I would like to voice my opion on the NezPerce National Forest plan.

I feel the timber cut should be at least 120 million board feet for the next five years. #1

I value our natural resourses and some wilderness very highly. However, like a lot of other people my job depends upon the National Forests.

If we do not have enough timber to harvest to keep our mills running and people employed the National Forests will find that they are in as tight a financial bind as the rest of the of the state. #2

We all know that it is the working people who keep everything functioning, and that includes the National Forests and Yes, even your own job.

Good multi-use and good management is the only answer to build a sound and stable economy.

Past history has taught us that it is best to set our sights on a middle course. We already have too much wilderness to meet this goal and any more would be a disaster to the whole state of Idaho. #3

Sincerely,

Donna Peterson

Donna Peterson

LETTER 66

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Comment No. 67

May 10, 1985

Forest Supervisor,

I am writing concerning the timber being allotted for sale on the Forest for the next 5 years. I would like to see an increase to around 120 million. I am a single parent whose job depends on the logging industry. I need my job to support my family. I know of several other close friends whose jobs depend on timber production. #1

I think we have enough wilderness area in Idaho. The majority of local population doesn't have time or money to use the areas. #2

Forest land is very similar to a garden spot if left unattended it soon becomes overgrown and dies. The new logging techniques have made it possible to select cut timber for harvest later.

If the Forest Service keeps cutting back on saleable timber the citizens will soon be trying to support their families on nothing. I can't raise my family in a wilderness, recreation area, and etc.

The communities in this area are slowly dying now. With a timber reduction, our communities will die even more. The Idaho economy will go downhill even more.

It is my hope that the Forest Service will raise the amount of sale timber to at least 120 million.

/s/ Debra L. Allen

LETTER 67

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

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Response No. 2

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

The Forest Service does not establish or decide wilderness. This is the role of Congress, as provided for in the 1964 Wilderness Act. The Forest Service role is to provide data, analysis, and recommendations for consideration by Congress.

Comment No. 68

5-11-85

Dear Tom Kovalicky,

We cannot afford to have any more sawmills closed down in our area. People are hurting and some are barely making ends meet. I know of some people who are going hungry! They are not lazy, it's just that there is no work available. Some are getting 3 and 4 days a week, no one can make it on that.

Whatever you do, please don't lower the suggested allowable cut. We need to increase the yield on the Nezperce to assure that we have adequate timber to keep the sawmill production in our area at least at present levels. We would like to see the allowable cut from 102 to 120 million board feet. #1

I pray to God that all the people of the United States that are out of work will have the feeling of more faith in their jobs if and when they find one, that they can work from year to year instead of day to day.

/s/ James M. Tucker

LETTER 68

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#69

May 12, 1985

Forest Plan
Nez Perce National Forest
Route 2 Box 475
Grangeville, ID 83530

Dear Sirs,

We are writing in concern over the Nez Perce Forest Plan. It is important on our part to voice our opinion, since West Meadow Creek, Silver Creek-Pilot Knob and Jersey Jack are areas that have meant a lot to our heritage as well as many of the people who live in this part of our country. Hunting and fishing is a large part of the Northern Idaho lifestyle, as well as income for many whom their livlihood depend on business that hunters and fishermen bring to this area.

We hope you will understand how important this means to the people of Idaho by making the decision for alternative 'C'. Another good suggestion, if someone is searching for something to do, is perhaps utilizing what is up there by cleaning up the mess that was left there in prior elimination attempts. *1

Thank-you,

Rick L. Rice

Sheryl [illegible]

3207 7th
Lewiston 83501

LETTER 69

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 69

Response No. 1 (Con't)

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

#70

May 14, 1985
Grangeville, Idaho

Mr. Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Sir:

In my opinion the proposed Forest Service Plan is marginally sufficient to provide enough timber to sustain area mills at their peak capacities over the next decade. #1

I appreciate the great amount of work that you and your staff have put into this plan over the past several years. My greatest fear is that pressure from special interest groups (especially outside this area) will lead to reductions in the allowable cut that is proposed in Alternative G. In my mind the Plan has considered the interests of all concerned parties in a fair and equitable manner.

Having set in on some of the meetings at the local level when the North Central Idaho Wildnerness issue was being debated a few years ago, it was my understanding that many of these issues were pretty well resolved with the trade-offs and compromises that were agreed upon at that time.

I feel most of the area (outside designated Wildnerness) on the west side of Meadow Creek should be roaded, to the extent needed to allow for timber harvest, with proper constraints excercised to protect wildlife (such as road closures), water qualities and fisheries. #2

Although our industry would like to see the allowable cut raised from the recommended 102-106 million bd. ft. over the next five years to around 120 million bd. ft., I personally feel we can live with the proposed plan without endangering many of the jobs that exist today. I would be strongly opposed, however, to any reductions or so-called compromises that would reduce the allowable cut in the final plan. #3

Sincerely,

Gary D. Cash

Gary D. Cash
915 South "C" St.
Grangeville, ID 83530

LETTER 70

Response No. 1

You are correct in saying that the level of timber harvest proposed for the next ten years is not sufficient for local timber mills to operate at their total physical or peak capacity. Based on a survey of the local mills, the total physical capacity of these mills is 135 million board feet. However, it should also be realized that these mills have not operated at this peak capacity over the past 10 years and market conditions do not indicate that they will operate at this level in the near future.

Response No. 2

The responses are varied to the Meadow Creek issue. Most reviewers stress the importance of the East Meadow Creek roadless area retaining the roadless environment for future generations, but the West Meadow Creek roadless area has had fairly equal pressure from both timber and recreation interest groups. The East Meadow Creek roadless area will be managed without additional roads in order to meet wildlife and fishery objectives.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

LETTER 70

Response No. 3 (Con't)

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#71

5/9/85

TOM KOVALICKY
NEZPERCE NATIONAL FOREST
ROUTE 2 BOX 475
GRANGEVILLE, ID 83530

Dear Sir:

This letter is in responce to the Forest Service's proposed plan to manage roadless area's in our forest. A few years ago we went through a bitter battle in this area. It was over the Gospel Hump Wilderness Bill. The people who live here fought with everthing in their power to keep area's which needed timber harvest open to roads. We were told to compromise. We were ask to let them lock up some area's, and after a few studies we could harvest the area's that needed it. Being people who have dealt in honesty most of our lives we believed the lying environmentalist. Some people are still believing them. They will not leave us alone until the entire forest is their personal playground. Enough is Enough!! We need to harvest some of the timber in these roadless area's. People who want to live and work here need to keep their jobs. The wildlife will benefit, the state will benefit, and the country will benefit. I know you are getting pressure from some recreational groups to leave these area's roadless. If you would like a comparison. Be at Winchester Lake on opening day of fishing season, then be at Lake Creek Lakes in the Burnt Knob area during the months of August and September. I have been at both places quite a few times. 500 people or more enjoy Winchester Lake on opening weekend. All sexes, ages shapes, and sizes. Maybe 40 to 50 people will enjoy Lake Creek Lakes and surrounding area in those summer months. Please stop listening to a few special interest groups that pay little or no taxes on the forest lands they wish to control. Listen to the people who work and live here. Please ask yourself this. After all the mills are shut down, all the business's that depend on the timber are closed, all the people who are supported by the forest have to move elsewhere, Who will be here to enjoy the roadless area's and wilderness? I can tell you who, a few farmers who are busy trying to make a living when the snow has melted enough to get into the high country, and out of state hikers. Its your job to manage our forest Mr. Kovalicky. If you want to live and work in this area fine, help us fight to open up the area's that can be and need to be logged. Help us to get on with our lifes. If you don't care, then why not move on. Maybe the next person in your capacity will like living in Grangeville. Maybe he will help us fight for our way of life. Maybe he will fight for what is right for the majority of the people. And most important, maybe he will fight for what is best for the forest we all love. #1

Marv Hall
600 maple
[illegible]

LETTER 71

Response No. 1

Out of 503,162 acres in roadless areas, only 236,846 acres will continue to be managed for uses other than timber harvesting. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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#72

Lewis-Clark Wildlife Club

Box 146 Lewiston, Idaho 83501

May 15, 1985

Forest Supervisor
Nez Perce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Dear Supervisor Kovalicky,

We have carefully reviewed your proposed forest plan and the draft EIS. Club members have attended each of the public meetings conducted within the region. You and your staff have done a commendable job under difficult conditions. We appreciate the difficulty of attempting to develop a true multiple use plan for a forest with the range of diverse interests found in the Nez Perce.

After a careful review of the alternatives, the Lewis-Clark Wildlife Club recommends that your final plan adopt Alternative C, with modifications. Included herein are our comments and recommendations for changes and improvements. #1

Roadless Areas

The EIS does not adequately assess the wilderness values forgone as required by the 9th Circuit Court in Calif. v Block. A full evaluation of such values as tourism, recreation, wildlife, water and soil must be made for each area designated in RARE II. We recognise that substantial areas of the forest are already designated as wilderness and are not recommending any further wilderness area at this time. We do ask that full consideration be given to all RARE II lands as required by law. A complete EIS will lead to a more adequate designation of roadless areas. #2 In addition to Rackliff-Gedney 1841, Meadow Creek East 1845d, and Rapid River 1922, we recommend that Meadow Creek West 1845c, Silver Creek-Pilot Knob 1849 and Jersey Jack 1921 be also designated as roadless areas. #3

Meadow Creek West Recent court decisions indicate a requirement for a "worst case" evaluation of environmental damage possible. Because of the tremendous importance of the anadramous fish resource in the Meadow Creek drainage, we ask that the effects of the roading/timber sale plan be evaluated in the "worst case" of a 100 year rain on snow weather occurence. Recent experience in the Rapid River and South Fork Salmon River has shown what can happen and the public should be made aware of the dangers inherent in this option. #4 The EIS should evaluate the loss of economic benefit if roading/timber sales adversely effect existing outfitter/guide operations in the area. #5
The plan shows the upstream tributaries of Meadow Creek as maintained at or near 100% of fish potential. This is not realistic if substantial portions of the lower stream are in areas roaded and logged. More study must be done to determine if there will be an adverse effect on these upstream spawning areas. #6
Neither the plan nor the DEIS mention the earlier study of soil suitability done by the forest. There is no indication that a more recent study has found this earlier study to be in error when it found that much of the drainage was not suitable for roading. Soil suitability for roading/timber sales must be determined. #7

Silver Creek-Pilot Knob Study should include the cumulative effect upon big game of the extensive roading and logging that has already occurred in the surrounding areas. This area is a haven for elk and moose in an area that has been extensively damaged by development in Newsome Creek and Clear Creek. A cumulative impact study to include the extensive sales planned already may disclose substantial damage to wildlife values. #8

Jersey Jack Recent decisions of the 9th Circuit Court have already pointed out the inadequancies of this DEIS. #9

Timber Harvest

The DEIS is not adequate unless it includes maps of suitability for timber, location of timber sales with regard to land suitability and a comprehensive road construction map. These maps must be prepared and made available for public review. #10
An allowable cut of 102mbf is not justified. The five year period, 1979-1983, shows an average harvest of approximately 80mbf. 1984 sales were close to 55mbf. There is no economic indication of demand for more than one billion board feet in the first decade. A level of 74-85mbf can be achieved by Alternative C without destroying key roadless areas and with no loss of jobs in Idaho County compared with present 1985 levels. #11 The long term sustained yield attained by Alternative C is 197mbf annually, a decrease of less than 5% from the preferred alternative. #12

Reforestation The plan assumes that reforestation efforts will be successful. Long term sustained yield is dependent upon successful reforestation on a timely basis. Not all attempts will meet with success on a first time basis. The plan must address the process to adjust allowable cut when less than perfect reforestation occurs. Even a small error in accessing reforestation success will have a large multiplier effect when viewed over the 60-120 year regrowth cycle. #13

Road Construction #14

No map of proposed road construction has been provided for public comment for either the first decade or the fifty year period. This is necessary to show both the location of proposed roads and the intensity of roading. #14

It is hard to see the economic justification for a 40% increase in road mileage. This level of roading does not appear necessary to achieve an allowable cut of either 74mbf or 102mbf. Road construction well in advance of need for timber sales will create unnecessary maintenance expense in a era of budget austerity. Advance roading further aggravates the difficulty of enforcing road closures. There is no indication that advance road construction plans will be coordinated with actual timber sold/cut as opposed to sales planned. #15

In all of the public meetings it was clear that road construction and road closures were of great public concern. The plan must address how road closures can be effective with 6000 miles of roads when we have not been able to effectively close 2050 miles. #16

Budget

An increase of 16% in budget authority is not realistic. The plan as written cannot be supported. The plan must be based upon a realistic budget estimate. The public must be provided with a plan that shows what will occur at various levels of funding. By your own admission, it can be anticipated that the revenue generating activities (roads, timber, grazing and mining) will not suffer during budget cuts. The plan must address this. #17

The plan should also address the source of road construction dollars, the public has a right to know what construction is planned with "hard dollars" and what will be accomplished with road credits. #18

Monitoring Plan

The monitoring plan is a good start but needs further definition. The plan must provide for dissemination of the monitored information once gathered. This information must be available to the public in addition to other interested agencies such as Idaho Department of Fish and Game and Health and Welfare. The plan should indicate what will happen when environmental limits are exceeded or not met. There is no indication of what will happen to environmentally sensitive activities if the monitoring program cannot be accomplished because of budget cuts or Forest Service personnel actions such as a RIF of essential personnel. #19 #20

Need for Additional Information

The economic impact of the alternatives does not include many important forest related activities. Revenue generators such as timber, grazing and mining are given full consideration while many other important economic values are ignored. Tourism, hunting and fishing, river recreation, outfitting and guiding and back country recreation are all becoming more important to the Idaho county area. If the traditional resource based industries continue to decline, the recreation based activities will become more important. The communities of Higgins and Kamiah are examples of this shift in the economic base. This information is essential to properly evaluate the alternatives in RARE II areas. #21

The entire subject of recreation needs to be addressed in detail. Timber sales have been projected in detail for many years. No such projections exist for back country trails, winter sports or any of myriad other activities. #22

The Lewis-Clark Wildlife Club looks forward to a continued opportunity to work with you and the forest staff in developing a final plan and EIS that will meet the multiple needs of the region. We remain confident that the Nez Perce Forest Plan can become a reality and provide an example for other forests and interest groups.

Sincerely,

Keith E. Carlson

Keith E. Carlson
President

72

Response No. 1 and Response No. 12

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Information on environmental consequences of roading roadless areas is located in Chapter IV of the Draft Environmental Impact Statement (EIS) and the Final EIS. More detailed information can be found in Appendix C of the Draft EIS and Final EIS. We believe this information meets the requirements set forth in California vs. Block.

Response No. 3

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 4

A "worst case analysis" is required in an Environmental Impact Statement (EIS) only when there are gaps in relevant information or scientific uncertainty pertaining to an agency's evaluation of significant adverse impacts on the human environment.

An agency must include a worst case analysis of the potential impacts of the proposal and an indication of the probability or improbability of their occurrence if: (1) the information relative to adverse impacts is essential to making a reasoned choice among alternatives, and is not known; (2) the overall costs of obtaining the information are exorbitant; or (3) the means to obtain the information are unknown, i.e. beyond the state of the art.

Response No. 4 (Con't)

For the decisions being made in the Forest Plan, we believe there were no "gaps" in the relevant data or information, which precluded a "reasoned" choice.

Response No. 5 and Response No. 21

Tourism and recreation, including outfitter and guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism/recreation industry should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 6

Although the lower reaches of Meadow Creek (ie. Horse Creek and the Indian Hill area) have either been roaded or logged, the fish habitat potential in this area is still very high. There has been no measurable effect of this activity on the lower reaches, thus no impact on the undeveloped upper Meadow Creek drainage.

Response No. 7

There are some stability problems with certain landscapes in the West Meadow Creek area, but much of the area has soils and landscapes similar to those in areas where road construction and timber harvesting activities have been carried out without significant adverse effects. The land in West Meadow Creek will be assigned to timber management, but no timber harvest is scheduled for the first decade. When roads and timber harvest are initiated in the West Meadow Creek area, our management activities will meet the resource management standards we have established in the Forest Plan.

Response No. 8

Based on public comments, it was decided to manage approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

Elk summer range in this area will be managed at nearly 100 percent of potential.

Response No. 9

In the Final Forest Plan, a Forestwide standard has been added which states, "Implement no timber harvesting or road building activities in the Gospel-Hump (1921) and Mallard (1847) roadless areas until a more site-specific environmental impact statement has been completed for these areas. The U.S. Fish and Wildlife Service will be formally consulted during this analysis in relation to threatened and endangered species."

Response No. 10

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas suited versus not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 3 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road construction projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection.

Response No. 11

Many of the comments we received pointed out that the demand for National Forest timber in this region and specifically on the Nez Perce has been considerably below the supply in recent years. While this is true for the previous 5 years (1980-84), the period from 1975-79 shows higher volumes of timber, both cut and sold. Since the softwood timber market is historically cyclical and can change relatively quickly, basing the Forest Plan on short-term data projections is not in the best public interest; however, the

Response No. 11 (Con't)

Plan is designed to be responsive to changes through monitoring outputs and effects. For example, if the timber volume offered for sale consistently exceeded the demand, the Plan would either be revised or amended. The planning process involves the development of management alternatives which cover a 50-year period, but allows for updating the Plan at 10 to 15 year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest, given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

Response No. 13

You are correct in saying that in some instances, despite our best efforts to rapidly reforest cutover areas, uncontrollable factors such as abnormal weather may cause initial plantings to fail. Our data shows that approximately 85 percent of the stands planted have the required stocking of established trees 3 to 4 years after the inital reforestation project. The remaining 15 percent of the stands are re-treated as necessary to meet the minimum stocking levels. The timber yield tables used in the Forest Planning Model for regenerated stands are derived from measurements taken in regenerated Forest stands on the Nez Perce. These stands were not all "perfect" and included a variety of stocking levels. While mistakes in assumptions regarding reforestation (along with many other factors) will impact long-term sustained yield capacity (LTSYC) calculations, the Forest Plan will be updated every 10 to 15 years.

Response No. 13 (Con't)

This will assure that necessary corrections are made in the LTSYC. The allowable sale quantities for the first 30 years in the Forest Plan are considerably below the LTSYC, so any reductions in it during the first or second major revisions would not have any significant impact on the Forest programs.

Response No. 14

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road schemes shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that these have not been ground-reviewed nor reflect the exact number or placement of the final system, which may not be complete for 100 years in the future, nor do they specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed, leaving the system totals to remain near-constant throughout the planning cycle.

Timber planning is scheduled on a 10-year planning cycle with at least the first 5 being data collection and additional analysis periods. During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and, generally, a copy can be reviewed at any District office.

Response No. 15 and Response No. 18

Road construction on the Nez Perce is not substantially increased during the first decade, as implied in the Plan with the Preferred Alternative's 830 miles. From 1975 to 1984, the Forest constructed 813 miles, while reconstructing 191 miles. We presently have 2,053 miles of access roads, of which 45 percent, or 924 miles, have restrictions of use. This is further broken down to 419 miles with yearlong closures and 505 miles with seasonal closures.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

Response No. 15 and Response No. 18 (Con't)

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 16

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Response No. 16 (Con't)

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 17

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates,

Response No. 17 (Con't)

based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 19 and Response No. 20

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 22

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use was developed. Additional analysis was done to estimate the impacts from each alternative on jobs and income related to outfitter/guides, as well as the timber industry and other recreation related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

#73

Forest Plan

Nez Perce National Forest

Dear Sirs,

I remember my youth as being filled with days of time spent fishing the Meadow Creek area. Large families often look for wildlife habitat and forest for a means of recreation as there is no better way for a family to develop closeness than to experience what nature provides.

Entertainment for eight does not come cheap, and my parents found ways to make do with what they had and good Mother Nature gave us. I imagine my mother always breathed a sigh of relief when our old jeep rolled to a stop and doors flew open and six kids made tracks to the nearest fishing hole. The entire day was spent with laughter and good clean fun.

This area and many more areas in Idaho has provided this sort of recreation and pleasure. My father's hunting trips put much needed meat on the table and the best homemade sausage in my school lunch....

...so please take heed to Alternative G. Leave our forests the way they are for our future children. There must be already roads enough for timber production. Also, those places cut in the past could use a good cleaning-up. #1

Sincerely,

Connie R. Grant

Connie R. Grant
1712 5th St. #4
Lewiston 83501

LETTER 73

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#74

May 10, 1985

NezPerce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Attn: Tom Kovalicky

Dear Tom,

In regards to the Forest Service plan for our National Forest for the next 5 years I would like to see the timber harvest increased from 102 to 120 million board feet. #1

I feel that our jobs and a stable economy are more important than more wilderness area. #2

Multi-use, good management and an increase in the timber harvest would make a very healthy and stable economy for our area.

Sincerely,

Vernon Kennedy

Vernon Kennedy

LETTER 74

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

#75

May 10, 1985

NezPerce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Attn: Tom Kovalicky

Dear Tom,

In regards to the proposed plan for our National Forests, I would like to see the timber harvest raised from 102 to 120 million board feet. #1

I feel that jobs for the people of this area are more important than more wilderness area.

Good multi-use planning would preserve our jobs, make a healthy economy, and the working people would be able to enjoy our National Forests.

The wilderness area is only enjoyed by the wealthy and retired and we have more than is healthy for the state of Idaho now. #2

Sincerely,

Carl E. Young

Carl E. Young

LETTER 75

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

#76

I Support Plan G on the forest plan with strict Road Closure for the west side of Meadow Creek, *1 *2

Richard Swanson

LETTER 76

Response No. 1

We appreciate your support for the Nez Perce Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 76

Response No. 2

As stated above, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation for most resources is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

#77

I support plan G on the Forest Plan with strict road closures for the west side of Meadow Creek #1 #2

Raye Swanson

LETTER 77

Response No. 1

We appreciate your support for the Nez Perce Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 77

Response No. 2

As stated above, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation for most resources is the road closure policy and its timely completion with the scheduled activities.

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2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Comment No. 78

5-14-85

Dear Mr. Kovalicky,

Thank you for bringing your "road show" to Moscow.

Comments on your proposed Forest Plan:

1. The planned timber harvest is unnecessarily high. Timber markets now and likely in the future won't support this production. #1

2. Elk numbers should be given at least the same priority as timber harveset levels. #2

3. The Reed Mountain area timber harvest plans are a total abomination. I've been hunting there for 32 years. An enormously expensive road system is going in which could never be justified by timber production. Much of the timber is white fir and a high percentage of that is rotten. Road construction is silting hillsides and even the contractor says the roads may not hold in place. The Leggett and Silver Creek drainages are a beautiful and pristine but fragile area. Continuing the development will lead to a scandalous deficit program of even greater proportions than already committed. Do look this area over -- I'm sure an objective review would reveal that too much damage has already been done to this "seed area" for wildlife and the best action to take would be to stop now. #3

Dick Johnston
1113 Highland
Moscow, ID

LETTER 78

Response No. 1

Many of the comments we received pointed out that the demand for National Forest timber in this region and specifically on the Nez Perce has been considerably below the supply in recent years. While this is true for the previous 5 years (1980-84), the period from 1975-79 shows higher volumes of timber, both cut and sold. Since the softwood timber market is historically cyclical and can change relatively quickly, basing the Forest Plan on short-term data projections is not in the best public interest; however, the Plan is designed to be responsive to changes through monitoring outputs and effects. For example, if the timber volume offered for sale consistently exceeded the demand, the Plan would either be revised or amended.

Response No. 2

The Forest Plan is providing sufficient winter range capacity to meet the elk population objective established by the Idaho Department of Fish and Game in the Department's species management plan.

We agree that the philosophy represented by statements in the Proposed Plan and Draft Environmental Impact Statement (EIS) such as "...summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the Preferred Alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize that this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. The ratio of elk summer habitat to winter habitat on the Forest's non-wilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

The elk management objectives will be met. Elk objectives and timber objectives will be monitored as discussed in Chapter V of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

Response No. 3

This comment was passed on to the Elk City District Ranger. We hope his response answered your questions. If you have other questions or concerns about specific timber sales, feel free to contact the District offices.

Comment No. 79

5/14/85

Dear Sir:

As regards the proposed Forest Service Management Plan, my wife and I would like to strongly support the needs of the timber industry in our area by supporting the plan as written. In addition, I would favor the allowable cut to be increased over the next five years from 102 to 120 million board feet. #1 #2

As an employee of Idapine Mills, and formerly of Wickes Forest Industry, I've seen the financial loss and the hardship suffered by many in our industry, and I also personally experienced a fairly lengthy period of unemployment due to the cut-back the industry made during the last five years.

I feel our jobs and the economy of our area depend on a constant and consistent available supply of timber that can be purchased at a reasonable price to allow our company and others in the area to make a fair profit in the face of rather unfair imports of Canadian timber. #3

I feel Idaho has more than its share of good roadless and wilderness areas that are already protected, and that we have a great need now to properly develop our natural resources to promote jobs and the betterment of our local economy. #4

Thank you!

/s/ Bob and Carol Smith
Box 546
Grangeville, ID
83530

LETTER 79

Response No. 1

We appreciate your support for the Nez Perce Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

While the problems created by the Canadian lumber imports and the high value of the dollar in the international monetary market are very real problems faced by the local timber industry, it is not an issue that can be addressed or resolved in National Forest plans. The timber pricing policies of the Forest Service are determined at the national level and cannot be changed at the local level.

Response No. 4

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Of the 503,162 acres in roadless areas, only 126,846 acres will continue to be managed for uses other than timber harvesting.

Response No. 4 (Con't)

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

#80

Dear Sir:

I am writing to you concerning the timber harvesting in Nezperce National Forest.

I feel that we have to much of our public lands already set aside for wilderness. I would like to see enough of the remaining roadless areas opened up for logging to assure a sustained yield of at ~~least~~ as high as suggested in the Proposed Forest Plan. #1 #2

In our area the lumber industry is essential to our livelyhood. We can't afford to have anymore sawmills closed in our area.

Randel W. Fults
P.O Box 166
Stites 83552

LETTER 80

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Of the 503,162 acres in roadless areas, only 126,846 acres will continue to be managed for uses other than timber harvesting. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Comment No. 81

May 14, 1985
Lewiston, Idaho
1409 Cedar Drive Ct.

Mr. Tom Kovalicky,

My connection with East Meadow Creek has been a pleasant one. We ride in or up Meadow Creek on motorcycles to fish. The fish are not too big but good eating. I know quite a few other people that do the same thing.

The timber in this area heeds harvested as you know. It would bring in money for the County, schools, and Forest Service as well. To put into a roadless area would put all of us weekenders out of a pleasant outing.

What if we put all of Idaho's timberland into wilderness? I would be out of a job. Possibly we would not need all the Forest Service personnel. Where would that put all of us? Hunting for a new job and starting over. I have worked in this sawmill since 1947 and it has been good to me (no unemployment for me). I work for Guy Bennett Lumber Co., Clarkston. I worked here long before Guy bought it.

I am well acquainted with the Elk City/Red River area also where I have hunted the last several years.

So, no, I do not want East Meadow Creek 1845D and Rackliff-Gedney 1841 put into roadless area. #1

Sincerely,

/s/ Kenneth J. Bacon

LETTER 81

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

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East Meadow Creek will be managed with no additional roads in order to meet wildlife and fishery objectives. This area would be very difficult to road and log economically at this time. This area will be reevaluated in 10 to 15 years when the Forest Plan is revised.

The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives.

#82

May 13, 1985

Dear Mr. Kovalicky,

I am an employee at Clearwater Forest Industries at Kooskia, Idaho. In the past there has been one large sawmill closed in our area and two smaller ones completely wiped off the map - one in Orofino (Riverside) and one in Kamiah. And another in Kooskia (Cosy Lumber Co.). This means jobs that support the local economy. I think we need to seriously look at the future, making it so the U.S. sawmills can stay alive and provide for people who are willing to work.

Our jobs depend largely on timber from the Nez Perce National Forest. I think an allowable increase in timber cutting should be considered. We have enough of Idaho set aside for wildness. It's time we started (over) #1

using what we have and quit wasting.

I believe that the people in the area in which they live should determine what happens and not someone who doesn't depend on that area for their livelihood #2

Yours truly
Lynn Erb
Glenda Erb
Kooskia 83539

RECEIVED
MAY 1 5
FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE

LETTER 82

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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The Forest Plan does not recommend any additional lands on the Nez Perce National Forest to be added to the National Wilderness System.

Response No. 2

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, as mentioned above, the economic health of the local communities dependent on the Forest resources was a major consideration in the land management planning process.

#83

May 13, 1985

Tom Kowalsky, Supervisor
Nez Perce National Forest

Dear Sir.

I would like to vote against any more roadless area in the Nez Perce National Forest. #1

The area that I would most like to see kept open to logging is West side of meadow creek - 1845C. I also think the timber harvest should be increased to 120 million board feet. #2 #3

I have supported my family for 26 years thru the forest industry + would like to continue doing so. If you keep closing the forest to logging and eliminating jobs who will be left to pay the welfare. #4

I dont think people from other states should be dictating to the people of Idaho how they should be managing their forest. #5

Sincerely,

Robert Knutson
2416 Easy St.
Clarkston, Wash.
99403

LETTER 83

Response No. 1 and Response No. 2

Of the 503,162 acres in roadless areas, only 126,846 acres will continue to be managed for uses other than timber harvesting. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3 and Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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LETTER 83

Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, as mentioned above the economic health of the local communities dependent on the Forest resources was a major consideration in the land management planning process.

5/12/85 #84

Mr Zaricky.

Sir - I am a sawmill worker. I am 48 years old, I have been in sawmill work for 25 years. I have my family living on the lumber use. Just to make a living.

I am my family love the woods. Enjoying hunting an part of our lives.

But! If we do not have the lumber to cut we can not work, I do not wish to see my 7 year old Boy grow up on welfare.

We need the lumber on 1845. 10th Houthorn so the mills can keep running.

I am to old to start a new lively work.

Thank You Gary D. Gill

730 3rd St., Clarkston, WA 99403

#1

LETTER 84

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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#85

May 14, 1985

Dear Mr. Kovalicky,

I read your proposed forest plan. I agree with most of Alternative G-G1. But I think the allowable cut should be increased to 130 million board feet. I think that all non-wilderness RARE II areas should be roaded, and managed for all uses including timber production and recreation. #1 #2

I have lived in this area all my life and I feel that we already have enough wilderness area. I also hope that the wishes of the "area" people will be considered before the wishes of the people outside the area. #3 #4

Sincerly, George A Newby
1014 N. College
Grangeville 83530

LETTER 85

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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Response No. 2

Of the 503,162 acres in roadless areas, only 126,846 acres will continue to be managed for uses other than timber harvesting. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

LETTER 85

Response No. 3

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 4

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, as mentioned above the economic health of the local communities dependent on the Forest resources was major consideration in the land management planning process.

#86

May 14, 1985

Dear Mr. Kovalicky,

I have lived in the Nezperce National Forest area all my life. I love this area and have no desire to ever live anywhere else. I am also the wife of a sawmill worker.

I feel that we have set aside enough land for wilderness purposes. Now we need to open up enough roadless areas to logging to assure the survival of the sawmills in this area. Also opening up these roadless areas will provide roaded recreation for people who don't have the time or the money to enjoy the wilderness areas. #1 #2

I also feel that the wishes of thepeople in this area should be considered before the wishes of outsiders #3

Sincerly,
Margaret Lea Newby

Margaret Lea Newby
1014 N. College
Grangeville 83530

LETTER 86

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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LETTER 86

Response No. 3

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, the stability and economy of the local communities dependent on the Forest resources was a major consideration in the development of the Forest Plan.

#87

May 14, 1985

Mr. Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky;

I have read the proposed Forest Service Plan and Environmental Impact Statement. I believe that the timber harvest figures should not go below 102 million board feet per year. #1

The economy of Grangeville and the surrounding communities needs the timber industry and the timber industry needs trees to cut. Under Alternative G, I feel enough timber could be cut as well as protecting certain areas for back country recreation. I support this Alternative. #2

As a resident of Idaho county for 20 years and a member of the timber industry, I enjoy living in this area. But in order to continue to enjoy this life style we must have adequate timber harvest to support our local economy as well as certain protected areas in which we can hunt, fish, and back pack.

I would like to see the West Side of Meadow Creek, in particular area 1845C, open to multiple use. We have enough wilderness and roadless areas without tying up this valuable timber resource. #3

Sincerely,
Mike Murphy

Mike Murphy
716 S. B St.
Grangeville, Id. 83530

LETTER 87

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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Response No. 2

We appreciate your support for the Nez Perce Forest Plan.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 2 (Con't)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 3

As stated above, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#88

May 14, 1985

Mr. Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky;

I understand that my job is on the line. I work as a logger for Pierson Logging Company. My job depends largely on timber from the Nezperce National Forest. I feel your plan is barely sufficient to provide timber needed to feed the sawmill capacities in this area. Whatever you do, please don't lower the suggested allowable cut. #1

I have lived here with my family for 25 years and would hate to leave now. Thank you.

Sincerely,

RT. 2. Box 124 D
Grangeville, Id. 83530

LETTER 88

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#89

May 14, 1985

Mr. Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Mr. Kovalicky;

As a member of the timber industry, I am very interested in the Proposed Forest Plan and Environmental Statement. I support this plan, with an increase of allowable timber harvest to 120 million board feet per year. #1

I also believe the West Side of Meadow Creek should be open to all activities, including logging. This area could support many years of adequate timber harvest as well as recreational opportunities. #2

My job depends on an adequate supply of timber and I think this can be accomplished under your plan. I also enjoy the outdoors which would be protected under this plan.

Sincerely,

Wayne L Dane

403 W. North 4th
Grangeville, Id. 83530

LETTER 89

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#90

May 14, 1985

Mr. Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky;

I have lived in this area for 24 years and have worked for Pierson Logging for over 20 years. I have heard the controversy concerning roadless areas and wilderness areas. It seems to me that preservationists have more influence over Forest Service policy than they should. #1

We need the timber industry in this area to support the local economy. We cannot all depend on the tourist industry for our jobs as the environmentalists would have us do. #2

I would like to see the proposed Forest Plan adopted if it would include opening the West Side of Meadow Creek to multiple use, and raising the allowable timber cut to 120 million board feet. #3 #4

Sincerely,

Art. Fearn

328 W.N. 6th
Grangeville, Id. 83530

LETTER 90

Response No. 1

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, the stability and economy of the local communities dependent on the Forest resources was a major consideration in the development of the Forest Plan.

Response No. 2 and Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

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#91

15 May 1985

Tom Kovalicky
Nezperce National Forest
RR2 Bx 475
Grangeville, Idaho 83530

Dear Sir:

As I have been associated with timber and lumber most of my adult life I sure can't understand any one wanting to close the forest lands to a few people. We need the lumber industry to keep this nation going. Why waste good timber when we need it so badley for housing and other industry. Idaho is a beautiful state but wont be very long if no one has a job. So please think twice about putting Idaho in a Wildnerness area. I have lived here in Grangeville for thirty one years.

#1

#2

Respecifully

Mrs Dutch Sego
Star rt Bx 489
Kooskia Idaho

FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 16 1985
RECEIVED

LETTER 91

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

#92

May 14, 1985

Mr. Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky;

I am a logger for Pierson Enterprises in Grangeville, Idaho. I basically support the proposed Forest Plan and Environmental Impact Statement. However, Grangeville needs the timber industry and the timber from the Nezpere National Forest. I believe the minimum timber harvest should be 120 million board feet per year. This would support the sawmills in this area which also support the economy. #1

Also, the West Side of Meadow Creek should be opened to timber harvest. This area has much timber which should be opened to multiple use. #2

Sincerely,

Wayne H. Stickney

PO Box 1113
Kamiah, Id. 83536

LETTER 92

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#93

May 14, 1985

Dear Mr. Kovalicky
Regarding the Nezperce National Forest Draft Plan, of wanting to manage an additional 170.000 acres of roadless area's, with no Timber Harvest, most of this ~~but~~ Is In the EAST Meadow Creek -1845D, and Rackcliff - Gedney - 1841, I'm fully against this of the Nezperce National Forest of managing EAST Meadow Creek 1845D, If that should happen then there would be no Timber to Harvest, on the West Side of Meadow Creek-1845-C, so I'm fully against It, and I ask that all non-wildeness Rare II area's be roaded, and managed for all Including Timber Production, of these area's menioned, I'm employed by Idapine Mill's #1

Idapine Mills, and other mills around the area's very much against this as well, we just don't want to have any more Sawmills closed down.
I'd very much like to see the allowable cut Increased to a 120 million board feet on the Nezperce National Forest, over the next 5 years, our jobs depends largely on the Timber from the Nezperce National Forest, and I'd prefer to have allowable cut, Increased to around 120 million board over the next 5 years, so that people here In Grangeville, can have there job's, and surrounding area's, such as Kamiah, and others, so I'm very much, and fully, against the Nezperce National Forest to manage an additional 170,000 aea's, to where #2

3.

93

our job's depends on the Timber Harvest In the area's mentioned, East Meadow Creek - 1845-D, Rackcliff-Gedney 1841, and particular the West Side of Meadow Creek - 1845-C with It's large standing inventory, job's In the sawmills depend on this Timber.

Sincerly
SAM ROWSON

My ADDRESS
SAM ROWSON
306 N. 2ND #6
ORANGEVILLE IDAHO
83530

LETTER 93

Response No. 1

Out of the 16 roadless areas (503,162 acres), only 3 (126,846 acres) will be managed without additional roads. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

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Comment No. 94

5-14-85

Mr. Kovalicky,

I work in a sawmill in Clarkston, Wash. I've worked since January 1979. I've had this job longer than any other, in part I think because I love it. I was born in Clarkston, Wash. (1957), I've lived here off and on all my life. Since 1979 I've gotten married, bought a $40,000 house with $500 a month payments, a car, and all the trimmings like everyone else. I don't want to lose my job now or ever. I think everyone in the timber industry has sacrificed something at one time or another in the last 5 years. We took a 10% cut in wages for a year and haven't seen a raise in years. Others haven't been as fortunate as we have. We could all use a little job security.

I agree with Alternatives G-G1, especially 1845-C, the west side of Meadow Creek and Jack's Spur. I believe we need to arise our annual harvest of timber to 120 million board feet per year. I think this will help the timber industry and all the people within it and around it. I think it is unjust to let people from New York or Florida or anywhere outside of the northwest express any opinion at all. We've been through this before. I'll write as many more letters as I need to if it will help. #1 #2 #3

/s/Pat Jerald Deboraherman
1045 Webster
Clarkston, WA 99403

LETTER 94

Response No. 1

We appreciate your support for Alternative G.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 1 (Con't)

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Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. However, the stability and economy of the local communities dependent on the Forest resources was a major consideration in the development of the Forest Plan.

#95

May 14 1985

Tom Kovalicky
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, Idaho, 83530

Dear Mr. Kovalicky:

I am the bookkeeper for S & M Logging. We log eight months of each year out of Elk City, Idaho for the Shearer Lumber Co. there, which is owned by Bennett Lumber.

The livelihood of many people depend on jobs in the forest industry. It's very alarming to hear that the outfitters are trying to keep roads out of the West Meadow Creek area. I read in the Tribune that only 3000 hunters used guides each year in Idaho. This means outfitters and enviromentalists are greatly exaggerating the tourist dollar spent in Idaho roadless areas. How many hunters are guided through West Meadow Creek each year? How many jobs would 90,000 acres of timber provide? #1

The paychecks I write stay in the Elk City and Grangville areas. The bills I pay are to Elk City and Grangeville businesses. The schools of Idaho benefit when a parent logs on Forest Service timber. Road taxes are paid, income tax, in short the Idaho money stays here.

I spent the summer months in Elk City doing bookwork and upgrading the crew house for S & M Logging. We stayed in two trailer parks - Junction Lodge and Red River. The other "campers" were surveyors, road construciton, and loggers. People that spent their money in town! Not campers from the city that bypassed the grocery stores and added nothing to the economy.

In closing I'd like to go on record in favor of plan G. #2

Yours truly,

Mrs. Richard Swanson

Box 130
Lewiston, Idaho
83501

LETTER 95

Response No. 1

We found a mix of feelings on the importance of outfitter industry to the area. The balance the Forest Plan is trying to provide is not in total numbers, but rather with diversification of employment opportunities. The present timber based economy has resulted in some very serious economic impacts on communities such as yours. This impact can be lessened if we diversify our economic base allowing non-consumptive industry to become better established.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

We appreciate your support of Alternative G.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

Response No. 2 (Con't)

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

#96

1713 Swallows Nest Loop
Clarkston, Wa., 99403
May 14, 1985

Tom Kovalicky
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, Idaho, 83530

Dear Mr. Kovalicky:

In regard to your forest plan I would like to be recorded as favoring Plan G. Idaho has enough roadless areas and 1.1 million acres dedicated to back country without roads would certainly seem like it should satisfy the enviromentalists and outfitters alike. #1

After the meeting in Grangville we were doing some figuring on this plan, our company was also represented at Elk City the same evening. As you know the loudest opponent was a woman that had acquired outfitter rights for the West Meadow Creek area. She is pushing very hard to keep roads out of this area. Last year she had 100 customers-over a two month period I would suppose that means around 11 hunters each week for the 90,000 acres involved. How much of this money does the State of Idaho ever see? Out-of-State license and tags? The Elk City economy has been depressed for 5 of the 7 years our company has logged there. Tying up more valuable timberland by not allowing roads to be built will only hurt the state and counties more. #2

I have lived in Idaho for 66 years and been associated with the timber industry for over 40 years. Thank you for registering my opinon.

Sincerely, Carl Milton

Carl Milton
co-partner
S & M LOGGING

LETTER 96

Response No. 1

We appreciate your support of Alternative G.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 96

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative. Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in regard to nonpriced benefits) of National Forest management.

It should be noted that Community Stability is one of ten issues identified in the Planning process (see Appendix A). Competitive public issues such as community stability and wilderness/roadless area management exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced ouputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the State by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#97

May 14, 1985

Tom Kovalicky
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, Idaho, 83530

Dear Mr. Kovalicky:

I have worked out of the Elk City area for the past seven years as a logging contractor for Bennett Lumber. We have employed 13 local loggers during 1984, plus another 8 additonal loggers we have brought in and housed there for from 3 to 5 months. Our logging operation worked out of this area for 8 months last year. This coming year we will be moving 10 million board feet of timber which will be brought to the Shearer Lumber Co. located in Elk City.

I am in favor of Plan G. in your Forest Overview. Idaho has enough wilderness and roadless areas already. The problem is very real to the Elk City area, without the road building and logging they can't keep their business' going. Rumors are running through town that the mill will close. Times are tough, and they were there the year the mill did stop production. Our payroll means alot to the town; the merchants defintely favor the industry rather than the tourist dollar. #1 #2

From the sportsman's point of view, I don't feel roads or logging activites hamper wildlife in anyway. The elk, deer, moose, and even cougar are in these areas while the logging and trucking are in progress. #3

I hope you receive many letters in favor of your plan. It is indeed very important that Idaho people get what is best for their state.

Yours truly,

Richard Swanson

Richard Swanson
co-partner S & M LOGGING

Box 120
Lewiston, Idaho, 83501

LETTER 97

Response No. 1

We appreciate your support of Alternative G.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 97

Response No. 2

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers, ie, as tank traps, removing bridges, or tearing up and revegetating road beds.

Dear Sir, May 13, 85

My name is Paul Harai
I live at 1017 McCarroll Clarkston, W.A. 99403
I have lived in this area all of my life.

I am employed at Guy Bennett lumber company. I have been there for 14 years. I have three children and a spouse that depend on me. I am very concerned about the future of my family and job.

Your proposal is not in the best interest of the people that are depending on the timber industry for a future. #1

I do just don't understand why a solution can't be reeloved on the matter of the West meadow Creek 1845 C. #2

I, also am a Viet Nam Veteran and also love to hunt and Fish. I, love the outdoor as much as I do my children.

I would like to see allowable cut increase to 120 million B.F. per year over the next 5 years. #3

I, love the outdoors and love working in the timber industry. I'm sure there can be a happy medium for both of us.

I, do feel in my heart that we have enough wilderness at the present time. #4

One more comment before I close. I, think and hope the timber industry can work out a solution on the area of west side of meadow Creek 1845 C. I don't want to be out of a job and lose everything I have worked for all my life.

Sincerely,
Paul Harai and
Family
1017 McCarroll
Clarkston 99403

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

As mentioned above, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered, ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 4

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

The Forest Service does not establish or decide wilderness. This is the role of Congress, as provided for in the 1964 Wilderness Act. The Forest Service provides data, analysis, and recommendations for consideration by Congress.

Comment No. 99

5-14-85

Dear Mr. Kovalicky,

I have lived in this area for over 30 years, and have visited most of the United States of America, and we have one of the most desirable places to live there is in this country.

But we must open our forest lands to multiple use. To let this land set and rot is a terrible waste of our natural resources which we cannot afford. We need the jobs in this area that lumber, mining, grazing these lands will bring. Also the Forest Service can supply more jobs if we are actively using our lands the way they should be. #1 #2

/s/ Doug Sego
HCR 1-Box 489
Kooskia, ID 83539

LETTER 99

Response No. 1

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

In the management of undeveloped lands, eleven roadless areas are assigned to multiple uses which include timber harvesting and road building. Of the 503,162 acres in roadless areas, only 126,846 acres will continue to be managed for uses other than timber harvest. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

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#101

District No. 2 Wildlife Federation

NEZ PERCE · IDAHO · LEWIS · LATAH · CLEARWATER
COUNTIES OF IDAHO

May 15, 1985

Mr. Tom Kovalicky
Forest Supervisor
NezPerce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

After careful review of the proposed forest plan and draft E.I.S., the Idaho Wildlife Federation commends you and your staff for a fine effort at attempting to balance the diverse interests vested in the NezPerce Forest. Further, we wish to thank you for the courtesy and consideration shown our representatives at each of the public meetings held over the past two months.

While we understand the Alternative G is your preferred alternative, the Idaho Wildlife Federation recommends you adopt Alternative C with modifications. Our specific comments and recommendations are provided below: #1

Timber Harvest

The allowable cut of 102 mbf is not justified. A linear regression analysis shows only a 42% correlation between program sale quantity and volume sold, yet the figure of 102 mbf appears based on past program sale quantities. Trend line analysis for the ten year period of 1974-1983 shows a minus 60% correlation of a time line to volume sold, indicating diminished rather than increased sales are more likely. A trend line for the period 1980-1985 shows a minus 66% correlation with a mean of 72 mbf and a standard deviation of 17.26 indicating that at the very most, an annual program sale quantity of 90 mbf per year is justified and a program sale level of 74-85 mbf, achievable under Alternative C, should maintain jobs in Idaho County without destroying key roadless areas. The long term sustained yield attained by Alternative C is 197 mbf annually, a decrease of less than 5% from the preferred alternative and greater than any realistic appraisal of future demand, given present data. #2

No data was found in the plan concerning actual timber cut. According to #3

☆ ☆ CONSERVATION PLEDGE ☆ ☆
I GIVE MY PLEDGE AS AN AMERICAN TO SAVE AND FAITHFULLY DEFEND FROM WASTE THE NATURAL RESOURCES OF MY COUNTRY – ITS SOIL AND MINERALS – ITS FORESTS, WATERS, AND WILDLIFE.

101

our figures, some 300 mbf of sold, uncut timber is standing in the NezPerce Forest, indicating an average annual cut over the past ten years of about 55 mbf. It is recommended that allowable timber cut, and subsequent roading plans be based on timber sold and timber cut rather than on past quantities offered. Further, it is recommended that the D.E.I.S. include figures on timber cut over the past five years. #3

Budget

Alternative G assumes a 16% budget increase, an invalid assumption. Recent experience would indicate budget decreases as more likely. The Idaho Wildlife Federation is concerned that promises made within the plan, predicated on the proposed budget, will be unattainable, and the short falls will be absorbed in those line items most likely to adversely affect wildlife, fishery management, watershed and the other non-timber, and cattle production interests. The plan must show the public what will occur at various funding levels. #4 The Idaho Wildlife Federation is also concerned that road credits may be used to build roads into roadless areas when proper monitoring and evaluation is precluded by budget cuts. The public must be informed of what construction will be accomplished with appropriated funds and what is planned for road credits. #5

Monitoring and Evaluation

The monitoring plan shows commendable effort, but falls short of being fully satisfactory. The plan must provide for dissemination of information to the public. #6 The plan should provide for public disclosure of exactly what monitoring and evaluation functions will be limited or terminated by budget cuts or Forest Service Personnel actions such as reductions in force of personnel. The plan should include written guarantees that progression of roading, timber sales and other commercial use of the forests will only be continued or expanded based upon the ability of existing funding and personnel staffing levels to support adequate monitoring, evaluation, and disclosure of information. #7

Economic Analysis

The economic impact analysis of the alternatives does not include adequate consideration of many important forest related activities. Traditional land exploitation revenue generators such as timber, grazing and mining are given full consideration while other economic values are ignored. The value of tax payer dollars used in forest management and recouped through recreation is almost completely ignored. Tourism, hunting and fishing, river recreation, outfitting and guiding are becoming more important to Idaho and Idaho County. Riggins and Kamiah provide examples of communities with economies evolving away from declining traditional industries toward recreational land use. Over emphasis on past economies may well preclude the future well being of Idaho County. #8

The entire recreation industry as it emerges in outfitters and guides, sporting goods manufacture and sales, hunting, fishing, river rafting, back packing and a variety of other enterprises needs to be given the same weight of emphasis as traditional industries have been. Timber sales have been projected in detail. No such attention has been given to what we feel may be the #9

economic future of Idaho County. One outfitter and guide in the NezPerce Forest generates $300,000 annually, yet no consideration is given to this important revenue source. #9

Big Game Habitat Versus Timber

Insufficient economic and esthetic value consideration has been given to elk, moose and other big game when compared to timber production. Figures used for the value of elk are outdated and need to be updated. The local population has a life style that places high value, both esthetically and economically on elk and other big game. These need to be given more realistic weight in comparison to timber, mining and grazing. #10 #11

Roadless Areas

The E.I.S. does not meet the requirements of California versus Block in the 9th Circuit Court of Appeals to adequately assess the wilderness values foregone by roading in Rare II areas. A full evaluation of tourism, recreation, wildlife, water, soil, etc., must be made for each Rare II area. A complete E.I.S. will assist in developing a more adequate designation of roadless areas. #12

In addition to Rackliff-Gedney 1841, East Meadow Creek 1845D, and Rapid River 1922, the Idaho Wildlife Federation further recommends that West Meadow Creek 1845C, Silver Creek-Pilot Knob 1849, Jersey-Jack 1921 and Mallard Creek 1847 be retained in their present roadless state. #13

West Meadow Creek

Whereas there was no economic analysis mentioned in the D.E.I.S. as to the loss of economy to the two outfitters operating in West Meadow if this pristine area was to be roaded, as the forest plan indicates, the Idaho Wildlife Federation feels any additional roading to be unacceptable in the upcoming decades. The earlier study of soil suitability done by the Forest Service in this area along with the importance of the anadromous fish resource and lack of a "worse case" evaluation should further strengthen any opposition to roading this area. #14 #15

Silver Creek-Pilot Knob

Taking into account the extensive roading and logging of Newsome, Leggit, Peasly and Clear Creeks surrounding this area, any further roading would be very detrimental to the remaining elk and moose populations. In the past, Silver Creek and the surrounding area contained one of the largest elk herds in the NezPerce Forest. Silver Creek is the last haven for what remains of this herd. #16

Any soil siltation other than natural could have very adverse effects to the resident fishery on Silver Creek. #17

Jersey-Jack

In accordance with the recent decisions of the 9th Circuit Court of Appeals, #18

this roadless area should remain so. The Idaho Wildlife Federation contends that the Noble Creek road as planned is also in violation of this decision. #18

Mallard Creek

The Idaho Wildlife Federation believes that the scenic values of this region outweighs timber values. Additional roading will adversely impact visual qualities. #19

Reforestation

The long-term sustained yield is dependent upon successful reforestation on a timely basis. Past performance indicates that not all attempts will meet with success. The plan must address procedures to adjust allowable cut when reforestation fails or falls short of expectations. #20

"A fundamental objective of forest management is a regulated forest. In a regulated forest the acres of land occupied by each age group, up to some rotation age, are approximately equal." (D.E.I.S., pp. III-35) Further study on the impact of single age, single species management needs to be included in the D.E.I.S. to show the impact of this policy on game management, watershed management and riparian environment. #21

The evidence from past efforts to manage Idaho forests as other than multi-age, multi-specie forests is far from supportive of the validity of this policy. More realistic definitions of suitable timber lands and a commensurate reduction in road building and timber development on genuinely unsuitable lands is necessary. #22

Road Construction - Road Closure

No map of proposed road construction has been provided for either the first decade or the fifty-year period. The public needs to see both the location of proposed roads and the intensity of roading in order to effectively evaluate the plan. On the surface, the proposed 40% increase in road mileage is unnecessary to meet an allowable cut of either 74 mbf or 102 mbf. Advance road building in this area of budget austerity will in all likelihood create an unsupportable maintenance load and is therefore contraindicated. The Idaho Wildlife Federation is concerned that road credits will be allowed and used to build roads that are beyond budgetary capabilities of the Forest Service to properly monitor and evaluate. Some guarantee must be included in the plan that road credits will not be allowed if man power and/or budgetary restrictions preclude proper inforcement of environmental standards over either the roads or the timber cuts for which they are built. #23 #24 #25

According to your forest economist, the discount rate for road construction is 4% based on a sixty-year average of discount rates. This rate is patently inappropriate in an era when interest rates routinely are three or four times higher. A more realistic discount rate should be used in cost factoring road construction. It is also important that environmental quality standards and mitigation costs continues to be included in road construction projections. #26 #27

101

Advance road construction is further contraindicated by the problem it will create in road closure to protect big game range. The D.E.I.S. should take into account the tremendous increase in recent years of off-road capable two, three, and four-wheel vehicles. The proliferation of all-terrain vehicles has not been effectively deterred from abusing road closures in a forest with 2,050 miles of road. The plan must specifically address how road closures will be effective with 6,000 miles of road. The Idaho Wildlife Federation submits that unless road closures are effective, no amount of "habitat improvement" will improve elk survivability. #28

The Idaho Wildlife Federation appreciates this opportunity to review and make comment on the proposed plan. It is sincerely hoped that our comments will be received as constructive criticism. We look forward to working with you and your staff in developing a final plan and E.I.S. We are certain that through continued cooperation we can develop a plan that will meet the many varied interests associated with multiple use.

Sincerely,

Kent Henderson

Sonny Bethard

NezPerce Forest Monitoring Team
Idaho Wildlife Federation

sg

LETTER 101

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Your observations of the timber volume sold and harvested on the Nez Perce in the early 1980's are correct and indicate that the timber offered during those years exceeded the demand. However, it should also be pointed out that the softwood lumber market, historically, has been cyclical. For example, in the period from 1975 to 1979, the annual volume cut on the Forest was 109 million board feet (MMBF). In fiscal year 1986, approximately 120 MMBF of timber was cut on the Nez Perce. This indicates that conditions, such as timber demand, can change relatively quickly and to base the Forest Plan on short-term data projections is not in the best public interest; however, the Plan is designed to be responsive to changes through monitoring outputs and effects. For example, if the timber volume offered for sale consistently exceeds the demand, the Plan will either be revised or amended to reflect this.

The allowable sale quantity for the Preferred Alternative was determined by the constraints necessary to achieve other multiple use objectives, the timber yield tables, and the amount of land suitable for timber management.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

There was 300-350 MMBF of uncut timber under contract throughout the early 1980's on the Nez Perce National Forest. Examining timber data back to 1960 indicates, however, that this amount is not any higher than in many other years. The least amount of uncut timber under contract over the past 30 years has been 250 MMBF. The mills generally prefer to have more than a single year's supply of timber under contract for security and flexibility to respond to changes in the market. We do not believe it would be worthwhile to include this type of data in the EIS or Forest Plan; however, it is available upon request, and various individuals have received it in the past.

Response No. 4

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 5

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

Response No. 5 (con't)

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 6

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 7

The Plan is a written guarantee that progression of roading and timber sales will be continued and expanded based upon the ability of existing funding. This allocation of funds will be used to design, develop, implement, monitor, and document all land use activities. All land-disturbing activities will be analyzed and reports published for review and comment through the continued use of Environmental Assessments, Environmental Impact Statements, and Categorical Exclusions.

At any time during these processes when you feel that there has not been proper consideration given to a resource your comments will be reviewed and a response forwarded per your request. This is guaranteed through the legislative controls governing the Forest Planning Process.

Response No. 8

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of ten issues identified in the Planning process (see Appendix A). Competitive public issues, management concerns, and resource opportunities exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives are explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 9

Tourism and recreation, including outfitter and guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter and guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism and recreation industry should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and

Response No. 9 (con't)

recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 10

There have been a number of comments in regard to the values for timber and wildlife used in the FORPLAN model. The recreational value associated with elk was considered specifically in the economic analysis of the alternatives. Other recreational values associated with big-game as well as small-game hunting was included in the valuation of dispersed recreation outputs for each alternative.

Due to a number of public comments, we decided to revise timber values and projections and wildlife/recreation values for the purpose of doing a sensitivity on land assignments, scheduled activities, and present net value (PNV). The results of the analysis indicated that revised timber values and projections did have significant effect on the contribution of timber to present net value. With only the revised timber values, wildlife/recreation values contribute more to present net value (PNV) than timber. The revised values for wildlife/recreation were used from the Loomis and Sorg study and the Draft 1985 RPA estimates.

The effect on the assignment of prescriptions to analysis areas is less significant. There are several reasons for this. Desired levels of nonpriced outputs are specified as constraints based on the objectives of the alternative. Prescriptions are assigned to specific areas to achieve multiple use objectives. The non timber outputs from these prescriptions as well as nontimber outputs which were not constrained in the model are valued outside of the FORPLAN model and included in the total present net value for the alternative.

Also, negative (PNV) prescriptions may be included in the model because they provide the most cost-efficient means of achieving the objectives of the alternative. The satisfying of non timber as well as allowable cut and scheduling constraints often means that the most efficient prescription-timing choice is not selected.

In addition, the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

Response No. 11

Approximately 60,000 acres of old-growth grand fir/Pacific yew stands exist on the Forest. They have been identified as key winter habitat for moose. The Forest is planning to manage all 60,000 acres as habitat for moose. About half of the acreage has been removed from the timber base. No timber harvest is scheduled on these lands. The remainder has been allocated to management for moose winter habitat. Timber harvest

Response No. 11 (con't)

is allowed on these lands. Specific guidelines for harvesting timber on these lands have been developed to perpetuate Pacific yew and other habitat characteristics that make the habitat suitable for moose. All prescriptions for harvesting timber on these lands will follow these guidelines.

The proposed Forest Plan is providing sufficient winter range capacity to meet the elk population objective established by the Idaho Department of Fish and Game in the Department's species management plan.

We agree that the philosophy represented by statements in the Proposed Plan and DEIS such as "...summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the proposed alternative (G) and is incompatible with sound big game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize that this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. The ratio of elk summer habitat to winter habitat on the Forest's non-Wilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

You will notice several changes in the Final Plan that will significantly reduce the chances of conflict between elk management objectives and timber and road management objectives such as:

1. No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan establishes management policy and direction for the development, implementation, and enforcement of road closures. These will appear as standards and Forest-wide management direction in the Final Plan.

2. No timber sales or road construction activities are scheduled within the West Meadow Creek drainage (Roadless Area 1845C) during the first decade after the Plan is implemented. East Meadow Creek, Rapid River, and Silver Creek/Pilot Knob roadless areas will remain roadless.

3. The Final Plan will show a development schedule for the Gospel-Hump (Jersey-Jack) and the Mallard Creek roadless areas (1921 and 1847, respectively). However, except for a small sale (1.3 million board feet) scheduled in the headwaters of Slide Creek, no entry will be made

Response No. 11 (con't)

into these areas until a site-specific Environmental Impact Statement is prepared. This will permit a more detailed analysis of the cumulative effects, management opportunities, and management strategies for these areas than is possible with a Forestwide Environmental Impact Statement.

The elk management objectives will be met. The flexibility to reduce elk objectives to meet timber objectives at the project level no longer exists. Elk objectives and timber objectives will be monitored as discussed in Chapter IV of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

Response No. 12

Information on environmental consequences of roading roadless areas is located in Chapter IV of the Draft Environmental Impact Statement (EIS) and the Final EIS. More detailed information can be found in Appendix C of the DEIS and FEIS. We believe this information meets the requirements set forth in California vs. Block.

Response No. 13 and Response No. 16

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

As you have mentioned, Rapid River and East Meadow Creek roadless areas will be managed without additional roads. Silver Creek-Pilot Knob will also be managed without roads. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Approximately 38,000 acres of Rackliff-Gedney will be managed for uses that do not require road construction.

Response No. 13 and Response No. 16 (con't)

Also, site-specific Environmental Impact Statements will be completed before any harvesting or road construction activities take place in the Gospel-Hump (Jersey-Jack) or Mallard areas.

Response No. 14

In response to this concern, the Forest management team has reviewed the issue of the Meadow Creek roadless area. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

The Plan will be reviewed after the first decade. Those areas that were not developed will be included in this revision to determine the most optimal assignment of the lands for multiple resource management.

An economic analysis was done on the assignment of all lands within the Forest using the FORPLAN model. This linear programing model assigned lands for multiple resource production which would maximize the present net value (PNV) of the Forest. This model used costs estimated to produce the resource outputs and market and nonmarket priced benefits in the optimal assignment of the lands. There was also additional analysis done on the impacts of alternatives on outfitters/guides on a district by district basis. For more information see appendix B, Section V.

Competitive public issues such as development vs. nondevelopment of roadless areas exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (roadless areas) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. In following this process, we believe that the Preferred Alternative is a balanced approach to managing the Forest in the future and maximizes public net benefits.

Response No. 15

There are some stability problems with certain landscapes in the West Meadow Creek area, but much of the area has soils and landscapes similar to those in areas where road construction and timber harvesting activities have been carried out without significant adverse effects. The land in West Meadow Creek will be assigned to timber management, but no timber harvest is scheduled for the first decade. When roads and timber harvest are initiated in the West Meadow Creek area, our management activities will meet the resource management standards we have established in the Forest Plan.

Response No. 17

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

Response No. 18 and Response No. 19

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

Response No. 20

You are correct in saying that in some instances, despite our best efforts to rapidly reforest cutover areas, uncontrollable factors such as abnormal weather may cause initial plantings to fail. Our data shows that over 85 percent of the areas planted have the required stocking of established trees 3 to 4 years after the initial reforestation project. The remaining 15 percent of the areas are re-treated as necessary to meet the minimum stocking levels. The timber yield tables used in the Forest Planning Model for regenerated stands are derived from measurements taken in regenerated forest stands on the Nez Perce. These stands were not all "perfect" and included a variety of stocking levels. While mistakes in assumptions regarding reforestation (along with many other factors) will impact long-term sustained yield capacity (LTSYC) calculations, the Forest Plan will be updated every 10 to 15 years. This will assure that necessary corrections are made in the LTSYC. The allowable sale quantities for the first 30 years in the Forest Plan are considerably below the LTSYC, so any reductions in it during the first or second major revisions would not have any significant impact on the Forest programs.

Response No. 21

While a regulated forest is an objective, or perhaps more correctly a goal, it is many decades away from attainment on the Nez Perce National Forest, if it is even possible. With the harvest rates and suitable

Response No. 21 (con't)

acres proposed in the final Forest Plan, approximately 250,000 acres of suitable timber land (not including the areas to be managed as roadless) will not be entered for timber harvesting during the first 150 years. Also, in most areas on the Forest, timber harvesting increases the variety of vegetative age classes within watersheds and drainages. Single species management is not a desirable practice from either a wildlife habitat or a silvicultural perspective. Single species stands are vulnerable to catastrophic losses due to insects and disease. In the past, large ponderosa pine plantations have been created and we are expecting some real challenges from bark beetles in these stands in the near future. Current reforestation practices emphasize more species mix in plantations.

Response No. 22

Land suitability in the alternatives was determined following the procedures defined in 36 CFR 219.14. In general, timber harvesting and road construction is not scheduled on the lands determined as unsuitable for timber production as defined in 36 CFR 219.14. On small, isolated parcels of unsuitable land, road construction may occur when necessary to access adjacent suitable lands.

Response No. 23

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor, does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed leaving the system totals to remain near constant throughout the planning cycle. Alternative G calls for construction of approximately 4,700 miles of road. Permanent closures will close a like number.

ATP maps are on file at the Supervisor's office and a copy generally, can be reviewed at any District office.

Response No. 24 and Response No. 28

Road construction on the Nez Perce is not substantially increased during the first decade as implied in the Plan with the preferred plan's 810 miles. From 1975 to 1984, the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,053 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Response No. 24 and Response No. 28 (con't)

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

The Final Plan sets the policy for road closure, timing of closures, types of closures, and estimates percentages of each type of closure to maintain all resource objectives.

Response No. 25

Your guarantee is the Forest Plan document; more specifically, Chapter 2 Forestwide Management Direction. Any activities affecting the Forest, including budget proposals, shall be based on the Forest Plan. Proposed implementation schedules may be changed to reflect differences between proposed annual budgets and appropriated funds. Such schedule changes shall be considered an amendment to the Forest Plan, but shall not be considered a significant amendment, or require the preparation of an environmental impact statement, unless changes significantly alter the long-term relationship between levels of multiple use goods and services projected under planned budget proposals as compared with those under actual appropriations. Any activities will be required to follow the directions listed in the projected 12 to 14 pages enclosed in the Forest Plan.

Response No. 26

Two discount rates (4 and 7 percent) were used in the FORPLAN model to calculate the economic consequences of the benchmarks and alternatives. The 4 percent rate approximates the real rate of return on corporate long range investments above the rate of inflation (Row, Kaiser, Sessions, 1981). For further information refer to Section IV in Appendix B of the EIS.

Response No. 27

Any land-disturbing activity on the Forest will bear the expense of maintaining the environmental quality standards. This cost is for the mitigation and monitoring of effects. Presently on the Nez Perce, road construction costs may be as high as 35 to 55 percent above base to cover these items while meeting management direction of environmental quality and maintenance of this direction.

#102

Dear Mr. Hovlicky:

I am writing in response to the problem of the wilderness + lumber market.

Being the wife of an Idaho Mills employee, I can strongly stress the need for the mills to continue to operate in the future. We have a home to support, and we have kids to support + to send to school. It is important that my husband continues to have his mill employment, so we can meet our bills + keep our home in Grangeville. Without the Mill, we would be faced with serious financial problems. A lot of families would probably have to relocate elsewhere. Without the lumber industry here, Grangeville would probably shrink considerably in size, and this, of course, would have a big effect on local businesses. It takes jobs for our men, before we can spend the money to support our town.

I don't fully understand all wilderness + lumber "talk", but I do think something needs to be done to save our mills + the men's jobs.

Having lived in Grangeville for 25 years, I've seen a change in the mills over the years. In the past, the mill worked year round with little or no lay-offs. That was a pretty "secure" feeling back in those years. In recent years, it seems like there are more + more lay-offs, + the mills outlook for the future has been rocky.

Having a wilderness is important, but I think we should be able to drive through it, + walk through it + enjoy it.

I don't believe in shutting it off to people or to the lumber industry.

#1

#102

MAY 1? 1995

[illegible]

Thank you

[illegible]
[illegible]
Grangeville, Idaho

LETTER 102

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

MR. KOVALICKY,

AFTER ATTENDING THE MEETING AT GRANGEVILLE HIGH SCHOOL, I WAS QUITE SATISFIED WITH THE PROPOSED MANAGEMENT PLAN FOR THE NEZPERCE NATIONAL FOREST. HOWEVER, RECENTLY IT HAS BEEN BROUGHT TO MY ATTENTION THAT MUCH OF THE INPUT YOU ARE RECEIVING IS IN FAVOR OF GREATLY REDUCING THE TIMBER HARVEST ON THE FOREST. THUS I FEEL COMPELLED TO MAKE A FEW COMMENTS ABOUT THE SITUATION. #1

FIRST OF ALL, I WAS BORN AND RAISED IN GRANGEVILLE. I LIVE HERE NOW WITH A FAMILY OF MY OWN AND I HOPE TO BE ABLE TO CONTINUE TO DO SO. THE ONLY REASON I WOULD NOT BE ABLE TO STAY IN GRANGEVILLE IS IF THE ALLOWABLE TIMBER HARVEST IS CUT BELOW THE 120.0 MILLION LEVEL. ANY SUCH CUT WOULD MEAN A LOSS OF JOBS. #2

THE OUTFITTERS OF IDAHO AND THE BACKERS OF ROADLESS, BACK COUNTRY RECREATION WHO WANT A REDUCED TIMBER HARVEST MUST REALIZE THAT THE COMMUNITIES OF ELK CITY, KOOSKIA AND GRANGEVILLE CANNOT THRIVE AND PERHAPS NOT EVEN SURVIVE IF THE TIMBER HARVEST ON THE NEZPERCE IS REDUCED BELOW THE 120.0 MILLION. THE OUTFITTERS AND RECREATIONALISTS CANNOT PROVIDE JOBS TO SUPPORT THESE COMMUNITIES IN THE WAY THE TIMBER

INDUSTRY DOES. THE OUTFITTERS AND THE TIMBER INDUSTRY CAN BOTH SURVIVE WITH PROPER ROAD BUILDING AND LOGGING MANAGEMENT AND TIMELY ROAD CLOSURES. AN AREA OF SPECIFIC CONCERN IS THE WEST SIDE OF MEADOW CREEK - 1845 - C WHICH IS NEEDED BY BOTH CONCERNS. LET'S MANAGE IT FOR BOTH! #3

ONE MORE THING ABOUT JOBS - IT SEEMS ONLY COMMON SENSE TO ME THAT IF THE TIMBER HARVEST IS REDUCED IT WILL REDUCE THE NUMBER OF FOREST SERVICE JOBS WHICH ALSO CONTRIBUTE A GOOD DEAL TO THE ECONOMY OF THE BEFORE MENTIONED COMMUNITIES.

YOU HAVE PROPOSED TO MANAGE 170,000 ACRES OF THE RARE II AREAS AS ROADLESS WITH NO TIMBER HARVEST. THIS SEEMS REASONABLE IF THE OTHER RARE II AREAS ARE MANAGED FOR TIMBER HARVEST AND OTHER ROAD NEEDED INTERESTS. THE RARE II AREAS ARE AREAS THAT I HAVE WRITTEN LETTERS AND ARGUED TO KEEP OUT OF WILDERNESS CLASSIFICATION IN THE PAST. #4

THANKS FOR TAKING TIME TO READ THROUGH MY COMMENTS,

Rick Pearson

RICHARD PEARSON
733 SO. IDAHO
GRANGEVILLE, IDAHO

EMPLOYED AT IDAPINE MILLS

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive issues, such as timber harvests, roaded vs unroaded areas, and outfitter and guide operations exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 3

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

LETTER 103

Response No. 4

No land will be added to the wilderness system.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

PIERSON ENTERPRISES, INC.
Phone 208-983-1009
GRANGEVILLE, IDAHO 83530
Highway "95" North

#104

Tom Kovalicky
Nezperce National Forest
Rt. 2 Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky,

My livelihood and that of 50 members of our crew depends largely on timber from the Nezperce National Forest. I would like to see enough of the remaining roadless areas opened up for timber production to, at least, keep the remaining sawmills operating in this area. A sustained yield of around 120 million board feet will be necessary. #1

I feel the roadless areas in Rackliff - Gedney - 1841 and East Meadow Creek - 1845D should be left as they are. However, the West Side of Meadow Creek - 1845C should be made available for timber production in order to assure a sufficient supply to the sawmills. Thank-you. #2

Sincerely,

Ronald D Pierson

LETTER 104

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Of all the roadless areas, the West Meadow Creek area received the most public comment. Many comments cited the high fishing and wildlife values for this area. Other comments like yours have recommended that his area be developed.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Rackliff-Gedney will be available for scheduling timber harvests in the first decade.

May 16, 1985

#105

Tom Kovalicky
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, Id 83530

Dear Sir:

In my opinion creating more wilderness area in Idaho is a useless, stupid crime! #1
It serves no one but the very rich, or the welfare hippies or backpackers ~~at~~ with time enough to use (& litter) such areas.
It costs money to administrate instead of bringing in taxes from the lumber industry.
Our unemployment rate is terrible & your plan could only make it worse. #2
Shame on you all!

Sincerely,
Mr & Mrs L.C. Jordan
2926 Echo Hills Drive
Lewiston, Id 83501

LETTER 105

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 106

I believe that there should be enough timber released yearly for production. We need the mills for employment and employment to help our tax base and the economy in general. Timber is a renewable resource and with management and care can be harvested without damage to our environment. Our area is limited as far as industry and we need as many mills and related industry as possible. We need to live with and use the land, not just lock it up. #1 #2

/s/ Leroy A. Blankenship

RESPONSE TO LETTER 106

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability)

Response No. 2 (con't)

to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

107

SOLSTICE PRESS

May 17, 1985

Forest Plan
Nezperce National Forest
Rt. 2, Box 475
Moscow, Idaho 83843

Dear Forest Supervisor:

Concerning future plans for the Nezperce National Forest, I am writing to urge a plan for fewer roads than now planned for the upcoming decade. Considering that much land currently placed up for cutting is left standing, and a depressed need for timber products, fewer access roads seem advisable. #1

Meadow Creek in particular should be left as it is now, including its drainages, resources and current uses. #2

Please adopt a realistic timber harvest plan, in the 75-95 MMBF/year range that will leave much of the area untouched by large scale road building. Lower Noble Creek and Mallard Falls areas, in particular, should be left free from the ecological devastation of road building. Unnecessary road building on lands with remote potential for development of timeber sales must be avoided. #3 #4

As an Idaho resident concerned about our economic development and future as a place that will attract recreation-minded tourists, I urge you to consider the impact planning in the forest will have on outfitters. #5

In closing, I ask that we, the public, continue to be kept well informed about plans for the Nezperce National Forest, and that all plans for the future be monitored closely for impact on the state and our economic future. #6

Best regards,

Patricia Hart

P.O. Box 9223 • Moscow, Idaho 83843 • 208-882-0888

LETTER 107

Response No. 1

The overall objective of forest planning is to produce a package or mix of resources that maximizes the Net Public Benefits. Competitive issues such as timber harvests/road construction versus roadless areas exist and it is impossible to fully meet all wants and desires at the same time. Relationships between priced outputs (timber and range) and nonpriced outputs (roadless areas and fish/water quality) illustrate the interactions of attempting to resolve various issues. By examining an array of priced and nonpriced outputs, it becomes possible to see what the trade-offs are as a range of alternatives is explored. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues discussed in Chapter I and Appendix A of the EIS.

After evaluating the public responses and the overall forest situation, a final resource package with a timber harvest of 108 MMBF annually with the associated road construction was selected. The road closure policy established in the Forest Plan is such that the miles of roads closed annually will be equal to miles constructed annually.

Additional analysis using revised timber values and projections (based on past 10-year data) was done to determine the sensitivity of land assignments, outputs and present net value. The results of this analysis can be viewed in Appendix D of the FEIS. It should be remembered, that decisions in forest planning should be based on the long-term goals and objectives and should not be heavily influenced by short-term market conditions.

Response No. 2

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. In the Forest Plan, East Meadow Creek will be managed in an undeveloped state with no timber harvesting or road construction to be scheduled in this area.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

Response No. 3 (Con't.)

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 4

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 5

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy during the planning period (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism/recreation industry, of which outfitter/ guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 6

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

May 14, 1985
Orangeville, Id.

#108

Tom Kovalicky
% Nezperce National Forest
Box 475
Grangeville Idaho:

Dear Tom,

I love our area here in Central Idaho. The beautiful green and later gold of our prairies, our winding rivers, the gleaming mountain lakes and streams matched the blue-green of our majestic mountains. I have great appreciation and admiration for the fish, game and many natural resources available to us here. All of which provide us with great pride, boundless recreation and job security for all the people here.

My great-grandparents homestaded in this area, so did my husbands great-grand parents. They have founded a way of life here for us. But now we see many of our children leaving this area because of lack of work. Are we too, to be forced to leave our family heritage behind, because of lack of work? Where do we go?

Enough of our land has been given to Wilderness areas. We need our timber industries producing to help our towns, families and heritage alive. We have lost enough lumber mills and other jobs created by the lumber industries in this area. #1

108

Please don't close any more by not releasing the much needed timber.

The controlled burning of timber areas may create browse for the elk, but doesn't provide homes and food for our families. Timber production can provide browse for the elk and homes and food for our families at the same time.

We need non wilderness Roar II areas opened for timber production. This would help and provide more jobs for our people. And help keep alive what is left of our timber industries in this area. While at the same time provide recreational areas for people who are physically unable to visit remote areas. Also provide access for people who don't have the time or money required to visit roadless, back country areas. #3

If the non wilderness Roar II areas are not opened and managed for timber production. We will see the death of many jobs, towns and our own heritage.

We, the people who live here, should be the ones to decide how to manage our forests. We depend on them for survival. We don't want them closed to us or destroyed. We want them opened and managed for the good of our people. Help keep our area alive for us and visitors for many many years #4

Sincerely,
Sam Bruegman

513 Dawn Drive
Orangeville

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

The prescribed (controlled) burning of timber areas is necessary, not only to create browse, but to dispose of debris so that reforestation can begin. Burning for the creation of browse is generally done in areas that have historically been brushfields and submarginal for timber production. Burning is also done under fire-tolerant species such as larch, Douglas-fir, and Ponderosa pine.

Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow

Response No. 3 (Con't)

Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

Because National Forests are jointly owned by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

#109

Lewiston, Idaho 83501

1003 Cedar Avenue

May 17, 1985

Forest Plan
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83519

Sirs:

I am writing in favor of Alternate C which includes the following points:

1. That the Forest plan for a realistic budget, and one that will build far fewer roads in the first decade than are now planned. #1
2. That all of the Neadow Creek Drainage on Silver Creek, Jersey-Jack, Mallard Creek and all existing uses continue there. #2
3. A recommendation of a short and long term timber harvest level continuing in the 75-95 MMFB/year range, one that does not need large scale advance road building. #3
4. That the Forest keep roads out of the lower Noble Creek and Mallard Falls areas. #4
5. That there be improvements in the monitoring and added data sections of the plan. #5
6. That there will be more information on "suitable" timber lands and reductions in road building and timber development on genuinely unsuitable lands. #6
7. That the final plan better evaluate the impact of development on outfitted and research natural area proposals. #7

Yours truly,
Opal Mc Intyre
1003 Cedar Avenue
Lewiston, Idaho 83502

LETTER 109

Response No. 1

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction for developing planned program implementation. In Appendix J, activity schedules for various resources are displayed. Cost estimates which are based from these schedules are converted into out-year program budget proposals to identify needed funding to meet the objectives of the Forest Plan. These proposals are reported upward to Congress who determines the final allocations of the Federal budget. Once this determination is made, agency budgets are adjusted and finalized and funding allocations are made recognizing the stated needs of the Forests for implementation of their Forest Plans.

Funding needs that do not materialize to fully fund outyear program proposals require adjustments to planned program implementation schedules (road construction/reconstruction, timber sale schedules, and wildlife/fish projects) which require amendments to the Forest Plan. Adjustments of this nature will not significantly alter the long-term levels of multiple use goods and services projected under the Forest planned budget proposals. The process that will determine "significant change" can be found in Chapter V in the Forest Plan.

Response No. 2 and Response No. 4

One of the more common public comments is related to the assignment of roadless areas to various management purposes. The East Meadow Creek roadless area will be managed with no additional roads in order to emphasize fish, wildlife, and water quality. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Also approximately 13,300 acres of the Silver Creek-Pilot Knob area will also remain undeveloped in order to protect the religious and cultural values of the area for the Nez Perce Tribe.

The Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel Hump (Jersey-Jack) Assessment Area. the Forest Service will complete an Environmental Impact Statement (EIS) for the Jersey-Jack and Mallard creek areas before any development activities are scheduled.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 6

During the planning process, each National Forest is being evaluated to determine its capability to meet various sets of Forestwide objectives through a series of planning alternatives, i.e., alternative Forest plans. The Forest Planning Model (FORPLAN) is being used by each Forest as a tool to help them determine lands which are the most cost-efficient, over the planning horizon, in meeting the objectives of each alternative. These objectives can include timber production as well as other market and nonmarket and nonpriced benefits and values. Land classified suitable or nonsuitable for various uses, including timber production, will vary by alternative within a Forest, depending upon the objectives of the alternative.

Response No. 6 (Con't.)

To facilitate the FORPLAN analysis, each Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Based on the inherent capability of the lands in each analysis area, a range of alternative types of management (Prescriptions) is "assigned" to each analysis area. FORPLAN uses this information along with the assigned cost and yield projections to determine the optimum way of achieving the Forestwide objectives of each alternative. This is done by selecting a management prescription, from among those assigned, for all acres within each analysis area.

Each piece of land is classified, based on the intent of the selected prescription, as suitable or non-suitable for timber production in that alternative. The lands that are not scheduled for timber production in an alternative are, for that alternative, "not cost-efficient, over the planning horizon, in meeting Forest objectives, which include timber production" (36 CFR 219.14(c) (3)). The map for each alternative, which displays management areas (groupings of similar management areas), can be used to determine the parts of the Forest that are not suited for timber production.

Response No. 7

Tourism/recreation including outfitter/guide operations is a growing industry in the state of Idaho and within the regional economy that this Forest influences. For the 1984-1985 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis based on the data and assumptions used for the IMPLAN model show that the local timber industry has a dominant influence on the local economy in the first decade of the plan period (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grows significantly in regard to jobs and income.

The importance of the tourism/recreation industry, which outfitter/guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, please see Chapters II, Sections 16-18, Chapter III, Section B, Chapter IV, Section 3-4, and Appendix B, Section V in the EIS.

In regard to Research Natural Areas, information has been added to the Final EIS and Forest Plan. This information can be reviewed in Chapter IV, Section B of the Final EIS and in Chapter II of the Forest Plan.

#110

RAM

5-17-85

Mr Tom Kovalichy
Forest Supervisor
Nez Perce National Forest
Rt 2 Box 475
Grangeville ID 83530

There is a great deal of concern about Plan G your agency is recommending for the Nez Perce Area. Please accept this communication as a strong endorsement of and for Plan C. #1

Plan C would be the more acceptable means of preserving the ecological balance in this area. It is felt that Plan G would be very detrimental to the wildlife in Nez Perce because of the vehicles, logging, and human activity causing disruption. These activities would be especially harmful in the Back Country area west of Meadowcreek. #2

It is important to all of us to preserve the balance of nature for the long-range future of areas such as yours. We cannot afford to be short-sighted in our efforts to ensure that future generations are able to enjoy the wildlife and forest as we have.

Sincerely

R. A. Meyer

R A Meyer
7824 La Verdura
Dallas TX 75248

LETTER 110

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 110

Response No. 2

The overall objective of forest planning is to produce a package or mix of resources that maximizes the Net Public Benefits. Competitive issues such as timber harvests/road construction versus roadless areas exist and it is impossible to fully meet all wants and desires at the same time. Relationships between priced outputs (timber and range) and nonpriced outputs (wildlife habitat and fish/water quality) illustrate the interactions of attempting to resolve various issues. By examining an array of priced and non priced outputs, it becomes possible to see what the tradeoffs are as a range of alternatives is explored. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues discussed in Chapter I and Appendix A of the EIS.

The two roadless areas that make up the Meadow Creek area are East Meadow and West Meadow Creek. In the Forest Plan, East Meadow Creek will be managed in an undeveloped state with no timber harvesting or road construction to be scheduled in this area. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Comment No. 111

Dear Mr. Kovalicky:

I think the allowable cutting should be 120 million board feet over the next five years to keep the mills in these areas running and the people working. It's all we have in this area. We cannot afford to have any more sawmills closed down. #1

I would like the proposed Forest Service plan adopted as written. We need adequate timber to maintain the sawmill's production in these areas at present levels. I would like to see all the land east of Meadow Creek open for logging. These areas that they talk of keeping roads out of will not be used by many people. They do not have the time, money, nor physical stamina to use them. #2 #3 #4

I have lived here some 40-odd years and have been in the mountains a lot. I have not seen a lot of people using these areas. So I think we have more than enough land in wilderness areas (to) be open for roads and managed timber production. #5

This issue is too critical for outsiders to comment on. They think if it is not covered with asphalt or a toilet they can flush, they are in the wilderness. I do not think we should let them influence our judgment on this issue. #6

Sincerely

/s/ Lester Cash
309 Hill St.
Grangeville, ID 83530

LETTER 111

Response No. 1 and Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 2 (con't)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 4

In several of the alternative management plans studied for the Nez Perce National Forest, the option of developing East Meadow Creek for timber management and other multiple uses was considered. In the Preferred Alternative, the decision was to manage the area east of Meadow Creek primarily for wildlife, high water quality, fish, and roadless dispersed recreation. Several factors were considered in this decision. A primary consideration with regards to timber management was the current inaccessibility of the area. Even with minimum water quality requirements, it is unlikely that road construction over the next 10 years would be sufficient to access the area east of Meadow Creek. Also, the timber outputs projected without the East Meadow Creek area were sufficient to meet the forest objectives. When the forest management plan is revised in 10 to 15 years, the area will be reevaluated for the best use based on the situation at that time.

Response No. 5

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time. Besides the nondevelopment of East Meadow Creek and portions of West Meadow Creek and Silver Creek Pilot-Knob, part of Rapid River is assigned no timber harvesting or road construction. The remaining 12 roadless areas will be developed over the next ten years (1988-1997).

Response No. 6

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest. We understand your frustration with the seemingly endless controversies concerning the management of the National Forests. The fact is, however, that the users of the National Forests are a diverse group and want this Forest to produce many different kinds of resources. We realize that differences of opinions exist and will continue but we hope that the Forest Plan will provide a sound basis for multiple use management on this Forest in the next 10 to 15 years.

#113

Dear Mr. Kovalicky,

I'm responding to the meeting I attended at Grangeville High School concerning the Nez Perce Draft Forest Plan. Having listened to all comments on most of the plans, I feel a need to ask you for additional acres for all uses especially timber harvest. #1

I have lived and worked here in the Grangeville area my entire 33 years and feel that we have plenty if not too much wilderness and roadless areas. We now need to open the roadless areas and manage them for multiple use. One area in particular is the West Side of Meadow Creek - 1845-C with its mature and abundant timber. #2

Rooding this area would be of great benefit to most all local businesses including packing and guiding as well as the timber industry. My family and I enjoy the mountains and rivers but also need the paycheck from the mill.

Under your management, I feel all non-wilderness RARE II areas can be roaded and managed for multiple use including timber production! #3

Sincerely,
Don Fischer

LETTER 113

Response No. 1

The acres available for harvest in the first decade have been determined after a full consideration of all resources, including timber harvest. The acres determined to be suitable for timber management have not changed from the proposed Forest Plan released earlier this year.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2 and Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#114

DUKE K. PARKENING
WILD RIVER RANCH · STAR ROUTE
KOOSKIA, IDAHO 83539

May 18, 1985

Tom Kovalicy, Supervisor
Nez Perce National Forest
Grangeville, Idaho

Dear Sir -

I am opposed to the roading of 300,000 acres of Nez Perce National Forest. I prefer all 16 roadless areas be left roadless therefore "Alternative (H)" is my choice. #1

Thank you

Duke K. Parkening

LETTER 114

Response No. 1

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road construction constrained. Frequently, only a few miles of road can be constructed in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

#116 -

To: forest plan team

I am writing in regards to the [illegible] forest plan. I have worked in Meadow Creek area for the last 8 yrs as a guide for an Outfitter. I feel that if you log the meadow creek area that it kill off about half the herd that we have now. I am sure that it will cause large erosion problems. #1

Meadow Creek area has very little tree regrowth that well grow to [illegible] size. I feel that you should use alternate plan C. I feel that if we had a strong market for timber a person could understand the proposal to [illegible] these areas. It seems that you people are trying to save your butt, about the trouble the Bennett Lumber mill in Elk City is having. You are just trying to keep the blame from being on the F.S. Also the cost of roads to the money returned in timber sales money. #2

Sincerely

Jacy

LETTER 116

Response No. 1

The East Meadow Creek roadless area will be managed without additional roads for high quality dispersed recreation, and to meet fish and wildlife objectives. Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

There are some stability problems with certain landscapes in the West Meadow Creek roadless area, but much of the area has soils and landscapes similar to those in areas where road construction and timber harvesting activities have been carried out without significant adverse effects. When we construct roads and harvest timber in the West Meadow Creek area, our management activities will have to meet the resource management standards we have established in the Forest Plan.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

Response No. 2 (Con't.)

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

I would like to see the allowable cut of timber increased to 120 million bd ft over the next five years #1

#117

Edwin A. [illegible]
1241 #26 Country Court
Grangeville, Idaho

LETTER 117

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#118

Nezperce National Forest
Rt. 2 Box 475
Grangeville, ID

Dear Sir;

I attended your informational meeting at Moscow earlier this spring and I thought all the Forest personnel did a good job of explaining the proposal as well as replying to questions from the floor.

I have one comment about the plan. In the light of recent shift of timber supply from the traditional north to the south part of the country, mainly southeast where the faster growing soft wood species occur, perhaps your projected demand of Nezperce timber in the decades ahead is too high. #1

Yours truly,

Kenneth Riebsgield
5-21-85

LETTER 118

Response No. 1

A number of comments express the concern that the proposed timber harvest level in the Preferred Alternative is too high given the current market. The planning process involves the development of management alternatives which cover a 50-year period but allows for updating the Plan at 10 to 15-year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

Prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

The prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

In response to comments on the Proposed Plan, a study on Idaho's timber supply was completed. The results of this study were used in finalizing the Final Forest Plan.

May 17, 1985

#119

Tom Kovalicky
Forest Supervisor
Nez Perce National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky:

Having reviewed your alternatives for implimenting the Forest Plan, I urge you to adopt some form of alternative 'G'. #1

Any alteration to this preferred alternative should:

1. Reduce the total amount of roadless area proposed.

   a. Develope an E.I.S. that will specifically address these areas and move forward with some kind of roading program whether or not you enter them for harvest under this plan or the next one.

   b. Resist all pressures to leave the West side of Meadow Creek roadless. Clearly, that issue already was decided: Develop it! #2

2. Raise your timber output to near the 120 MMBF per year level. #3

Please include these remarks in the record of public response to the Draft Plan.

Sincerely,

Jack Waldemarson

Jack Waldemarson
Forester

JW/dlv

LETTER 119

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

In the Preferred Alternative, approximately 376,000 acres of the current roadless inventory are assigned to prescriptions that include timber management as one of the resource uses. This is about 75 percent of there maining nonclassified roadless areas on the Forest. Part of the area and project development process for the roadless areas includes the development of an Area Transporation Plan to assure that roads constructed for the initial entries are compatible with the long-range goals of an optimal and cost-effective road system for the entire area. An environmental assessment will be completed prior to all land-disturbing activities on the Forest whether in an inventoried roadless area or not, following the guidelines in the National Environmental Protection Act. These analyses will be accompanied by the appropriate documentation depending on the circumstances. An Environmental Impact Statement will be completed for activities planned for the first decade in the Gospel-Hump roadless area. Environmental documentation for projects in other roadless areas will be determined on a case by case basis.

Of all of the roadless areas, the West Meadow Creek area received the most public comment. Many comments cited the high fishing and wildlife values for this area. Other comments like yours recommended that this area be developed. It has been decided not to schedule any timber harvesting or road construction activities in this area during the Plan Period (1988-1997) except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

Response No. 3 (Con't.)

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#120

Dear Mr. Kovalicky,

I am infavor of the forest plan as it is, but would like to see the allowable cut increased. #1

Thank-you,

Douglas A. Dog
Rt. 2 Box 120F
Kamiah, Id.
83536

LETTER 120

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#121

May 16, 1985

Dear Mr. Kovalicky,

Having lived in Idaho County all my life I'm very interested in whats going on. My husband has worked in the Grangeville sawmills almost 38 yrs. and needs to have continued employment.

I feel we have enough of our public lands set aside for wilderness. I would like to see enough of the remaining roadless areas opened up for logging to assure a sustained yield of at least as high as suggested in the proposed forest Plan. Please, have all non-wilderness Pare II areas roaded and managed for all uses including Timber Production. #1 #2

Sincerely yours,
Jennie Mutoll
Rt. 1 Box 121
Grangeville
Id. 83530

LETTER 121

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#122

May 20, 1985

Forest Supervisor
Forest Plan
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id 83530

As an Idahoan native, and active outdoor person, I feel I must express my views of your draft of the Nezperce National Forest Plan. The Nezperce is an area I frequently camp in, and I'm very concerned about your draft.

In reviewing the Plan - there are a few points I would like to bring up. I will keep this in an outline form and brief as possible. My concerns are as follows:

1) I think that all hydrolic drainage of Meadow Creek should be managed without any new roads because a) it would be a waste of my (and all taxpayers') money. b) it would seriously disrupt fish and elk habitat. (Point: What real hunter needs roads everywhere? Poachers!!) c) be detrimental to outfitters. d) Mostly, why build roads in a ethnically "timberless" area? There is no decent timber to harvest there! #1

2) Trying to raise the harvest number to 206 MMBF is absurd, and very unrealistic. As a forester, I feel that to set the level at 85 MMBF, at the most, would be much more advantageous and productive. By the way, don't go building roads on what you assume will be a goldmine only! (2) #2 122

3) Generally, I feel the road planning in the draft need to be drastically reduced. Specifically Noble Creek, Anderson Butte, Mallard Falls, and West Meadow Creek definitely don't need any roads. It goes without saying that our money will go down the drain (and our money is so direly needed elsewhere). #3

4) Please tell me, exactly, how is the road budget being set? How much by we, the taxpayer, and how much by the purchasers? And how about a forest budget that is nice and stable (or even declining slowly)? #4 #5

5) And please improve your monitoring system! I, as a part of an extremely interested public, would like to be kept informed on the changes and all monitoring results. #6

6) Show some evidence of where the suitable (as defined by law) are located. A Plan showing suitability is imperative. One that does not, does not comply with the law. Please send me a map, or maps providing: a) the lands that Do meet the absolute suitability standard by law b) timber sales planned in both suitable and unsuitable lands over the next 10-15 yrs. c) the main road plans associated. #7 #8

7) We need more recreation information for the Nezperce. #9

8) Provide information on the economic impact to the outfitters. #10

9) I think one research area should be added to your Draft - Square Mountain Creek. Also, please make it clear that establishing new RNAs must be a continuous process throughout the term of the Plan. #11

In closing, I must express my support for Alternate "C". It seems to be the most viable of the alternatives for everyone concerned, not just the FS and timber companies. Please #12

take Alternative C into very serious consideration

Thank you very much for your time and consideration.

RECEIVED
MAY 21 1985
FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO

Sincerely,

Vicki Wolkenhauer
S. 1207 Meadow View Ct.
Rathdrum, Id. 83858

Response No. 1

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Specialists from the Idaho Fish and Game, Bureau of Land Management, and Forest Service have strived to achieve quality management standards. These standards and guidelines have been incorporated in the preferred plan as management direction. The Plan also calls for continued monitoring and site specific research projects in an effort to continually reduce these impacts and the costs associated with the design standards and practices.

Response No. 2

The long-term sustained yield capacity (LTSYC) is a projection of 210 million board feet (MMBF) based on the best information we have available at this time regarding timber growth rates, timber demand projections, constraints necessary to meet other resource objectives, and the acres available for timber management. We recognize the fact that some of these factors may change, especially assumptions regarding other resources, as more is learned about long term relationships between fish, wildlife and timber. Through monitoring of the Forest Plan and periodic updates which, by law, must be done every 10-15 years, we feel confident that we will either be able to verify the reality of achieving 210 MMBF or identify reasons for reducing this projection. The harvest level for the first decade will be 108 MMBF, significantly lower than the projected LTSYC.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in

Response No. 2 (Con't)

the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 3

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage.

The lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel Hump (Jersey Jack) assessment area. The Forest Service will complete an Environmental Impact Statement (EIS) for Jersey Jack and Mallard Creek areas before any development activities are scheduled.

The Plan also calls for continued monitoring and site specific research projects in an effort to continually reduce these impacts and the costs associated with the design standards and practices.

Response No. 4

Under all alternatives, approximately 210 miles of roads in the first decade and 90 miles in the second decade will require Capital Investment funding. This is an estimate of the total needs based on historic records and transportation planning analysis of the higher standard roads. All remaining road mileage will be constructed using timber purchaser credits.

Public law requires the Forest Service to build only that amount and standard of road necessary to accomplish the designed timber volume of the awarded timber sale. Payment for these roads is accomplished through a Purchaser Credit program. (The purchaser is given timber credits for work accomplished on road construction/reconstruction.)

This process allows the Purchaser and Forest Service to exchange logs for road construction/reconstruction, but also limits the receipts that are returned to the treasury. The estimate for Purchaser Road construction cost in the Forest Plan budget is $3.8 million dollars (1984 $) annually. This estimate is based on the annual harvest level of 100 MMBF.

Roads built to higher standards to provide for multiple uses and entries are constructed/reconstructed under a program commonly referred to as Capital Invest. This contract awarding is accomplished prior to facility needs to

Response No. 4 (Con't)

allow completion time, avoiding progress delays in timber sale contracting. These delays are costly to those involved and limit Forest Service budget ability. Capital Investment cost estimates in the Forest Plan budget is $1.6 million dollars annually.

Most road systems presently built on the Forest are for the harvest of timber. Each road placed under contract must be covered under a timber sale environmental assessment and is directly attributed to timber harvest planning. This does not assure the government that the road will not be delayed with court appeals or changes in management direction.

Response No. 5

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 6

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 7

The procedures for determining the suitable and unsuitable lands for each management alternative are described in 36 CFR 219.14. A map showing the general land assignments is given as part of the information for each alternative in the Environmental Impact Statement. These maps show the large blocks of land that are unsuitable for timber development in each alternative. It is possible that there are smaller, scattered parcels of land that are also unsuitable in each alternative. Because of the small size of these areas and the difficulty of mapping each one, they are not displayed on the maps. The regulations do not require these areas to be mapped; however, it is possible to locate these areas using the computer data base reports and large scale maps on file in the Forest Supervisor's Office.

Response No. 8

The criteria and process for determining land suitability is outlined in the planning regulations, 36 CFR 219.14. These regulations were written to implement the National Forest Management Act. Included with the EIS, is a set of forest maps delineating the large blocks of lands that have been identified as unsuitable for each alternative management plan. In addition to the large contiguous blocks of unsuitable lands, there are other scattered acreages that have been determined to be unsuitable in the alternatives. The small scattered areas do not lend themselves to mapping without considerable time and effort. Since it is not required by the regulations, and would not be useful as a decision criterion, we do not intend to map or otherwise single out those lands in each alternative with positive and negative present net values for timber production.

The timber sale schedule for the next 3 years is outlined in considerable detail in Appendix J of the Forest Plan. Included is data on acres to be harvested, harvest methods, volume, and locations of the harvest areas. No timber harvest is scheduled on the unsuitable lands. A map of the proposed sale

Response No. 8 (Con't.)

areas and major road projects for the next 10 years was made and displayed during the public meetings held earlier. These maps are available for review at the Forest Supervisor's Office.

Response No. 9 and Response No. 10

Tourism and recreation, including outfitter and guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism and recreation industry should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 11

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Response No. 12

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho

Response No. 12 (Con't.)

Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#123

Marilyn B. Carlson
2018 14th Street
Lewiston, Idaho 83501

May 20, 1985

Forest Plan
Nez Perce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Gentlemen:

I enjoyed very much your recent public meeting in Lewiston and want to commend Tom Kovalicky and his staff for their fine work in presenting the issues in a very organized manner. After considering the many points brought up, I would prefer Alternative Plan C for the following reasons: #1

A. It is important to keep West Meadow Creek, Silver Creek-Pilot Knob and Jersey Jack as roadless areas. #2

B. The annual allowable cut of 102 mbf is not justified by demand for timber products. 75-85 mbf is sufficient. #3

C. I am against advance road construction,. Roads should be built only as we need them. #4

D. A monitoring plan must keep the public informed of how well the plan is working. #5

E. The budget plan must be realistic. #6

Thank you very much for your consideration of these matters.

Sincerely,

Marilyn B. Carlson

LETTER 123

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

It should be remembered that decisions in Forest planning should be based on long-term goals and objectives and should not be heavily influenced by short-term market conditions.

Response No. 4

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

LETTER 123

Response No. 6

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

#125

Brad Carlson
804 Elm St.
Moscow, ID 83843

Forest Plan
Nez Perce National Forest
Route 2 Box 475
Grangeville, ID 83530

Gentlemen:

As a sportsman and naturalist who realizes the importance of the Nez Perce National Forest to the Idaho economy, I strongly encourage you to adopt Plan C of the Nez Perce Forest Plan. #1

The areas of West Meadow Creek, Jersey Jack and Silver Creek-Pilot Knob must remain roadless. The timber that would come out of these areas would not be significant enough in number or quality to justify the environmental damage that would be sustained. #2

Plan C is favored for these reasons as well:

*An annual cut of 102 mbf is not justified by the demand for timber products. 75-85 mbf is sufficient. #3

*Advance road construction can only hurt the forest environment. Roads should only be built as needed. #4

The monitoring plan must keep the public informed on how well the plan is working. The budget plan must be realistic. #5 #6

Tom Kovalicky and his staff are to be congratulated for their work in bringing the prevalent issues to the public in an organized fashion.

Thank You.

Brad Carlson

Brad Carlson

LETTER 125

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 125

Response No. 2

As stated above, most of the West Meadow Creek roadless area will be managed without additional roads for the first decade, and no timber harvesting or road construction will be scheduled in the Silver Creek-Pilot Knob area in order to protect the area's Native American cultural values. The Forest will complete an Environmental Impact Statement for the Gospel-Hump (Jersey-Jack) area with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 4

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

Response No. 4 (Con't.)

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 6

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

LETTER 125

Reponse No. 6 (Con't.)

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

#126

Dear Mr. Kovalicky, 1.

I am very concerned about the outcome of the Forest Service Over-View Plan. Mainly because it concerns my lively hood or job. I work for a lumber mill. They're are a lot of jobs on the line, mine, my fellow workers, and many more in the Drongeville, Kooskia, & Elk City areas.

From what I understand, the Packers & Outfitters like Mike Daly, Archie Deorges, and Travis York would like to see the West Side of Meadow Creek 1845C and its large stand of timber, to be kept closed off from Multiple use. This is so they can make a living only for themselves, they don't care about the rest of the working people that will lose their jobs if this area is closed. I think that all non-wilderness Rare II areas should be roaded and managed for all uses including timber management, Recreation, and ect. #1

126

2.

If the West Side of Meadow Creek is closed, and there is no timber howest, there will be at least 40 jobs a year lost if not more than that.

Also if the East Side of Meadow would be managed properly, with Clear cut logging and reforestation, there would be plenty of feed for Elk and Deer to Browse on. Then the Forest Service wouldn't have to do all of this controlled burning. This area would also product about 30 to 40 jobs a year from now on. #2

We already have over One Million Acres of Wilderness already for people to Sight See, Back Packing, Hunting, Fishing, tourism and so on. The Packers and Outfitters can still pack their hunters into these areas if they're managed properly. It just doesn't make good sense to close the West Side of Meadow Creek, when there is only 3 Outfitters and maybe 50 to 100 hunters packed into these areas every year compared to all the jobs that are lost.

126

If this area, West Meadow Creek was managed properly their wouldn't be any timber shortage for the area mills that are still running.

Our Jobs at Idaho Mills depend largely on timber from the Nezperce National Forest. I think our allowable cut should be brought up to 120 Million Board Feet a year for the next 5 to 15 years. #3

I keep wondering what my family and other families have to look forward to - jobs or unemployment. We've had so many mills close we cannot afford to have anymore mills close in this area.

Sincerely
Mr. Bernard F. Bruegemann
Mill Superintendent
Idaho Mills Inc.

LETTER 126

Response No. 1

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, or security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

LETTER 126

Response No. 2 (Con't.)

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines, we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

May 16, 1985 #127

Mr. Tom Kovalicky,

I, also, would like to see more Annual Timber Harvest. It certainly is nice to have Wilderness areas - (beautiful - indeed!) - It would be great to have it both ways - #1

Since so many of us make our living in Timber Industry, it seems more feasible to let us who live here decide.

I have lived here all my life and have spent most of my working years in the Timber Industry.

If it comes down to:

(Jobs versus Recreation)

then I must choose whatever helps my family's welfare the best -

Sincerely
Pete Hansen.

LETTER 127

Response No. 1

Many factors and criteria were considered in determining what the best overall mix of resources would be from the Nez Perce National Forest. We agree with you that it would be great if we could produce all of the different resources the public wanted from the Forest; however, that is not possible. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#128

May 15, 85

Dear Mr Kawlocky,

My family love northern Idaho & have spent a lot of time camping, fishing & enjoying the out door life, we do not however have a lot of time & money to spend on our vacation. If the forest service keeps putting more land in Wilderness areas, we will not be able to enjoy this kind of life any longer. We drive in & camp & enjoy walking into a lake & fishing for the day & walking back out to the camp. If there are no roads, then we wont have the time to do this. We dont have the time or money to hire pack horses or a small plane to get us where we want to go in a week. #1

It would be sad if the ordinary hard working people could no longer enjoy the Meadow Creek - 1845 D & Rockliff - Jedney 1841 & West Meadow Creek 1845 C. This would also be a hard blow to the already hard hit timber industry. #2

I do hope you will consider the honest, hard working, ordinary people on this matter.

Thank You
Rhoda L. Bacon
1409 Cedar Dr #.
Lewiston, Idaho
83501

#128

LETTER 128

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

East Meadow Creek will be managed with no additional roads in order to emphasize fish, wildlife, and water quality. The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 30,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

RAY A. KAUFMANN
512 South 'A' Street
Grangeville, Idaho
83530

Dear Mr. Kovalicky: #129

The proposed G-G1 PLAN is better than I expected, with a few exceptions.

I am pleased to find that NO more wilderness was proposed. I believe that when a stand has reached maturity it should be put to use, not set aside to rot. I think that some wilderness is good but we have pleanty. #1

Roadless, means wilderness to me, because if an ~~area~~ area doesn't have road accsess I will probably never have the time or the money to see it. #2

I work at Idapine Mills and have lived in G'ville my entire life. I know that this community and many others around us reley on the timber industry for a prosperous community. So I would like to see an annual harvest of at least 102 million board feet. and I am in favor of 120 million. #3

Finally I am sick and tired of people who probably have never even been in this area having a say in our issues. #4

Thank you for your time.

LETTER 129

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

Out of 503,162 acres of roadless areas, only 126,846 acres will continue to be managed with no additional roads. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 129

Response No. 4

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

PALOUSE Journal

#130

Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Sir,

I am writing in support of Alternative "C" as the most realistic and positive plan for the development of the Nezperce National Forest. #1

As publisher of the largest regional magazine in central Idaho, I have become aware in recent years of a decided shift in the economy of our region, away from a total reliance on the removal of natural resources from our region, and towards the use of our forests, mountains, rivers, and lakes as the basis of rapidly developing recreational and tourist industry.

The most popular issue of our magazine is our summer recreational guide for the area. It is time that we in Idaho recognize that our foremost "natural" resource is that our state has what the rest of the United States doesn't have, and wants. Namely, large areas of relatively untouched "wildness" which provide more and more people with outdoor excitement and enjoyment.

Tourism means money. And those tourists won't come here if the elk are dead, the fishing poor, and the mountains scarred with unnecessary mining and timbering. Some areas should be kept untouched because they are so unique and striking that their loss would be irreplaceable. Other areas, the majority, should be utilized only if removal of the economic resource there, trees or minerals, is clearly of benefit to our society. Federal subsidies for road building to marginal timber sales just doesn't make sense. #2

Sincerely,

Ivar Nelson
Publisher

P.O. Box 9041 Moscow Idaho 83843 208-882-6704

LETTER 130

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 130

Response No. 2

The goal of forest Planning is to develop the best possible mix of resource management which maximizes net public benefits for society as a whole. Competitive issues over what resources should be emphasized over others exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (roadless areas) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives are explored.

This Forest recognizes the importance of the tourism/recreation industry as well as other industries which are dependent upon the use of this Forest. Additional analysis on the impact from the various alternatives on jobs and income of the regional timber, outfitters and guides, and other recreational businesses was done. The results of this analysis can be reviewed in Chapter II, Section 16 and Appendix B, Section V of the Final EIS.

16 May 1985 #131

Tom Kovalicky
NezPerce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Sir:

I would like to address a few issues and express my personal views on the amount of land being designated as Wilderness.

It is my understanding that the NezPerce Forest currently has 900,000 acres of Wilderness, and that the Forest Service wants to manage an additional 170,000 acres as roadless with no Timber Harvest. Most of this land is in East Meadow Creek - 1845D and Rackliff - Gedney - 1841. No Harvest in these areas is acceptable if the Forest Service accelerates harvest on all other Rare II areas particularly the West Side of Meadow Creek - 1845 - C. #1

Although I am mainly concerned with the above areas, I can't help but be upset about the whole Wilderness issue. When are they going to stop designating all of our forests into wilderness? It would seem to me that we have way more than enough designated as such already. Why don't we put it ALL into wilderness, then we could close all our mills, and a lot of people could hit the welfare lines. You can have my newly purchased home and my new (American Made) car, when I file for bankruptcy. Then I could walk to the mountains and enjoy the wilderness! Just where does it stop? I can't believe that someone who lives 3,000 miles from here can write a letter and have the same impact as mine does. I am the headsawyer for Guy Bennett Lumber and my whole livelihood depends on the forest industry. Do these people even know what wilderness is? Or are they pulling into our roadside campgrounds in their motor homes, plugging into the nearest current bush, and saying "this wilderness is great, lets go for more." So much more of our forests can be enjoyed if we have them designated as multiple use, with logging, and trails for the recreational use of motorcycles and snow-mo-biles. I am not against designating wilderness areas, but you could walk for years in the forests already designated as wilderness and never cover the same area. #2 #3

In my position as head-sawyer I have sawed some beautiful yellow pine. I have heard people say its a shame to cut that down and saw it up. I think the shame is letting it rot on the butt, or blow down and rot.

131

I am aware that we have enough timber right now for continued employment, but the mortgage on my home is not a right now mortgage, its a 30 year mortgage. At the rate our forests are being set aside, as wilderness, I'd hate the think where we will be 30 years from now. #4

Thank you for reading my views, and I truly hope that they warrant more impact than a person from Florida. #5

Sincerely,

Nick L. Hasselstrom

NICK L. HASSELSTROM

1132 11th St
Clarkston, Wa.
99403

LETTER 131

Response No. 1

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2 and Response No. 4

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 3 and Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

#132

439 Styner Avenue
Moscow, Idaho 83843
May 16, 1985

Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Sir:

The following comments are concerned with the treatment of Research Natural Areas (RNA's), and to a lesser extent certain other Special Interest Areas, in the Proposed Nezperce National Forest Plan.

I commend the Nezperce for consideration of the need for RNA's in the Forest Plan. It has been a pleasure working with the Forest during the past 12 years in determining the elements of natural diversity that should be included in RNA's and in searching for suitable areas to include these elements. I suggest that the Forest Plan could be improved in its consideration of RNA's as follows:

1. Recognition should be made in the Plan that additional RNA's may be needed as knowledge improves of the range of natural diversity embraced by the Forest. This is especially true in view of the Cooper - Neiman classification of habitat types in Northern Idaho, several of which are best represented on the Nezperce Forest. Ronald L. Haag's letter with enclosures to you of 2/19/85, 4060-3, summarizes additional types and several possible RNA needs. In addition, the Regional Guide does not recognize incidental habitat types as assigned types. Yet incidental types usually are rare types which should receive consideration because of their rarity. #1

   I believe the Forest has relied too strongly on the RNA assignments in the Northern Region Guide. Bob Pfister best summed the situation when he was Chairman of the Northern Region RNA committee in a 4063 memorandum to Supervisor Biddison dated 7/30/81: "The cell-targeting system is an attempt to ensure that a minimum number of representative examples of vegetation and aquatic types are represented in the system. The tables do not include unique areas, representation of vegetative types on different geologic substrates, nor representation of other important features of biological diversity. In addition, the forest cells are based on Daubenmire's broad types, which are currently being revised. Therefore, each National Forest needs to consider more than just the target-cell tables in their RNA plans". And in the same memorandum "Recognition should be made in the plan that new areas may be needed."

2. Square Mountain Creek should be included in the Forest Plan as a proposed RNA. We were surprised not to find this area, within the Gospel-Hump Wilderness, in the list of proposed RNA's. For a number of years our Idaho Natural Areas Coordinating Committee has carried Square Mountain Creek as a proposed area and the Northern Region Committee has included it as a candidate RNA. We believe Square Mountain Creek should be included for the following reasons: a) It contains one of the rarest plant species in Idaho, Douglasia idahoensis, which is known from only three sites in Idaho and has been recommended for Federal listing as Endangered. b) Its complex geology provides an excellent field opportunity to study plant requirements and responses. It is astride the contact line between sedimentary Belt quartzite rocks and igneous granitic rocks of the Idaho Batholith. c) It offers possibilities of including needed subalpine fir habitat types. d) It contains a very good lake-stream system. e) It contains several wet meadows. #2 /132

3. Possibly too great a reliance has been placed on the proposed Little Granite Creek RNA in the Hells Canyon Wilderness to fill assigned objectives. Little Granite Creek is listed to fill 15 assigned cells. Little Granite Creek is an excellent proposed RNA but much of its substrate is old volcanics. Wouldn't it be a good plan to replicate these habitat types on granitics of the Idaho Batholith to have better baseline areas for a large part of the Nezperce Forest? Some of these habitat types may be found in proposed RNA's after better inventories of them are obtained. #3

4. The management standards for RNA's on pages III-15 to 17 are good. However, I am puzzled by the element, Developed Recreation and the Standards for it on page III-15. This item seems out of place in a consideration of RNA's. I am also at a loss to understand item E on page III-17. Why are D2, E-7, and L-1 applicable? What is really needed are good inventories and permanent plots so that changes in vegetation, water, and soils can be determined over time. #4

   An inconsistency: In the EIS on pages I-5 and II-69 total acreage of established RNA's is given correctly as 8,015 acres. Yet on page III-1 total acreage is shown as 9,725 acres. #5

5. I am disappointed that the Plan did not give consideration to such kinds of Special Interest Areas as Botanic, Geologic, and Paleontologic, which are set aside largely for public education and enjoyment. Surely the Forest has a number of such areas which if identified would add to a visitor's enjoyment! For example, Volume I of the "Proposed Natural Landmarks of the Northern Rocky Mountains: Geologic Themes" by Hyndman and Alt, January, 1982, for the National Park Service identified two Priority 1 sites on the Nezperce: #7 Black Canyon of the #6

Salmon River, Salmon Falls, and Barth Hot Springs, and #46 Whistling Pig Orbicular Granite. Aren't there small but interesting and unique botanic and geologic areas on the Forest which if identified would add to the enjoyment of Forest visitors?

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I appreciate the opportunity to review and comment on the Nezperce Forest Plan.

Sincerely

Charles A. Wellner

Charles A. Wellner, Chairman
Idaho Natural Areas Coordinating Committee

LETTER 132

Response No. 1

Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Response No. 2

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan.

Response No. 3

Your description of inventory needs is valid. At the present time, our interest is primarily in identifying needs and finding suitable areas to represent the various vegetative communities. Detailed information will be dependent on financing in the future.

It would be beneficial to have a list of all vegetative communities needing representation in RNAs which might occur on the Nez Perce. At the present time, our documentation is pretty spotty due to changes in habitat types, not having detailed inventories of existing RNAs, and several sources identifying needs.

Response No. 4

"Developed Recreation" has been deleted from the standards and listed as an activity not compatible with RNA establishment and management.

The Trail Management practice is needed in RNAs where trails exist. We shouldn't delete a portion of an existing trail when an RNA is established in the same area. Range monitoring (D2) applies when an RNA is located within a grazing allotment. D-2 doesn't imply that grazing will occur, but points out that those reserved acres need to be considered in managing the allotment.

Response No. 5

The acreage discrepancy you addressed has been corrected in the Final Plan. The correct acreage is 8,015.

Response No. 6

An inventory of special interest areas would need to be developed. We have searched our files and questioned Forest Service personnel, but have not been able to locate a list of geologic, palentologic, or botanic interest areas other than those identified in the Research Natural Area program. The Forest is interested in developing such a list of information, but it is not necessary that it be included in the Forest Plan.

Idaho Conservation League
Box 844 Boise, Idaho 83701 (208) 345-6933

#133

May 21, 1985

Forest Plan
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, ID 83530

Dear Forest Planner,

As President of the Clearwater Chapter of the Idaho Conservation League, a group of 50 members, I write to urge you to adopt alternative C for the Nez Perce National Forest. Your draft plan has several problems, including sketchy information on where roads will be built over the next 10 years. We urge you to keep roads to a minimum and strive to make those you do build cost effective over the long term of their use. Roads for Mallard Falls and Noble Creek seem highly unfeasible in this respect. Overall, we ask that you strive for a realistic road/timber budget. #1 #2

The Meadow Creek drainage, likewise, should be left as it is now. All existing uses should continue. (If we can't protect Meadow Creek, we can't protect the Selway-Bitterroot Wilderness to which it directly contributes). #3

We support a short and long term timber harvest of 75-95 MMBF, one that does not need large-scale advance road building. We ask also that in the future you provide specific information on just what constitutes "suitable" timber land. #4 #5

Cordially,

William Johnson

William Johnson
President
Clearwater ICL
1720 Alder
Lewiston, ID 83501

LETTER 133

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road scheme shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor does it reflect the exact number or placement of the final system which may not be complete for 100 years in the future, nor does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce; there are 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are constructed, others will be closed leaving the system totals to remain near constant throughout the planning cycle.

ATP maps are on file at the Supervisor's office and a copy generally, can be reviewed at any District office.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Roads are analyzed as to traffic service levels and road classes. Road Management objectives are summarized formulating traffic and service objectives, management warrants, design elements, and maintenance warrants. These items are developed into transportation facilities to service the total area and resources.

Response No. 2 (Con't.)

The economic implications of timber sales and associated road construction which do not recover timber related costs are a national concern. The Regional Forester has directed that additional analysis be done on timber sales over a million board feet to reduce timber costs. In scheduling individual timber sales and related road construction, it is important to remember that the ability to recover costs for a particular sale is not a specific criterion in determining timberland suitability for any alternative, but that economic efficiency and attainment of nonpriced benefits in response to issues and concerns are criteria in selecting a Preferred Alternative. Outputs and activities by management areas are given in Chapter III of the Forest Plan. Also, for additional information, see Appendix J which includes a 3-year timber sale schedule that shows acres to be cut and miles of road to be constructed.

Lower Noble Creek and Mallard Falls areas are part of the Frank Church River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel Hump (Jersey Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for this area and Mallard Creek area which will contain a biological evaluation, economic analysis before any roads are constructed. This should be accomplished before 1990.

Response No. 3

The two areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. In the Forest Plan, East Meadow Creek will be managed in an undeveloped state with no timber harvesting or road construction scheduled in this area.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

Response No. 4 (Con't.)

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 5

Suitable timber land, as used in the forest planning process, is defined in 36 CFR 219.14. Physical and biological factors and legislative history is one set of criteria used to determine the suitability and availability of land for timber harvesting. The land that satisfies this set of criteria is tentatively suitable for timber management. The tentatively suitable lands are further analyzed by each alternative to determine which are cost-efficient over the planning horizon in meeting the forest objectives. The definition of suitable lands, and the process used to determine these lands are contained in the Environmental Impact Statement and the Forest Plan. These explanations are included in the Final Environmental Impact Statement. The breakdown of suitable and unsuitable lands for the Preferred Alternative can be found in Appendices E,G, and J of the Forest Plan. Additional information on the criteria and process used to determine the suitable and unsuitable lands has been added to Appendix B and Appendix D of the Final Environmental Impact Statement.

May 15, 1985

Dear Mr. Kovalicky, #134

I have read your Overview and am opposed to the road construction. That's enough miles to cross the United States. I have seen first hand the trees left on the ground. #1

I have hunted the Tetons in Wyo. Up Union Pass out of Dubois. Seen the land and disapproved.

As you have assumed we are parents of outfitters Karen & Mike Haly.

We have had our river & streams ruined in Fla. The Kissimmee River, dredged and straightned. Now they are putting diversions in the river to divert water back in the old

river bed. Corp of Engineers playing God. Our Governor is now trying to Save Our Everglades. We have clubs Save Our Lakes based in Kissimmee Fla. We have fought. For the first time in 20 yrs. I have seen the bottom of Lake Hatchinika Only to see beer and soft drink cans on the bottom. When you open your forest to the uncaring you will have the same. Easy access means trash. I hate to see beautiful Idaho go this route.

I'm a born native of Fla. I have never seen such beauty as Idaho, Wyoming and Montana. We have spent 7 years in Wyo. and

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ten to twelve weeks a year in Idaho. You can't believe the pleasure I spend just looking at your trees and walking down the streets of Grangeville. Cars stopping for you crossing the streets

Go ride with Mike he's not only in business he loves the land and horses. Tell him Mad said he will let you ride Louie.

We are contacting Lawton Childs, Andy Ireland and agencys in Fla. who can voice their objections.

Sincerely
James + Beverly
Seymour

124 Polk Drive SE
Winter Haven, FL
33880

LETTER 134

Response No. 1

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

The overall objective of forest planning is to produce a package or mix of resources that maximizes Net Public Benefits, competitive issues such as timber harvests/road construction versus roadless areas and outfitter/guides viability exist and it is impossible to fully meet all wants and desires at the same time. Relationships between priced outputs (timber and range) and nonpriced outputs (roadless areas and community stability) illustrate the interactions of attempting to resolve various issues. By examining an array of priced and nonpriced outputs, it becomes possible to see what the tradeoffs are as a range of alternatives is explored. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues which are discussed in Chapter I and Appendix A of the FEIS.

LETTER 134

Response No. 1 (Con't.)

Through this land management planning process which included public involvement in the decision making, we believe that the Preferred Alternative is a balanced approach to the management of this Forest in the next 10 to 15 years.

#135

The Nature Conservancy
Forestry Sciences Laboratory
1221 South Main
Moscow, ID, 83843

20 May 1985

Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, ID, 83530

Dear Mr. Kovalicky,

I appreciate the opportunity to review the Proposed Nezperce National Forest Plan. The following comments pertain to the preservation of natural diversity on the forest, more specifically, how the plan addresses Research Natural Area establishment and, to a lesser extent, sensitive plant species. I suggest that the Forest Plan could be improved by incorporation of the following comments:

1. Square Mountain Creek should be included in the Forest Plan as a RNA. I was disappointed to see that the area was ommitted, even though it has been supported and carried as a RNA candidate by the Idaho Natural Areas Committee and the Northern Region Research Natural Area Committee for many years. The Nature Conservancy feels that Square Mountain Creek should be a RNA for the following reasons: #1

a) The area contains the type locality of Douglasia idahoensis, the importance of which cannot be overstated. This is a very rare plant, occurring on only four mountaintops in Idaho, and is a candidate for federal listing as endangered. Forest Service policy on RNA establishment is to include, not only the common situations, but also the unique. This is perhaps the most unique situation on the forest and should be reason enough to include Square Mountain Creek within the RNA system.

b) It contains excellent examples of subalpine forest, wetland, and aquatic ecosystems, some of which are needed to fill targeted cells on the forest (i.e., ABLA/CABI).

c) The area is geologically complex, lying across the contact of Belt sreies quartzites and granites of the Idaho batholith. This area would be ideal for the study of community response to different geologic substrates over a relatively short distance.

d) It lies within existing wilderness and is not grazed, hence, few conflicts exist.

2. You have recognized the presence of one endangered and four federal candidate plant species on or near the forest. You also state that, additionaly, 29 species of concern to the State of Idaho are found on the forest. This is somewhat misleading because the Idaho state government could care less about rare and sensitive plants. It would be more accurate to state that there are 29 taxa occurring on the forest that are of concern in the state of Idaho and list the taxa and/or cite the source of this information for future reference. Citation: #2

Rare and Endangered Plants Technical Committee of the Idaho Natural Areas Council. 1981. Vascular plant species of concern in Idaho. Bull. No. 34, Forest, Wildlife, and Range Experimental Station, University of Idaho, Moscow.

3. It appears that too great a reliance is placed on the proposed Little Granite Creek RNA to meet cell targets on the forest. Little Granite Creek encompasses much diversity and is a fine candidate, but it occurs at the western edge of the forest, on a geologic substrate that is unique to that area. Please do not overlook the need to replicate the various cells in areas of differring climatic regimes and, more importantly, on different geologic substrates, such as the granites and related metamorphics that are more widespread on the forest than the volcanics of Little Granite Creek. #3

4. There is inconsistancy in reporting existing RNA acreage several times in the planning documents. In the DEIS, on page I-5 and II-69, you correctly report existing RNA acreage at 8015. Later in the DEIS (Table III-1, page III-1), and in the Proposed Forest Plan (page III-15) you state that there are 9725 acres in existing RNAs. #4

5. Recognition should be made in the plan that additional RNAs may be needed as knowledge of the range of natural diversity embraced by the forest improves. Along these lines, it seems as if too great a reliance was placed on the Northern Regional Guide. The Northern Regional Guide appears to include only a minimum number of representatives, relies on outdated sources, and ignores incidental/rare plant associations. Several examples bear this out: #5

a) The guide does not include types that were known to exist prior to its issuance. Example: Miller's 1976, classification of riparian communities dominated by white alder along the lower Salmon and Snake rivers was not included. These types are localized, but, given the current management emphasis on riparian areas, it would be beneficial to ensure inclusion of pristine examples of such ecosystems within the RNA system on the forest.

b) At least one vegetation study has identified previously undescribed plant associations on the forest since issuance of the guide. Example: Crawford's 1983, classification of Taxus dominated communities in the Elk City area. It is interesting, however, that his Taxus habitat types were used in setting goals

for Management Area 21 (moose winter habitat), yet were not included as targets for inclusion within RNAs, no doubt because they were not in the Regional Guide. I realize that examples of these communities may be included within a proposed RNA in upper Newsome Creek. It is important to include pristine examples of Taxus dominated vegetation because 1) it has a very limited distribution, and 2) your identified research needs include an investigation of Taxus ecology in response to silivcultural treatments (Proposed Plan page II-14).

c) Strict adherence to the Regional Guide negates any further need to establish new RNAs even if new knowledge identifies gaps in the coverage of the existing RNA system. This is especially timely in view of Cooper, Neiman, and Steele's revision of the northern Idaho habitat types, due out soon. This revision has stratified the landscape into finer, more natural units than did Daubenmire's broad classification. It has also identified several associations that are best represented on the Nezperce.

Thanks again for the opportunity to comment.

Sincerely,

Bob Moseley

Bob Moseley
Idaho Public Lands Protection Planner

LETTER 135

Response No. 1

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. An active sheep allotment covers the area of the proposed RNA and grazing could possibly occur or has likely occurred in the past.

Response No. 2

Sensitive plants are preserved in some of the Research Natural Areas. As plants are identified, special precautions are made if a planned activity would endanger or eradicate the plant. The change in reference to "Species of Concern to the State" will be made. The bulletin you cited will be added to our references.

Response No. 3

Your description of inventory needs is valid. At the present time, our interest is primarily in identifying needs and finding suitable areas to be dependent on financing in the future.

It would be beneficial to have a list of all vegetative communities needing representation in RNAs which might occur on the Nez Perce. At the present time, our documentation is pretty spotty due to changes in habitat types, not having detailed inventories of existing RNAs, and several sources identifying needs.

Response No. 4

The acreage discrepancy you addressed has been corrected in the Final Plan. The current acreage 8,015.

Response No. 5

Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

The acreage discrepancy you addressed will be corrected in the final Plan. The change in reference to "concerns to State" will be made and the bibliography will include the Idaho redbook.

IDAPINE MILLS Inc.
P. O. BOX 153
GRANGEVILLE, IDAHO 83530
(208) 983-1290

#136

May 21, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Tom:

Counting both our mills, Idapine Mills in Grangeville, and Clearwater Forest Industries in Kooskia, we are the largest single employer in Idaho County. We have a total of 250 employees in these two plants.

In the past year at CFI and Idapine we have paid out approximately $4,790,000 in wages to our workforce. We have paid an additional $6,162,881 to our contract loggers, $4,583,650 for open market log purchases, and $841,379 to our road builders. This is $16,377,910 we have paid, mostly into the local economy, between the two plants.

Our employees have paid $1,341,200 during this period to federal, and state governments. This aside from the state, federal and county taxes we have paid.

During the past nine months at Idapine and longer than that at Clearwater we have operated in the black, despite a depressed lumber market. This has been possible only after developing a "lean and mean" posture at both mills. Some of the changes have been painful. Believe me, we have no plans of becoming a part of what has been called by some, "A dying forest industry!"

When the Central Idaho Wilderness issues were resolved a few years ago, we were led to believe, by both wilderness advocates and our elected officials, that most of the areas outside the designated wilderness would be released and earmarked for multiple use, including timber harvest. At that time Frank Church made a public pledge that he did not want to see another sawmill closed in Idaho. #1

I feel the Forest Service has spent a lot of time and money in developing a Forest Plan that has considered the interests of all parties concerned. In my estimation the people "on the ground", who developed this plan were in a far better position to evaluate the proper future use for these lands than most of the people from outside our area, who may have only listened to "slanted" opinions.

For our area mills to survive, at even current levels of production, we need <u>at least</u> an allowable cut of 102 million bd. ft. over the next 10 years. We're convinced that any significant reduction in this figure would endanger the existance of at least one of the sawmills currently operating in this area. #2

Most of our employees are both hunters and fishermen, and enjoy outdoor recreation on the Nezperce National Forest. However, they, and many others, can't afford to pay or take the time to be packed into the unroaded or Wilderness areas. Consequently, most of them will never see more than the fringes of these vast areas.

We're willing to work with other groups, such as the Idaho Outfitters and Guides, but we feel we are entitled to an allowable cut from the Nezperce which will sustain our sawmills at least at their present capacities. #3

By proper road-closure measures and other management techniques we feel that logging certain areas will actually increase our elk and deer herds and provide a more suitable habitat. Just as much as your prescribed burns that are being considered in some areas. #4

In summary, I feel all of the roadless areas outside of the designated Wilderness Areas, and the areas that are proposed as roadless in Alternative G, should be opened up for multiple use, including timber harvest. In particular we would like to see the West Side of Meadow Creek - 1845 - C, with its large standing inventory, opened up as soon as possible for timber sales as needed. In my mind this area is critical for a sustained yield that we will need in upcoming years. #5 #6

With approximately 1.1 million acres dedicated to roadless, back country recreation under your proposed plan, I firmly believe enough is enough! #7

Sincerely,

Robert H. Krogh

Robert H. Krogh
Owner/Manager

RHK/tm

Response No. 1

We have considered the implications of the Central Idaho Wilderness Act; however, there are varying opinions on the legal implications of the language actually in the Act versus the Committee notes. In any event, we have considered the potential timber resource in our analysis of the Rackliff-Gedney and East Meadow Creek roadless areas. As a result, in the Forest Plan approximately 11,000 acres in Rackliff-Gedney will be available for timber scheduling. The suitability decision for East Meadow Creek will be deferred. If market conditions and economics for harvesting change significantly, some timber may be scheduled after a required Plan amendment.

Response No. 2 and Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Response No. 4 (con't)

Road closures are an integral part of a road Management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the closure policy for the road and its timely completion with the scheduled activities.

Numerous research efforts on timber management throughout the northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 5, Response No. 6, and Response No. 7

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

LETTER 136

Response No. 5, Response No. 6, and Response No. 7 (con't)

Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#137

Dear Mr. Kovalicky,

I support the Nezperce National Forest Management Plan alternatives G + G1. #1

I understand the majority of the lands site in East MEADOW creek where the outfitter's and guide's want it to remain roadless.

As you know the woods products people and the packers tried to reach a compromise on this area. The woods people do not want to ruin the packer's business so they told the packers that they would leave the area before hunting season, they would pile slash a half a mile long on the road so people could not see it, and offer a reward for anyone caught on a closed road. The packers turned it down and insist that it remains roadless.

Last year the packers took in 100 hunters into that area. I feel that closing such a large area for just 100 people is not justified.

Yes, I do work in a sawmill and we depend largely on timber from the Nezperce National Forest. We need to have adequate timber to maintain sawmill production or their will more sawmills closures and loss of jobs. The packers say they can keep everyone working but I cannot see making a living changing sheets in hotels. #2

I also am an avid camping enthusiast. I enjoy pulling my camper into the woods with my family and friends. If this area remains roadless, very few people would see this part of the country. As far

as horses go; I could not see my five year old daughter on horses.

I am sure you are getting a lot of letters from through out the country expressing their views. But what the thing boils down to is this; HOW MANY PEOPLE IN THESE UNITED STATES WOULD USE IT, IF IT WAS ROADLESS? and HOW MANY PEOPLE IN THESE UNITED STATES WOULD USE IT, IF IT HAD ROADS? #3

Sincerly,

David D. Wassmuth
(no address)

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

East Meadow Creek will be managed without additional roads in order to emphasize wildlife and fishery objectives. This area would be very difficult to road due to the high construction costs.

Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use, including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Your question is a difficult one to answer. While roaded areas may receive more total use than roadless areas, one of our objectives is to provide a variety of recreation opportunities on the Forest. This includes wilderness, roadless, roaded-dispersed, and roaded-developed. We feel that the Preferred Alternative provides a balanced mix of these recreation opportunities on the Forest.

Pam Keller
Box 1105
Orofino, ID 83544

#138

Forest Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, ID 83530

May 20, 1985

Dear Sir,

The following comments concern the Nezperce Forest Plan.

I think a timber harvest level of less than 100 MMBF/year is much more reasonable considering the history of timber prices and demand. I'm opposed to building roads for timber sales far in the future, particularly unnecessary or uneconomical roads. Along these lines, more information is needed on which Forest lands are "suitable" for timber harvesting. The criteria used for suitability should be the same for all areas and management alternatives. A map showing suitable and unsuitable acreages and the planned timber sales and roads in each would be very helpful. #1 #2 #3

I support the plan's recommendations for roadless management in the Rapid River and Coolwater Ridge areas, but would like to see the entire Meadow Creek drainage maintained in its present condition. I have enjoyed the trails in this area several times. #4

The plan assumes a budget increase which isn't realistic. I would like to know where cuts will be made if and when the Forest's budget decreases. The road-building budget shouldn't be given priority over other needs such as trail maintainence or water quality improvement. I would like to see more emphasis on monitoring such things as harvesting impacts and in general how successfully the plan is being implemented. The public should be allowed to participate somehow in the monitoring program. #5 #6 #7

Of the alternatives given, I support alternative C. #8

Thanks for your time — Sincerely,
Pam Keller

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Long-term harvest levels still show significant increases over the current levels. They are based on the acres available for timber management, the amount of existing timber volume, timber growth rates, estimated price projections, nondeclining yield constraints and constraints necessary to achieve fish objectives, elk objectives, etc. All of these factors are based on the information available now. Continuing research programs, monitoring, etc. will provide updated information overtime and this will be used in updating the Forest Plan every 10 to 15 years.

The value for timber has fluctuated considerably in the past and it will probably continue in the future. Timber base values used in the economic analysis consisted of data from 1975 through 1984. This period takes into account the full cyclical nature of the timber market. Timber price projections were based on a market equilibrium model called TAMM (Timber Assessment Market Model). Demand for timber shifts for each successive year in response to changes in population, economic growth and supplies according to the growth and drain in resources and changes in the forest product industries. The projected stumpage values used in FORPLAN are based on these predicted shifts in the TAMM model.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 2

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 3

Information on suitable timber lands can be found in several places in the Environmental Impact Statement (EIS) and Forest Plan. The acres of suitable timber land in each alternative are listed in Chapter II of the EIS and large

Response No. 3 (con't)

contiguous blocks of unsuitable land are outlined on the maps supplied for each alternative. In addition, several detailed breakdowns of the suitable and unsuitable lands for the Preferred Alternative can be found in Appendix E of the Forest Plan. Additional information on the criteria and process used to determine the suitable and unsuitable lands has been added to Appendices B and D of the Final Environmental Impact Statement.

The criteria used to determine land suitability is the same for all management alternatives and is described in 36 CFR 219.14. Lands are first examined to determine if: 1) the land is forested, 2) the lands can be harvested without irreversible damage to soils or watersheds, 3) there is reasonable assurance that the land can be reforested, and 4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. Lands that remain after these tests are regarded as tentatively suitable for timber management. In each management alternative, the tentatively suitable lands are determined to be suitable for timber management if: 1) the multiple use objectives for that particular alternative do not preclude timber management in some areas, 2) management objectives do not limit timber production to the point where management requirements cannot be met, and 3) the lands are cost-efficient over the planning horizon in meeting the total Forest objectives. The computer model, FORPLAN, was used to determine the set of lands that were cost-efficient in meeting the overall objectives of the alternative.

Response No. 4

The two areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. East Meadow Creek will be managed in an undeveloped state with no timber harvesting or road construction scheduled in this area. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 5 and Response No. 6

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These

Response No. 5 and Response No. 6 (con't)

proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 7

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

LETTER 138

Response No. 8

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 139

I support the proposed Nez Perce National Forest Management Plan as it now reads. #1

/s/ Anthony N. Wassmuth

LETTER 139

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 140

Mr. Kovalicky,

I am writing to you to express my concern for the proposed (Plan) for the Nez Perce National Forest. I think your selection of the G or G1 alternative is a good choice, but further consideration should be given to the independent mills. #1 #2

Another concern is a lack of any plan to enter East Meadow Creek and Rackliff-Gedney (1841, Nez Perce portion). The Central Idaho Wilderness Bill intended these areas to be used for multiple use including timber harvest, but further consideration should be given to some sales within these areas within the first decade. #3

/s/ Angela Heustis

LETTER 140

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 140

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

We have considered the implications of the Central Idaho Wilderness Act; however, there are varying opinions on the legal implications of the language actually in the Act versus the Committee notes. In any event, we have considered the potential timber resource in our analysis of the Rackliff-Gedney and East Meadow Creek roadless areas. As a result, in the Forest Plan approximately 11,000 acres in Rackliff-Gedney will be available for timber scheduling. The suitability decision for East Meadow Creek will be deferred. If market conditions and economics for harvesting change significantly, some timber may be scheduled after a required Plan amendment.

#141

May 20, 1985

Forest Plan
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Sir or Madam:

I am writing this letter in support of Alternative C for the development of the Nezperce National Forest. I believe there are several issues regarding the Draft Plan which should be discussed. #1

I support the recommendation to keep several roadless areas in a roadless state. I am concerned, however, that the plan for development around Meadow Creek will harm that area. I therefore suggest that all of the hydrologic drainage of Meadow Creek be managed without any new roads. #2

I believe the draft plan intent to raise timber harvest is improper, and I suggest that first decade harvest levels be set at no more than 100 MMBF per year. #3

I am concerned that the plan calls for road levels to dramatically increase, and suggest that such plans be substantially reduced. Additionally, roads should not be build in the Mallard Falls and lower Noble Creek areas. #4 #5

I am concerned that the forest budget is unrealistic, and also that it does not include a fallback position. I suggest that the budget be stabilized, or. perhaps, even gradually decline. #6

I am concerned that the monitoring plan in the Nezperce is poor, and suggest that it be strengthened. Furthermore, there does not appear to be adequate data on recreation, and I suggest that more information be gathered. The plan should also discuss the impact of building new roads on outfitter businesses. Please also note that concern for establishing new research natural areas should be on-going throughout the life of the plan. #7 #8 #9 #10

Once again, alternative C appears to offer the best balance between the needs of all users of the Nezperce, and I support this alternative.

Sincerely,

James S. Heller
630 Residence St.
Moscow, Idaho 83843

LETTER 141

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 4

Road construction on the Nez Perce will not substantially increase during the first decade. The Preferred Alternative calls for 830 miles. From 1975 to 1984, the Forest constructed 813 miles, while reconstructing 191 miles. We presently have 2,050 miles of access roads of which 45 percent, or 924 miles, have restrictions of use.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is

Response No. 4 (con't)

prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Previous roadless areas are placed under first and second decade harvest schedules to reduce and spread out the timber harvest activities. Initial access into these areas are with roads of higher standard and will serve multiple timber sales and multiple uses. Because of this first entry and sizeable landbase being developed for timber harvest activities, the present net values are considerably higher than areas of past development.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Response No. 4 (con't)

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 5

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

Response No. 6 (con't)

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 7

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

LETTER 141

Response No. 8

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Additional analysis was done to estimate impacts of each alternative on jobs and income related to outfitters/guides as well as the timber industry and other recreational related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Sections B; Chapter IV, Sections 3-4, and Appendix B, Sections V in the Final EIS.

Response No. 9

Timber harvesting and roads are compatible with big game hunting, fishing, and outdoor recreation, all of which are utilized by visitors through outfitters or individually. Mitigation of timber harvest effects has been increased to benefit elk, fish, water, and recreation and can be mitigated for the outfitting industry with cooperation from each side. The true wilderness environment will not be obtained on 100 percent of the landbase acreage, but multiple use management requires that no resource will be set aside in favor of another.

The outfitters will have the opportunity to increase their business by providing a service to those who will be utilizing the 47 percent wilderness/roadless acres and those that will be experiencing their needs in the remaining area.

Road Management objectives are to close an equal number of roads as constructed. This will require the managers to invoke area closures and closures on road segments. Many new timber harvest roads will only be open for timber harvest, and then temporarily or permanently closed. The backcountry experience will be altered by the fact that the trail is now a closed road.

Response No. 10

Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

#142

Scott Ploger
392 Moonlite Drive
Idaho Falls, ID 83402

May 22, 1985

Forest Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, ID 83530

Dear Sir:

I cannot honestly profess intimate knowledge of most of the Nezperce -- excepting the Hells Canyon/Seven Devils/Rapid River area, where I fervently support the heart of the Rapid River drainage for wilderness management. However, it is evident that your draft forest plan proposes far too much subsidized timbering -- a practice I've come to know and hate in eastern Idaho. Furthermore, the extensive roading required will obviously destroy a great deal of trout spawning and wildlife habitat, every bit of which is essential to Idaho's future as a recreational paradise unparalleled in the contiguous United States. Deficit timber sales simply are not in the best interest of the Idaho citizenry and of the taxpayers at large. #1 #2 #3 #4

I'm personally opposed to development of any currently roadless acreage in any form, feeling strongly that Mother Nature and a billion + years of evolution are difficult to improve upon. However, none of your alternatives reflect my outlook. Accordingly, please list me as a supporter of Alternative C, which would at least curtail some of the ecological pillage. #5 #6

Thanks for your attention.

Sincerely yours,
Scott Ploger

LETTER 142

Response No. 1

The Rapid River roadless area will be managed without additional roads in order to meet water quality objectives.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Response No. 2 and Response No. 4

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 3

The Forest Service has completed many research projects studying the effects of roads and road design features on the impacted environment. These studies such as Horse Creek, Silver Creek, and Coram administrative research have been developed to give land managers an insight into the effects of land-disturbing activities and the mitigation effects of different design standards and practices. Coupled with these studies and a continuing effort with the University of Idaho, University of Montana, and Intermountain Research Station on site-specific projects on the Nez Perce, mitigating road standards have been developed to meet quality resource objectives. These studies have especially been centered around water quality and anadromous fisheries habitat. The Nez Perce is known as a leader in this field with the Idaho Department of Fish and Game, State Water Quality Board, and other Federal agencies in Washington, Idaho, and Montana.

Specialists from the Idaho Fish & Game, Bureau of Land Management, and Forest Service have strived to achieve quality management standards.

Response No. 3 (con't)

These standards and guidelines have been incorporated into the Plan as management direction. The Plan also calls for continued monitoring and site-specific research projects in an effort to continually reduce these impacts and the costs associated with the design standards and practices.

The Forest Plan as presented has the constraints within the development to meet the attainment goals presented and provide for quality results while protecting your concerns for the environment.

Response No. 5

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

Response No. 6 (con't)

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#143

May 24, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Forest Supervisor:

It doesn't do our outfit any good to know that ten years from now you propose to increase the allowable sale quantity to 139MMBF or in forty years to 206MMBF. Theres alot of it dying out there now! We need to get more cut now. Alternative "D" comes alot closer to what we need today. Lets not get any more wilderness. We have to much now! #1 #2

Sincerely,

Earl W. Cox Trucking
Box 25
Elk River, ID 83827

LETTER 143

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 2 (Con't)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

#144

May 23, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Attn: Forest Supervisor

Alternative D with its 157MMBF annual timber harvest in the Decade 1 is the one we need. Next is alternative E harvest cut in the first decade of 127MMBF. I cannot see how the industry can get along on the 102MMBF. Whatever we do lets not get any more wilderness! #1 #2 #3

Respectfully,

Jerry D. Triplett

Jerry D. Triplett
Route 2, Box 130
Kamiah, ID 83536

LETTER 144

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 144

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Dear Kovalicky,

I think personally we have enough wildnerness. I like the outdoors myself and we have beautiful country here. Things we don't have in New York where I was born but to much wildnerness is a fire hazard because things are not controled there enough. #1

I also believe we need to keep people working and that means we had enough mills closing. My husband work is important. We don't need more unemployment and crimes because people can't feed there family. #2

Also everyone needs what the logs make paper ect. We should plant more trees to take the place of the others and that will give more jobs. #3

I appreciate if you take this

and other peoples letters in consideration. It affects us all one way or another.

Sincerely yours,
Marilyn Deardorff
P.O. Box 185
Granguille 83530

LETTER 145

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

Your suggestion to plant trees to occupy the lands where timber has been harvested is a good one and is something that the Forest Service has believed in for many years. We have a large reforestation effort on the Forest, and plant several thousand acres of young seedlings each year. Unfortunately, this alone will not increase the amount of timber that can be cut in the first 10-20 years. In order to protect the fish and wildlife habitats, we must control how many roads we build and how many acres of Forest we cut from those roads. By doing this, we should be able to have adequate supplies of timber as well as fish and wildlife.

#146

Dear Mr. Kovalicky:

Any more wilderness would be against multipical use practice. I have logged in the north west since 1956 and presently employ about 20 workers. We need the areas in multipical use in stead of wilderness because it it used for logging, but also access for hunting, fishing, berry picking, mushrooming and even just a ride, Wilderness is just for the few that have the physical endurance, time and money to enjoy it, none of which the average person enjoys. Road closures and good management would protect the game and resources and insure future uses for every one and not just a select few. #1 #2

Sincerely

Ray Moss
Logging
Clarkston, Wa.

Ray Moss
1833 Quailwood Dr.

LETTER 146

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Response No. 2 (Con't)

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

#147

Tom Mavlicky
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Mr. Mavlicky:

I was born and raised in the Kooskia Area, and now live in Grangeville. My wife and I have 2 sons and I have spent my entire adult life working in the timber industry, most of the time as a log truck driver. It is absolutely necessary for my economic well being that sufficient timber be made available each year on a sustained yield basis to keep the present sawmills operating. #1

I also enjoy using the forest for recreation, and roads and trails are necessary as I do not have the time or the resources to venture very far into wilderness areas. I feel there is enough wilderness and roadless areas in the Nezperce Forest at this time, and any long range plan should provide for some additional road building and logging. #2 #3

If logging and road building are properly engineered it will not only continue to provide jobs in this area, but will increase the use of the forest by local people and tourists and allow the common person and the infirm to participate in this form of recreation.

Kathleen Roberts
112 N. Junction
Grangeville, Idaho

LETTER 147

Response No. 1

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 2

The presence of logging and roads affect each individual differently. To some, a quality backcountry environment or experience is a walk or horseback ride in the backcountry, undisturbed by the noise and visual modifications of logging. Others can gain this same enjoyment by driving along a mountain road and stopping at a clearcut to view the surrounding country.

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Out of the 16 roadless areas (503,162 acres), only 3 areas (126,846 acres) will remain undeveloped. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in

Response No. 2 (Con't)

the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#148

Tom Hovlicky
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Mr. Hovlicky:

I was born in Grangeville and have spent my entire life in this area. My husband is employed as a logging truck driver and I am employed in a local grocery store. My husbands job depends on there being an adequate supply of timber made available each year to supply our local sawmills with sufficient logs to operate in a efficient manner. My job depends on my employer having sufficient customers, and a large number of present customers are connected directly or indirectly with the timber industry. #1

My family enjoys being able to use the forest lands for camping, picknicks, fishing etc. We do not have the time or the resources to really use wilderness lands. I feel there is sufficient wilderness in the Nezperce Forest at this time, and that any long term plan developed for the use of the Nezperce Forest should include some additional road building to provide for an adequate sustained yield of logs, and also to provide access into the forest by people who need or want to use an automobile to enjoy this experience. #2 #3

Claudia Roberts
412 N. Junction
Grangeville, Idaho

Claudia Roberts

LETTER 148

Response No. 1

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatves is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Out of 503,162 acres of roadless areas, only 126,846 acres will remain undeveloped. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

LETTER 148

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Sierra Club
NORTHERN ROCKIES CHAPTER

May 20, 1985

MEMBER GROUPS
Eastern Idaho
Middle Snake
Palouse
Sawtooth
Spokane

Forest Supervisor
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Supervisor:

As Chairman of the Northern Rockies Chapter of the Sierra Club, I am making the comments and recommendations below concerning the Draft Nez Perce National Forest Plan. We ask that these comments be included in the record, and we ask that you address each of our comments in the Final Plan.

The Draft Plan is well done in many respects, and there are many parts of the Plan with which we concur. For example, we support your proposed allocation of the Rapid River and Coolwater Ridge areas to roadless management. You have recognized the important wildlife, watershed, and fishery values in these two areas. However, despite good intentions, there are numerous problems with the Plan which we urge you to correct in the Final. Below, we have summarized our major disagreements with proposed allocations, and we also point out several inadequacies in the Plan which must be addressed before the Final Forest Plan can be considered adequate.

The recommendation that a small part of the East Meadow Creek roadless area be retained in its current roadless condition is insufficient to protect this extremely fragile drainage with its pristine watershed and vital fishery. It is mandatory that the west side of Meadow Creek and the east side of Meadow Creek above the Gaurd Station also be maintained as roadless. This is the only way to really protect Meadow Creek from the detrimental effects of timber development and road building. We are strongly opposed to any further roading of the Meadow Creek drainage. Timber values here are insufficient and uneconomic, the watershed is far too fragile, and the fishery and wildlife values are too great to permit roadbuilding. In addition, Meadow Creek is heavily used by hunters, outfitters, and hikers, and it has a fine trail system. Its recreational values alone are more valuable than its timber resource. It is wrong to put outfitters out of business, for example, when these marginal timber stands are not needed to sustain Idaho County timber mills. #1

The proposal to slowly increase in annual cut to 206 MMBF is another bad flaw in the Plan. It is improper for you to base this recommendation on presumptions that are unreasonable. The Plan assumes that demand will rise to meet this supply and that timber prices will rise as well. These assumptions are unreasonable in light of historical data. To make your recommendation even worse, you propose to support these excessive, environmentally dangerous harvest levels by advance roading (the building of many miles of roads in the first decade to service timber sales in the distant future). These taxpayer subsidized roads are an uneconomic investment. Road maintenance and reconstruction alone will require expenditures in excess of the timber values present. We ask that the Plan be modified to set first decade harvest levels at about 85 MMBF or lower. This level of harvest will easily sustain the local timber industry. We also ask that you halt wasteful, uneconomic advance roading. #2

A 200% increase in roads in the Nez Perce National Forest (from the current 2050 miles to an eventual 6400 miles) is difficult to visualize. The Draft Plan states that 900 miles will be built in the first decade! Yet, the Plan has no map to notify the public as to where these roads will be. Our question is . . . "Where's the Map?" Such a map should appear in the Final Plan. We oppose roads in such areas as Meadow Creek, Jersey Jack SW of the Red River Ranger Staton, or a road parallel to Noble Creek. Another question that is left unanswered in the Draft is how the Forest plans to increase its road budget to the degree required to add so many miles of roads. We urge you to greatly reduce planned road mileage, and to delete in particular road plans for the areas mentioned above. #3 #4

The Plan makes several unreasonable assumptions concerning the Forest's budget. It assumes an immediate increase of 15-20%, with most of the increase to go to new roads and timber management. It is very unlikely that the Forest will get that kind of increase in budget from Congress. The Plan has no fall back position if budgets remain steady or more likely decline. We ask that the Plan be based upon a reasonable budget, one that is either stable or slowly declining. The Plan must also clearly explain how the road budget is being set (how much is purchaser credit and how much is capital investment). #7

A vital component of any forest plan is its monitoring section. The Nez Perce monitoring section is very weak and inadequate. The plan should clearly state how a wide range of impacts will be monitored, explain exactly how and when monitoring will be done, and explain what will be done and how soon it will be done if monitoring shows that resource damage is occurring. It should also provide for clear and frequent involvement of the interested public. The public should be informed of monitoring results and of proposed changes in development activities. Your section on what will be done if unacceptable damage is occurring is far too vague. We urge you to greatly strengthen the monitoring section of the Plan. #8

Congress has clearly legislated the Forest Service's responsibility concerning identification of lands suitable for timber harvest. The Nez Perce Plan assumes that suitability is a variable (for example, each alternative shows different suitable acreages). The Plan does not even have a map that shows where suitable lands (as defined by law) are located. In these respects the Plan fails to comply with the law. We, therefore, ask that you provide a map which shows the lands which meet the absolute suitability standard of the law, the location of timber sales planned on both suitable and nonsuitable lands, and the main haul roads planned in association with these sales. #9

"Not blind opposition to progress, but opposition to blind progress."

#149

There is a severe lack of information in the Plan concerning recreation on the Forest. We ask that the Final Plan have a greatly increased section on recreational importance and use. #10

The need for additional data on the Gray Wolf which are present in this Forest is great. The proposed plan to address this lack of information by 1990 involves too much procrastination. We ask that this study be speeded up. #11

The Plan needs to better address outfitter and hunter use on the Forest. The effects of implementing the Plan on outfitters and hunters needs to be thoroughly discussed in a separate section since these uses of the Forest are so important now. For example, the existing outfitter economic impact should be summarized, and the Plan should address the effects of Forest development on economic returns to the local economy resulting from changes in outfitting and hunting caused by Forest development. #12

Research natural areas are treated pretty well in the proposed Plan. However, we ask that one additional area be added. Square mountain creek, and area of rare plants and an ecological boundary area, has not included though it is highly deserving. The Plan would also be improved by making it clearer that the establishment of RNA's is an ongoing process. #13 #14

Of all of the alternatives, we feel that Alternative C comes closest to appropriate allocation of lands and resources on the Nez Perce National Forest. It is preferable to the preferred alternative because it 1) keeps new roads out of 329,000 acres including both sides of Meadow Creek, yet 2) builds 630 miles of roads in the first decade and still enters 30% of currently roadless areas, 3) sets a reasonable harvest level of 75 MMBF, 4) does a good job of protecting elk and fish habitat, and 5) requires a $13 million annual budget (about the current level of spending). #15

Thank you for the opportunity to comment on the Plan. As you can see, we have been rather specific in discussing what we feel needs to be increased in order to make the Final Plan adequate under current laws and regulations. We hope that you will incorporate these revisions into the Plan.

Sincerely,

Don L. Crawford

Don L. Crawford
Chairman
Northern Rockies Chapter
Sierra Club
825 Camas
Moscow, Idaho 83843

LETTER 149

Response No. 1

We appreciate your comments in regard to the Meadow Creek area. The two roadless areas that make up this area are East Meadow Creek (1845D) and West Meadow Creek (1845C). East Meadow Creek will be managed in an undeveloped state with no timber harvesting or road construction to be scheduled in this area. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 2

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

The effects on the assignment of prescriptions to analysis areas is less significant. There are several reasons for this. Desired levels of nonpriced outputs are specified as constraints based on the objectives of the alternative. Prescriptions are assigned to specific areas to achieve other multiple use objectives. The non timber outputs such as fish/water quality are constrained so that management prescriptions are assigned to specific analysis areas in order to meet the constrained level. These outputs as well as those non timber outputs which are not specifically constrained in the model are valued outside the FORPLAN model and are included in the total PNV for the alternative. These levels of non timber outputs more than meet the projected levels of consumption.

Another reason is that negative prescriptions may be included in the model because they provide the most cost-efficient means of achieving the objectives of the alternative. The satisfying of non timber as well as allowable cut and scheduling constraints often means the most efficient prescription-timing choice is not selected.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 4

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred

Response No. 4 (Con't)

to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road scheme shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground-reviewed nor does it reflect the exact number or placement of the final system which may not be complete for 100 years in the future, nor does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce. There are 77 plans with at least two maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are constructed, others will be closed leaving the system totals to remain near constant throughout the planning cycle.

ATP maps are on file at the Supervisor's office and a copy generally can be reviewed at any District office.

Response No. 6

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

All development on the Forest including development within previously designated roadless areas are covered under the Road Management direction that clarifies road closures. In simple terms this states that "all constructed roads will be managed to mitigate negative impacts on other resources." This direction can include permanent and/or temporary closures.

Response No. 7

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 8

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 8 (Con't)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 9

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas there are suited vs not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations nd would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 3 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the preferred alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 10 and Response No. 12

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism should be strengthened. We agree. Additional analysis was done to estimate impacts of each alternative on jobs and income related to outfitters/guides as well as the timber industry and other recreational related businesses. The importance of the recreation and tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of the recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Sections 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Sections V in the FEIS.

Response No. 11

Research on wolves was begun on the Nez Perce Forest in 1982. A final report on this initial research effort was completed in 1984. Additional inventory and analysis is an on-going project in consultation with the U.S. Fish and Wildlife Service through the biological evaluation process. We are striving to have all wolf habitat inventoried and delineated by 1990.

Response No. 13 and Response No. 14

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Response No. 15

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a

Response No. 15 (Con't)

non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

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#150

May 17, 1985

Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Tom Kovalicky:

I would like to formally register my support for Alt. G plan of forest mangement. I feel that the less land that we tie up for roadless areas the better. At a time when the economy is so depressed, I can't see doing something that will negatively affect so many people living around the Elk City area. #1

I have lived in Idaho for most of my life, for the past 6 years I have been living in Clarkston. I am very familiar with the area in question, since my family is in the logging business. I have spend quite alot of time around Elk City and feel that the area set aside for roadless areas is more than adequate. #2

Each time I have been in Elk City I have seen alot of wildlife including a bear, a moose and calf and one time a Moose walked right down main street! Does this sound like an area that needs more roadless areas? I think not. It sounds to me that you are catoring to a select few of people who can afford to take time off work and spend several hundred dollars for a pack trip to go hunting. These hunters do nothing for the economy around Elk City, the don't eat in the restaurants, drink in the bars, and certainly don't pay for lodging there! The only people who will benefit from more roadless areas are the people who own the packing outfits. Is the lining of a few pockets worth risking a whole town? I think not.

As long as Elk City and surrounding areas are allowed to better themsleves financially, the "wilderness mistique" will always prevail in Elk City. I love the area and encourage many of my friends to go there to just "get away from it all" for a few days.

Since I am in the real estate business, I understand the need for compromise, that is why I support plan G. Maybe that will help to keep both sides happy.

Sincerely yours,

Teresa Kamerrer

Teresa Kamerrer
President of Asotin County Board of Realtors

LETTER 150

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 150

Response No. 2

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#151

1001 Cedar Ave.
Lewiston, ID 83501
May 22, 1985

Dear Mr. Kovalicky:

I am concerned about the Forest Plan for the NezPerce National Forest and would like to give you my thoughts in this letter:

Meadow Creek should be left as it now is; the planned road north of Anderson Butte would be an expensive one to build. Also the Mallard Falls and Noble Creek roads. A more realistic budget should be planned with far fewer roads in the first decade than is currently under consideration. More information is needed about the suitable timber lands before these roads are built; the impact on all forest users including outfitters and guides and general recreation. More plans for reforestation of the currently roaded areas are needed and I support a short and long-term timber harvest plan in the 75 to 95 mbf per year range that does not need advanced large scale road building. The monitoring system of the Forest Plan needs improving and what is the public's role in this monitoring? #1 #2 #3 #4 #5

I feel that there are a lot of good points in the plan, but there are too many unknown factors that could play a big role in forever changing our forest heritage unfavorably when there could have been a better long-term management plan. Do we want to take the chance?

Sincerely,

Linely Grant

LETTER 151

Response No. 1

The Meadow Creek area includes the East Meadow Creek and West Meadow Creek roadless areas. East Meadow Creek will be managed without additional roads in order to emphasize fish, wildlife, and dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the

Response No. 2 (Con't)

objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 3

Additional information on the process and criteria for determining suitable and unsuitable lands has been added to Appendices B and D in the Final Environmental Impact Statement. In addition, detailed data for the suitable and unsuitable lands in the Preferred Alternative can be found in Appendix E of the Forest Plan. A map showing the proposed major road construction projects in relation to the current roadless areas on the Forest was prepared for the public meetings this spring and is available for review in the Forest Supervisor's Office.

As a result of the the comments received, the Forest has completed additional analysis on the impacts of the alternative management plans on the outfitting and guide industry. This analysis was done to estimate impacts of each alternative on jobs and income related to outfitters/guides as well as the

Response No. 3 (Con't)

timber industry and other recreation-related businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities and the quality of the recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Section 3-4; and Appendix B, Section V in the Final EIS.

Competitive issues such as timber harvests/road building, roadless area management, and outfitter and guide operations exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (acres assigned to wilderness/roadless management) outputs, it becomes possible to see what is given and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach toward the Forest and maximizes Net Public Benefits. For more information, see Chapter II, Section 16, in the EIS.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

Response No. 4 (Con't)

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

#152

May 23, 1985

Forest Supervisor:

Alternative D with its 157MMBF annual timber harvest in the first decade is the one we need. Next is alternative E harvest cut in the first decade of 127MMBF. I cannot see how the industry can get along on the 102MMBF. Whatever we do lets not get any more wilderness! #1 #2

Sincerely,

Darrell Adams

Darrell Adams
Route 2, Box 452
Grangeville, ID 83530

LETTER 152

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 152

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other Forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

As part of the Forest Planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Forest Supervisor
Nez Perce National Forest

#153

Sir:

Concerning the proposed forest plan for the Nez Perce Forest, I would support a realistic budget and the building of far fewer roads than are now planned. And specifically to keep roads out of the lower Noble Creek and Mallard Falls areas. Please preserve all of the Meadow Creek drainage as it is and continue the existing uses. I would also recommend a harvest level of 75-95 MMBF/per year which would not need large scale advance road building. #1 #2 #3

Concerning the monitoring portion of the plan, I feel it is very weak and ask that it be greatly strengthened. What are the long range impacts/? If plans go wrong what action can we expect? How will we the public be kept informed of changes? Also recreational data seems limited. How about asking the users what they would like to see in forest management. I would like to start gray wolf habitat work started. Soon. #4 #5 #6

I would like to see a separate section for the impact of outfitters towards the local economy and what effect the building of 4400 miles of new logging roads will have on their business. #7

Please provide me with a map which shows suitable and unsuitable lands for timber harvest over the next ten years and the main roads for each development. I feel reductions should be made in timber harvest on genuinely unsuitable lands. #8 #9

I think the draft plan generally does a good job recommending potential research areas except for Square Mountain Creek. Please include it. #10

I strongly support Alternative "C". #11

Karen J. Williams

405 So. 13th
Coeurd'Alene, Idaho
83814

Karen J Williams

LETTER 153

Response No. 1

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

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Road construction on the Nez Perce will not substantially increase during the first decade as implied in the Plan with 830 miles. From 1975 to 1984, the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,050 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

Response No. 2

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis

Response No. 2 (Con't)

before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The area that makes up Meadow Creek consists of East Meadow Creek (1845D) and West Meadow Creek (1845C). East Meadow Creek will not be scheduled for any development activities in order to protect fisheries, wildlife, and high quality dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is complete under NEPA guidelines.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the Final Forest Plan.

Response No. 4

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 5 and Response No. 7

Many participants in our planning effort have suggested that the sections of the Draft EIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use will be developed during the monitoring phase of the Forest Plan. Additional analysis was done to estimate impacts of each alternative on jobs and income related to outfitters/guides, as well as the timber industry and other recreational businesses. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities and the quality of the recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V, in the Final EIS.

Response No. 6

Research on wolves was begun on the Nez Perce Forest in 1982. A final report on this initial research effort was completed in 1984. Additional inventory and analysis is an on-going project in consultation with the U.S. Fish and Wildlife Service through the biological evaluation process. We are striving to have all wolf habitat inventoried and delineated by 1990.

Response No. 8

The proposed timber sale schedule for the next 3 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 9

As previously stated, no timber harvest is scheduled for unsuitable lands. By your reference to "genuinely unsuitable" land, we infer that you have some question about the criteria used to determine which lands are suitable for timber management.

The criteria used to determine land suitability is the same for all management alternatives and is described in 36 CFR 219.14. Lands are first examined to determine if: 1) the land is forested, 2) the lands can be harvested without irreversible damage to soils or watersheds, 3) there is reasonable assurance that the land can be reforested, and 4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. Lands that remain after these tests are regarded as tentatively suitable for timber management. In each management alternative, the tentatively suitable lands are determined to be suitable for timber management if: 1) the multiple use objectives for that particular alternative do not preclude timber management in some areas, 2) management objectives do not limit timber production to the point where management requirements cannot be met, and 3) the lands are cost-efficient over the planning horizon in meeting the total Forest objectives. The computer model, FORPLAN, was used to determine the set of lands that were cost-efficient in meeting the overall objectives of the alternative.

In addition, in the Final EIS there is a discussion of the economics of individual timber sales particularly those cases which do not recover the timber-related costs (below cost sales). These discussions can be found in Chapters I, II, III, and IV of the EIS.

Response No. 10

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Response No. 11

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 11 (Con't)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Mr. Tom Kovalicky
Supervisor, Nezperce National Forest
Rt 2, Box 475
Grangeville, Idaho 83530

#154

Bob Lamm
421 N. Georgia
Caldwell, Idaho 83605

This letter is written to express my concern regarding the Nezperce Forest Plan. I spend 2 weeks or more each year traveling through, fishing and hunting in this area. The vast expanse of country with better than average roaded access provides a unique experience on all counts, and provides areas for the diverse uses. Unroaded or closed road areas provide adequate wildlife cover, and cushion the effect of man's activities. Generally a good balance already exists, let us not diminish it's value.

I am particularly concerned that increased road building will damage elk habitat and the excellent fisheries in the area. Planning increaed timber harvest when the market has been largely relocated from our state by the ineconomies of harvest and transportation makes no sense either economically or environmentally. Subsidy of the forest industry to the detriment of the countryside is not my idea of a well invested tax dollar. #1 #2

I willingly spend my travel and recreation dollar in this area, and will continue as long as it's values remain, but I do not choose to support a non-competitive industry by destroying the value of our public land.

Respectfully,
Bob Lamm
Member: Idaho Sportsman Coalition
& Rocky Mountain Elk Foundation

Copies:
Sen. Jim McClure
Sen. Steve Symms
Rep Larry Craig
Rep John Seiberling
Gov John Evans

LETTER 154

Response No. 1

The Forest Service has completed many research projects studying the effects of roads and road design features on the impacted environment. These studies such as Horse Creek, Silver Creek, and Coram administrative research have been developed to give land managers an insight into the effects of land-disturbing activities and the mitigation effects of different design standards and practices. Coupled with these studies and a continuing effort with the University of Idaho, University of Montana, and Intermountain Research Station on site-specific projects on the Nez Perce, mitigating road standards have been developed to meet quality resource objectives. These studies have especially been centered around water quality and anadromous fisheries habitat. The Nez Perce is known as a leader in this field with the Idaho Department of Fish and Game, State Water Quality Board, and other federal agencies in Washington, Idaho, and Montana.

Specialists from the Idaho Department of Fish & Game, Bureau of Land Management, and Forest Service have strived to achieve quality management standards. These standards and guidelines have been incorporated into the Plan as management direction. The Plan also calls for continued monitoring and site-specific research projects in an effort to continually reduce these impacts and the costs associated with the design standards and practices.

The Forest Plan as presented has the constraints within the development to meet the attainment goals presented and provide for quality results while protecting your concerns for the environment.

Response No. 2

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

DONALD E. FAIRLEY
CERTIFIED PUBLIC ACCOUNTANT
638 B Sixteenth Street
Clarkston, Washington 99403

RECEIVED
NEZPERCE NF #155

MAY 23 1985

FS
AO
Plng
TM,Rge,WL,Min
R&L,Fire
Eng
Prec May 17, 1985
Plng & Ser
Const & Mtce
P10
Mgmt Infor
Cont & Proc
B&F
Pers
Resource 5/28

Tom Kovalicky, Supervisor
Nez Perce National Forest
Rt. 2, Boc 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

This letter is being written concerning your proposed sale of timber in the West Side Meadow Creek drainage of the Nez Perce National Forest.

I am 57 years old and have lived in the Lewiston, Idaho area my entire life. During this time, I have seen many changes in the lifestyles, logging practices and in particular, the recreational habits of our people.

As I have observed this transformation, it has been obvious that the increased use of our forest lands has been in direct proportion to the access provided to these lands by the road systems which were made possible through the sale of timber. I, therefore, strongly support multiple use of our forest land as it not only realistically utilizes a renewable resource, it provides additional benefits and enjoyment to R.V.'rs, woodcutters, hunters, fishermen, and nature lovers.

Millions of acres of land have been designated as wilderness and roadless areas, and I believe enough is enough. The timber and animal habitat on these lands, will, in all probability, be destroyed by insects, disease or fire. Wilderness may be a fine idea in concept, but all living things die, so it behooves us to use good judgement in balancing the various uses of our lands against present utilitarian benefits and future generations. #1

I have also hunted in the Nez Perce National Forest for the last 25 years. It is my opinion that logging (including clearcutting) has been a great influence in increasing our Deer and Elk herds, as additional food had been made available to sustain the additional animals. I have seen more game today in the logged over areas where I hunt, than I have seen in all the years I have hunted the area.

Regarding the economics of harvesting U.S.F.S Timber, I have the following comments to make:

1. The "so called" subsidy that is purportedly being paid to the timber industry because critics claim the U.S.F.S. is losing money on its timber program can be traced directly to main road costs. U.S.F.S. accounting charges an entire main road system to the first timber sale it supports. This is not realistic as in practically all cases this road system is used for many subsequent timber sales and in reality, supports the harvest of many times the timber volume to which the road was orginally charged. The road is also amortized as a single purpose logging road, when in fact, the road serves as a future Forest Service management aid, as well as the multiple purpose referred to above. #2
2. The timber industry is one of the basic industries that support our local economy. When men are employed, they pay local and federal taxes, and their "take home" pay is basically spent locally for the basic requirements of life. Every payroll dollar is respent or "turned over" an average of six times in a local economy. This turn over is what provides a community with economic continuity and well-being. Additionally, 25% of the timber sale is given to the local school districts for their general funding in lieu of local property taxes. #3
3. When the environmental groups and professional packers accuse the U.S.F.S. of subsidizing the timber industry, one can't help but wonder how much money is being lost by virtue of keeping roadless areas in a status quo for the benefit of a few packers who work one month a year. A valuable asset that is not earning any revenue is really operating a loss. #4

In conclusion, I repeat, that I am in favor of systematically logging the West Side of Meadow Creek in as economically feasible manner as possible.

Very Truly Yours

Donald E. Fairley

Donald E. Fairley

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

We agree that current accounting methods for assessing road costs for timber harvest sometimes overlook the multiple use benefits derived from the use of these roads. New procedures to track timber sale-related costs are now being implemented and hopefully will provide a more accurate assessment of road development costs.

Response No. 3

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the Preferred Alternative (Alternative G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource- dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment and income resulting from increases or decreases in Forest resource outputs with base year (1980) employment and income of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment and income by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues,

Response No. 3 (Con't)

management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 4

The option of scheduling timber harvesting in West Meadow Creek was considered in several of the alternative management plans studied for the Nez Perce National Forest. In the Preferred Alternative, the decision is to include West Meadow Creek as an area suitable for timber management, but to delay any harvest activities for the next 10 years. The reasons for delaying immediate entry into the area are: 1) the current condition of the timber stands in the area are relatively young and thrifty, 2) current economic conditions in the timber market and the amount of road construction necessary would likely result in sales that would be costly for the Forest Service and the purchaser, and 3) delaying entry will not have a significant impact on the timber harvest levels in the first decade, since the fish objectives for the drainage preclude rapid development.

#156

To Mr. Kovalick:

5/19/85

In reagard to the 'Roadless Area's' Proposed Forest Plan. I think the People sould be aware of the wood's and how it's maintained..I have read New's Paper some of the people complaintes. I have seen a film, and listened to some of the conserns at the Saw mill where I work. I also have talked with people who also hunt and fish and enjoy the woods.

In regaard t o these Concerns, from what I have read, or heard, or seen on these Isuse, is that the Elk, Deer, and Moose, don't go near the roads? I have seen all of these animals on or near a road, incluieding -Bear, wild rabits, and other wild life animals. I also have talked to people who enjoy hunting or fishing and in there years of hunting there kills were within less than one mile..How do you explain that? From what I have heard is that Deer, and Elk, and other wild game mygrate when there food runs low they move on.I don't make more "Roadless Areas"", the wild Game would increase that much ! As for the roads, I don't think reading human road maps are done by Deer and Elk, and other wild game. #1

On the isue of Streams , from what I have read that putting colverts in couse dameges and polutens to the streams, that afect the fish. In regard to this I talked to a person where they put cement forms on each side and then put a half colvert over the stream, so it dos'nt afect the stream. #2

I regar to the "Forest Trees", I think the people have adequate conserns. I think the type of "Loging Operation" is wrong for this area. It takes around 100 years to grow a tree in this area where as over on the Coast it takes about 40 years, and they use selective cutting. #3

A few years ago I went TO a plase in the woods where I use to go during my teenage years motercyling, and hunting, it was selective cut, then now it is clear cut now, and looks bad, both for man, and animal. I think that logging operation's should go to selective cutting, or thing. selective cut areas would provide better kind of fowlege and food suply, than clear cut areas, and it would provide a renewing supply of logs for saw mill operations, this way we could stay at the curent level of 102.0 million board feet a year, or increase to 120.0 million board feet a year if needed. I don't think we need any more unemploment. Espialy when your famly is countting on you. #4

Sincerly
George D. Deardorff
P.O Box 185
Grangeville 83530

LETTER 156

Response No. 1

Many differences in opinion are generated with the road/elk issues. The only consistent opinion is that motorized vehicles harass wildlife during early spring calving periods and during hunting season. This is mitigated by road closures throughout the management direction within the Plan. Road management planning will eliminate motorized vehicle access in most cases during periods of harassment and allow for access during timber harvest or wood gathering periods.

Response No. 2

The culvert design procedure in your letter is used by many of the Forests to eliminate resource damage within the stream channel when crossings must be constructed. This process is one of many tried and approved by the Idaho Department of Fish and Game and other specialists in the fishery/water quality fields.

The Forest Service has completed many research projects studying the effects of roads and road design features on the impacted environment. These studies such as Horse Creek, Silver Creek, and Coram administrative research have been developed to give land managers an insight into the effects of land-disturbing activities and the mitigation effects of different design standards and practices. Coupled with these studies and a continuing effort with the University of Idaho, University of Montana, and Intermountain Research Station on site-specific projects on the Nez Perce, mitigating road standards have been developed to meet quality resource objectives. These studies have especially been centered around water quality and anadromous fisheries habitat. The Nez Perce is known as a leader in this field with the Idaho Department of Fish and Game, State Water Quality Board, and other Federal agencies in Washington, Idaho, and Montana.

Specialists from the Idaho Department of Fish and Game, Bureau of Land Management, and Forest Service have strived to achieve quality management standards. These standards and guidelines have been incorporated into the Plan as management direction. The Plan also calls for continued monitoring and site-specific research projects in an effort to continually reduce these impacts and the costs associated with the design standards and practices.

The Forest Plan as presented has the constraints within the development to meet the attainment goals presented and provide for quality results while protecting your concerns for the environment.

Response No. 3

In the Final Environmental Impact Statement we did include additional information on how we considered selective logging (uneven-aged mangement). Basically, our reasons for not choosing to selective-log large areas of the Forest are: 1) It is difficult to maintain the desired species mix in the stand, which is more grand fir, less Douglas-fir and ponderosa pine, 2) It

Response No. 3 (con't)

requires frequent reentries into the same stands which are disruptive to wildlife, 3) Many forest types on the Nez Perce are naturally even-aged lodgepole pine. Selective logging will be used on the Forest in some instances where it is the best method to harvest timber and meets the needs of other resources. Some examples are in riparian areas and in stands that have high visual quality objectives.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

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Comment No. 157

Dear Sirs,

We need to increase the sustained yield on the Nezperce to assure that we have adequate timber to maintain the sawmill production in the area at least at present levels. #1

Our jobs depend largely on timber from the Nezperce National Forest. We prefer to have the allowable cut increased to about 120 million board feet over the next 5 years. #2

We feel that we have enough of our public land set aside for wilderness, and #3
would like to see more of the remaining roadless areas opened up for logging. #4

Being of a logging-related work family, these issues are very important to all of us.

/s/ Hope Honeyfield
Milton R. Honeyfield Sr.
Milton R. Honeyfield Jr.
Heather Honeyfield
Tamara Burgus
Robin E. Frieze
Dwayne Freize

LETTER 157

Response No. 1 and Response No. 2

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LETTER 157

Response No. 3

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 4

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Comment No. 158

Dear Mr. Tom Kovalicky,

I have been living in Idaho for the past 16 years and have enjoyed being employed at the lumber mill which now is Idapine Mills. This was a good area and I have enjoyed raising my two sons here. I would hate to think just a few people could put so many people out of work if we lock up more timber. #1

I enjoy hunting and fishing and my two sons have enjoyed it along with me, but we had to use roads to get to places we like to hunt and fish. I cannot afford to go far on just weekends. In fact, I don't even hunt elk, but I have seen plenty in my outings.

Timber is my job. If the timber goes, I'll have to go looking someplace other than Idaho for work and I hate to leave my home and friends I have made in the past 16 years.

I feel Idaho is a rich State if we look to the future, and timber will be there for the future if people can agree on a suitable proposal for all to enjoy. I feel we need more than 120 million board feet to keep our mills in our area running. We have enough roadless area and enough land locked up for just a few to enjoy. #2

I am all for the RARE II if it keeps our timber open for logging. There is enough wilderness in Idaho already for everyone to enjoy if they have the time and money to get to it. To me, it's a shame to see a fire in woods and have to watch it burn because it's locked up. This is a waste and I'm sure we are all trying to improve on this. Timber should be treated as a farm. It's a renewable resource and we all can improve on this so our future generations can go out and enjoy a walk in the wild. #3 #4 #5

Idaho cannot live just off tourists. It would soon go bankrupt supporting the people that lost jobs because a few people locked up more timber just for a few to enjoy.

I feel our mill supports a lot of people and not just the people that work directly in timber only. We have lost too much in this area already -- just drive around Grangeville and look how many houses are for sale. This makes me wonder why they are not selling and our town booming. Not just in Grangeville, some of our other towns around the area are in the same shape.

Sincerely,

/s/ Paul Rieger

LETTER 158

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

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Response No. 3 (Con't)

fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

Fires are suppressed throughout the Forest. This includes fires inside as well as outside wilderness. There is no area on the Forest where suppression action cannot be taken because the area is "locked up." Only those fires meeting strict prescriptions are allowed to burn.

Response No. 5

Timber, just like many of the other resources on the National Forest, is a renewable resource and we agree with you that our renewable resources should be carefully managed so that they can be used and enjoyed by future generations. In many areas of the country, timber is grown in a manner very similar to a farming operation or an agricultural crop. In this area of the country, our management of the timber has to take into consideration the terrain, fairly short growing seasons, and the other uses and Forest resources that occur with the timber. These factors limit the use of some of the intensive management treatments used in other regions, but on the areas where the emphasis is timber production we strive to maintain the maximum growth in each stand by replanting immediately following harvest, protecting the seedlings from animals when necessary, and thinning out the young stands when they become overcrowded with trees.

#159

May 23, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Forest Supervisor:

We can live with road closures and a few less fish and elk. What we can't live with is fewer jobs. We need the 157MMBF annual timber harvest now. We can't stand any more wilderness, so lets get the roadless area roaded. #1 #2

Thank you,

Kiele Brothers Logging
Route 1, Box 52
Kamiah, ID 83536

LETTER 159

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

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Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Of the 503,162 acres of roadless area, only 126,846 acres will remain undeveloped. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#160

May 25, 1985

Forest Supervisor,

We can live with road closures and a few less fish and elk. What we can't live with is fewer jobs. We need the 157MMBF annual timber harvest now. We can't stand anymore wilderness, so lets get the roadless area roaded. #1 #2

Thanks,

Hal K. Smurthwaite
1003 N. Junction
Grangeville, ID 83530

LETTER 160

Response No. 1

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#161

May 25, 1985

Attn: Forest Supervisor

I like to fish and hunt on the Nezperce. I have to work first! #1
What needs to happen is to start cutting that old growth timber #2
as quickly as possible. Expecially the Ponderosa Pine and stop
it from dying. Alternative D is where I would recommend we go. #3

Respectfully,

Bill Stolz
1103 Crooks Street
Grangeville, ID 83530

LETTER 161

Response No. 1

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Response No. 2

Most of the timber harvest in the first 10 years of the plan will be directed toward the old-growth stands or those areas where the growth potential of the stand is not being realized and young, thrifty stands could be established. The amount of ponderosa pine that will be cut will depend on the specific location of each timber sale. We realize that this is currently one of the most valuable lumber species, but selection of timber sale areas must also take into account which stands are in the worst condition overall and how the other resources (wildlife, fish, visuals) would be affected.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

Response No. 3 (con't)

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#162

May 24, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Forest Supervisor:

It doesn't do our logging operations any good to know that 10 years from now you propose to increase the allowable sale quantity to 139MMBF or in forty years to 206MMBF. Theres alot of it dying out there now ! We need to get more cut now. Alternative "D" comes alot closer to what we need today. Lets not get any more wilderness. We have to much now! #1 #2 #3

Sincerely,

Dave E. Cox

Cox Industries, Inc.
405 N. W. 4th
Grangeville, ID 83530

LETTER 162

Response No. 1

As noted in your comment, the timber harvests are scheduled to increase in the out decades. We realize that future projections of higher volume are not an adequate substitute for current needs and they are not intended to be. These are our best projections on what we will be able to do in the future based on current assumptions.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 2 (con't)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 3

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

May 24, 1985

#163

Forest Supervisor:

We can live with road closures and a few less fish and elk. What we can't live with is fewer jobs. We need the 157MMBF annual timber harvest now. We can't stand anymore wilderness so lets get the roadless area roaded. #1 #2

Sincerely,

Glen Deasy
Box 186
New Meadows, ID 83654

LETTER 163

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total Forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Of the 503,162 acres of roadless area on the Nez Perce, only 126,846 acres will remain undeveloped. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#164

May 23, 1985

Forest Supervisor,

I like to fish and hunt on the Nezperce. I have to work first! What needs to happen is to start cutting that old growth timber as quickly as possible. Especially the Ponderosa Pine and stop it from dying. Alternative D is where I would recommend that we go. #1 #2 #3

Sincerely,

Gary Swift
Box 272
New Meadows, ID 83654

LETTER 164

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Most of the timber harvest in the first 10 years of the plan will be directed toward the old-growth stands or those areas where the growth potential of the stand is not being realized and young, thrifty stands could be established. The amount of ponderosa pine that will be cut will depend on the specific location of each timber sale. We realize that this is currently one of the most valuable lumber species, but selection of timber sale areas must also take into account which stands are in the worst condition overall and how the other resources (wildlife, fish, visuals) would be affected.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

Response No. 3 (Con't)

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#165

May 22, 1985

The Nezperce National Forest
Rt. 2 Box 475
Grangeville ID 83530

Dear Forest Supervisor Kovalicky and staff,

I'd like to comment on the Nezperce Forest's draft land management plan.

I'm sure that nearly all of you would tell me if I asked that the chances of your Forest's budget rising 15-20% anytime soon are slim to none. Yet that assumption underlies your preferred alternative. NFMA requires realistic planning based on the best available data. Have you checked with either OMB or Senator McClure as to the likelihood of your assumption coming true?

The budget for your preferred alternative should be at best a stable budget in real dollars. That will then force changes in the program, and choices, that should be displayed since in the real world you will be making them. #1

The plan assumes that timber demand and prices will rise. Those are also unrealistic assumptions. Do you have explicit evidence for them? #2

There is no good economic or resource reason to pursue steadily rising timber harvest from the Nezperce. It can only be done by continuing present federal subsidies embedded in your road and timber programs. It is not necessary for local community stability or mill capacities. The Forest is now selling less timber than it offers, and cutting less than it sells. Your real world budget will only allow it if nearly all other programs shrink dramatically.

I recommend a timber harvest target somewhere around 80-90 MMBF annually. #3

By far the largest management impact proposed on the Forest is the 800 miles of new road proposed for the next decade, and over 4300 miles over 50 years. It is therefore curious, and revealing, that the plan presents no map or area-specific analysis of that roadbuilding program. Both should be included, as well as description of the roadbuilding budget in more detail. Where are these road funds going to come from? #4

The Mallard Falls and Noble Creek roads should not be built, nor new roads on West Meadow Creek. Those roads which are built should only be constructed if the timber harvest associated with them will occur in the next year or two. Advance roading as you propose is the most blatantly wasteful economic practice in a program shot with such. #5 #6

The plan's land suitability analysis is plainly contrary to NFMA. The Forest must classify all its forestland as either suitable or unsuitable for timber harvest, based on the criteria and process contained in NFMA. I would predict that unless you do this the plan will surely be taken to court. #7

I support Denis Baird's suggestion that the plan contain a map showing lands you classify as suitable under NFMA, timber sales planned in both suitable and unsuitableland in the next 10 years, and the associated roads. Such a map would provide an excellent test of the plan's compliance with NFMA. #8

#165

I support the plan's recommendations to manage lower Rapid River and Coolwater Ridge as roadless. I urge similar management for all of the entire Meadow Creek drainage remaining roadless, and for nearly all the Jersey-Jack area. #9

Among the alternatives presented, I recommend Alternative C over the preferred alternative on grounds of economy, resource protection, and realism. #10

Sincerely,

Pat Ford

Pat Ford
4414½ 2nd Street
Boise ID 83702

RECEIVED
MAY 28 1985

Response No. 1

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 2

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Response No. 2 (Con't)

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

The effects on the assignment of prescriptions to analysis areas is less significant. There are several reasons for this. Desired levels of nonpriced outputs are specified as constraints based on the objectives of the alternative. Prescriptions are assigned to specific areas to achieve other multiple-use objectives. The nontimber outputs such as fish/water quality are constrained so that management prescriptions are assigned to specific analysis areas in order to meet the constrained level. These outputs as well as those nontimber outputs which are not specifically constrained in the model are valued outside the FORPLAN model and are included in the total PNV for the alternative. These levels of nontimber outputs more than meet the projected levels of consumption.

Another reason is that negative prescriptions may be included in the model because they provide the most cost-effective means of achieving the objectives of the alternative. The satisfying of nontimber, as well as allowable cut and scheduling, constraints often means the most efficient prescription-timing choices are not selected.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, see Appendix D of the EIS.

Response No. 3

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5 and Response No. 7

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road scheme shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor, does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and there are 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are constructed, others will be closed leaving the system totals to remain near constant throughout the planning cycle.

ATP maps are on file at the Supervisor's office and a copy, generally, can be reviewed at any District office.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale

Response No. 5 and No. 7 (Con't)

contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 6

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 8

The planning regulations, 36 CFR 219, were written to implement the National Forest Management Act as directed by Congress. Section 219.14 of the planning regulations contains specific direction for determining suitable lands in the forest planning process. We believe that the determination of suitable lands for all of the alternatives considered in the Environmental Impact Statement and the final land assignments described in the Forest Plan, are consistent with this direction. The final breakdown of suitable and unsuitable lands can be found in several places in the Final Environmental Impact Statement and Forest Plan. The suitable lands for each alternative can be found in the descriptions in Chapter I and in the Tables in Chapter II. A detailed

Response No. 8 (Con't)

description of the suitable and unsuitable lands in the Preferred Alternative can be found in Appendices E, G, and I of the Forest Plan as well as in Chapter III.

Response No. 9

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns, Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas that are suited vs. not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 3 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 10

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West

Response No. 10 (Con't)

Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 11

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 165

Response No. 11 (Con't)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#166

708 Lombard Street
Salmon, Idaho 83467

May 21, 1985

Mr. Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Tom.

I have reviewed the Draft EIS and Proposed Nezperce National Forest Plan and find both documents inadequate; and the decision to implement the proposed Alternative G is completely unacceptable. They are both written as "justification statements" for continuing present management and doing business as usual. Some of my reasons for these conclusions are as follow.

The preferred alternative (G) will "Emphasize fish and wildlife resources through specific drainage objectives, and to provide a high level of market outputs." There is certainly no question about production of high level of market outputs, but I do not agree that there is any kind of emphasis placed on the fish and wildlife resources. This is with special reference to elk, which you repeatedly state is the major big game species and also a Management Indicator Species. On August 13, 1980, Director Jerry M. Conley, Idaho Department of Fish and Game wrote to all of the Supervisors of National Forests in Idaho, asking them to adopt Management Objectives for Spring/Summer/Fall Elk Habitat. He asked specifically that (1) key elk range be managed for 100% of potential, (2) developed standard elk range be managed at no less than 50% of potential and (3) undeveloped standard elk range be managed at no less than 75% of potential. I fail to find any reference to his proposal in either the EIS or Plan. Was it used as an Evaluation Criteria or given any other special consideration? If so, how ? Implementing IDF&G's Management Objectives would definitely emphasize wildlife objectives. #1

The most disturbing part of the Plan was the statement in Forestwide Management Direction, "In case of a conflict between managing for summer elk habitat goals and meeting the timber allowable sale quantity, the summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met." How could a statement such as this appear in an alternative that supposedly emphasizes wildlife resources? This is ludicrous! It is also the history of the Forest Service in a nutshell. They make well intentioned Standards and Guidelines to be

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followed as long as they do not conflict with the major goal, cutting timber. When they do, the Standards and Guidelines are swept under the rug. No wonder the Forest Service has lost all its credibility when it comes to managing wildlife. I strongly suggest you remove this blatant statement from the Plan. If not, it will get wide spread publicity in the media from coast to coast. I don't think the Forest Service needs that kind of publicity. I hope you agree.

Also in Forestwide Management Direstion, you say that "Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho" will be used to manage for and assess attainment of summer elk habitat objectives in project evaluations. I found at least one contradiction of these recommendations, and that is your 40 acre clearcut. If the Elk Guidelines are followed, the clearcut would be no larger than 23 acres. How will this conflict be resolved?

In the Alternatives Section (Range), it says "Increases in livestock grazing on elk summer range limit the opportunities to increase elk populations." Again, how can this be true in an alternative that supposedly emphasizes wildlife resources? This needs further explanation. There are other statements in the plan that suggest that elk/livestock problems already exist on summer range. Yet, I see no solution to these problems. Please go into detail about the problems and how you are proposing to correct them.

Your method for portraying the environmental consequences on summer elk habitat is very poor. I found no table that displayed this for all alternatives. I strongly suggest that you devise a method for graphically showing the loss of summer elk habitat and/or security cover for each alternative so that the public can see how much is being traded off.

There were several key maps that were lacking which are needed to tell the whole story. These are a timber suitability map, a key elk summer range map and a map showing both the planned roads and timber sales for the next decade. I suggest that these be included in the revised Plan. #2

Again, I will say that Alternative G is completely unacceptable to wildlife resources which you say are being emphasized. The only Alternative that really emphasizes wildlife is Alternative C, which I urge you to adopt with some modifications. This alternative, along with all of the others, still has too many miles of roads. Please find some means of harvesting timber with a vastly reduced road system. I endorse all of the Roadless Areas which are planned for roadless management in Alternative C. #3 #4

As an ex-Nezperce National Forest employee, I feel the

major resource value of the Forest is wildlife habitat, especially for big game animals. These high wildlife values should not be exploited to favor timber production, which you suggest in your Forestwide Management Direction. There are ways of getting the best of both worlds, recognizing that timber and wildlife are at least co-equal resources. I hope this will be reflected in the final Nezperce National Forest Plan.

I wish to thank you for the opportunity to comment on the Forest Plan and EIS.

Sincerely,

Hadley B. Roberts

HADLEY B. ROBERTS
Certified Wildlife Biologist
U. S. Forest Service (Retired)

LETTER 166

Response No. 1

We agree that the philosophy represented by statements in the Proposed Plan and DEIS such as ". . . summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the proposed alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. Secondly, the ratio of elk summer habitat located within the Forest's nonwilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

You will notice several changes in the final Plan that will significantly reduce the chance of conflict between elk management objectives and timber and road management objectives.

1. No road management policy and direction was explicitly developed in the proposed Forest Plan. The final Plan establishes management policy and direction for the development, implementation, and enforcement of road closures. This will appear as standards and Forestwide management direction in the final Plan.

2. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. East Meadow Creek, Rapid River, and Silver Creek-Pilot Knob will remain roadless.

3. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The elk management objectives will be met. The flexibility to reduce elk objectives to meet timber objectives at the project level no longer exists. Elk objectives and timber objectives will be monitored as discussed in Chapter IV of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

Response No. 2

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas suited vs. not suited for timber production; however, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such on the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 3 years is detailed in Appendix J of the Forest Plan and contains specific information on harvest volumes, location, harvest methods, and the amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection. No timber harvests are planned for lands identified as unsuitable.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber

Response No. 3 (Con't)

management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 4

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

Response No. 4 (Con't)

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

LETTER 166

Response No. 4 (Con't)

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

(509) 924-4600

SUITE 110
MEDICUS PROFESSIONAL CENTER

HAROLD R. HOOVER, Jr., M.D.
GENERAL & PERIPHERAL VASCULAR SURGERY
EAST 12615 MISSION AVENUE
SPOKANE, WASHINGTON 99216

#167

May 23, 1985

Forest Supervisor
Forest Plan
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Forest Supervisor:

Please allow me to comment about the Nez Perce National Forest Plan. Of the alternatives, I support alternative C. #1

My main problem with the other plans is that I feel that extensive road building in the forest does not make a great deal of economic sense. As you know, lumber harvesting has decreased of late, lumber prices are falling, lumber imports are increasing, and it makes no sense to me to build expensive roads into this area of forest, which won't have particularly high forest yields anyhow. #2

Thank you very kindly for your consideration of various opinions.

Sincerely,

Harold R. Hoover, Jr., M.D.
HRH:jik

LETTER 167

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 167

Response No. 2

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Comment No. 168

Craig Norris
P.O. Box 2365
Coeur d'Alene, ID
83814

Nezperce National Forest
(Forest Plan)
Rt. 2, Box 475
Grangeville, ID

Dear Sirs:

In your Forest Plan you propose to build roads in areas to be logged in the future. I do not understand how this can be done wihtout knowing what the future demand for timber will be. Also, you have no data to show suitability of these areas for timber harvest. On other forests, roads are already being built without the required timber on sale sites to cover the road costs. These hard money roads are paid for with tax dollars and I would rather my taxes went to other things. Also, the demand for timber seems to be declining in some areas due to imported timber from Canada and the economy in general, yet roads continue to go in these areas. I do not think the Forest Service is justified managing in this way, and I would like to have explained to me how much of your forest budget will pay for roads and how much will be paid for with tax dollars. #1

I ask that you reduce the road amounts currently in your plan. Specifically, I ask that the roads in Meadow Creek (ecologically part of the Selway-Bitterroot Wildernress), Mallard Falls, and Noble Creek be withdrawn from the Forest Plan. These areas would be better managed for wildlife and recreation which bring great economic value to this State now and will bring more in the future. #2

More and more people are using out of the way, primitive areas for recreation and study, and more data and information is needed on recreational and natural areas and should be made available to the public. I think it would be wise, simply, to leave these areas as they are not only for the benefit of people, but for wildlife, particularly those species which require isolated areas for habitation. These species are not getting proper concern, and to allow further encroachment on them is irresponsible. For isntance, your plan calls for work to be done on the gray wolf by 1990. Good. But this work needs to be started sooner. The gray wolf will not survive without required habitat, the preservation of which should be the primary goal of its management. #3

I support your plan to leave roadless the areas of lower Rapid River, Coolwater Ridge, and the west bank of Meadow Creek. I support Alternative C of the Plan. #4

Sincerely,

/s/ Craig Norris

LETTER 168

Response No. 1

The projections of road construction in the Forest Plan were primarily based on the estimated harvest levels for the Plan period (1988-1997) and projected four decades beyond the first decade. Factors considered in determining the harvest level are existing timber volume, timber growth rates, projected demand for timber, and various nontimber objectives like community stability, anadromous fish habitat, and big-game winter range. In answer to your question, projected miles of road construction is directly based on the projection of timber demand.

It is true that recently the demand for timber has dropped due to changes in the overall economy. But for the purposes of projecting demand in the next decade, as well as decades beyond the Plan period, it is important to consider long-term projections of timber demand in the efficient management of forest lands.

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

For information on Forest Plan budget and appropriated vs. non-appropriated road costs, see Appendix J in the Forest Plan.

Response No. 2

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, no timber sales or road construction activities are scheduled in the the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. East Meadow Creek will be managed without additional roads in order to emphasize fish, wildlife, and water quality.

Response No. 3

The National Forest Management Act of 1976 states that Forests are to "provide for a diversity of plant and animal communities" and requires that National Forests "Maintain viable populations of all existing native vertebrate species". In order to comply with these regulations, standards were developed to maintain minimum viable populations of old-growth-dependent species. These standards were based on the most current literature and may change as new information becomes available.

Appendix N of the Plan establishes the standards and management direction for old growth and snag management. The Forest is planning to maintain at least 10 percent of the total forested acres as habitat for old-growth species. On non-Wilderness lands at least 5 percent of the forested acres will be managed as old growth within each prescription watershed or combination of watersheds totaling 5,000 to 10,000 acres.

Age of trees is not necessarily a good criteria for old-growth habitats. However, for planning purposes, we are using an age criteria of 160 years or older until a better definition based on field data can be developed for the Nez Perce Forest. Only stands that meet this age criteria are designated as existing old growth. Existing old-growth stands will be at least 260 years old before any silvicultural treatments are applied.

Although 10 percent of the forested acres has been designated for management as old-growth habitat, our analysis shows that at 50 years about 59 percent (about 632,000) of the potentially suitable timber (1.06 million acres) will be in an age class 160 years old or older.

Because existing research on old-growth-dependent species was not designed to specifically assess minimum viable populations and the requirements to maintain them, we recognize that the percentages of old-growth habitat and its dispersion that we have identified may not be adequate. Therefore, we identified in Chapter II of the Plan the research need to investigate and validate the minimum habitat requirements for management indicator species. We can only hope that the congress, State legislatures, and wildlife interest groups place a high priority on this type of research and fund it accordingly.

A goal of the proposed Forest Plan is to provide habitat to contribute to the recovery of threatened and endangered (T&E) species in accordance with approved recovery plans. After reviewing our plan, the U.S. Fish and Wildlife Service wrote that it is not likely to jeopardize the continued existence of T&E species on the Forest. The Service also wrote recommendations on how we might promote the conservation of these species. The Forest will continue to work closely with the Fish and Wildlife Service to revise and implement the recommendations.

The Forest also has a well-established policy of working informally with the Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service to provide habitat for these species and to promote their recovery.

Response No. 3 (con't)

Research on wolves was begun on the Nez Perce Forest in 1982. A final report on this initial research effort was completed in 1984. Additional inventory and analysis is an on-going project in consultation with the U.S. Fish and Wildlife Service through the biological evaluation process. We are striving to have all wolf habitat inventoried and delineated by 1990.

Response No. 4

Rapid River and East Meadow Creek will remain undeveloped. West Meadow Creek and Rackliff-Gedney (Coolwater Ridge) will be managed as stated below.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 168

Response No. 4 (con't)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Jackson Investment Co.

#169

May 22, 1985

Forest Plan
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Re: Meadow Creek Drainage

Dear Planners:

I strongly recommend the adoption of Plan "C" with regards to the Meadow Creek Drainage for the following reasons: #1

1. Roads destroy a wilderness like area and a valuable natural resource. Take Oregon for example (my home-state) where roads are everywhere and there is too much use of the land. Recreational and Hunting opportunities have greatly decreased. I now spend my money on summer trips and hunting in Idaho because of the vast "roadless" & wilderness areas, as do a great number of other people. Putting roads into Meadow Creek will be a great detriment to the area, as well as to the State of Idaho. #2

2. The Economics of putting roads in such a remote area are all wrong. By saving the 12 million or so that you have budgeted for roads would allow the forest service to sell timber to companies at a price where Helicopter or other means of roadless logging would be feasable. Helicopter logging would actually be beneficial to the forest and should be encouraged. #3 #4

I would appreciate endorsement of Plan C, and thank you for your time and consideration.

Yous truly,

Ron Jackson
Dallas, Texas

cc: Tom Kovalicky, Nez Perce National Forest
Phil Gramm, U.S. Senator - Texas

LETTER 169

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 169

Response No. 2

The area that makes up Meadow Creek consists of East Meadow Creek (1845D) and West Meadow Creek (1845C). East Meadow Creek will not be scheduled for any development activities in order to protect fisheries, wildlife, and high-quality dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 4

Helicopter logging was considered during the development of the Forest Plan and is assumed to be the type of logging operation that will be used 10-20 percent of the time for harvesting timber on the steep lands. The Forest has had several helicopter sales in the past. A frequent misunderstanding of helicopter logging is the relationship between the helicopter as the yarding system and trucks as the hauling system. It is not economical for a helicopter to transport logs more that 1/2 to 1 mile from the harvest area. With helicopter logging, it is possible to log an area with fewer roads, but not without some roads nearby. Therefore, it is not feasible to log large, unroaded tracts with helicopters.

24 May 1985

#170

RECEIVED
MAY 28 1985
FOREST SERVICE
NEZ PERCE NATIONAL FOREST
NEZ PERCE, IDAHO

Dear Forest Supervisor

Re: Nezperce draft Plan

I would like to go on record as supporting Alternate C as being the most responsible of the plans offered. #1

I am particularly concerned about the inflated timber sale - road building plan. Timber sales have declined in Idaho because of worldwide economic factors and because most of the timber profitable to harvest has already been cut. First decade harvest levels should be no higher than 80 MMBF/year, and roads should be built only as needed. #2 #3

I am also concerned that the entire Meadow creek drainage be protected as a roadless area. It is an important adjunct to the Selway-Bitteroot Wilderness, an important elk range and a major tributary to the Selway. #4

With budget cuts in the news for all government agencies, what is the Nezperce plan doing to cut its forest budget? Not building unnecessary roads would be a good start. #5

170

Sincerely,

Linda P. Bergerson

Box 1792
Ketchum, ID 83340

LETTER 170

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 170

Response No. 2

A number of comments express the concern that the proposed timber harvest level in the Preferred Alternative is too high given the current market. The planning process involves the development of management alternatives which cover a 50-year period but allows for updating the Plan at 10 to 15 year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat.

Response No. 3 (Con't

Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the Final Forest Plan.

Response No. 4

The area that makes up the Meadow Creek drainage consists of East Meadow Creek (1845D) and West Meadow Creek (1845C). East Meadow Creek will not be scheduled for any development activities in order to protect fisheries, wildlife, and high-quality dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 5

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Response No. 5 (con't)

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

#171

Karen A. Buxton
P.O. Box 3024
Moscow, ID 83843
May 21, 1985

RECEIVED
MAY 28 1985
FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE, IDAHO

Forest Superintendent
Nezperce National Forest
Rt 2 Box 475
Grangeville, ID 83530

Dear Superintendent:

I recently read about the latest Nezperce Forest plan. There are some aspects of the plan that I like. I was happy to see that some areas of the forest are going to remain roadless, but I was surprised and upset to learn that roads are going to be built with the intention that they be used at some undetermined time in the future. I oppose this strenuously. #1

What guarantee do we as tax payers have that these roads will ever be used? Do potential timber harvests more than offset the cost of road building in say a 10 year period? My information is that they do not. #2

And finally I object to these roads for the future on the basis that these lands should remain roadless as long as possible because that ~~let~~ #3

#171

few remaining roadless areas are some of the only habitat left to our wildlife and should be left ~~along~~ alone as long as possible. Please reconsider this poorly thought out aspect of your plan.

Sincerely,

Karen A. Buxton

Response No. 1

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 2

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 3

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. Approximately 38,000 acres of tentatively suitable land in the Rackliff-Gedney roadless area will be managed to meet wildlife objectives using prescribed burning. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

#172

ROCKWOOD CLINIC
PHONE (509) 838-2531
312 WEST EIGHTH AVENUE • TAF C-13 • SPOKANE, WASHINGTON 99220

RECEIVED
MAY 28 1985
FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO

GENERAL, THORACIC & VASCULAR SURGERY
Daniel F. Cammack, M.D.
GENERAL & THORACIC SURGERY
Roy A. Zimmer, Jr. M.D.
VASCULAR & GENERAL SURGERY
André J. LeSaye, M.D.
OPHTHALMOLOGY
Norman A. Holoway, M.D.
ORTHOPEDICS
Eric G. Dreyer M.D.
UROLOGY
Thomas K. Farrand, M.D.
DERMATOLOGY
Thomas H. Reed, M.D.
DIAGNOSTIC RADIOLOGY
Roy A. Beale M.D.
Richard L. Eaton M.D.
Scott J. Schulte M.D.
DIAGNOSTIC AND INTERNAL MEDICINE
ALLERGY & CHEST DISEASES
James C. Eunch, M.D.
ALLERGY / CLINICAL IMMUNOLOGY
Charles G. Gower, M.D.
CARDIOLOGY
Eric E. Castleberry M.D.
Kirk S. Simpson M.D.
Lee T. Wooster M.D.
ENDOCRINOLOGY
Richard R. Russ M.D.
GASTROENTEROLOGY
Ian Logan Jr. M.D.
George M. Perry, M.D.
GENERAL INTERNAL MEDICINE
Charles J. McCartan, M.D.
Thomas C. Lasene, M.D.
Kenneth Willard M.D.
HEMATOLOGY / ONCOLOGY
Stephen Thomas M.D.
Joe F. Chase M.D.
Stephen G. Kraemer M.D.
NEPHROLOGY
Thomas S. Maier M.D.
John S. Wilcox M.D.
PULMONARY DISEASES
Ronald L. Bailey M.D.
Charles E. Burns M.D.
RHEUMATOLOGY
Paul T. Hochhauser M.D.
Charles R. Stacey M.D.
Gregory L. Saue M.D.
ADMINISTRATION
Keith E. Gannon

May 22, 1985

Forest Plan
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

TO WHOM IT MAY CONCERN:

I write to oppose the plan to extend 4400 miles of new logging roads into the Nezperce National Forest. This is not only a poor use of taxpayer's money, in the face of lack of demand for additional timber; it also will have deleterious effects on the area. Additional development will predictably harm wildlife and recreational opportunities. This, in turn, will effect the tourism and business outfitters in the area. #1

I strongly urge that this extra road building be abandoned.

Yours truly,

Gregory L. Saue, M.D.

GLS:lp

cc: Representative Tom Foley
House Office Building
Washington D.C. 20515

LETTER 172

Response No. 1

The mileage figure that you cite is based on 830 miles of road construction during the Plan period (1988-1997), as well as 3,980 miles of road projected out into future decades. It is important to remember that the Forest Plan covers the time period from 1988 to 1997. After this time period, the Forest Plan will be revised to account for environmental, social, and/or economic changes.

Road construction on the Nez Perce is not substantially increased during the first decade as implied in the Plan with the preferred plan's 830 miles. From 1975 to 1984 the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,053 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. One of the most effective mitigation measures, to most resources, is the closure policy for the road and its timely completion with the scheduled activities.

The Final Forest Plan sets the policy for road closure, timing of closures, types of closures, and estimates percentages of each type of closure to maintain all resource objectives.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Response No. 1 (con't)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

In regard to demand projections for timber and impacts on tourism and outfitters/guides, see the Final EIS, Appendix D and Appendix B, Section V, for the results of additional analysis on these two issues.

Comment No. 173

May 23, 1985
Spokane, WA

Nezperce National Forest

Dear Sir:

I understand that a "plan" is being formulated that will impact the users of the Nezperce National Forest for many years to come. I realize many groups as well as individuals will be lobbying on their own behalf. So must I.

For a number of years I have been a user of the Idaho National Forests. My primary use has been recreational and perhaps a bit of fireplace fuel. I count the hours and days spent backpacking, hunting, fishing, and ejoying the out of doors with my family as special.

I would propose that the timber interests be kept out of the Meadow Creek area. There isn't that much good timber and the damage to Wapiti habitat would be detrimental to hunting and other recreational uses. #1

The demand for new timber resources the past several years doesn't justify encroachment of the Meadow Creek area by timber interest.

I would be in favor of Alternative "C". #2

I urge the Forest Service to plan a budget that will build few if any new roads. I would support some timber harvest of mature stands, but urge that the number of board feet be kept to limits that won't require more roads. Roads, especially new roads, severely impact elk habitat and of course elk hunting. #3

As I understand the proposed plans, I would support Alternative "C" as the best of those proposals. Thanks for your giving the sportsman a chance for input.

Sincerely,

Gale A. Palmer
N. 5329 Alameda Blvd
Spokane, WA 99205

LETTER 173

Response No. 1

The area that makes up Meadow Creek consists of East Meadow Creek (1845D) and West Meadow Creek (1845C). East Meadow Creek will not be scheduled for any development activities in order to protect fisheries, wildlife, and high quality dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

Response No. 2 (con't)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

#174

FOREST SERVICE
NEZPERCE NATIONAL
GRANGEVILLE, IDAHO
MAY 28 1985
RECEIVED

1118 King Road
Moscow, ID.
May 22, 1985

Forest Supervisor
Nezperce National Forest
Grangeville, Idaho

Dear Sir:

I am writing to express concerns regarding the draft version of the Nezperce National Forest Plan. As a state employee I am certainly aware of the importance of the timber industry in our state's economy, and I believe that reasonable steps should be taken to assure its health.

I am concerned, however, by what appears to be an unnecessary amount of proposed road building in what are currently roadless areas. I believe that the this state's economy will increasingly depend on tourism, recreation, and the ability to bring in desirable industry based on the unique attractions this state has to offer. Hunting, fishing, skiing, and a host of other outdoor activities will undoubtedly be an important component of the economy of this state as a whole, and, of course, these activities make living in this state such a joy for most of us. #1

Although I am certainly not familiar with all of the roadless areas in Northern and North-Central Idaho, I have spent a good deal of time in the Meadow Creek drainage region. I would strongly urge that this entire drainage be left in its current state, and that no new roads be built in this region. This is a unique region of great ecological significance, and values other than timber harvest should take precedence in this area. #2

In general, I would hope that roadbuilding in roadless areas be kept at a minimum level, sufficient to meet reasonable needs of the forest industry, but without destroying other resources. It seems to me that Alternative C of the proposed plan will best meet our present and future needs, and provide the desired balance between the competing interests. I urge its support. #3

I realize that your task of finding a balance between the various interests is a most difficult one. I hope you will choose a path that best preserves those values that make this state such a unique one, so that not only we, but our children and theirs, will continue to experience what we have so long enjoyed. I believe that it is possible to find the necessary balance in our forest uses, but it will require considerable foresight and courage.

Thank you for your attention in this matter, and good luck.

Sincerely,

Bill Voxman

Bill Voxman

P.S, I would appreciate it if you could send a map indicating all of the proposed roads. Thanks. B.U. #4

LETTER 174

Response No. 1

Two factors considered while developing the Forest Management Plan were the level of timber harvest and the associated road construction. Several different levels of harvest and road construction, as well as other resource outputs, were considered in developing alternatives.

In the Forest Plan, a schedule of roads to be constructed was developed based on the timber harvest schedule in the Forest Plan. The reason for this basis is the assumption that roads must be constructed/reconstructed in areas where there will be multiple timber sales as well as other multiple resource uses. As the Forest Plan is implemented, project level analysis will be performed to determine the miles of road to be constructed in the area, the design of the road, and the purpose (single vs. multiple) of the road to be constructed. Also, the Forest Plan will establish a strong road closure policy.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

The area that makes up Meadow Creek consists of East Meadow Creek (1845D) and West Meadow Creek (1845C). As stated above, East Meadow Creek will not be scheduled for any development activities in order to protect fisheries, wildlife, and high quality dispersed recreation. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 3 (con't)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 4

Area Transportation Planning (ATP) portrays alternative road schemes that would give the reviewer a proposed roading system for any drainage on the Forest. The road scheme shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor does it reflect the exact number or placement of the final system which may not be complete for 100 years in the future, nor does it specify the closure scheduling that will be developed with initial entry.

Response No. 4 (con't)

These plans are approximately 60 percent complete for the Nez Perce. There are 77 plans with at least two maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are constructed, others will be closed leaving the system totals to remain near constant throughout the planning cycle.

ATP maps are on file at the Supervisor's office and a copy generally can be reviewed at any District office.

eyecenter

Charles B. Parker, OD
Wesley G. Rose, OD
John T. Steile III, OD
Robert B. Grill, OD
Thomas J. Tappen, OD

#175

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 28 1985
RECEIVED

May 22, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Rt 2, Box 475
Grangeville, Idaho 83530

Re: Nez Perce Forest Plan

Dear Mr. Kovalicky:

Would you please place my name in opposition to the Nez Perce National Forest Plan.

I believe the plan would have a significant detrimental effect on wildlife, fish and the pristine value of this forest. It is now time for all of us to look at the true value of this forest.

There is much to be lost, a great cost to the taxpayer, about $185 million over the next 50 years. The value of hunting and fishing should not be undervalued. I believe if the forest service would promote and work toward establishing better habitat without road building and timbering, they would find a savings to the taxpayers of not only $185 million but a tremendous economic income to the area by tourists, hunters, campers, recreation, etc., etc. The lumber is not needed and the taxpayers certainly don't need more taxation. #1

There is no way you can balance federal budgets by spending $360 million and only have a return of $175 million. #2

Let's keep the elk, deer, and fish with the pristine value that we now have. Please don't allow the road building and don't allow this timber cut plan.

Sincerely yours,

Wesley G. Rose, O.D.

Wesley G. Rose, O.D.
JEROME EYECENTER

twin falls eye center
844 shoshone street east
twin falls, idaho 83301
734-9500

jerome eye center
201 south lincoln
jerome, idaho 83338
324-4363

hailey eye center
box 1360
hailey, idaho 83333
788-4120

high mountain eye center
box 1097
challis, idaho 83226
879-2783

LETTER 175

Response No. 1

The overall objective of Forest planning is to produce a package or mix of resources that maximizes Net Public Benefits. Competitive issues such as timber harvests/road construction vs. wildlife habitat and recreation exist and it is impossible to fully meet all wants and desires at the same time. Relationships between priced outputs (timber and range) and nonpriced outputs (wildlife habitat and fish/water quality) illustrated the interactions of attempting to resolve various issues. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the attempts to resolve public issues discussed in Chapter I and Appendix A of the FEIS.

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage.

Therefore, all elk summer range within these roadless areas will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential. All elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads. Also, prescribed burning of deer/elk winter range is being increased from 1,700 acres to 5,000 acres annually in the Plan period (1988-1997).

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

LETTER 175

Response No. 2

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 28 1985
#176
RECEIVED

176

May 24, 1985

Tom Kovalicky, supervisor
Nezperce National Forest
Rt 2 Box 475
Grangeville, ID 83530

Dear Supervisor Kovalicky,

Please consider these comments on the draft plan for the Nezperce Forest.

The selection of the preferred alternative seems to be based primarily on timber cut targets. These targets are too high in view of current demand for timber from the forest, and in view of a backlog of 358 million board feet of timber that was sold and not cut as of 1984. This backlog would equal a seven-year supply, based on the average cut of 55.2 million over the five years through 1984. #1

You show an alternative H, leaving all of the roadless areas roadless, with a cut of 92 million board feet. That would be 40 per cent more than the actual cut of recent years.

The final plan should set an offering figure for the next 10 years no more than 10 per cent higher than the average cut figure for the last five years. With a seven-year backlog of uncut timber, that should be more than enough to meet demand. #2

With this sales figure, road plans for the next 10 years could be greatly reduced. Considering the actual demand for timber, and the backlog, it would be a waste of taxpayer money to spend $7 million a year on additional roads. There should be a moratorium on new roads on the Nezperce until the backlog is reduced to a three-year supply. #3

The 10, 20, 30 and 40-year timber cut targets in the preferred alternative are not based on reality, but apparently on unrealistic RPA goals. It would be much wiser to set targets no more than 10, 20, 30 and 40 per cent greater than the average cut level of the past five years. #4

The Nezperce Forest is part of an area that has approximately 60 per cent of the total elk population in Idaho. Nowhere does the draft plan recognize the destructive impact of roads on elk summer range. The draft attempts to show a negative impact on elk with more area left roadless, by proposing no winter range burning in roadless areas. #5

All of the roadless areas in the Nezperce should be left roadless for the next 10 years, until the next forest planning cycle. #6

With the proposed alternatives, the Panhandle, Clearwater and Nezperce forests are proposing to road approximately 1.3 million acres of roadless areas, including about one million acres of the best roadless elk country in Idaho. This would be devastating to elk. Studies by Jack Lyon at Missoula showed that with roading, and with roads closed to all but administrative use, elk did not come back, even five years after roading. There was still an 80 per cent loss of elk. #1

Road closures are not an effective remedy since they are usually not effective. Presently the plan indicates year-around or partial closure of only 10 per cent of the roads. The best way to close a road is not to build it in the first place. #4

Elk hunting provide a positive economic return in Idaho. Building $84,000 a mile roads for timber sales, which may find no buyers, is a money-losing activity. #7

The Jersey Jack and West Meadow Creek areas, particularly, should remain roadless. #4

I would urge a modified alternative H, with all areas left roadless (not recommended for wilderness designation), but with a lower timber cut, and greatly reduced road building plans. The proposed alternative is not a multiple use plan, but a road plan. #4

Thanks for considering comments on the draft.

Sincerely,

Kenneth L. Robison

Kenneth L. Robison
1119 N 12th
Boise, ID 83702

Response No. 1

Your figures on the volume of timber harvested and sold but uncut are essentially correct based on data from 1980 to 1984. The volume of sold and uncut timber has varied between 300 and 350 million board feet (MMBF) during the early 1980's. Examining timber data for the Forest back to 1960, however, indicates that this amount of sold, but uncut timber is not significantly higher than in most of the years since 1960. The least amount of timber under contract in the 30-year period was approximately 250 MMBF. As you point out, the 1984 uncut volume equals almost 7 years' of cut based on the previous 5 years' harvest levels. Conditions can change rapidly, however, as evidenced by an annual harvest rate on the Forest of 109 MMBF during the period of 1975-1979. During the 1985 fiscal year (October 1984-September 1985) over 100 MMBF was harvested on the Nez Perce. We feel that in developing a plan to guide the Forest's programs over the next 10 years, it is most appropriate to consider the average timber demand from the previous 10 years which includes both good and bad timber market conditions. We are aware of the fact that the timber industry may be undergoing long-term structural changes and not following cyclical market trends. The monitoring provisions described in the Plan will allow us to track this situation and respond with adjustments to the timber sale program if the demand continues significantly lower than the allowable sale quantity.

Response No. 2 and Response No. 4

Your observations of the timber volume sold and harvested on the Nez Perce in the early 1980's are correct and indicate that the timber offered for sale during those years exceeded the demand. However, it should also be pointed out that the softwood lumber market, historically, has been cyclical. For example, in the period of 1975 to 1979, the annual volume cut on the Forest was 109 million board feet (MMBF). In fiscal year 1985, approximately 120 MMBF of timber was cut on the Nez Perce. This indicates that conditions, such as timber demand, can change relatively quickly and to base the Forest Plan on short-term data projections is not in the best public interest. The Plan is designed to be responsive to changes however, through monitoring outputs and effects. For example, if the timber volume offered consistently exceeds the demand, the Plan will either be revised or amended to reflect this.

As mentioned previously, there has been 300-350 MMBF of uncut timber under contract throughout the early 1980's on the Nez Perce National Forest. Examining timber data back to 1960 indicates, however, that this amount is not any higher than in many other years. The least amount of uncut timber under contract over the past 30 years has been 250 MMBF. As you point out, the 1984 uncut volume of 358 MMBF equals almost 7 years' cut based on the 5-years period 1980 to 1984. As mentioned previously though, conditions can change rapidly. For example, at the end of fiscal year 1985 the Forest had approximately 250 MMBF under contract, a significant decrease.

Response No. 2 and Response No. 4 (Cont.)

The only alternative where the RPA timber goals were used to set timber outputs in the first 4 decades was Alternative E. The goal of this alternative was to meet the RPA goals for all resources on the Forest. The timber outputs in decades 1-4 in the Preferred Alternative (and all others except E) are based on the the existing timber inventory, the acres suitable for timber management, and the other resource objectives of the alternative. We do not feel it would be appropriate to predetermine or "hardwire" the timber outputs for the out decades by selecting an arbitrary percentage increase without supporting rationale.

Response No. 3

Timber harvest will be limited by industry's needs, numerous plans, constraints, and limitations placed to eliminate rapid change. The economy of the United States is based on supply and demand. The Plan can call for a sustained harvest of 200+ MMBF, but the sell will not exceed the demand for lumber. (The increase to 200+ MMBF would be gradually increased to allow industry to develop technology and capabilities to manufacture.) Alternative G shows this increasing from decade 1 to decade 3. The timber industry is limited by the demand for products and this demand will dictate any annual volumes cut.

The timber economy during 1982-84 was low and our sale program allowed us to offer 90 to 100 MMBF. We prepared and offered this amount, but sold considerably less. The timber industry usually carries at least a 3-year supply of timber in contracts, and cuts (manufactures) only to meet the lumber demands. During this period, they have utilized this backlog of timber and presently have an all-time low (250 MMBF) volume under contract.

Roads are mainly constructed for timber harvest, as the demand for timber decreases so will the demand for roading. The reverse of this is also true. When the demand for timber increases, the miles of roads will increase to the limit allowed by mitigation and management direction to maintain fish, wildlife, and other Forest Plan objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5 and Response No. 7

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 6 and Response No. 10

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that

Response No. 6 and Response No. 10 (con't)

do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 8

Road closures are very controversial with Forest users. The Forest Service in the past has lacked the ability and support of the public, and of the judicial system to enforce road and area closures. The Forest, in an attempt to eliminate some of the problems, will be utilizing closure techniques that eliminate access to the facility by obliterating the travelway. This will help in most cases, but will not eliminate the trespass and vandalism that roads and their closure devices receive.

The Forest Service needs your help in this enforcement by your active support with closure policies and information from you regarding vandalism or trespassing. We now have a cooperative program with Idaho Fish and Game and CAP (Citizens Against Poaching) hotline for the public use in reporting vandalism or breeching of closure devices.

The Nez Perce is emphasizing road closures through an inform and involve process. Through this educational process we should achieve credibility with the public and judicial systems. If this process doesn't work, timber harvesting and associated roading may not be compatible with multiple use management. Road closures are necessary to provide quality of all resources.

Alternative G, as presented in the Proposed Forest Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Response No. 8 (con't)

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 9

Relationships between priced outputs (timber, range) and nonpriced outputs (big-game habitat and fish/water quality) illustrate the interactions of attempting to resolve various issues. Competitive public issues, such as timber harvest and road construction, vs. elk habitat and fish/water quality exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers (including the public) decide which alternative maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues which are discussed in Chapter I and Appendix A of the EIS.

Response No. 11

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 11 (con't)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#177

May 27, 1985

Mr. Tom Kovalicky, Supervisor
Nez Perce Nat'l Forest
Rt. 2, Box 475
Grangeville, Idaho, 83530

Dear Sir,

I respectfully submit my support for the proposed Forest Service Management Plan as written. #1

However, I would encourage you to increase the allowable cut from 102 to 120 million Board feet over the next five years. I believe that this would cause no additional detrimental effects to air quality, water quality, animal quality, fish quality or soil quality. #2

It's possible timber stands consisting of old trees will not be harvested to produce young managed stands. This leads to greater forest fuel, wind throw, insect and disease damaged and/or the chance of smoke, sensitive areas being smoked in for longer periods of time. #3

Sincerely,

Harvey Laufenberg
(no address)
STAR RT
GRANGEVILLE

LETTER 177

Response No. 1

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

We agree to a certain degree that there would be a loss in timber volume as well as increasing fuels and windthrow by setting the allowable annual harvest at 108 MMBF instead of 120 MMBF. The decision that establishes this harvest level takes into account the overall objectives of the Forest Plan. The loss of suitable timber and the potential for fire or insect/disease is one of a number of tradeoffs considered in the selection of the Forest Plan. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored.

#178

May 24, 1985

Tom Kovalicky
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky:

I am a saw filer for Bennett Lumber Company of Clarkston, Wn. I have worked in the lumber industry for over twenty five years. More wilderness and roadless area is a threat to my livelyhood. #1

With the economy and government debt as bad as it is, why tie up more land and timber to be used only by people with money and time to spare.

I am not against wilderness, but all the present wilderness has done for me is lock me out of the forest. Because of my time schedule, I used to motorcycle in and fish the Seven Devils Area, catching 16" - 18" Cutthroat trout. I simply do not have the time available to walk to the lakes since it was classified as Hells Canyon Roadless Area. I also farm 300 acres so my time is very limited.

I would like to have the West side of Meadow Creek, 1845, not classified as roadless area and would like to see it eligible for timber harvest. #2 I would like to see the Nezperce National Forest harvest 120,000,000 board feet. #3

Sincerely,

Jack C. Blewett

Jack Blewett
Rt. 1, Box 163
Lapwai 83540

LETTER 178

Response No. 1 and Response No. 2

As part of the Forest planning process, we evaluated the current roadless area situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Out of 503,162 acres of roadless areas, only 126,846 acres will remain undeveloped. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#179

May 25, 1985

Draft Forest Plan

Forest Plan
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Sirs:

Following are my comments on the draft Forest Plan for the Nezperce National Forest.

The proposed Plan, Alternative G, places too much emphasis on timber harvest and road building, and not enough on retention of roadless areas and ecological values. Instead of G, you should adopt an alternative which retains most of the roadless area, protects habitat for existing populations of vertebrate species, entails construction of only a modest amount of new road mileage, and proposes a lower annual budget, similiar to the current one. #1

Roadless Areas

Much of the National Forest land in the Northern Rockies is undeveloped. These wild lands are mosaics of ecosystems, the continued existence of which is becoming increasingly important. The Nezperce National Forest in particular is largely composed of wild lands which have outstanding ecological values. For the bulk of these lands, I believe the primary value to humans, economic as well as otherwise, lies in preservation instead of development.

The fact that 41% of the Nezperce N. F. is designated wilderness area does not detract from the high value of the other 472 thousand acres of roadless area. For example, a F. S. study of a few years ago rated Meadow Creek as pristine as the adjacent Selway Bitterroot Wilderness Area. The Nezperce is a great wilderness Forest, both designated and de facto wilderness. We should retain most of the latter as well as the former in its undeveloped condition.

In particular, we should retain as roadless Meadow Creek (the whole drainage), Rapid River, Jersey-Jack, Rackliff-Gedney, and Silver Creek-Pilot Knob, as Alternative C provides. #2

I support the your recommendation for Research Natural Areas, and suggest that you add Square Mt. Creek to your list. #3

Wildlife and Fish

The proposed Plan would not adequately protect habitat. The radical increase in road mileage would most certainly have an adverse impact upon many wilderness species, including elk. It would also significantly increase sediment in the streams. #4

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It is important to retain most of the roadless areas for wildlife. The development of these areas eliminates this habitat for many species.

You should manage habitat for existing populations of vertebrate species, subject of course to natural habitat changes (eg., fire). Providing habitat to support only viable populations, as stated in Objective 3, is not adequate. #5

Roads

Your proposal to build another 4360 miles of road in the next 50 years, thus tripling the mileage of the current Nezperce N. F. road system, is outrageous. In fact, all the alternatives you considered entail too much new roading. #6

Currently, there are about 2000 miles of road in 846 thousand acres of the Nezperce N. F., or an average road density of about 1.5 miles of road per square mile. The proposed Plan calls for roading another 303 thousand acres, and for building another 4360 miles of road in the next 50 years. This would amount to an average road density of 3.3 miles per square mile, or over twice the existing density on the currently roaded lands!

Alternative C, which is generally much better than the proposed plan, still calls for 4000 miles of new road; it implies an average road density of 3.9 miles per square mile! Why is this much new roading needed?

Timber

The Plan calls for too much timber harvest. A better figure for the first decade would be around the 74 MMBF of Alternative C. It would better protect wildlife and fish values, require less roading, be less economically wasteful, and still provide timber to local sawmills. #7

I understand that the average annual cut on the Nezperce for the past 5 years is about 55 MMBF. This is probably a more relevant figure than the Current Level (1980) figure of 102 MMBF which the Overview shows.

You should identify lands which are physically or economically unsuitable for timber harvest, as required by Section 6(k) of NFMA. The Plan should show this stratification on a map. It should also indicate where, if anywhere, you plan to harvest timber from unsuitable lands. #8

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Economics

The display of economic values in the Overview's Alternatives comparison doesn't mean much, because Costs are generally to the F. S. (taxpayers), while Benefits are not. The Plan should show costs to the government vs benefits to the government. Since the bulk of the Benefits are not paid to the government, I suspect that the displayed Costs alone furnish a good first-cut economic comparison of Alternatives. #9

I recommend a lower proposed annual budget than in the draft Plan: something like the $13 million of Alternative C, which is also about the same as Current level. #10

Monitoring

More emphasis is needed on monitoring environmental impacts of road building and timber harvest, as well as other activities. The Plan needs to discuss better what will be monitored and how, what levels of impacts are defined as unacceptable and what will be done if these levels are reached, and how the public will be kept informed and involved regarding monitoring efforts. #11

In summary, I urge you to disgard Alternative G, and adopt instead one which better protects roadless areas, wildlife, and other natural values. I support Alternative C, except that I think 4000 miles of new road are not needed to implement it.

Thank you for your consideration of my comments.

Sincerely,

Jerry Jayne

Jerry Jayne
1568 Lola St.
Idaho Falls, Id 83402

LETTER 179

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas.

However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990. As stated in Response No. 1, 38,000 acres of Rackliff-Gedney will be managed to meet wildlife objectives.

Response No. 3

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Response No. 4

Road construction, timber management, and maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activities in any one drainage, and, most importantly, a high level of understanding and cooperation between all resource managers involved.

Roads are an effect of timber harvest and will only be built to allow for this harvest. Presently, timber harvest is the only budget allowing for road construction. In the first few decades, timber harvest will be spread over the entire suitable timber acres (889,571 acres 47 percent) to allow for mitigation requirements of this activity.

Response No. 4 (con't)

Road construction on the Nez Perce is not substantially increased during the first decade as implied in the Plan with the preferred plan's 830 miles. From 1975 to 1984, the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,053 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roada and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Response No. 4 (con't)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 5

The National Forest Management Act of 1976 states that Forests are to "provide for a diversity of plant and animal communities" and requires that National Forests "maintain viable populations of all existing native vertebrate species." The management goal #3 you refer to is the minimum acceptable for all species.

Response No. 6

The road construction miles that you have quoted are correct in regard to the overall projection over a 50-year period. It is important to remember that the Forest Plan covers only the first decade (1988-1997) and it will be revised at the end of that period. Miles of road constructed in that period is 830 miles. In the monitoring of the Forest Plan, should road construction cause other resource objectives or standards to be violated, then adjustments will be made to protect the other resources.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Response No. 6 (con't)

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

A management tool which will be used extensively and forcefully is the use of road closures. See Response No. 4 above.

Response No. 7

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 8

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas suited vs. not suited for timber production; however, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the

Response No. 8 (con't)

Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 3 years is detailed in Appendix J of the Forest Plan and contains specific information on harvest volumes, location, harvest methods, and the amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection. No timber harvests are planned for lands identified as unsuitable.

Response No. 9

We agree with your comment in regard to benefits and costs displayed in the Overview document of the Draft Forest Plan. This document was used as a summary of the Forest planning process and purposely did not go into the detail that the Draft Environmental Impact Statement or Forest Plan did. For more information on economic values, refer to added sections 16-18 in Chapter II, and Appendix B in the EIS.

Response No. 10

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Response No. 10 (con't)

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 11

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Idaho Environmental Council

P.O. Box 1708 #180
Idaho Falls, Idaho 83401

1820 N. 7th Street
Boise, ID 83702
May 23, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky:

This letter represents the position of the Idaho Environmental Council regarding the Draft Forest Plan for the Nezperce National Forest.

We compliment you on the good job you have done in developing a wide range of realistic alternatives; this has made it easier for the public to see the results of a variety of management schemes. We do not, however, agree with the choice of Alternative G as the preferred alternative. We feel that this alternative is based on some false assumptions and on insufficient data and that, therefore changes in it must be made. #1

1. You have assumed in Alternative G a budget that is higher than historical levels and also that timber demand and prices will rise to meet supply, which contradicts 75 years of timber supply/demand/price data and is totally illogical. As a result you propose long term harvest levels which make neither economic nor environmental sense. Please plan for a realistic budget near today's $13 million, or a slowly declining budget as is more likely, which will result in fewer first decade road miles and in a lower long term harvest. In particular, the first decade harvest levels should be set at about 85 MMBF/year or lower. Since this level is lower than what you have sold in recent years, it should have no negative economic impact on Idaho County. #2 #3 #4

2. Roadless Areas. The I.E.C. has endorsed the Nezperce portion of the Rapid River roadless area for Wilderness. We urge that your final plan recommend this area for Wilderness. Furthermore, we urge that the entire Meadow Creek drainage be managed without any new roads. Road building in Meadow Creek will waste taxpayer dollars, harm the fine hunting and fishing there, and put outfitters out of business. The timber is also not needed to sustain Idaho County sawmills. There is no sense to further road building in the lower Noble Creek, Mallard Falls, and Anderson Butte areas; the final plan should maintain these areas as roadless. We commend you for your wise decision to keep the Cottonwater Ridge area roadless. #5 #6 #7

3. Outfitting. Our study of the plan indicates that you have lumped economic benefits of the outfitting industry in with a general section on local economic impact. We feel that the outfitting enterprise is significant enough to warrant a detailed study separate from the more general information on local economics. What effects will 4400 new miles of roads have on the industry? More generally, what effect will 4400 new miles of roads have on elk populations? You indicate that elk populations will increase. This is contrary to all the research we have seen on the impacts of roads on wildlife. Please justify your conclusions. #8 #9

4. Research Natural Areas. In general, you have done a good job here. One area should be added, however; Square Mountain Creek, an area of rare plants on the border between two vegetative substrates. The Plan should also detail the impact of development on RNA's and make it clear that establishment of RNA's will be on-going throughout the life of the Plan. #10

5. Additional Data. A strong section should be added to deal with recreational data. For example, you might survey recreational users of the Forest and determine what they want in forest and recreation management. Also, research on the gray wolf should not be deferred until 1990; that is too late in the planning cycle. #11 #12

6. Monitoring. This section is currently very weak. It should be strengthened so that it 1) explains how impacts will be monitored; 2) explains precisely what will be done; and how soon, if the Plan goes awry; and 3) explains how monitoring information will be provided in a timely fashion to the interested public. #13

7. Land Suitability. As you are aware, the I.E.C. was one of a number of groups which wrote you requesting that maps be provided with the Plan detailing land suitability. The Draft Plan does not do this. Therefore, we strongly request that the Final Plan contain maps showing 1) lands that meet the absolute suitability standard of the law; 2) timber sales planned in both suitable and unsuitable lands over the next decade; and 3) the main roads to be built that are associated with such development. We are convinced that a Plan without such maps is in violation of relevant law and court decisions and of the Forest Service's own regulations. #14

In summary, this Draft Plan needs improvement. It would be significantly improved if the above suggestions were adopted. None of the alternatives presented is perfect, but we feel that Alternative C should be adopted as the preferred alternative in the Final Plan, if the Final Plan must be one of the alternatives already discussed. #15

Thank you for the opportunity to comment.

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Sincerely,

Alan R. Hausrath

Alan R. Hausrath, President
Idaho Environmental Council

LETTER 180

Response No. 1

The data and assumptions used to develop the Preferred Alternative and other alternatives were based on the most reliable information that was available at the time. The assumptions that were used have been based on sound scientific theory which has been reviewed by the Forest Service's Regional and Washington Offices specialists.

It should be emphasized that the Forest Plan reflects a management scheme or philosophy that will direct the Forest in the next 10 to 15 years. This direction was developed to attain long-term goals and objectives based on the most reliable information used in the planning process. Of course, political, economic, and environmental conditions change over time and this Plan must be flexible to incorporate these changes. The Forest Supervisor shall review the conditions on the land covered by the Plan at least every 5 years to determine whether conditions or demands of the public have changed significantly enough to revise the Plan.

For information on the data and assumptions used in the analysis process, see Appendix B of the Final Environmental Impact Statement. In regard to timber demand and prices, see Appendix D in the Final EIS, Sensitivity Analysis of Timber and Recreation Values.

Response No. 2

In order to develop long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model and, therefore, do not significantly change the level of resource outputs.

Response No. 2 (con't)

The planning process involves the development of management alternatives which cover a 50-year period but allow for updating the Plan at 10 to 15-year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

Response No. 3

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5, Response No. 6, and Response No. 7

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Response No. 5, Response No. 6, and Response No. 7 (con't)

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage.

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

Response No. 8

Tourism and recreation, including outfitter and guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1988-1997). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

Response No. 8 (con't.)

The importance of the tourism and recreation industry, of which outfitter and guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 9

Numerous research efforts in timber management throughout the Northwest since the early 1970s have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, or security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 10

Square Mountain was inadvertently ommitted from the list of proposed Research Natural Areas (RNAs) and has been included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion into the RNA system.

Prior to establishment of a Research Natural Area (RNA), all surrounding land is evaluated for development over time. Most commonly, roads can be routed around RNAs, but RNAs can also be established with a road right-of-way through them if necessary. RNAs are intended to represent undisturbed conditions over time and are established with that in mind.

Response No. 11

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism should be strengthened. We agree and have done so in the Final EIS and Appendices. Better statistical information on actual and potential recreation use will be developed during the monitoring of the Forest Plan.

Response No. 12

Research on wolves was begun on the Nez Perce Forest in 1982. A final report on this initial research effort was completed in 1984. Additional inventory and analysis is an on-going project in consultation with the U.S. Fish and Wildlife Service through the biological evaluation process. We are striving to have all wolf habitat inventoried and delineated by 1990.

Response No. 13

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 14

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns.

Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas that are suited vs not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

Response No. 14 (con't)

The proposed timber sale schedule for the next 10 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the Preferred Alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 15

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 180

Response No. 15 (con't)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

P.O. BOX 671
COEUR D'ALENE, IDAHO 83814

#181

4055 GOVERNMENT WAY
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PHONE (208) 667-6473
TOLL FREE 1-800-632-8743

May 21, 1985

Mr. Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Subject: Recommendations and comments on the Nezperce National Forest. Proposed Plan (Plan), and Draft Environmental Impact Statement (DEIS).

Dear Mr. Kovalicky:

We appreciate this opportunity to submit our recommendations and comments on the proposed plan and DEIS. In our review of this plan we have become even more appreciative of the complex nature of this undertaking, and the extensive effort put forth by yourself and your employees. We compliment you and your employees in this effort to provide a management plan for our Nezperce National Forest. We have found areas within the Plan and DEIS which we submit are not proper, and will need revision prior to the development of a final Nezperce National Forest Plan and final Environmental Impact Statement. However, the honesty and sincere integrity of the Nezperce National Forest planning staff in this undertaking has always been evident, and we certainly have all grown to respect them for their efforts.

Fundamentally, we take great issue with the reliance this plan and DEIS appear to place upon its data and forecasting models and methods. We find that the foundation data is not at all adequate to rely upon for statistically sound mathematical calculations of the current status of the Nezperce National Forest. We point this out to insure recognition of the fact that the data base is comprised of expansions of light sampling, judgments and many outright estimates. Thus, the statistical confidence limits on this data will be necessarily very wide, and in some cases no correlation may exist. The methods used for forecasting the future forest outputs and status are founded upon very broad based models and studies which are not site specific and have equal odds of having applicability or not. When combined, we find that the data and #1

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forecasting which FORPLAN operated with could not provide any solid results which did not require extensive judgmental decision making before identifying the status or output. We submit that these facts be identified in the final Nezperce National Forest Plan and final Environmental Impact Statement. This will not only insure that those implementing the plan are not improperly constrained, but also place the proper emphasis on the monitoring aspects of this forest planning process.

We vehemently disagree with the plans merchantable timber output in the first decade! It is pointed out that forested timberred land existing within the already classified wilderness and wild and scenic areas of the Nezperce National Forest (Forest) are shown on page G-1 to be 902,303 acres. The suitable timber land base of 925,140 acres is only a little over 41% of the total gross acres of the forest. When potential commercial sawtimber outputs in the first decade are restricted to 102 MMBF (106.7MMBF for all timber outputs) against maximum PNV of 196MMBF, we want to identify the fact that any timber management output will be taking place on an extremely small percentage of the forest this first decade, and that these restrictions will have relatively little effect upon the total forest status or long range outputs. However, with 80% of the forest in an unmanageable old growth timber status the annual morality on this suitable land of 58.2MMCF (pp J-1) or approximately 270MMBF per year necessitates a dramatic increase in the allowable sale quantity (ASQ). In addition these restrictions continue the unacceptable practice of little or no timber management and delay the long term sustained yield capacity of 206MMBF into the fourth decade (pp I-2). We recommend a minimum A.S.Q. of 140MMBF per year in the first decade. We submit that this 140MMBF A.S.Q. is the minimum required for dependent community stability in the first decade. In the past ten years we have seen major wood product manufacturing facilities in Riggins, Kamiah and Grangeville closed permanently. The reduction in direct timber processing employment (50% is logging and road building) and other economically dependent businesses has made a shambles of our dependent communities and our local families. With a 140MMBF A.S.Q. we can expect to be able to reasonably maintain the remaining manufacturing facilities and provide an opportunity for restarting one of these closed facilities, re-establish it with some new business, or increase the amounts processed at the current facilities. It must be noted that the adjoining Clearwater National Forest cannot be expected to provide any help in this persistant community stability problem.

When analysising the plan, and reviewing the contents with your staff, it became evident that restriction on the potential first decade timber yield came primarily from fisheries and water quality restraints. Deeper analysis identified that the water quality issue was in fact tied directly to fisheries outputs through perceived sediment problems. It became even more evident that normal timber harvesting apart from roads was not really a significant contributor to this sediment problem. Even with the PNV timber outputs of 196MMBF

Mr. Tom Kovalicky
Page 3
May 21, 1985

annual water yields for the forest for the first decade were not noticeably increased (DEIS Figure 11-14). The sediment yield figure 11-13 of the DEIS did identify an increasing sediment yield and the discussion on pp 11-81 of the DEIS identified that "Road Construction is the major source of sediment production". The Anadromous fish species impacts and correlation between the preferred alternative G and Alternative D identify a first decade difference of Smolt production of 31,000 while increasing road construction by 1,400 miles. Thus, an increase in timber yield to 140MMBF would initially indicate a potential 967 mile increase in road construction and a loss of 21,412 smolt (Alternatives compared). The road density for "Main Acess Roads" of 0.5 miles per square mile is an acceptable level on the average for fisheries habitat needs. We suggest that lower standard roads should produce dramatically lower sediment levels than predicted (Estimated to be up to 70 percent less). These low standard roads specifications are currently being utilized in Region Four, and should be available in the Region I office. They have been applied primarily to local roads, but do have direct applicability to mail access roads as well when heavy sediment yield problems are expected. The roads are single lane and substantially narrower than the min. 12' identified in the Plan. In addition they are outsloped when possible and rely upon log truck radios to match turnouts. The alignment is always on the contour only. These low standard road mitigating measures applied to local roads, as well as collectors and arterials, when needed, are the only road construction which should be authorized, funded and attributed to the ASQ. They should when properly combined with major road closures, substantially mitigate the predicted fisheries impacts as well as any big game impacts. However, additional items also assist in attaining this increased harvest yield in the first decade to 140MMBF per year. Under the water quality description of the analysis process, "Excess sediment delivered to a critical fish habitat was considered cumulative and little recovery in habitat condition occurred since activity". (pp B 54-55) This simply does not mesh with reality. It is recognized that annual stream flushing occurs and that in the long term stream channels in mountainous terrain deepen, not fill in. The "Fisheries Yield Tables" and the E.C.A. (pp B-52) are assumed to represent the entire forest (2,218,040 acres). We submit that this assumption should be continued in the monitoring phase also. Application to a specific watershed as criterion is not proper as the tables cannot be interpreted properly except on the forest as a whole, for any validity. We seriously question whether the fisheries and water quality objectives set are realistic. However, it is recommended that you not constrain the ASQ below 140 MMBF and utilize the monitoring segment of the planning process to evaluate conformity. We submit that the weakness of the fisheries and water quality data coupled with the very broad and relatively untested prognosis techniques, must not have such constraining capability on the ASQ or departure alternative runs.

We submit that road closures will mitigate Big Game habitat requirements and allow the targeted goals to be achieved. However, it must always be #4

Mr. Tom Kovalicky
Page 4
May 21, 1985

remembered that the heavy amount of wilderness on the Nezperce National Forest is not habitat manipulative. Thus, responsibility for outrageous increases in elk herd numbers must not be burdened upon the suitable land base out of proportion. In addition you are requested to identify the fact that any failure to achieve elk population goals do to hunting is the responsibility of the Idaho Department of Fish and Game, and failure on their part should not affect additional big game habitat constraints on other multiple-use benefits. #

Semi-primative recreation need should be easily met without retaining any roadless areas beyond the first decade. It is suggested that the Forest Service access the boundaries of all wilderness areas frequently, and as soon as possible, to insure that this item never becomes a constraining criteria. #

In summary: The minimum dependent community stability needs of 140MMBF per year in the first decade can easily be met without any measurable impacts upon other multiple-use aspects identified in the proposed plan. We recommend that you look to accessing the roadless areas quickly to maximize the capture capability of the overwhelming 270MMBF of annual mortality on our identified suitable land base. We submit that the monitoring portion of the Forest Planning Process should be the tool used to review the achievement of goals and attainment of milestones. The severe restraints currently identified in the proposed plan and D.E.I.S. simply are not founded upon data and methods which in combination allows reasonable confidence limits on site specific drainages and in some cases on the forest as a whole. We support the long range timber yields and a priority multiple use, which maximizes present net value. The use of road closures required to meet multiple use needs is supported, as is the concept which allocates only the costs of roads directly related to the immediate timber sale requirements. Thank you for allowing us this opportunity to respond to the Nezperce National Forest Proposed Plan and Draft Environmental Impact Statement. #

Donald Jensen, President
Beth Schneider-Kirshner
Jack A Buell
Elvin Nelson
Rachel Coy
Darrell Adams
Tauno Pattala
Leo Mendelman
Gail Triplett
Clifford D. Kley
Charles F. Scott
John C. Blumer
AGO
Thomas Hodgson

Response No. 1

The methodologies used to determine the data itself were developed from the best sources available to the Forest Service. The FORPLAN linear programing model evolved from earlier models which were used to evaluate timber assignment problems. FORPLAN was used to determine optimal assignments and scheduling of management prescriptions for each analysis area. This overall process is the key to cost-efficient resource assignments. Cost efficiency was considered by the interdisciplinary team while they were developing a realistic and flexible set of management prescriptions. Professional judgment played a major role.

It should be remembered that the outputs and costs generated from the FORPLAN model should not be interpreted as absolute figures with 100 percent accuracy. They are estimates indicative of the management direction for a particular alternative. Also, the implementation and monitoring of the Forest Plan will be flexible enough to make minor adjustments where needed.

Response No. 2 and Response No. 7

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by Region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

Road standards on the Nez Perce Forest have gone through the complete evolution of extremely wide roads to very narrow systems. The Forest has completed many research projects on the effects of roads such as Horse Creek Administrative Research Project. The findings of these studies are incorporated in our road standards in an attempt to mitigate potential negative impacts to the environment.

Through this cooperative effort with Intermountain Research and the University of Idaho, we have the standards that are presently being used on our road systems. We are learning with each new project and we incorporate all positive findings where applicable.

Each road system must be analyzed as a separate entity and the standard for that system is designed for that specific project. Some of the criteria used to establish the road standard are:

- commercial design vehicle
- recreational/administrative design vehicle
- critical user vehicle
- anticipated traffic volumes
- season of haul
- length of haul
- length of service life of facility
- period of inactivity
- landform
- fish and wildlife objectives
- water quality requirements
- soil types

This list can go on and on, but the main concern of engineering is to build the least impact facility to serve the necessary uses safely and protect the resources.

Many of the low volume road standards from Region 4 are incorporated within the standards now in use on the Nez Perce and throughout Region 1. A road density of 0.5 mile per square mile is, in itself, not a valid measure of fish habitat needs. In theory, it is possible to achieve greater road density (possibly as high as 4 miles per square mile) and still maintain high fish habitat production potential. The key to this concept is the amount of road constructed in any given year. By constraining road construction, by length or standard, excess management sediment does not exceed the transport capacity of the stream and can be moved through the drainage without deposition in critical habitat. Recovery of the habitat in this situation is either not necessary or rather rapid. Transport capacity is exceeded when the road building and harvest activity is not tempered by timing and spacing of projects (a frequent situation in the past). In this case since there is insufficient stream energy, excess sediment tends to be locked into the gravel substrate, and becomes very difficult for the stream to remove. The reality of habitat recovery in this situation would be at least a 50-year hydrologic event.

LETTER 181

Response No. 3 (con't)

We realize that the watershed and fisheries models which were used to analyze this relationship are lacking in many respects. However, they are considered state-of-the-art management tools and we will continue to use them and improve upon their reliability through monitoring.

Response No. 4

We agree that a road closure policy will mitigate impacts on big-game habitat and the Forest Plan management direction emphasizes such a policy. Alternative G, as presented in the Draft Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

The Final Forest Plan sets the policy for road closure, timing of closures, types of closures, and estimates percentages of each type of closure to maintain all resource objectives.

Road closure is only one of the factors affecting big-game habitat. Other fators need to be considered when evaluating overall big-game needs. The procedure used to evaluate this habitat is explained in Appendix B of the Forest Plan.

Response No. 5

We stress throughout the Draft Environmental Impact Statement and Proposed Forest Plan that the goals and objectives of the Nez Perce Forest are to provide the quality and quantity of habitat to support or carry a desired population level, i.e., we are managing to provide "habitat capacity" to support an identified number of animals. Whether or not the numbers of animals actually reach this capacity is dependent upon a number of factors, one of which is mortality due to hunting that is regulated by the Idaho Department of Fish and Game.

Response No. 6

Only 126,846 acres will be managed with no additional roads. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#182

26 May, 1985

Forest Plan
Nez Perce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

You will have noted, I expect, more organizational comment than usual on the NPNF Plan as opposed to earlier submissions. It is quite apparent, I think, that the number of us who can look at a stand of timber, for example, and see more than just board feet is growing quite rapidly. It is no longer reasonable to suppose that potentially questionable procedures re the management of lands in trust will escape the general notice.

It is also true that letters of more than a page are not read. I must get on--with thanks to Kovalicky and staff for a great deal of good work.

Considering the past, present (and probable future) state of the timber market, the Plan's optimism in this regard, particularly as it supports harvest levels over 85 MMBF per annum, and an ultimate 300% increase in ill-considered roading, is totally illogical. So also is the alternative expectation that the current federal deficit can tolerate an immediate annual budget increase of 15-20%. My notion of letter-length suggests that I stop here. Permit me to observe in closing that informed sentiment suggests that the Meadow Creek drainage be "let be" and that roads not be a part of future action involving the lower Noble Creek and Mallard Falls areas. #1 #2 #3

I join with many others to recommend the adoption of Alternative "C" -- which seems best to respond to the above and related questions/problems.

Sincerely yours,

Eugene E. Reed

[illegible] N. Washington, 1G
Moscow, Idaho 83843

LETTER 182

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

In order to develop long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the comprehensive study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

In relation to the amount of road miles constructed within the Forest Plan, it is true that there would be an increase of 300 percent in miles of road constructed over the 50-year period if there were no changes in Forest Plan direction from preceding decades. In the first decade, there would be only 830 miles constructed and a greater number of previously constructed roads would be closed.

Response No. 2

We have received numerous public comments concerned with the budget developed to implement the Forest Plan, which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. In the Forest Plan, East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3 (con't)

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness, which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

#183

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May 23, 1985

Forest Plan
Nezperce National Forest
Rt. 2 Box 475
Grangeville ID 83530

Gentlemen:

My business and my livelihood are dependent upon the timber resources for survival. However, it is imperative that we balance the need for timber both on the short term and the long term with the needs of other natural resources both presently and in the future. Therefore, I ask that my testimony be entered in favor of alternative C of the Nezperce National Forest Plan. #1

I believe it is imperative that the Meadow Creek drainage be spared the disruption as otherwise provided. #2 It is also my belief that it is the interest of the public, as well as the needs present and future of other natural resources primarily wildlife, that road construction be held at a minimum until desired harvest plans are accepted by all and agreed to by due process and the need for use is current. #3

To be more clear,

#1 I do not believe in premature construction of roads using funds that could be channelled for other public benefit uses. #4

#2 It is also my belief that roads not in current use for timber extraction are extremely detrimental to wildlife. #5

Again I urge adoption of plan C.

Sincerely,

Vern E. Ziegler

SEI THE (NOR T WIT DING RIALS

LETTER 183

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. In the Forest Plan, East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3 and Response No. 4

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

Numerous research efforts in timber management throughout the Northwest since the early 1970s have demonstrated two general principles.

Response No. 5 (con't)

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, or security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Kaleidoscope
Photographers & Authors
Box 912
Bonners Ferry, Idaho 83805
(208) 267-7374

Jerry Pavia
Joanne Pavia

#184

May 24, 1985

Forest Plan
Nezperce National Forest
Rt. 2 Box 475
Grangeville Idaho 83530

Dear Sirs,

My wife and I would like our comments regarding the proposed Nezperce Forest Plan to be part of your reviewing process.

After reviewing the plan we feel that the best alternative to implement is Alternative C. We would particuarily like to see all of the Meadow Creek drainage left as it now is and also that there be no roads built in the Noble Creek and Mallard Falls area. #1 #2

Another point we would like you to consider is to build less roads in the Nezperce National Forest than what you are now planning. We feel that there are already too many roads in many of the National Forests in the west. It is time to return to a more sensible use of our forests and that would mean to limit the massive roadbuilding efforts that are now under way in many of our western National Forests. Please, build less roads! #3

Thank you for your time in reading our comments and please include them with the other comments you receive regarding your proposed forest plan for the Nezperce.

Sincerely,

Jerry + Joanne Pavia

Jerry and Joanne Pavia

LETTER 184

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. In the Forest Plan, East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

Response No. 3

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Response No. 3 (con't)

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 23 1985
RECEIVED

#185

May 20, 1985

Mr. Tom Kovalichy
Forest Supervisor
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalichy:

There is a great deal of concern about Plan G your agency is recommending for the Nez Perce Area. Please accept this communication as a strong endorsement of and for Plan C. #1

Plan C would be the more acceptable means of preserving the ecological balance in this area. It is felt that Plan G would be very detrimental to the wildlife in Nez Perce because of the vehicles, logging and human activity causing disruption. These activities would be especially harmful in the Back Country area west of Meadowcreek. #2

I am planning on hunting in this area later this year and will be very disappointed to have a hunt that is interrupted with activities such as those under Plan G.

It is important to all of us to preserve the balance of nature for the long range future of areas such as yours. We cannot afford to be short-sighted in our efforts to ensure that future generations are able to enjoy the wildlife and forest as we have.

Sincerely,

R. R. Hornbeak

R. R. HORNBEAK

2315 Mills Rd.
Kalamazoo, MI 49001

RRH/sm

LETTER 185

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
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- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 185

Response No. 2

Numerous research efforts in timber management throughout the Northwest since the early 1970s have demonstrated two general principles.

1. Removing timber by logging or by other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

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Box 35
Yellow Pine Idaho 83677
May 24, 1985

#186

Forest Supervisor
Nexperce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Sir,

In 1969 while visiting a friend in Yellow Pine to go fishing with him I was so impressed by the beauty of the Basin and by the fact that so much of Idaho consists of nation*Forests with generous portions designated as wilderness areas that I bought a cabin in the little village and eventually decided to retire there with my wife. We've lived there since the winter of 1976/77 and all winters since expect 79/80 when we were in Europe. We travel extensively during the summers. We've become aware of the problems the National Forests, the BLM and other agencies have experinced in developing plans that will satisfy a wide variety of interests.

I would like to here support Alternative "C" of the draft version of the Nezperce National Forest Plan and further recommend that the Forest plan for a more realisitic budget than the one now proposed, that all the Meadow Creek drainage be left as it is now, and that all existing uses be continued there, that roads be kept out of the Noble Creek and Mallard Falls areas, that improvements be made in the monitoing and added data sections of the plan and that the final Plan better evaluate the impact of development on outfitters and research natural area proposals. #1 #2 #3 #4 #5

May we be put on your mailing list and will you send a copy of the plan in its final form to Tom Richardson, Chairman, Yellow Pine Village Council, Yellow Pine, Idaho 83677. Thank you very much.

Sincerely,

Don Millen

Response No. 1 LETTER 186

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

We have received numerous public comments concerned with the budget developed to implement the Forest Plan, which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. The East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 3 (Con't)

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness, which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

Response No. 4

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 5

Many participants in our planning effort have suggested that the sections of the EIS and Plan dealing with recreation and tourism be strengthened. We agree. Additional analysis was done to estimate the impacts of each alternative on jobs and income related to outfitters/guides as well as other recreational related businesses and the timber industry. The importance of the recreation/tourism industry should continue to grow. What may occur is a shift in the types of activities offered and the quality of the recreational experience. For more information on outfitters/guides and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V, in the Final EIS.

Prior to establishment of a Research Natural Area (RNA), all surrounding land is evaluated for development over time. Most commonly, roads can be routed around RNAs, but RNAs can also be established with a road right-of-way through them, if necessary. RNAs are intended to represent undisturbed conditions over time and are established with that in mind.

#187

Dear Sirs,

I am writing to voice my concerns on several issues involving the Nezperce National Forest Plan. As a sportsman and user of these areas I am concerned about how actions today will affect the outcome of the one thing man can not recreate — a wilderness area.

Specifically I would like to voice my support for Alternative "C" but am also concerned about several other points of the forest plan. I would like more information on "suitable" timber land, on reductions in road building and further development on unsuitable lands. Along with this I feel improvements need to be made in the monitoring and added data sections of the plan. #1 #2 #3

I will support a short and long term timber harvest in the 75-90 MMBF a year range so long as it does not need large scale advance road building. I would also urge the plan to have a realistic budget which would build fewer roads than planned in the first decade. #4 #5

187

I am strongly opposed to any roads in the lower Noble Creek and Mallard Falls areas and that Meadow Creek drainage be left as it is with existing use continuing. #6

In closing if there is an error to be made let it be on the side of wilderness for if it is not then we have lost something which can never again be replaced. #7

Thank you,

Michael D. Mylire
Rt. 1 Box 206
9 Mile Falls, Wa. 99026

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Land suitability in the alternatives was determined following the procedures defined in 36 CFR 219.14. In general, timber harvesting and road construction is not scheduled on the lands determined as unsuitable for timber production as defined in 36 CFR 219.14. On small, isolated parcels of unsuitable land, road construction may occur when necessary to access adjacent suitable lands. More information on suitable and unsuitable lands in the Preferred Alternative can be found in Appendices E, I, and J of the Forest Plan. Additional information on the criteria and process used to determine the suitable and unsuitable lands has been added to Appendix B and Appendix D of the Final Environmental Impact Statement.

Response No. 3

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further

Response No. 4 (con't)

harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

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Response No. 5

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

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Response No. 5 (con't)

proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 6

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness, which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. The East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

LETTER 187

Response No. 7

Approximately 45 percent of the Forest is classified as either wilderness or wild and scenic rivers. In addition, the Final Forest Plan calls for 126,846 acres in three separate roadless areas to be managed with no additional roads and no scheduled timber harvests. These include the Rapid River (19,343 acres), East Meadow Creek (94,203 acres), and Silver Creek-Pilot Knob (13,300 acres) roadless areas. Also, timber harvesting and road building activities in most of the West Meadow Creek roadless area will be delayed during the Plan period (1988-1997).

President

W. F. MOODY
S. 4039 Conifer Court
Spokane, Washington 99206
WA 6-9263

#188

To: Nez Perce National Forest
Grangeville, Idaho 83530

May 24, 1985

Re: National Forest Plan

As a private citizen and sportsman, I am writing you to encourage your serious consideration of alternative plan G in your forest draft plan. This plan, to me, encourages compromise on the important points of concern as voiced by various groups. #1

I find it difficult to support large timber sales and road building at a time when timber is depressed and certainlynot an economic "plus" for the area at this writing. #2

I also would encourage road closing after timber harvests have been completed to allow nature, wildlife and man to again enjoy the region in a "semi-wilderness" until the next timber harvest forty years hence. #3

Has there been any consideration in the plan for the economic impacts on outfitters/?. I find nothing in print to indicate this has been studied. They contribute largely to the area and deserve consideration under any plan that comes to reality. #4

Regards

W. F. Moody

W. F. Moody

LETTER 188

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

A number of comments expressed the concern that the proposed timber harvest level in the Preferred Alternative is too high, given the current market. The planning process involves the development of management alternatives which cover a 50-year period but allows for updating the Plan at 10 to 15-year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the comprehensive study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

For more information on the sensitivity analysis using updated timber price projections and values, see Appendix D of the EIS.

Response No. 3

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools,

Response No. 3 (con't)

Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 4

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism be strengthened. We agree. Additional analysis was done to estimate impacts from each alternative on jobs and income for outfitters/guides, other recreation-related businesses, and the timber industry within the local area.

The results of this analysis show that the local timber industry has a dominant influence on the local economy in the first decade (1988-1997). In the fifth decade, outfitter/guide operations and other recreational activities grow significantly in regard to jobs and income. The importance of the recreation/tourism industry, of which outfitters/guides are an element, should continue to grow. What may occur is a shift in the types of activities offered and the quality of the recreation experience. For more information on outfitters, guides and recreation, see Chapter II, Section 16; Chapter III, Section B, Chapter IV, Sections 3-4; and Appendix B, Section V, in the Final EIS.

May 23, 1985

#189

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 28 1985

Dear Sir;

I am a young physician in Spokane Washington. During my off hours, which are infrequent, I enjoy out door recreation in Montana, Idaho, and Washington. I write at this time to assert my interest in keeping the Nez Perce National Forest of Idaho wild. In particular, I would like to see road building and timber harvests kept to a ~~minimum~~ level that does not compromise alternate uses such as wildlife use, fishing, hunting, and hiking. #1 #2

I ask that in developing plans for use of the Nez Perce forest, special interest for aesthetics be directed towards Meadow Creek, Lower Noble Creek, Mallard Falls, West Meadow Creek, and Jersey Jack. #3

Thank you for your consideration of this letter.

Daniel J. Downey MD
c/o Dept Med. Ed.
SHMC TAF-C9
Spokane 99220

LETTER 189

Response No. 1

Approximately 45 percent of the Forest is classified as either wilderness or wild and scenic rivers. In addition, the Final Forest Plan calls for 126,846 acres in three separate roadless areas to be managed with no additional roads and no scheduled timber harvests. These include the Rapid River (19,343 acres), East Meadow Creek (94,203 acres), and Silver Creek-Pilot Knob (13,300 acres) roadless areas. Also, West Meadow Creek will remain undeveloped during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 2

The level of timber harvests planned for in the Preferred Alternative reflect an attempt to develop an overall management plan that is balanced among all resources and uses. All resource uses and activities are in some way interrelated, and activities to manage for one resource frequently involves tradeoffs or compromises of other resources, i.e. the level of timber harvest planned does compromise some wildlife uses, just as the level of wildlife habitat management compromises the level and intensity of timber management. In arriving at the resource management levels in the Preferred Alternative, these tradeoffs have been evaluated. After consideration of the public input and the overall Forest situation, it was determined that the mix of resources maximized total benefits to the public.

Response No. 3

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. The East Meadow Creek roadless area will be managed in an undeveloped state with no timber harvests or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

#190

25 May 85

Gentlemen

I wish to comment on the draft Nezperce National Forest Plan. Surely it must be time for the Nezperce to determine where they can harvest and grow timber at a profit to the public, and where they cannot. If you cannot or will not do that, at least stop assuming that cutting any trees anywhere is a profitable thing to do. That is, keep road building and timber harvest at low levels, more in keeping with your likely budget and more in keeping with the profitability of what is, after all, a commercial operation. Certainly alternative C comes closest to this approach. Thus I must support alternative C. #1 #2 #3

Sincerely,

J. A. Kittrick
NW 465 Orion
Pullman, WA 99163

LETTER 190

Response No. 1

The issue of high road costs and deficit timber sales has become a national concern. In the past 3 years, overall timber-related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities.

Response No. 2 (Con't)

During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

Response No. 3 (Con't)

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#191

1722 Manitou Ave.
Boise, Idaho 83706

May 22, 1985

Tom Kovalicy, Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Mr. Kovalicy:

I am alarmed at the possibility that U.S.Forest Service officials might decide to build roads in some or many of the 16 unprotected and currently roadless areas of the Nezperce National Forest. #1

I recognize the argument that more timber might be needed in the future than at present, but I remember also Idaho Power Company's strident pleas for permission to build a coal-fired power plant near Boise on the grounds that a great deal more electricity was going to be needed in the very near future by southwestern Idaho residents. Those arguments have proven untrue, as Idaho Power officials admit today, and most Boise residents and other Idahoans are grateful that we do not have the coal-fired plant in our area. #2

In view of the considerable amounts of unsold timber in already-roaded areas of the Nezperce Forest, it seems extremely unwise to build new roads which would certainly have an irreversibly negative effect on elk, fish, and other wildlife of the area. #3

I and my friends have camped and hiked in the Buffalo Hump area in the past, and last summer we spent several days in the beautiful Gospel Hump area. In both of these areas we were delighted by the numbers of deer, elk, and moose we encountered, and in the unspoiled ecology and natural beauty of the region. We can find and open roads to more timber as we determine that we truly need it, but once their habitat is ruined, or the ecological balance of that habitat disturbed, it will be practically impossible to save the wildlife resources we now have, to say nothing of finding new ones. #4

For these and other reasons, I earnestly recommend that all 16 of the presently roadless areas in the Nezperce National Forest be left roadless.

Respectfully yours,
Orvis C. Burmaster
Orvis C. Burmaster

LETTER 191

Response No. 1

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the comprehensive study done by Adams and Haynes for the 1980 RPA Assessment.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using revised timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to management prescriptions in the FORPLAN model.

Response No. 2 (con't)

The planning process involves the development of management alternatives which cover a 50-year period but allows for updating the Plan at 10- to 15-year intervals. This allows for adjustments or revisions to the Forest Plan due to changes in political, social, and economic factors.

Response No. 3

The volume of sold and uncut timber has varied between 300 and 350 million board feet (MMBF) during the early 1980's; however, examining timber data for the Forest back to 1960 indicates that this amount of sold, but uncut timber is not significantly higher than in most of the years since 1960. The least amount of timber under contract in this 30-year period was approximately 250 MMBF. Conditions can change rapidly, however, as evidenced by an annual harvest rate on the Forest of 109 MMBF during the period of 1975-1979. During Fiscal Year 1985, over 100 MMBF was harvested on the Nez Perce. We are aware of the fact that the timber industry may be undergoing long-term structural changes and not following cyclical market trends. The monitoring provisions described in the Plan will allow us to track this situation and respond with adjustments to the timber sale program if the demand continues significantly lower than the allowable sale quantity.

In order to meet the resource objectives for fish and wildlife and at the same time provide a continued output of timber, it is necessary to disperse the harvest over the entire suitable landbase. This will require road construction into some of the currently unroaded areas. The road construction will be done only as required to support the timber harvest. Considerable effort has gone into designing and scheduling the road construction and harvesting so that fish and wildlife habitats will be maintained or enhanced in the timber harvest areas.

Response No. 4

We must agree with you that the Gospel-Hump Wilderness is a beautiful place for one to enjoy with friends and family. Forty-five percent of the Nez Perce landbase is set aside for this type of enjoyment in Wilderness and unroaded. The remainder will have timber harvest activities which will also be managed to provide a large recreation experience.

Multiple use management will control the balancing of resources and no one resource will be impacted for the sake of another. This will ensure that wildlife, fisheries, soil, visuals, and recreation will not be short-changed for the sake of timber, but enhanced to sustain present levels or increased levels.

#192

FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 28 1985
RECEIVED

Bernard F.Brown
Box 1693
Wenatchee, WA 98801

Nez Perce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

22 May, 1985

Dear Sirs,

I would like to express my opinion on the upcoming forest plan that will be considered for the Forest.

I hold a degree in Forest Management and a Master of Science in Forest wildlife habitat management. I have been a practicing forester, college instructor, writer of environmental assessments and am fairly well versed in the management of habitat for wildlife. I have contracted with both the NPS at Glacier and the Montana Department of Highways in vegetation work.

Jack Lyons work shows that road density per square mile is directly related to the disturbance of elk. I'm sure that other game animals suffer in a similar manner, when roads are built in an area.

I am certainly not a nogrowth advocate, nor am I against logging. I am, however, concerned for both the wildlife and economics of timbermanagement. Please consider the alternative "C" in planning the management of the Nez Perce Forest. I believe that it is the most appropriate at this time. #1 #2

Thank you.

Sincerely,

Bernard F. Brown

cc: Inland Empire Big Game Council

LETTER 192

Response No. 1

The overall objective of Forest planning is to produce a mix of Forest resources that maximizes benefits to the public. Benefits include outputs that can be objectively measured and assigned a price as well as those that are subjectively measured and valued.

Competitive public issues and management concerns such as wildlife habitat, below-cost sales, and timber harvest levels, exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the trade-offs between alternatives is required to help decisionmakers (including the public) decide which alternative maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of varied attempts to resolve the public issues which are discussed in Chapter I and Appendix A of the Final EIS.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Base stumpage values and real price trends were developed using data from timber sales during the period of 1974-1980 and the comprehensive study done by Adams and Haynes for the 1980 RPA Assessment.

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Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2 and Response No. 4

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

Of the 830 miles of roads constructed in the first decade, 385 miles are capital investment. In decade 2, 710 miles are projected to be constructed, with 155 miles of capital investment. Construction is then projected to decline to a constant level of 100 miles in decade 9.

Response No. 5

Roads are an effect of timber harvest and will only be built to allow for this harvest. Presently, timber harvest is the only budget allowing for road construction. In the first few decades, timber harvest will be spread over the entire suitable timber acres (889,571 acres 47 percent) to allow for mitigation requirements of this activity.

Road construction on the Nez Perce is not substantially increased during the first decade as implied in the Plan with the preferred plan's 830 miles. From 1975 to 1984, the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,053 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

Response No. 5 (Con't.)

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 6

The procedures for determining the suitable and unsuitable lands for each management alternative are described in 36 CFR 219.14. A map showing the general land assignments is given as part of the information for each alternative in the Environmental Impact Statement. These maps show the large blocks of land that are unsuitable for timber development in each alternative. It is possible that there are smaller, scattered parcels of land that are also unsuitable in each alternative. Because of the small size of these areas and the difficulty of mapping each one, they are not displayed on the maps. The regulations do not require these areas to be mapped; however, it is possible to locate these areas using the computer data base reports and large scale maps on file in the Forest Supervisor's Office.

The EIS and Forest Plan are in compliance with 36 CFR 219.14, the regulations promulgated under the NFMA, specifically the land suitability section that you have referred to.

Response No. 7 and Response No. 9

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

Response No. 7 and Response No. 9 (Con't.)

The overall goal in the Forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan, including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Long-term harvest levels still show significant increases over the current levels. They are based on the acres available for timber management, the amount of existing timber volume, timber growth rates, nondeclining yield constraints and constraints necessary to achieve fish objectives, elk objectives, etc. All of these factors are based on the information available now. Continuing research programs, monitoring, etc. will provide updated information overtime and this will be used in updating the Forest Plan every 10-15 years. Long-term projections are based on our best estimates at this time and will be subject to reevaluation and change in the future.

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the

Response No. 7 and Response No. 9 (Con't.)

work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 8

The assumptions on timber demand and supply were based on the best information available to the Forest at the time the alternatives were formulated.

In order to develop these long-range management alternatives, a linear programing model (FORPLAN) was used. It is built upon a set of assumptions using knowledge of the past about such things as costs and benefits and projected real price trends. Stumpage values were affected by incorporating two parameters to identify market response to variations in timber production. The first of these, use of a horizontal demand curve, assumes that the Forest's current production level is within the elastic portion of the demand function. The effect of this assumption is that unit prices for stumpage will be constant for all timber output levels predicted by FORPLAN, and that all additional output will be consumed (1970-1920 letter "Use of Demand Functions for Timber," 3/18/82).

The second parameter affecting market response to timber production involved the use of real price trends affecting lumber price and lumber production costs, consistent with the prediction of Adams and Haynes (FSM 1970, R-1 ID No. 5). The use of independent price trends was necessary in order to portray the net real increase in stumpage values throughout the planning horizon. This is because the stumpage values used in the FORPLAN model are the residual of these projected lumber prices and production costs, and result from the application of both trends.

Since the development of these values, the market for timber has significantly changed. A number of public comments have expressed the concern over the Preferred Alternative's proposed timber harvest given the current market for timber. In response to this concern, a sensitivity analysis using updated timber values and price projections (using data from the past 10 years) was performed to see what impact there would be on present net value (PNV) and land assignments for resource production. This sensitivity analysis can be reviewed in Appendix D of the Final EIS.

Response No. 8 (con't)

Summarizing the results of the analysis, the updated values and real price increases for timber do have a significant effect on the contribution of timber to PNV. With just updated timber values and price projections, wildlife/recreation opportunities contribute more to PNV than timber. However, there is not such a drastic effect on the assignment of land to other prescriptions in the FORPLAN model.

Response No. 10

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 11

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use is being developed. Additional analysis has been done on the economic contribution of outfitters and guides who operate on the Forest. For more information, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the Final EIS.

Response No. 12

Research on wolves was begun on the Nez Perce Forest in 1982. A final report on this initial research effort was completed in 1984. Additional inventory and analysis is an on-going project in consultation with the U.S. Fish and Wildlife Service through the biological evaluation process. We are striving to have all wolf habitat inventoried and delineated by 1990.

Response No. 13

Information on environmental consequences of roading roadless areas is located in Chapter IV of the Environmental Impact Statement (EIS). More detailed information can be found in Appendix C of the Final EIS. We believe this information meets the requirements set forth in California vs. Block.

Response No. 14

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into many of the roadless areas.

As you have mentioned, the Rapid River and East Meadow Creek roadless areas will be managed without additional roads. In addition, 13,300 acres in Silver Creek-Pilot Knob will be managed without roads to protect Native American cultural values. Approximately 38,000 acres in Rackliff-Gedney will be managed for wildlife. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

TOM P. MAY
Attorney-at-Law
1120 Paulsen Building
Spokane, Washington 99201

509/455-9080

#194

May 23, 1985

Forest Plan
Nez Perce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Re: Forest Plan

Dear Forest Supervisor:

Regarding your recent draft Forest Plan, I support the alternative that will prevent roading on Meadow Creek, namely Alternative C. #1

The final plan must better evaluate however, the impacts of development in regard to RNA proposals and outfitters. #2

Under Section 6K of the NFMA suitability standards must be clearly identified in the plan, and no alternative does this. #3

Even if a good plan were to be drafted, there is no adequate provision to monitor implementation of the plan, and I am especially concerned that your plan assumes full budget appropriations to implement the plan. What is the worst case analysis? #4 #5 #6

Also, the budget must be lowered so that fewer roads are built into the marginal and roadless areas. Along with this I must re-emphasize that Meadow Creek and its drainage must be left as it is now and that all existing uses continue there. #7 #8

Your current timber harvest is too high. A timber harvest of approximately 75 MMBF/Year is more realistic. #9

The forest service must not build any roads in the lower Noble Creek area. The Mallard Falls area must remain roadless. #10

The Final Plan should implement these changes to Alternative C.

Sincerely,

TOM P. MAY

TPM:v

LETTER 194

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Prior to establishment of a Research Natural Area (RNA), all surrounding land is evaluated for development over time. Most commonly, roads can be routed around RNAs, but RNAs can also be established with a road right-of-way through them, if necessary. RNAs are intended to represent undisturbed conditions over time and are established with that in mind.

Additional analysis was done to estimate impacts from each alternative on jobs and income for outfitters/guides, other recreation-related businesses, and the timber industry within the local area. The results of this analysis show that the local timber industry has a dominant influence on the local economy in the first decade (1988-1997). In the fifth decade, outfitter/guide operations and other recreational activities grow significantly in regard to jobs and income.

The importance of the recreation/ tourism industry, of which outfitters/guides are an element, should continue to grow. What may occur is a shift in the types of activities offered and the quality of the recreation experience. For more information on outfitters, guides, and recreation, see Chapter II, Section 16; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V, in the Final EIS.

Response No. 3

Section 6(k) of the National Forest Management Act (NFMA) states that the Secretary (of Agriculture) shall identify lands which are not suited for timber production, considering physical, economic and other pertinent factors to the extent feasible. The Act also directed the Secretary to promulgate regulations to implement the provisions contained in Section 6 of NFMA. These regulations appear in the Federal Register as 36 CFR Part 219. Specific direction for determining suitable and unsuitable lands are found in section 219.14. We believe that we have fully complied with the process and standards set forth for determining land suitability in the planning regulations. The breakdown of land suitability by alternative can be found in Chapters I and II of the Final Environmental Impact Statement and a description of the process for determining these lands can be found in Appendix B of the same document.

Response No. 4

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

Response No. 4 (con't)

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 5 and Response No. 7

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish, or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 1

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps, beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data-gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time for completion and to eliminate needless delays. Capital investment projects are funded based on need and economic return.

In regard to effects of roads on wildlife, numerous research efforts in timber management throughout the Northwest since the early 1970s have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, or security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

Response No. 1 (con't)

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 2

Marginal timber land is a term that was frequently used in previous timber management planning by the Forest Service. It was used to describe timber lands that for either biological, physical, or economic reasons were available for harvesting timber only under specific situations. Under the current process of forest planning, a specific process has been set forth in the planning regulations, 36 CFR 219.14, to determine which lands are suitable or unsuitable for timber management.

The criteria used to determine land suitability is the same for all management alternatives and is described in 36 CFR 219.14. Lands are first examined to determine if: 1) the land is forested, 2) the lands can be harvested without irreversible damage to soils or watersheds, 3) there is reasonable assurance that the land can be reforested, and 4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. Lands that remain after these tests are regarded as tentatively suitable for timber management. In each management alternative, the tentatively suitable lands are determined to be suitable for timber management if: 1) the multiple use objectives for that particular alternative do not preclude timber management in some areas, 2) management objectives do not limit timber production to the point where management requirements cannot be met, and 3) the lands are cost-efficient over the planning horizon in meeting the total forest objectives. The computer model, FORPLAN, was used to determine the set of lands that were cost-efficient in meeting the overall objectives of the alternative.

More information on land suitability for the Preferred Alternative can be found in Appendices E,G, and I of the Forest Plan. Additional information on the criteria and process used to determine the suitable and unsuitable lands has been added to Appendix B of the Final Environmental Impact Statement.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

Response No. 3 (con't)

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

Response No. 5

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness, which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

The two roadless areas that make up the Meadow Creek area are East Meadow Creek and West Meadow Creek. The East Meadow Creek roadless area will be managed in an undeveloped state, with no timber harvesting or road construction scheduled. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

DIXIE OUTFITTERS, INC.
IDAHO BIG GAME HUNTING

#196

May 28, 1985

Forest Plan
Nezperce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Dear Sirs:

As owners and operators of Dixie Outfitters; Dixie, Idaho, we have reviewed the Nezperce Forest Plan for the area around Dixie. Upon your suggestion we would like to submit the following recommendations.

Over the past two years we have received a vast increase in the number of people requesting information about our area. They are looking for a place to come and camp, explore, and just plain visit. The first question they ask is if this is a wilderness area; whether there are roads; horses to rent; or if pack trips are available.

We, as outfitters, feel there is a great need to leave the Dixie area unroaded. The future recreational value would be lost forever, once the area was roaded. We recommend that the Nezperce Forest Plan implement a fee for all users of the forest, much the same as the outfitted client now pays. If this were done, the Nezperce Forest could become a profitably operated forest. #1 #2

To offset the loss of revenue to the local counties, we recommend that all roadless areas and wilderness be taxed on a per acre basis. The taxes paid by the Federal Government on this land would be far less than the huge losses now encountered by deficit timber sales. #3

DIXIE OUTFITTERS INC.

Emmett and Zona Smith
Owners and Operators

LETTER 196

Response No. 1

It is important to understand the relationships between priced outputs (timber, range) and nonpriced outputs (wilderness, visual quality) which illustrate the interactions of attempting to resolve various issues. Competitive public issues, management concerns, and resource opportunities exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the trade-offs between alternatives is required to help decisionmakers (including the public) decide which alternative maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the varied attempts to resolve the public issues which are discussed in Chapter I and Appendix A of the EIS.

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into some of the roadless areas, such as Dixie Summit or Nut Hill.

The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

We did not develop an alternative which would impose fees on all Forest users for a number of reasons. One is that the Forest Service has not been given administrative or Congressional direction to charge fees for hunting and fishing, nor do we foresee any direction to do so. Second, there are potential legal conflicts between the State and the Forest Service dealing with such an issue which would jeopardize the viability of such an alternative. Third, the value to society of these recreational activities was considered in each alternative and we believe that this is in conformance with NFMA and 36 CFR 219 regulations. For more information on hunting and fishing values, see Chapter II, Section 16, and Appendix B, Section IV, of the EIS.

LETTER 196

Response No. 3

The recommendation from this comment in regard to taxation of roadless areas and wilderness areas to be paid by the Federal government to local governments can be considered a recently developed issue. Such an issue at this moment is beyond the capabilities of this Forest Plan. It would be more appropriate to deal with this issue at the Federal or State legislative level.

#199

1312 Ponderosa
Moscow, ID 83843
May 28, 1985

Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Sir:

I would like to comment on the Forest Plan. In terms of Research Natural Areas (RNA's), mention should be made that additional RNAs might be added at a later date, especially if new sites are located that meet all the selection requirements. It is near impossible to include all RNA possibilities in the short time we have been working on them since the Nezperce is such a large and varied forest. #1

Also, Square Mountain Creek should be included ~~on~~ as a proposed RNA in the Forest Plan. I helped survey this area along with Chuck Wellner and Nancy Savage. The shallow subalpine lake and stream system together with the wet meadows would provide excellent study sites and one of educational value. In the past, several of my graduate students have performed their research on remote, unaltered sites such as these. #2

I am also of the opinion that the Forest Plan should list special interest areas of paleontological, botanical, and geologic interest. These could be very small in acreage, but they would provide educational enrichment to the forest users. #3

Sincerely,

Fred W. Rabe

Fred W. Rabe
Associate Professor of
Zoology

FWR:cdf

LETTER 199

Response No. 1

Defining and establishing Research Natural Areas is a continuing process. When the need arises for various communities to be represented, the Nez Perce National Forest will evaluate areas for inclusion in the RNA system.

Response No. 2

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan.

Response No. 3

An inventory of special interest areas would need to be developed. We have searched our files and questioned Forest Service personnel, but have not been able to locate a list of geologic, paleontologic, or botanic interest areas other than those identified in the Research Natural Area program. The Forest is interested in developing such a list of information, but it is not necessary that it be included in the Forest Plan.

May 28, 1985

#200

Forest Supervisor
Nezperce NaTIONAL Forest
Rt. 2 Box 475
Grangeville, ID 83530

Dear Sir:

I am writing to comment on the draft version of the Nezperce National Forest Plan. As I try to analyze how we might use our natural resources and tax dollars most efficiently, I especially wish to avoid a situation such as the one which often exists in fisheries rehabilitation. I approve of my tax money being spent to restore salmon runs and to restock game fish. However, I hate to see steep hillsides and marginal timber land logged because the resulting siltation interferes with the fish projects. Other wildlife production, notably elk, would decrease if you add as many miles of roads to the forest as you have proposed. I would especially like to see all of the Meadow Creek drainage left unroaded as well as the lower Noble Creek and Mallard Falls areas. #1

According to the preferred alternative, you will require a budget increase of 15-20%, which I believe you are unlikely to receive due to the national budget deficit. Moreover, since timber demand is not especially high, I see no reason for you to ask for such an increase. A more reasonable plan would be to continue on a timber harvest in the 75-95 MMBF/year range and to cut back on such large scale advance road building. #2 #3

For these reasons I advocate your choosing Alternative "C" as a better management plan for the Nezperce. It fits better with the most likely national budget and with the history of timber sales and demand in the area and does a better job of protecting elk and fish habitat. I strongly protest the 800 miles of new roads proposed in the first decade under your preferred alternative. That amount is unnecessary and potentially destructive. The plan needs a clearer explanation of how monitoring of timber harvest impacts will be done and what will happen if significant damage occurs. #4 #5

Thank you for the opportunity to comment and for your attention.

Sincerely,

Julia A. Jose

Julia A. Jose
W. 2632 Everett
Spokane, WA 99205

LETTER 200

Response No. 1

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan contains explicit Forestwide standards and management direction to develop, implement, and enforce road closures.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 2

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all affected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels was considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat.

Response No. 3 (con't)

Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost-efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 4

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 4 (con't)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, expected precision and reliability, and reporting time.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 5 (con't)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Comment No. 201

Please include the following comments in the record of the "Forest Plan." I would like to be assured that big game and fish habitat will be protected and improved. Very few new roads will be constructed. Most new roads will be closed to public access soon after they are built. No new roads should be built in Meadow Creek drainage, lower Noble Creek, and Mallard Falls areas. #1

A timber harvest of 70-100 MMBF/year is reasonable on suitable timberlands (which should be defined more clearly), both for short-term and long-terms. I do not like your proposed increases in timber harvest. What effect would they have on us private woodland owners? It looks to me like the proposed amounts could flood the market and hurt private enterprise, which is considered to be best for this society by the present administration and some citizens. Local tree farmers should not have to compete with the Federal government. Use the land for outdoor recreation as much as possible. Improve the huckleberry yields and establish some bee trees. Get out of big timber business. #2

I support Alternative "C". #3

/s/ Everett Hagen

RESPONSE TO LETTER 201

Response No. 1

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies. Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the closure policy for the road and its timely completion with the scheduled activities.

LETTER 201

Response No. 1 (Con't.)

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho

Response No. 2 (Con't.)

Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in approximately 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

Response No. 3 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#202

South 2611 Manito Blvd.
Spokane, WA 99203

May 23, 1985

Forest Plan
Nez Perce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

I am writing to you as a resident of Spokane to earnestly request that you consider the following issues before proceeding with plans for utilization of the Nez Perce National Forest. I think it is imperative that the Forest Service have a realistic budget, so that the budget balances the various needs of the Nez Perce National Forest. It does not appear to me that extensive building of new logging roads is a realistic plan inasmuch as millions of tax dollars would be spent on these roads and the cost of building those roads would far exceed any net income gathered from any timber harvest contemplated. Furthermore, logging roads have a definite impact on outfitters and guides, and the economic future of the Inland Empire and Idaho rests more with sophisticated and imaginative recreational wilderness opportunities than in timber harvesting. However, I do recognize that a timber harvest is wise, and believe that a harvest of 75 million board feet would be in keeping with the other uses of the Nez Perce National Forest. #1 #2 #3 #4

Finally, what roads are built I would hope will exclude the areas of Meadow Creek, Lower Noble Creek, Mallard Falls, West Meadow Creek, and Jersey Jack. #5

As a resident of the Inland Empire, I have visited wilderness areas in Idaho, Oregon, and Canada as well as here in Washington, and friends of mine from throughout the country constantly are asking for additional places to explore. The interest across the country in wilderness experiences is going to continue to increase, and wise management of the forest will allow for continued expansion of these recreational opportunities and areas with obvious benefits for all concerned. #6

Sincerely yours,

Larry S. Freeman

LSF:bjq

cc: Representative Thomas Foley

LETTER 202

Response No. 1

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 2

The economic implications of timber sale receipts which do not cover timber related costs (i.e. road costs) are of national concern. In scheduling timber sales and the associated transportation system, it is important to realize that the ability to recover costs on the sale is not a specific criterion in the determination of timberland suitability for any alternative, but that economic efficiency and attainment of nonpriced benefits in response to issues and concerns are the criteria in the selection of the preferred alternative. For further information, see Chapters I, II, III, and IV of the FEIS.

Response No. 3

The issues raised here are complex and there is no easy answer. Competitive issues such as timber harvests/road building, roadless area management, and outfitter and guide operations exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (acres assigned to wilderness/roadless management) outputs, it becomes possible to see what is given and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach toward the Forest and maximizes Net Public Benefits.

For more information, see Chapter II, Section 16 of the Environmental Impact Statement.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both

Response No. 5 (Con't.)

roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 6

What you say is true, and based on recreation use projections, management direction has been developed in the Forest Plan to meet the needs of the wilderness users.

Comment No. 203

2434 Moscow Mtn Rd
Moscow, ID 83843
5/26/85

Forest Supervisor
Forest Plan
Nezperce National Forest
Rt 2 Box 475
Grangeville, ID 83530

Dear Sir,

I am writing in regard to the Nezperce Forest Plan. I have several objections to the plan as proposed and of the various proposals I encourage adoption of Alternative C. I think it would be most undesirable to road the Meadow Creek corridor; I have backpacked in that area and was inspired by the unspoiled beauty. In general, I think there has been excessive road building in many of our National Forests, certainly more than justified by subsequent timber harvests (with a sizeable amount of proposed timber sales "going begging.") "Advance roading" certainly is a highly questionable practice in view of the uncertainty of future timber harvest levels. #1 #2 #3

Other areas I am personally familiar with and which I feel should remain roadless are the Mallard Creek Falls and Noble Creek areas. #4

Sincerely,
/s/ Richard Fredericks

LETTER 203

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 203

Response No. 2

The East Meadow Creek roadless area will remain roadless for high quality dispersed recreation, and to meet fish and wildlife objectives. The West Meadow Creek roadless area will not be opened for road construction or timber harvesting activities during the first decade because of large areas of relatively immature timber, and high roading costs. Fishery/water quality objectives will be maintained at 90 percent in Meadow Creek. Both areas will be managed for multiple uses that do not require road construction. Current uses will continue in both areas.

Response No. 3

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time from completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 4

Lower Noble Creek and Mallard Falls areas are a part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are implemented. This process is scheduled to be completed before 1990.

#204

May 29, 1985

Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky:

I wish to comment on the Proposed Plan for the Nezperce National Forest.

I attended the public meeting in Grangeville in April and was impressed with the information and some of the comments made.

I have lived Idaho County for 34 years and have used the Nezperce National Forest for hunting, fishing, camping and employment through timber harvesting, with employment in local mills. I have been employed with the original Idapine Mills since 1953, so I feel I can speak with 34 years of experience.

I feel we have enough wildnerness area and enough roadless area already set aside. The allowable timber harvest should not drop below 120 million bd. ft. The information stated in your briefing material states the possibility of 206 million bd. ft. as a sustained yield. #1 #2

I feel the west side of Meadow Creek area should not be set aside for outfitting and guides, and should remain open for multiple use, including timber harvesting. By closing this area Idaho County would stand to lose 40 or more mill jobs, not counting related jobs. The outfitters and guides can not fill this void in our economic loss. #3

The three local sawmills in our area can supply more economic base than all the outfitters in the entire state of Idaho. I feel the timber industry and the outfitter, and others, can work side by side to enhance our Forest so that we can all be proud of it.

According to your chart in the briefing material 7% is allotted to elk habitat, which benefits only a select few, while only 1% is allotted to livestock grazing, which helps feed the nation and the world. We are rapidly leaving the values that has made this nation great. #4

I feel that burning merchantable timber to improve elk habitat is not the answer. The timber should be removed and then the habitat improved. By experience I have seen and killed more elk in logged over areas, including clearcuts, than in wildnerness areas. #5

I believe that Alternative D or Alernative E would be best suited for the people of the entire nation.

We constantly hear comments complaining of timber harvest from people who have never seen a National Forest. While writing their complaints they are using paper from trees, while setting at a desk made of wood, blowing their noses on tissue made of wood waste, living in houses built and finished in wood products.....the list could go on and on. These same people have never seen a logged over area after God has removed the tracks man has left.

After all trees are a renewable resource!

Sincerely,

John Oltman

John Oltman
Star Rt., Box 30
Grangeville, ID 83530

Response No. 1 and Response No. 3

No additional areas on the Nez Perce are propesed for inlusion in the Wilderness system in the preferred alternative. The Forest Service can only make recommendations concerning wilderness designation; however, the final decision is made by Congress.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Different resources are emphasized on different parts of the Forest. The Plan attempts to match the resource capabilities of the land with public needs and to determine the best balance among resource uses. The 7 percent for elk and 1 percent for livestock grazing are percentages of the total Forest acreage where those management activities will be emphasized. They do not directly relate to animal numbers. The number of animal unit months available for livestock grazing will be maintained and increased slightly during the plan period.

Response No. 5

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Comment No. 205

I do not approve of the Nez Perce...Plan which calls for spending of millions of tax dollars on logging roads which will jeopardize an area so rich in pristine lakes and streams. I do not feel its effect on trout, steelhead, elk, and other wildlife has been adequately assessed--or if it has, the subsequent detrimental effect has been ignored in planning some 4400 miles of new logging roads. #1

I do not object to more realistic timber harvested which do not require such large road-building projects. Critical areas such as Mallard Falls, Jersey Jack and Meadow Creek certainly cannot withstand extensive roadbuilding and clearcutting. Roadbuilding in these areas constitutes a terrible misuse of taxpayers' dollars and threatens the balance of our valued wildlife and natural resources. #2 #3

Please consider these facts before spending our tax dollars unwisely without regard for our outdoor heritage in beautiful northern Idaho.

/s/ Michael Henneberry

RESPONSE TO LETTER 205

Response No. 1

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for either the West Meadow Creek roadless area or a portion of the Silver Creek/Pilot Knob roadless area during the first decade. In addition, the Rapid River, and East Meadow Creek roadless areas will continue to be managed with no additional roads. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential. In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

LETTER 205

Response No. 1 (con't)

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 2

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process

Response No. 2 (con't)

allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time from completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 3

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

#208

May 23, 1985

Mr. Tom Kovalicky
Nez Perce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

This is to let you know that I believe your current forest plan proposal for wilderness management under alternative G should be the absolute maximum, and then only if you accelerate the harvest on other RARE II areas, particularly the west side of meadow creek.

The current 900,000 acres of wilderness on the Nez Perce, plus the proposed 170,000 roadless acres is enough! #1 The USFS is required by law to produce timber and provide for community stability, but I worry that you are increasingly headed in the opposite direction. #2 I also think that the Jersey Jack area now being held up for roadless area is completely suitable for both timber and other uses and should be so managed. #3 I have worked in Lewiston for 13 years and earn my living from the production of timber, an activity which supports my community and which we cannot afford to cut back further.

Sincerely,

Merlin Clausner
Select Lu... Dist... Nat.

LETTER 208

Response No. 1

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 3

The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek roadless areas that includes a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvest activities are implemented. This process is scheduled to be completed before 1990.

Depending on the outcome of this EIS, the Gospel-Hump (Jersey-Jack) area could be available for timber harvest.

MacMenamin and Sons Mining

"Put It In Writing"

120 S.E. 7th St.
Grangeville, Idaho 83530
(208) 983-2488

RECEIVED
NEZ PERCE NF
MAY 29 1985

#209

FS
AO
Plng
TM,Pce,WL,Mn
P&L,Plc
Eng
Precon
Plng & Lgr
Const & Mtce
P10
Mgmt Infor
Cont & Proc
S&F
Pers
Resource

Tom Kovalicky, Forest Supervisor
Nezperce National Forest, Main Office
Grangeville, Idaho 83530

May 24, 1985

OL 12

Re: Nezperce National Forest Plan (proposed)—public review & comment

Dear Tom,

Back in 1981 and again in 1982 John Nichols, Minerals Specialists for the Nezperce National Forest undertook and developed a very useful tool for both the Miner and the Forest Service and made it available to all. His "Nezperce National Forest Mining Claims Location Map" using 3/4"-1 mile have been a useful tool for myself who basically knows an area, but to the outsider or international mining corporations and others in the mining field, and also talking with John Witherspoon and Bob Castaneda, Elk City Ranger District, I found that they use the old 81-82 maps regularly and would like to see the maps continually produced. #1

These maps would not only [illegible] aid the miner and minerals persons in the many districts of the Nezperce National Forest, but could be helpful knowing who is in what areas concerning timber sales, fish and watershed projects, Big game habitat areas and other Forest orientated projects. Just at a glance one could see that there is mining activity in the perticular areas, by just looking at the Forest Mining Claims Location Map, for that year.

Bob Castaneda and John Witherspoon both mentioned that John Nichols, I believe, was trying to link The BLM in boise with the Forest service computers to have access to records instantly and the most recent (accurate to within 3-9months) and even in the future, the possibility of grafting or mapping out in the rough, the claims themselves. Once a map is produced, on a yearly basis only the droped and newly added claims would have to be removed or placed on a master sheet and then produced and sold to the public on request....they would be a great aid to the miner and others.

It might be of interest to contact the other Forest Rangers in the Nezperce National Forest and see what their feel is concerning the map and its possible uses. The Nezperce National Forest to my understanding is the only Forest to have produced such an instrument, and it might with some incouragement, be developed in other areas of the country that are mining related areas.

This would be great to add to the Nezperce National Forest Plan, please consider.

Thank You,
Sincerely,

cc: Elk City Rander dist

LETTER 209

Response No. 1

Thank you for your comment regarding the "Nez Perce National Forest Mining Claims Location Map". It is true that John Nichols made such a map and that it was occasionally consulted by people in the mining business. John used seasonal employees to do much of the work in compiling this map. Unfortunately, in these days of tight budgets, we no longer have the funds to do this type of project. Even more important, such a map would be out of date as soon as it was completed. This is because mining claims are constantly changing ownership, new claims are being staked, and old ones are abandoned. We do not want to dispense outdated or inaccurate information to the public. Even the Bureau of Land Management, which has the responsibility to maintain records of all current mining claims, does not attempt to keep such a map.

The best source of up-to-date information on current mining claims is the BLM Mining Claim Index. These records are constantly updated, and are compiled into quarterly reports sent out on microfiche. Using these listings in conjunction with a Forest map, a person can quickly determine what mining claims, if any, are located in a specific area. The Nez Perce National Forest Supervisor's Office receives quarterly microfiche listings and invites the public to come in and view them at any time during regular office hours. We realize that this might not be as convenient as a map, but the microfiche actually provides more data, as well as being more up-to-date.

#210

Tom Kovalicky
Nez Perce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

Dear Sir

I'm writing in regards to the Nezperce Draft Forest Plan. And specially in regards to the West side of Meadow Creek - 1845 - C.

I would like to see the annual Timber Harvest go to around 120.0 Million b. feet. to ensure a future for the area's saw mills. #1

I have lived in this area for 40 years and I know what the timber Industries means to the different areas.

If we start locking up a lot of this state to Wilderness and roadless back Country. We are going to lose a lot of jobs and a lot of revenue. I can't help but think how the towns and schools systems will be hurt by this. Because there is a lot money that's put into them from the timber Industry.

I'm not saying that one side should have it all for them selfs. But I hope there's a way that everyone can have some, so that there's no way the other guy is going to be Comptely out of the picture.

210

I would like to see that all non-Wilderness Rare II areas be roaded and managed for all uses including Timber Production. #2

Again I would like say that the West Side of Meadow Creek - 1845 - C. would give this area a future in Timber Industry.

Thank you for taking the time, to read my letter, concerning my view point on this issue.

Sincerely Yours
Fred Sotin
Idaho Pine Mills, Grangeville
Idaho, 83530
Route 1, Box 119 D-3
Grangeville 83530

LETTER 210

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

#211

May 28,1985

Forest Supervisor;
for the record;

The Moscow Chapter of the Idaho Conservation League endores Alternative "C" in the proposed forest management plan for the Nezperce National Forest. #1

After attending the Moscow "public workshop" and evaluating the proposed draft and alternative plans, we feel it is in the best interest of both public and forest as to maintain close to present management practices and to follow those outlined in Alternative "C". In addition, it is important that the Meadow Creek drainage remain as a roadless area. #2 Vital elk and fish habitat also need careful, protective management. #3 The timber industry should also have sufficient available supplies where as current harvest levels need to be maintained at 75-95 MMBF/year but advance road building must be limited to this allowable harvest figure. #4 Finally, the Nezperce Forest has severly overlooked recreational use and potential! The proposed budget and plan does not adequetely reflect recreational management in terms of personnel and services. #5

Thank-you for this opportunity, Gerry Snyder

Gerry Snyder
206 E. Morton St.
Moscow, Idaho

Pres.- ICL-Mocsow Chapter

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

LETTER 211

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The East Meadow Creek roadless area will remain roadless for high quality dispersed recreation, and to meet fish and wildlife objectives. The West Meadow Creek roadless area will not be opened for road construction or timber harvesting activities until after the first decade because of immature timber, poor economics, and high road costs. Fishery/water quality objectives will be maintained at 90 percent in Meadow Creek. This greatly constrains road construction and timber harvesting activities. This area will be managed for uses that do not require road construction. Current uses will continue in both areas.

Response No. 3

Based on public comments during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for West Meadow Creek roadless area or a portion of the Silver Creek roadless area during the first decade after the Final Plan is implemented. In addition, Rapid River and East Meadow Creek are assigned to roadless management. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential.

In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

Response No. 4

Timber harvest will be limited by industry's needs, numerous plans, constraints, and limitations placed to eliminate rapid change. The economy of the United States is based on supply and demand. The Plan can call for a sustained harvest of 200+ MMBF, but the sell will not exceed the demand for lumber. (The increase to 200+ MMBF would be gradually increased to allow industry to develop technology and capabilities to Manufacture.) The timber industry is limited by the demand is one factor in determining the actual annual volumes cut.

The timber economy during 1982-84 was low and our sale program allowed us to offer 90 to 100 MMBF. We prepared and offered this amount, but sold considerably less. The timber industry usually carries at least a 3-year supply of timber in contracts, and cuts (manufactures) only to meet the lumber demands. During this period, they have utilized this backlog of timber and as of 1985 had 250 MMBF under contract.

Response No. 4 (con't)

Roads are mainly constructed for timber harvest, as the demand for timber decreases so will the demand for roading. The reverse of this is also true. When the demand for timber increases the miles of roads will increase to the limit allowed by mitigation and management direction to maintain fish, wildlife, and other Forest Plan objectives.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifing a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 5

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use is being developed, and additional analysis is being done on the economic contribution of outfitters and guides who operate on the Forest.

Mary E. Lyons
515 S. Meadow
Grangeville, Idaho 83530

#212

Tom Kovalicky
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky;

I wish to voice my protest against any more timber acreage being set aside for Wilderness areas. I feel Idaho and especially the Nezperce Forest has enough set aside already. #1

My husband and I were both born in this immediate area over fifty years ago. We were both raised here and have raised our family here. Nobody loves this area more than we do. We have spent so many enjoyable hours in the back country fishing, hunting, hiking and just enjoying the beautiful and rugged country.

We aren't getting any younger and feel that the roads in the back country need to be maintained so that we and others can continue to enjoy the forests. #2

My husband works for Idapine Mills and it is so important that the allowable cut be increased to at least 120 million board feet on the Nezperce National Forest over the next 5 years and a like amount from then on. Too many mills have already been forced to close in this area. This has had a great impact on Kamiah, Riggins, Whitebird and the surrounding area. I'm sure the merchants of Grangeville will confirm that the temporary closure of Idapine had an effect on their business. The jobs of the Idapine employees depend on timber fromthe Nezperce National Forest as does the economy of Grangeville. #3 #4

With a wise replanting plan, I believe our forests will continue to serve all for many years to come.

Sincerely,

Mary E. Lyons

Mary E. Lyons

LETTER 212

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

Alternative G, as presented in the draft Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Response No. 2 (con't)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Harry M. Lyons
515 S. Meadow
Grangeville, Idaho 83530
May 15, 1985

#213

Tom Kovalicky
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky;

I have lived in this area most all my life. I like to hunt and fish and my wife also likes the outdoors and the mountains and she was also born and raised in this area. We both, and our children, like to hike in the mountains when we can.

I feel that we already have more than enough of our public lands set aside for wilderness here in Idaho.

I have worked in this area most all of my life, from Lewiston to Orofino, Pierce, Kamiah, Kooskia, Stites, Elk City, Red River, Dixie, Grangeville, White Bird and Riggins and most of my jobs have had something to do with the National Forest or woods and timber or sawmills.

I am in my 50's and I now work for Idapine Mills Inc. at Grangeville as a debarker operator.

I feel there is a very critical issue before all the people of this area concerning the sawmills and the jobs of all the men and women that work in the timber and lumber industry in this area. I would very much like to see you work for a plan where I can see no more sawmills closed down in our area for the lack of enough allowable timber cut from the Nezperce National Forest. I would like to see the allowable cut increased to approximately 115 to 125 million board feet on the Nezperce National Forest over the next five years. #1

I feel that all the non-wilderness Rare II areas should be roaded and managed for all uses, including timber production for our local lumber mills. I firmly beleive that it can be done. I would also like to see you work more on accelerating the harvest of timber on the west side of Meadow Creek. I know this area very well. I think you can see this area cannot afford to have anymore sawmills closed down because of too low of an allowable cut. #2 #3

I believe that there can be a good workable plan between the timberman, the forest service and the hunter packer & guides.

It is a real bad thing if we let the money and the out of the area people do all the thinking and planning of this issue and let it get too one sided. #4

Whatever you do, I sure hope you don't lower the suggested allowable cut. #5

Sinderely,
Harry M. Lyons

LETTER 213

Response No. 1 and Response No. 5

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2 and Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Response No. 4

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

#214

Dear Mr. Kowalicky,

I Am Writing To In Response To The Proposed Cut In Timber To The Local Sawmills. Sir, I Feel That If This Cut Does Happen There Will Be A Lot Of Local Men And Women Out Of Work. If We Could Keep It As Is I would Settle For That, Although I would Like To See It Increased. #1

Not Only Does The Sawmill Depend On The Timber Sales, But Our Local Schools Depend Greatly On This Income, Not To Mention The Forest Service Too. There are a Lot Of Jobs At Stake Here, Sir, And Your Decision Is The Key To It All. #2

The Outfitters Don't Contribute Anything Near What The Timber Industries Does. They Still Have Plenty Of Roadless, And Wilderness Area For Their Businesses. I Feel The Concern Of The Local Community Should Have Priority When It Comes Down To Where The Greatest Benefits Would Be More Profitable For Everyone Concerned. #3

Thankyou

Bob Shells

(no address)

LETTER 214

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest. In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

Donda Mager
Route 2. Box 729
Grangeville, ID 83530

May 16. 1985

#215

Mr. Dom Kovalicky, Supervisor
Nezperce National Forest
Route 2. Box 475
Grangeville, Idaho 83530

Dear Mr Kovalicky:

I work at Idapine Mills here in Grangeville, Idaho, and my job is dependent upon timber sales on the Nezperce National Forest. For this reason, I'm really hoping that the allowable cut on the Nezperce Forest is increased to 120 million board feet over the next five years. #1

In my opinion, Idaho has more than sufficient land set aside in wilderness. In fact, most of the wilderness area is available to only the chosen few — rich easterners and Californians — those who can afford to hire horses and planes to take them into the roadless areas so they can "go back to nature" for a few days. #2

Most of us, we who live right next door to the wilderness, certainly can't afford to hire guides and all the other paraphernalia required before jaunting off into the back country. And there is no way we could ever afford the opportunity of doing so if our very livelihood is taken away from us. I definitely feel that the people should have some land set aside in roadless wilderness; however, it appears the environmentalists are attempting to set all Idaho's timberlands aside. #3

I would particularly like to see the Forest Service open up the West Side of Meadow Creek - 1845-C to timber harvest. This area has a large standing inventory, and if it was open for harvest, we, in the timber industry, would be more amenable to the Forest Service managing East Meadow Creek - 1845 D and Rackliff-Bedney - 1841 as roadless areas.

My family and I use firewood in the winter as a supplement to our electric heat. My husband hunts, and my family spends time camping and fishing and just, in general, enjoying the Nezperce National Forest. We will not be able to do any of this if the lands are locked up. I feel that we, who live in this area, should have more to say about the final plan for the Nezperce National Forest than the out-of-staters (many of whom have never even set foot in our State.)

Sincerely,

Donda Mager

LETTER 215

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 3 and Response No. 4

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

LETTER 215

Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Boise Valley Fly Fishermen
P.O. Box 311
Boise, Idaho 83701

#216

Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

I represent the Boise Valley Fly Fisherman Association in commenting on the Nezperce National Forest Plan. Our association is primarily concerned about how this Forest Plan affects the fisheries in this management area.

We feel that Alternative G (proposed) would have significant adverse effects upon the managment area's fisheries, water quality and economic potential for recreational activities. We believe that quadrupling the timber cut and tripling the road building from 2,053 to 6,550 miles will produce substantial stream sediment and destroy much more than the 2% of the steelhead and 9% of the trout population as proposed in Alternative G. #1

The road building activity for Alternative G would cost $360 Million while the timber sales would bring in only $175 Million, producing a deficit of $185 Million. This sort of deficit economics is irresponsible and ironic considering the federal government's massive budget deficit! #2

The Boise Valley Fly Fisherman cannot support Alternative G on either environmental or economic grounds. We support Alternative H as we feel this alternative is much more environmentally and economically sound and provides a more balanced multiple use concept for the Nezperce National Forest.

Sincerely,

Jeff Boyer

Jeff Boyer, Boise Valley Fly Fisherman

cc: Senator Steve Symms
Senator James McClure
Congressman Richard Stallings
Congressman Larry Craig

LETTER 216

Response No. 1

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

Response No. 2

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

852 Willoughby Rd.
Stevensville, Mt. 59870
May 27, 1985

#217

Nizperce National Forest
Route 2, Box 475
Orangeville, Idaho 83530

Dear Sir:

This letter is in response to your request for comments on the Forest Plan.

Our preference is alternative C for the following reasons:

1. We feel it is important to minimize subsidies for timber, due to the heavy resource damage which occurs with many timber sales. #1

2. It is vital to keep as much land as possible roadless, especially Meadow Creek. #2

3. It is ridiculous to expect higher budgets to pay for increased logging activities, as demand for timber drops in the Northern Rockies. #3

4. Although a moderate level of timber can be produced, the greater long range values lie with recreation, wildlife, fish and high quality water. #4

The economics of the plan are based on patently false assumptions. Real timber values have been declining for a long time, and the timber industry (who bets its own money on the issue) is betting the decline will continue. Demand is shrinking because of this. #5

Unless the plan assumptions are changed to agree with the real world, your actions will not fit reality, and the likely result will be a continual series of appeals and court battles to try to get Forest management on a more suitable course. #6

Sincerely,
Lisa Kirk Thompson

LETTER 217

Response No. 1

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek/Pilot Knob will be managed without additional roads for high quality dispersed recreation and to meet wildlife, fishery, and water quality objectives. Also, entry into the West Meadow Creek roadless area for road building and timber harvesting will be deferred for the first decade. Fishery/water quality objectives will be maintained at 90 percent in Meadow Creek.

Site-specific Environmental Impact Statements will be required before any harvesting or road building can take place in the Gospel-Hump (Jersey-Jack) or Mallard areas. All existing uses will continue.

Response No. 3

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

Response No. 3 (Con't)

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 4

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 4 (Con't.)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 5

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

Response No. 5 (Con't.)

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 6

The assumptions used to develop the alternatives and the Forest Plan were based on the best information that was available at the time.

In regard to real timber values, please see Appendix D, Sensitivity Analysis of Timber and Recreation Values. The results of this analysis indicated that updated timber values did not significantly change the assignment of the land for management purposes, nor the timber harvest levels.

It should be emphasized that the Forest Plan reflects a management scheme that will direct the Forest in the following 10 to 15 years. This direction was developed to attain long-term goals and objectives based on the most reliable and updated information available when the FORPLAN model and other models were developed. Of course political, economic, and environmental conditions change over time and this Plan must be flexible to incorporate these changes. The Forest Supervisor shall review the conditions on the land covered by the Plan at least every 5 years to determine whether conditions or demands of the public have changed significantly enough to review the Plan.

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#218

Nezperce Planners: 5-27-85

I am opposed to the proposed Nezperce Forest Plan. None of the alternatives is acceptable either. The Forest Service needs to develope a strong land ethic such that consumptive uses never intrigue with the long range health of the land. The National Forests are a public trust not a private corporation. They do not have to be operated to make money nor should they be used to subsidize private corporations. #1

The Forest Service is in a poor position now as it seems to have become a captive arm of the timber industry. All the economic methods possible to promote that industry are used no matter how absurd. Like the use of recreation and wildlife money to reward the designers of well planned timber sales. Or the use of fisheries money to control erosion from roads. #2

The Forest Service projects reforestation and growth rates that can't be met. It undervalues, and underestimates the destruction of, recreation and wildlife. It employs more engineers and foresters than biologist. As the manager of the largest biological resource in the U.S., all Forest Supervisors should be trained biologists. #3

The biologists employed by the Forest Service should study all living things not just those associated with timber sales. All studies done for timber sales should be charged to timber budget. In fact all work done #4

218

because of road building and timber harvest should be charged to timber so that a clear idea of the true cost of timber sales. For example all road maintenance costs should be charged to timber since virtually all maintenance is done for timber haul roads only. #5

The values used by the Forest Service for recreation and wildlife are too low. They should be valued at the publics willingness to pay. Grazing fees need to be set by competative bid and never below cost, including the cost of displaced wildlife. All roads and skid trails should be counted and deducted from the timber base. #6 #7

The whole economic system needs to be overhauled so that the true cost of consumptive uses are balanced with the true income and made available to the public. The Forest Service should never sell timber below cost. Nor should it always sell timber if it can make money doing so. The plan doesn't acknowledge that there are places in the forest that should never be logged or grazed or mined. #8 #9

The plan should not contain any Catch-22 clauses abandoning all other uses that conflict with plans to overharvest timber. The plan should say that timber cutting will be abandoned if it conflicts with other forest uses or if study indicates that ability to harvest timber were overstated. #10

In any case there is no need to increase timber harvest levels over the current ones. The public does #11

not have to subsidize the growth of local industry or forest service jobs by sacrificing public commons. #11

To preserve the values of a true National Forest there should never be any clear cutting. #12 There should never be timber cut near live water or in bog or slump areas. Never cut steep or unstable slopes. All roads that enter wildlife habitat should be closed all or part of the year. Roads should be inspected regularly so that unauthorized use of roads and off road areas is stopped. #13 All other unmaintained roads should be closed except during dry season. All expense for this should be charged to timber.

I believe that all roadless land should be added to the wilderness system or at least remain roadless. #14 The Forest Service fundamental objective should not be a regulated forest. Foresters have been trained to believe that regulation can only be done with roads. #15 Thus they believe that to manage a forest requires roads. #16 Yet a forest is self managing and foresters need only manage people and themselves. Many foresters view wilderness as an area where they are unable to manage the land so they are opposed to wilderness. Thus the Forest Service seems to be using timber cutting and road building to prevent the enlargement of wilderness areas. #17 Whereas some roaded areas should be allowed to return to wilderness. And most roadless areas should be left as [illegible]

as long as possible so that when the Forest Service subsidy ends and the mills fail then some will still be roadless.

Roads should not be allowed to destroy epicly hiking trails. The plan calls for the worst case recreation value as "roaded natural". It should include a catagory "roaded poisoned, trashed and destroyed".

The plan should make the South Fork of the Clearwater a Scenic River. No timber cutting should be seen from the river.

The plan should include maps showing all planned roads and cuts in every area.

Sincerely,

Stephen Hackney

RR 13
Grangeville

LETTER 218

Response No. 1

The overall goal of the Final Forest Plan is to manage the Forest in a way to maximize net public benefits in an environmentally sound manner. This has required a careful evaluation of a wide range of alternatives.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitabale acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitablity of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 218

Response No. 2

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

The data and assumptions used to develop the Preferred Alternative and other alternatives were based on the best information available at the time the analysis was performed.

In regard to the valuation of recreation and wildlife, please see Appendix D, Sensitivity Analysis on Timber and Recreation Values. The results of this analysis indicated that the updated values did not significantly change the land assignment for resource production.

In addition to this analysis, a tradeoff analysis of the public issues, management concerns, and resource opportunities was incorporated into Chapter II. This analysis was developed to take into account nonpriced outputs such as: providing dispersed recreation opportunities, production of big game (elk) habitat, and attaining anadromous fishery goals. For further information on nonmarket priced outputs and non-priced outputs, see Chapter II--Economic Efficiency, and Appendix B of the EIS.

Response No. 4

The National Forest Management Act of 1976 states that Forests are to "provide for a diversity of plant and animal communities" and requires that National Forests "maintain viable populations of all existing native vertebrate species".

About 390 species of wildlife are found on the Nez Perce National Forest. Because the large number of species that live on the Forest precludes special consideration for each, eleven species of wildlife and three species of fish were selected as management indicator species to help assess the impact of land management decisions on all species.

Three fish species will be used as an indicator of the condition of riparian habitats for wildlife species.

Forestwide management direction is included in the "Standards" section of the Plan to meet the needs of species dependent on snags and old-growth habitats. Specifics of the management direction are found in "Old Growth and Snag Management Standards" in Appendix O of the Plan.

Response No. 5 and Response No. 8

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 6

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

Response No. 6 (con't)

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 7

The acreage that would be dedicated to permanent roads was calculated and analyzed in several of the alternatives, including the preferred alternative. In all cases, the resulting acres (including cut and fill slopes) over the planning horizon was approximately less than 2 percent of the suitable acres. Skid trails will not be taken out of production for long periods of time as will the permanent roads. We recognize the fact that soil compaction and displacement on the skid trails can have a measurable impact on soil productivity. Studies on the specific impacts and possible mitigating measures are being analyzed on the Forest. The studies may result in either changed practices or yield estimates in the future.

Response No. 9

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 10

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 11

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Long-term harvest levels still show significant increases over the current levels. They are based on the acres available for timber management, the amount of existing timber volume, timber growth rates, nondeclining yield constraints and constraints necessary to achieve fish objectives, elk objectives, etc. All of these factors are based on the information available now. Continuing research programs, monitoring, etc. will provide updated information overtime and this will be used in updating the Forest Plan every 10-15 years. Long-term projections are based on our best estimates at this time and will be subject to reevaluation and change in the future.

Response No. 11 (con't)

Road construction will be based on the level of timber harvest. Further information on the timber harvest plans and associated road construction is in Appendix J of the final Forest Plan.

Response No. 12

Based on an interdisciplinary evaluation of physical, biological, and economic factors, clearcutting was determined to be the optimum harvest method under certain conditions and situations. Briefly these conditions are: 1) when the moisture and temperature regimes following clearing will be favorable for regeneration of the desired species, 2) the existing species in the existing stand are not desirable for regeneration due to disease or insect susceptibility, and 3) the management objectives for the area can be better achieved by total removal of the tree cover (wildlife, range objectives). Clearcutting is definitely not appropriate in all situations, but is a valuable tool in achieving the goals and objectives of the Nez Perce National Forest. For additional information on clearcutting, refer to Chapter II in the Final Environmental Impact Statement and Appendix F in the Forest Plan.

Special caution is used when logging is done in any riparian areas. Standards have been established in the Forest Plan to guide activities in these areas to prevent any damage to the riparian environment or to the other resources that depend on that environment for habitat. Refer to Chapters II and III in the Forest Plan for these standards.

Response No. 13

The patrolling, gating, and maintenance of road closures is funded by the resource or resources benefiting from the closure. Budget and fiscal regularity is mandated by regulations requiring the proper expenditure of funds. Timber sale activities do in fact pay for the majority of road closures and enforcement of the closures.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

Response No. 13 (con't)

Roads are closed for a number of reasons:

1. Erosion control and mitigating negative water quality/fisheries impacts.
2. Protection of road investment.
3. Reduction of wildlife harassment and mitigation of negative wildlife impacts.
4. Reducing road maintenance needs by eliminating adverse use.
5. Reducing resource conflicts.
6. Reduction of risk of man-caused fires.
7. Administrative controls.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 14

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Rackliff-Gedney will be managed without additional roads for high water quality objectives; entry into the Silver Creek/Pilot Knob and West Meadow Creek roadless areas for road building and timber harvesting will be deferred for the first decade; and site specific Environmental Impact Statements will be required before any harvesting or road building can take place in the Gospel-Hump (Jersey-Jack) or Mallard areas. All existing uses will continue.

Response No. 15

A regulated Forest is one where the age and size classes are represented in proportions that make it possible to have approximately equal harvests continuously. This concept is not necessarily a fundamental objective of Forest Service management, however it is similar to the concept of non-declining yield which is a standard Forest Service policy addressed in the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. The concept of a regulated forest where there are neat, square units of evenly spaced trees, all the same size and species, is not the concept of regulation we envision for the National Forest. On lands suitable for timber management, there will be a mosaic of many different sizes and shapes of timber stands with a variety of species and ages. Even this concept is far from being realized on the Nez Perce National Forest. The current Forest Plan projects that it will be 150 to 200 years before all of the suitable timber land on the Forest will have been harvested at least one time.

Response No. 16

It is true that it has been and continues to be the belief of some persons (foresters and others) that full development of the National Forests is the best method of management. We feel this attitude is in the minority, however, and that our current resource professionals and managers realize the benefits and advantages of managing the National Forest under various intensities for multiple uses. Roads are necessary in order to manage an area for timber management; however, it may not be necessary to leave those roads open between management activities. Also, there are some areas that are better managed for those resources which do not require roads such as wildlife, fish, and dispersed recreation. The Forest Plan proposes such a mix of land uses and management intensities.

Response No. 17

Undoubtedly, there are some foresters that oppose wilderness designations as you suggest, just as there are people in the population at large that are opposed to wilderness for many reasons. As a resource management agency, the Forest Service does not oppose wilderness designations and certainly does not view wildernesses as places where we are unable to manage the land. The ultimate determination of the wilderness designation lies with Congress and the Forest Service participates in this process by providing inventories and analysis of the resources and impacts resulting from the designation of any particular area.

On-going management activities are designed to following existing and approved land management plans, not to arbitrarily foreclose any future land use options such as wilderness. The roadless areas on the Forest will not all disappear after the first 10 years. Due to constraints on the rate of development to protect water quality and fisheries, roadless areas will be accessed gradually over 30 to 50 years.

Response No. 18

A part of this Plan is a strong road management program that will result in more acres of roaded natural recreation sites. Our trail program is currently being coordinated with road building and timber harvest to make the two more compatible.

Response No. 19

Wild and Scenic Rivers are designated by Congressional action as a response to the public. We are very concerned that the visual quality of the South Fork canyon be maintained, and this is spelled out in the planning process.

Response No. 20

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed leaving the system totals to remain near constant throughout the planning cycle. Alternative G calls for construction of approximately 4,460 miles of road. Permanent closures will close a like number.

Timber planning is scheduled on a 10-year planning cycle with at least the first five being data collection and additional analysis periods.

During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and a copy generally can be reviewed at any District office.

#219

Tom Kovalicky
Rt. 2, Box 475
Grangeville, Idaho 83530

May 29, 1985

Dear Mr. Kovalicky,

I am writting this letter in response to the Wilderness or Roadless Area in question in NezPerce National Forest.

I have lived in the Lewiston/Clarkston Valley for 13 years and was employed as a keypunch operator and now as a Secretary. Both jobs were dependent upon the timber and lumber industry in this area, as are many others. If any more wilderness or roadless areas are assigned there will undoubtly be a considerable lack of timber and therefore a lot more jobless residents in the valley. If we can not pay our bills a lot of others suffer. #1

Already the sawmills in the area are under such financial strain that they are being forced to either lay off some employees or close the doors completely. They can not take the added stress of more wilderness and less available timber.

Please remember that logging is the livelyhood of this valley and of Northern Idaho, and a lot of people have their dreams built here.

Stella McCauley
1116 Poplar
Clarkston, Wa
99403

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE IDAHO
MAY 30 1985
RECEIVED

LETTER 219

Response No. 1

No additional wilderness is recommended in the selected alternative.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED
#220

Tom Kowalsky
Nez Perce National Forest
Rt #2 Box 475
Grangeville Idaho 83530

Dear Sir,

I have lived in Idaho for 41 years. Half of those years in Northern Idaho.

I don't believe we need anymore wilderness area. #1

Timber has made Northern Idaho. How can you expect this part of the state to survive without it. We are working people and depend on the timber industry for a living. #2

We don't need more recreation area. You can't have recreation unless you can afford to enjoy it. No job, no recreation. #3

Why don't you just leave the forests alone. They have gotten along this long without your kind of interference and will continue to. #4

Leave the forests alone! We don't need your meddling! Love Northern Idaho the way it is

April Kennedy
3506 8th E
Lewiston Idaho

LETTER 220

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

A primary goal of the Forest Plan (Chapter II, page 1) is to "provide a sustained yield of resources that will support the economic structure of local communities..". During the public comment period many people pointed out that the volume of Nez Perce National Forest timber actually utilized over the past 10 years was approximately 85-95 MMBF annually. The volume of timber scheduled by the selected management plan should be sufficient to sustain the local wood products industry near current levels.

Response No. 3

We feel that we can manage the Forest for both timber and recreation.

Response No. 4

The overall goal of the Final Forest Plan is to manage the Forest in a way to maximize net public benefits in an environmentally sound manner. This has required a careful evaluation of a wide range of alternatives.

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

Response No. 4 (Con't.)

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

May 29, 1985

#221

Sir -

As a life long resident of Idaho County and a person who earns his living from the Nez Perce Forest I respectfully request you put Alternative "A" into effect. #1

The area does not need any more Wilderness, in fact quit spending money to manage what we are already lucky to have.

I feel that the economy of the area needs the lumber industry and its related works and the high sustained yield is one possible chance to make a sorry industry better. #2

Also I feel that comments from people in this area should be weighed heavier than those outside the area. I realize that you probably get more comments from special interest groups from outside the area and even state but by now you must realize how I would feel about their comments, even their existence. #3

I would like to compliment your committee for having meetings around the local area and not in Salt Lake or Boise as sometimes has been the case.

Sincerely,
Nick Geary
818 South Hall St.

FOREST SUPERVISOR

LETTER 221

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

A primary goal of the Forest Plan (Chapter II, page 1) is to "provide a sustained yield of resources that will support the economic structure of local communities..". During the public comment period many people pointed out that the volume of Nez Perce National Forest timber actually utilized over the past 10 years was approximately 85-95 MMBF annually. Any significant increases in the volume of timber offered by the Forest would not have any positive effects on the industry unless there was a corresponding increase in demand by the mills. The volume of timber scheduled by the selected management plan should be sufficient to sustain the local wood products industry near current levels.

Response No. 3

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

May 5, 1985

#222

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

[illegible]
[illegible] National Forest
Grangeville, Idaho 83530

Dear Tom

As an Elk City resident, I'm writing to offer my general support for alternative [illegible] of the proposed Forest Plan. My support is with some reservation.

I strongly agree that West Meadow Creek should be managed for multiple use with a timber emphasis. However, I am disappointed that Rackliff Gedney and East Meadow Creek will be eliminated from the timber base. #1

Our area mills have an annual capacity of 135 mm bd. ft. Depressed timber markets have forced these mills to cut heavy to private timber. These private sources cannot be expected to last forever. Public #2

timber will be needed to pick up the shortfall. Alternative "G" with 102 mm annual cut for the first 10 years will not be adequate. 222

Passage of the Central Idaho Wilderness Act implied the freeing of the Rackliff-Gedney and East Meadow Creek areas to multiple use. I suggest that these areas be opened to multiple use with timber given at least minor consideration.

I'm convinced that timber management can be compatible with other uses. Multiple use management will provide stability for Elk City and for my family.

Thanks for the opportunity to comment,

James W. Brownitz
Box 362
Elk City, Idaho
83525

Response No. 1

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

We have considered the implications of the Central Idaho Wilderness Act; however, there are varying opinions ont he legal implications of the language actually in the Act versus the Committee notes and so on. In any event, we have considered the potential timber resource in our analysis of the Rackliff-Gedney and East Meadow Creek areas. As a result, in the Forest Plan approximately 11,000 acres in Rackliff-Gedney will be available for timber scheduling. The suitability decision for East Meadow Creek will be defended. If market conditions and economics for harvesting change significantly, some timber may be scheduled after a required Plan amendment.

#223

May 28, 1985
631 25th Avenue
Lewiston, ID 83501

"Forest Plan"
Nezperce National Forest
Route 2-Box 475
Grangeville, ID 83530

To whom it may concern:

I am concerned with the draft "Plan" which is to allocate an additional 300% increase in roads to be built in the Nezperce National Forest. I feel that it is not necessary to build these roads for the present roads are indeed plenty. I will call direct attention the the Meadow Creek area which I am more familiar with. This area is where I spent a large amount of time with my family and friends camping, fishing, and enjoying the beautiful scenery. Now this area is logged over--what a waste. Now if you could, please, leave the West Meadow Creek area as it is--there is no need for wasting such beautiful land that belongs to the people for recreational use. #1 #2

My father is very familiar with the Pilot Knob-Silver Creek area. Here is where he hunts for elk for the use of meat on the family table. I hope he can continue hunting in this area and not at the neighborhood supermarket for good meat. Please, leave this land for his as well as other proud hunters use. #3

May I ask the you spend more time making good decisions for the use of land in Idaho which "you" as well as others will not be sorry for. As for the Meadow Creek area which has already been logged, sorry is not enough.

My support of alternative C is a alternative which I will not be sorry for. Thank you for any cooperation that you may give.

Sincerely,

Tina K. Grant

Ms. Tina K. Grant

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

LETTER 223

Response No. 1

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

Response No. 1 (con't)

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that couled not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

Approximately 13,000 acres in the Silver Creek/Pilot Knob area will be managed without timber harvesting or road building activities. This area is important to the Nez Perce Tribe for religious and cultural values.

#224

Dear Sirs,

I support Forest Service Plan G with a strict road closure for the general public. #1

I have gone to the meetings in Elk City and have listened to both sides. It seems very clear to me that there is already enough wilderness, let alone roadless areas. #2

The area in question, West Meadow Creek, can support 40 millworkers for 100 years if they take out 12 million board feet a year. These 40 jobs isn't even including the logging or hauling of the logs. That seems like a lot of jobs to be lost, just so an outfitter can have their own roadless area. #3

I have hunted in Elk City and can not see how the logging and the roads are going to run the said outfitter out of business. If the road is closed with a gate while logging operations are going on behind them, I suggest a watchman on the gate so that people can not sneak through while trucks and equipment are moving about. We have done this in the National Forest in Washington and it works very well. As for the elk dispersing, I have seen more elk and deer on the logging job than I have seen while hunting. We have enjoyed the wildlife in and around our logging units for years. It seems to me that logging creates more forage and cover than what was there to begin with. #4 #5

We need the roads to go in to the West Meadow Creek area. Once again I strongly support Plan G.

Thank you,

Mark Swanson

Mark R. Swanson
(Marks Swanson Trucking/ S&M Logging)
2133 Reservoir Rd.
Clarkston WA 99403

LETTER 224

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest-related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

Response No. 4

The presence of logging and roads affect each individual differently. To some, a quality backcountry environment or experience is a walk or horseback ride in the backcountry, undisturbed by the noise and visual modifications of logging. Others can gain this same enjoyment by driving along a mountain road and stopping at a clearcut to view the surrounding country.

It is important to realize that historically, outfitters have provided their clientele with an undisturbed environment. Timber harvest activities which encroach on outfitter's territories, will change this experience. This only affects the outfitters in nondesignated wilderness. These changes can be manipulated into benefits with the Forest Service and each outfitter working together.

Response No. 5

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

#225

To Whom it May Concern:

I am writing this letter to let you know that I am in favor of Plan G. It makes more sense to me to have the land opened up for the livelihood of many families and businesses in Idaho rather than a select few who in all probability come from other states or countries. To leave such a prosperous area closed because of such a reason as to let outfitters in to hunt is outrageous. With all of the mill closures and small business closings it seems to me that to close off West Meadow Creek would only add to the statistics of Idaho problems. I have never been an avid hunter and never plan to be but every deer or elk I have ever seen has been where loggers have already been or are presently working. To say that the elk and deer would disperse because of logging operations coming into the area just doesn't seem too valid to myself. As I understand it the outfitters go in and come in without actually visiting area merchants and what the small towns get out of these great hunting expeditions is minimal. Where as with the logging and mill operations, the loggers constantly frequent area merchants and they definitely prosper in the months the logging is going strong. It seems that every other day in the paper or on the news there is something about the decline in mill operations in Idaho and the northwest. To not support Plan G would only mean that more of the state can join the ranks of the unemployed. The ratio of outfitters to loggers around the state is fairly significant and it just doesn't seem fair to side with the minority.

#1 #2 #3 #4

I really can not believe that the wildlife would disperse if loggers went into the Meadow Creek area and once again I would like to voice my opinion in favor of Plan G.

Thank you for your time,

Jeri Swanson

Jeryl Swanson

2133 Reservoir Rd.
Clarkston, WA 99403

LETTER 225

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

A primary goal of the Forest Plan (Chapter II) is to "provide a sustained yield of resources that will support the economic structure of local communities." These resources include the amount of timber available for harvest as well as fish and wildlife populations and recreational opportunities. In determining the management of the roadless areas, the mix of resource outputs were evaluated in light of the economic as well as environmental impacts. The volume of timber scheduled over the next 10 years by the Forest Plan should be sufficient to sustain the local timber industry near current levels.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 4

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1986-1995). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism/recreation industry, of which outfitter/guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

#226

DEAR SIR:

I WOULD LIKE TO TAKE THIS OPPORTUNITY TO OBJECT TO THE PROPOSED LONG-RANGE MANAGEMENT PLAN FOR THE NEZ PERCE NATIONAL FOREST.

AS AN AVID SPORTSMAN & HUNTER, I HAVE SPENT COUNTLESS DAYS IN THE VARIOUS PRISTINE AREAS LOCATED WITHIN THE NEZ PERCE NATIONAL FOREST. I FIND IT QUITE RIDICULOUS THE WAY THE PROPOSED MANAGEMENT PLAN DOES NOT GIVE FULL CONSIDERATION TO WILDLIFE AND FISHERY HABITAT, AND YET, WEIGHS HEAVILY IN FAVOR OF ROAD DEVELOPMENT AND TIMBER CUTS, WHICH OF COURSE, YOU KNOW TO BE EXTREMELY DETRIMENTAL TO ALL WILDLIFE IN THE AREA. #1

NEEDLESS AND COSTLY ROAD BUILDING AND TIMBER #2

226

CUTS ARE NOT THE SOLUTION TO IDAHO'S DEPRESSED TIMBER INDUSTRY, ESPECIALLY AT THE EXPENSE OF ELK HERD'S HABITAT IN THE NEZ PERCE NATIONAL FOREST. WHAT THE FOREST SERVICE, POLITICIANS, AND TIMBER INDUSTRY MUST REALIZE IS, ALL THE ROAD BUILDING AND CLEAR TIMBER CUTS PROPOSED WILL DO NO GOOD IN THE FACE OF THE EVER EXPANDING CANADIAN SUBSIDIZED TIMBER EXPORTS. THE ANSWER LIES AT THE CANADIAN / U.S. BORDER AND IN THE BACKBONES OF OUR ELECTED OFFICIALS, NOT IN THE WILDERNESS OF THE NEZ PERCE NATIONAL FOREST. #2 #3

I STRONGLY URGE YOU TO REVISE AND RECONSIDER THE PROPOSED MANAGEMENT PLAN FOR THE NEZ PERCE NATIONAL FOREST BY GIVING FULL, NOT PARTIAL CONSIDERATION TO THE FRAGILE WILDLIFE LIVING THERE-IN. YOUR COOPERATION WOULD BE GREATLY APPRECIATED BY #4

226

Respectfully,

Phil Woodworth
985 So Meadowbrook Acres Rd
Coeur d' Alene, ID
83814

LETTER 226

Response No. 1

The Nez Perce Plan tries to strike a balance between all resources. Fish and fish habitat are primary concerns on this Forest and were major constraints on road development and timber harvest in the first decade.

We agree that the philosophy represented by statements in the Proposed Plan and Draft Environmental Impact Statement (EIS) such as ". . . summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the proposed alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. Secondly, the ratio of elk summer habitat located within the Forest's non-wilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

You will notice several changes in the Final Plan that will significantly reduce the chance of conflict between elk management objectives and timber and road management objectives.

1. No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan establishes management policy and direction for the development, implementation, and enforcement of road closures. This will appear as standards and Forestwide management direction in the Final Plan.

2. No timber sales or road construction activities will be scheduled within the West Meadow Creek roadless area or portions of the Silver Creek/Pilot Knob roadless area during the first decade. The East Meadow Creek, Rapid River, and Rackliff-Gedney roadless areas will be managed without additional roads.

3. The Final Plan shows a development schedule for the Gospel-Hump (Jersey-Jack) and the Mallard Creek roadless areas (1921 and 1847, respectively). However, except for a small sale (1.3 million board feet) scheduled in the headwaters of Slide Creek, no entry will be made into these areas until a site-specific Environmental Impact Statement is prepared. This will permit a more detailed analysis of the cumulative effects, management opportunities, and management strategies for these areas than is possible with a Forestwide Environmental Impact Statement.

Response No. 1 (Con't.)

The elk management objectives will be met. The flexibility to reduce elk objectives to meet timber objectives at the project level no longer exists. Elk objectives and timber objectives will be monitored as discussed in Chapter V of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on" Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Response No. 2

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for either the West Meadow Creek roadless area or a portion of the Silver Creek/Pilot Knob roadless area during the first decade. In addition, the Rapid River, Rackliff-Gedney, and East Meadow Creek roadless areas will continue to be managed with no additional roads. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential. In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

Response No. 3

The issue of Canadian imports is beyond the scope of this Land Management Plan. Current issues as the one above are part of a complex and ever changing national economy. The purpose of this Plan was to develop a balanced approach to managing the Nez Perce National Forest over a period of time in order to maximize the net public benefits to society. While the Canadian timber imports is an important issue to this part of the country, it is difficult, if not impossible at this level of planning, to lessen its impact on the local or regional economies.

Response No. 4

Based on public comments during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for West Meadow Creek roadless area or a portion of the Silver Creek roadless area during the first decade after the Final Plan is implemented. In addition, Rapid River and East Meadow Creek are assigned to roadless management. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential.

In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

Comment No. 227

May 26, 1985

Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho

Gentlemen:

I realize that Forest Service Chief Max Peterson defends below-cost timber sales in National Forests at the expense of wildlife habitat improvement and watershed protection, and that this decision has tremendous support from Senators McClure and Symms. I also realize that John Crowell, Jr., former Assistant Secretary of Agriculture, stacked the planning process to favor greatly increased road construction and deficit timber cuts, to the detriment of fish and wildlife.

The protection of wildlife habitat, in my opinion, should be the primary and ultimate consideration in the management of public land. When the managing entity decides to favor commercial interests, particularly endeavors such as deficit sales funded by the taxpayer, which necessitate roads in formerly pristine areas, it seems wrong to me. By the time either Alternatives G or H have been implemented for 50 years, all you'll have is subdivision land with some trees in it. #1

I urge you to do your best to keep the roadless land on the Nezperce National Forest as it is now--roadless. The destruction of fish and wildlife so that private interests are able to road that land at taxpayer expense is not good management. #2

Thank-you,
/s/ Andy Goodwin
Box 1658
Ketchum, ID 83340

LETTER 227

Response No. 1

The issues raised here are complex and there is no easy answer. Competitive issues such as timber harvests vs. roadless area management, below-cost timber sales, and projected timber demand exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (roadless areas) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach and maximizes net public benefits. For more information on tradeoffs between alternatives, please see Chapter II, Section 16-18 in the Environmental Impact Statement (EIS).

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

We agree that the philosophy represented by statements in the Proposed Plan and Draft EIS such as ". . . summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the proposed alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. Secondly, the ratio of elk summer habitat located within the Forest's non-wilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

You will notice several changes in the Final Plan that will significantly reduce the chance of conflict between elk management objectives and timber and road management objectives.

Response No. 1 (Con't.)

1. No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan establishes management policy and direction for the development, implementation, and enforcement of road closures. This will appear as standards and Forestwide management direction in the Final Plan.

2. No timber sales or road construction activities will be scheduled within the West Meadow Creek roadless area or portions of the Silver Creek/Pilot Knob roadless area during the first decade. The East Meadow Creek, Rapid River, and Rackliff-Gedney roadless areas will be managed without additional roads.

3. The Final Plan shows a development schedule for the Gospel-Hump (Jersey-Jack) and the Mallard Creek roadless areas (1921 and 1847, respectively). However, except for a small sale (1.3 million board feet) scheduled in the headwaters of Slide Creek, no entry will be made into these areas until a site-specific Environmental Impact Statement is prepared. This will permit a more detailed analysis of the cumulative effects, management opportunities, and management strategies for these areas than is possible with a Forestwide Environmental Impact Statement.

The elk management objectives will be met. The flexibility to reduce elk objectives to meet timber objectives at the project level no longer exists. Elk objectives and timber objectives will be monitored as discussed in Chapter V of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan contains explicit Forestwide standards and management direction to develop, implement, and enforce road closures.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Response No. 1 (Con't.)

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 2

We considered a variety of alternatives ranging from recommending wilderness classification for all 16 roadless areas to recommending that all roadless areas be available for timber production. The alternative that emphasized other resources while providing a high level of market outputs was chosen as the best overall.

In order to develop a balanced program that considers all resources, there is a need to develop many of the roadless areas. Part of this balanced program includes our increased emphasis in maintaining high water quality and anadromous fish habitat. To meet the objectives, the development of both roaded and roadless watersheds must be carefully controlled and road building constrained. Frequently, only a few miles of road can be built in a 10-year period. Because of this, the cut must be distributed over the entire available suitable acres. This means going into roadless areas. However, Rapid River, East Meadow Creek, and Silver Creek/Pilot Knob will be managed without additional roads for dispersed recreation and to meet wildlife, fishery, and water quality objectives; entry into West Meadow Creek roadless areas for road building and timber harvesting will be deferred for the first decade; and site specific Environmental Impact Statements will be required before any harvesting or road building can take place in the Gospel-Hump (Jersey-Jack) or Mallard areas. All existing uses will continue.

#228

Rick Johnson
P.O. Box 2372
Sun Valley, Idaho 83353
208-788-4264

May 25, 1985

Nezperce National Forest - Forest Plan
Rt 2 Box 475
Grangeville, Idaho 83530

Greetings:

I wish to take this time to comment on the proposed forest plan for the Nezperce National Forest.

I am particularly concerned with the long term protection of the Meadow Creek area. I strongly hope to see no new roads built into the roadless area. Such roadbuilding would most certainly impair the exceptional elk habitat there now. #1

Though there are problems with this alternative as well, I wish to lend my support to Alternative C in the forest plan. #2

Sincerely,

Rick Johnson

LETTER 228

Response No. 1

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 228

Response No. 2 (Con't)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

May 28, 1985

#229

Forest Supervisor Kovalicky
NezPerce National Forest
Route 2 Box 475
Grangeville Id. 83530

Dear Mr. Kovalicky,

I am writing to comment on the NezPerce National Forest plan because I appreciate and utilize the NezPerce National Forest for its unique hunting and camping features. Let me preface my suggestions regarding this area by stating that I do support Alternative C rather than the plans submitted by your forest planner. I believe that the lower Rapid River area and the Cool Water Ridge should be kept roadless. I strongly oppose the building of any roads into the west or east bank of Meadow Creek. #1 #2

Your road building plans do not seem to be in the best interest of the general public because many timber areas will not need access for twenty or thirty years. Surely these areas will be best kept undamaged untill they are needed. There is also the question of construction costs. How is the budget set, and how much of the road construction will be with purchaser credit? How much will be directly paid by the taxpayer?. There also seems to be a lack of information regarding the suitability of land for timber harvest if #3 #4 #5

these roads are built. The plan is also missing any map which shows where the main roads for timber access will be built. Also, the monitoring system built into the plan appears to be very weak and in grave need of improvement. It is my understanding that Congress desires a distinct system of guidelines be followed when land is evaluated for road building and timber harvest. What are your evaluation criteria? #6 #7 #8

You indicate that the elk population will rise or be stable leading to better hunting after extensive road building outlined in your plans. Surely this will not occur! This important elk habitat needs to be protected, not tainted by unnecessary roads. Towards this end, I urge you to set your forest decade level at approximately 85 million board feet or lower. This in itself will eliminate some of the premature detrimental road building. #9 #10

Yours truly,

Dean A Lyday

Rt 5 Box 450
Spokane Wa.
192--

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 3

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 4

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

Response No. 4 (con't)

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 5

The criteria used to determine land suitability is the same for all management alternatives and is described in 36 CFR 219.14. Lands are first examined to determine if: 1) the land is forested, 2) the lands can be harvested without irreversible damage to soils or watersheds, 3) there is reasonable assurance that the land can be reforested, and 4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. Lands that remain after these tests are regarded as tentatively suitable for timber management. In each management alternative, the tentatively suitable lands are determined to be suitable for timber management if: 1) the multiple use objectives for that particular alternative do not preclude timber management in some areas, 2) management objectives do not limit timber production to the point where management requirements cannot be met, and 3) the lands are cost-efficient over the planning horizon in meeting the total Forest objectives. The computer model, FORPLAN, was used to determine the set of lands that were cost-efficient in meeting the overall objectives of the alternative.

Response No. 5 (con't)

More information on land suitability for the preferred alternative can be found in Appendices E,G, and J of the Forest Plan. In addition, the proposed timber sale schedule for the next ten years is detailed in Appendix K and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the preferred alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 6

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor, does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed leaving the system totals to remain near constant throughout the planning cycle. Alternative G calls for construction of approximately 4,700 miles of road. Permanent closures will close a like number.

Timber planning is scheduled on a 10-year planning cycle with at least the first five being data collection and additional analysis periods. During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and a copy, generally, can be reviewed at any District office.

Response No. 7

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 7 (con't)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 8

The Secretary of Agriculture was directed by Congress to write regulations to implement the NFMA of 1976. These regulations were published in the Federal Register, Volume 47, No.190, on September 30, 1982. The criteria you have referred to are found in 36 CFR 219.14 and are used to determine land suitability. The criteria used to determine land suitability is the same for all management alternatives. Lands are first examined to determine if: 1) the land is forested, 2) the lands can be harvested without irreversible damage to soils or watersheds, 3) there is reasonable assurance that the land can be reforested, and 4) the land has been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. Lands that remain after these tests are regarded as tentatively suitable for timber management. In each management alternative, the tentatively suitable lands are determined to be suitable for timber management if: 1) the multiple use objectives for that particular alternative do not preclude timber management in some areas, 2) management objectives do not limit timber production to the point where management requirements cannot be met, and 3) the lands are cost-efficient over the planning horizon in meeting the total Forest objectives. The computer model, FORPLAN, was used to determine the set of lands that were cost-efficient in meeting the overall objectives of the alternative.

Response No. 9

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

Response No. 9 (con't)

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

LETTER 229

Response No. 10

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

May 29, 1985

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

#230

Dear Forest Supervisor,

It seems almost daily I read of the collapse of the Idaho timber industry, and yet the Forest Service proposes to launch an unprecedented expansion in its road building program. Just this week in Moscow, Senator Steve Symms once again predicted the demise of Idaho logging due to Canadian imports, and yet the draft plan for the Nezperce Forest proposes to double the timber harvest from the present 102 MMBF up to 206 MMBF per year. Something is not right here.

I urge you to implement Alternative C in the forest plan as the most conservative option given the "collapse" of the timber industry and the concomitant growth in tourism, outfitting, recreation, and the setting aside of research natural areas. #1

I also urge you to:

1. Retain all of the Meadow Creek drainage as it presently exists #2
2. Propose a realistic budget and one which greatly reduces monies spent for useless roads #3
3. Build no roads into Lower Noble Creek or the Mallard Falls area #4
4. Provide maps or information concerning what lands the Forest Service considers "suitable" for timber harvests #5
5. Provide maps showing all proposed roads to be built in the forest in the next decade #6

Sincerely,

Richard Meyers

LETTER 230

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The availability of economic timber sales and immature timber classes were issues presented that could not fully be answered until the West Meadow Creek roadless area surveys had been completed.

The Outfitters have presented an issue that the Draft Plan does not address satisfactorily. This group suggested that the recreation, hunting, and Outfitting industries could equal or exceed the revenues generated by the timber industry within this area. The economics were not fully developed by either group and further study is necessary.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Response No. 3 (con't)

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 4

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 5

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas that are suited vs not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative. It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

Additional information on the criteria and process used to determine the suitable and unsuitable lands has been added to Appendix B and Appendix D of the Final Environmental Impact Statement.

Response No. 6

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor, does it specify the closure scheduling that will be developed with initial entry.

Response No. 6 (con't)

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others will be closed leaving the system totals to remain near constant throughout the planning cycle. Alternative G calls for construction of approximately 4,460 miles of road. Permanent closures will close a like number.

Timber planning is scheduled on a 10-year planning cycle with at least the first five being data collection and additional analysis periods. During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and a copy, generally, can be reviewed at any District office.

COLLEEN RUTH CAREY, M.D.
ENDOCRINOLOGY - DIABETES - INTERNAL MEDICINE
SUITE 234 • ST. LUKE'S MEDICAL BUILDING • SOUTH 715 COWLEY • SPOKANE, WA 99202
(509) 624-6123

#231

May 28, 1985

Forest Plan
Nez Perce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Sirs:

I wish to thank the Forest Service for this opportunity to have input into the future of our national forests in north Idaho. Furthermore, you are commended for making a good start toward formulating a forest plan that is acceptable to the region as a whole.

The importance of the Nez Perce Forest to the region should not be underestimated. There is, as in Meadow Creek and Jersey Jack, an abundance of elk and other wildlife, clean waters, trout fisheries and salmon and steelhead runs. Thousands of us consider these values important, fishermen, hunters, environmentalists, native Americans and others who are concerned about handing on our outdoor heritage, this American birthright, to future generations. We are deeply concerned about how you plan to protect these resources.

I have the following particular concerns:

(1) Land allocations

In addition to the areas which you have recommended as roadless, I am requesting that the following areas remain roadless: Jersey Jack, Lower Noble Creek and Mallard Falls. Meadow Creek is of particular concern to many of us. It is a major tributary of the Selway River. It contains vital elk habitat and has a wonderful and popular trail system adjacent to the Selway Wilderness. Timber here is not needed for local mills, and roads will wast millions of taxpayers' dollars. Such roads and timber harvesting will also harm fine fishing and hunting while putting outfitters and guides out of business. #1

(2) Budget

Your entire plan is predicated on an unrealistic budget expectation. We urge you to plan for a more realistic budget that either holds at present levels or declines. This is in keeping with our country's increasing concern about financing critical national programs at a time of decreasing financial resources and expectations. #2

FOREST SERVICE
NEZ PERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985

231

(3) Impact on outfitters and guides

The businesses of these people depend on the timber poor, but wildlife rich forest land in north Idaho. We urge you to more fully assess the impact of logging roads on outfitters and guides. #3

(4) Harvest level

The harvest level of 75 million board feet is balanced with the other multiple uses of the Nez Perce National Forest. This level of harvest will also not require large scale advance roadbuilding, while assuring adequate levels for local mills. #4

(5) Roads

This is of growing public concern in the community at large. Roads are very costly, both in terms of monetary outlay and in terms of damage to our environment. Your roading program should be reduced, and advance road building should be eliminated. #5

These concerns are most in keeping with Alternative "C". #6

Thank you for allowing me to participate in this vital issue, deciding the future of the Nez Perce National Forest.

Sincerely,

Colleen Carey

Colleen R. Carey, M.D.

CRC:lg

cc: Rep. Tom Foley

Response No. 1

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1986-1995). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism/recreation industry, of which outfitter/guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 6

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 6 (con't)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

David Simmons
Rt. 1 Box 106
McCall, Idaho 83638

May 27,1985

#232

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

Forest Plan
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Idaho 83530

To the Forest Supervisor:

A few comments on the draft plan would seem appropriate. First of all, I recommend adoption of alternative "C" as a reasonable compromise between local economic interests and the broader, long-term interests of the public at large. #1

As a resident of central Idaho, a former employee of the Nezperce Forest, a frequent recreational user of the Nezperce, and a participant in the public involvement/ concensus group portion of the Payette N.F. planning process, I have more than a passing interest in the Nezperce draft plan. I would like to offer the following specific comments:

1) No new roading in meadow creek. Continue existing uses there. #2

2) Do not road lower noble creek or mallard falls. #3

3) Program timber harvest of 75-95 MMBF/yr.,and eliminate much of the advance roading. This will allow for: #4

4) A lower, more realistic budget due to far less roading in the first decade. #5

5) Improve the monitoring plan, especially monitoring of timber sale impacts. Broaden the scope of the monitoring, and hopefully avoid a court challenge of the plan in that area. #6

6) More on the impact of development to Research Natural Areas #7

7) Add Square Mountain creek RNA for its rare plants, and clarify the ongoing nature of the process of adding RNA's through the planning cycle. #8

8) Give a distinct evaluation of the impact of development on outfitters and guides, instead of including them in the general section on local economic impact. Discuss the impact of proposed roading of roadless areas on outfitters and guides. Discuss the present economics of outfitters and guides on the forest. This information willbecome increasingly important over the life of the plan. #9

9) The plan does not appear to comply with the law in the area of defining land suitability for timber harvest. Provide maps which clearly show: #10

-Lands which meet the absolute suitability standard of the law.
-Planned timber sales in both suitable and non-suitable lands.
- Arterial road construction associated with sales in both suitable and non-suitable lands.

I appreciate the difficulty of drafting a plan which meets the stringent requirements of the law. I hope you will accept my comments in the constructive way that I intend them.

Sincerely,

LETTER 232

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2 and Response No. 3

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 4

Road construction on the Nez Perce is not substantially increased during the first decade as implied in the Plan with the preferred plan's 810 miles. From 1975 to 1984, the Forest constructed 813 miles while reconstructing 191 miles. We presently have 2,050 miles of access roads of which 45 percent or 924 miles have restriction of use. This is further broken down to 419 miles with yearlong closures and 505 with seasonal closures.

Alternative G as presented in the Plan was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Response No. 4 (con't)

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 5 (con't)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 6

Prior to establishment of a Research Natural Area (RNA), all surrounding land is evaluated for development over time. Most commonly, roads can be routed around RNAs, but RNAs can also be established with a road right-of-way through them if necessary. RNAs are intended to represent undisturbed conditions over time and are established with that in mind.

Response No. 7

Square Mountain was inadvertently omitted from the list of proposed Research Natural Areas (RNAs) and will be included in the Final Forest Plan. Defining and establishing Research Natural Areas is a continuing process. Included in the Forest Plan is the recommendation to establish 7 aditional Research Natural Areas on the Forest, including Square Mountain. Refer to the Record of Decision of Chapter II of the Plan for further information on these areas and the selection criteria.

Response No. 8 and Response No. 9

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1986-1995). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

Response No. 8 and Response No.9 (con't)

The importance of the tourism/recreation industry, of which outfitter/guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 10

The process and criteria used to determine the land suitability is found in 36 CFR 219.14, the regulations written to implement the National Forest Management Act. We believe that the determination of suitable lands in all alternatives meets the requirements in the planning regulations. Included with the EIS, is a set of Forest maps delineating the large blocks of lands that have been identified as unsuitable for each alternative management plan. In addition to the large contiguous blocks of unsuitable lands, there are other scattered acreages that have been determined to be unsuitable in the alternatives. The small scattered areas do not lend themselves to mapping without considerable time and effort. Since it is not required by the regulations, and would not be useful as a decision criterion, we do not intend to map or otherwise single out those lands in each alternative with positive and negative present net values for timber production.

The timber sale schedule for the next 10 years is outlined in considerable detail in Appendix K of the Forest Plan. Included is data on acres to be harvested, harvest methods, volume, and locations of the harvest areas. No timber harvest is scheduled on the unsuitable lands.

A map of the proposed sale areas and major road projects for the next 10 years was made and displayed during the public meetings earlier this year. These maps are available for review at the Forest Supervisor's Office.

#233

May 28, 1985
631 25th Avenue
Lewiston, ID 83501

"Forest Plan"
Nezperce National Forest
Route 2-Box 475
Grangeville, ID 83530

Dear Forest Plan Coordinators:

Having beef on the supper table every night for the rest of my life does not appeal to me. If roads are put through the untamed forest of Idaho, I'm sure the dull beef dinners will be sooner than I expected.

I currently enjoy the delicacy of my father's elk meat in a variety of dishes, alternated, of course, with the cheap priced chicken and beef dinners. When I was younger, my father's elk hunting came in rather useful in providing meat at our supper table. Those were hard times back then for our family, and the elk meat kept us from starving during the cold winter months. I am quite proud of my father for his hunting skills and his determination during hunting season. To have meat for our family winter supper table was his best way to show he loved mom and us kids.

Amazingly enough, I never got tired of elk meat. I still enjoy the homemade jerky, salami, and the good ole fried elk meat with elk gravy and homemade biscuits. (It brings back tummy warming memories.)

Please don't put roads through our Idaho forest. I'm sure the money could be very useful elsewhere. If the undesired should come about, please keep the roads in the Nezperce Forest away from the Silver Creek area--pertaining to one of dad's favorite hunting places--Pilot Knob. #1 #2

I support alternative "C". Thanks. #3

Sincerely,

Cindy J. Grant

Cindy J. Grant
1001 Cedar Ave.
Lewiston 83501

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

LETTER 233

Response No. 1

Most road systems presently built on the Forest are for the harvest of timber. Each road is considered in an environmental analysis and is directly attributed to timber harvest planning.

Response No. 2 and Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been incre

May 29, 1985

#234

FOREST SERVICE
NEZPERCE NATIONAL F.O.
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

To Whom It May Concern,

This letter is in reference to the Nezperce National Forest Plan. My wife and I realize that much time and effort have gone into the production of this document and are for the most part satisfied with the draft version. We would like to voice our concern over a number of items.

We are pleased with the recommendation for continued roadless management of lands south of Riggins and the Coolwater Ridge area. We do feel, however, that the planned development of much of the Meadow Creek drainage is unwise. This is an area that provides vitally important elk habitat and supports a number of outfitter and guide services. The damage that would be done to this delicate drainage by road construction seems to far outweigh the minimal timber it would produce. #1

The information available to us suggests that timber sales in recent years have not produced enough revenue to cover sale costs. It puzzles us to see a proposal to raise the harvest levels with expectations of a receptive market. This is especially disturbing if you propose to access future sites with advance roading, a practice we find very wasteful. We feel a more realistic harvest level is called for. Such a level may well be slightly lower than those currently maintained. #2

The call for increasing road mileage by nearly 300% seems excessive as well. Some of the flagrantly unneeded roads include those proposed for Noble Creek, Mallard Creek Falls, and the West Meadow Creek area. We assume much of the forest budget to be directed toward road building and wonder how this road budget is being set. How much money will the taxpayers be paying for this unneeded construction? What happens if the preferred 15-20% budget increase is not realized? What will occur if the planning is centered around a budget that remains stable? #3 #4 #5

Another item which concerns us is the lack of any comprehensive map outlining timber suitability. We would very much like to see a map which includes (1) lands that have been designated absolutely suitable, (2) timber sales planned in both suitable and unsuitable lands over the next decade, and (3) main roads to be built in conjunction with such development. #6

The last item we wish to address is the monitoring plan proposed by the forest. It is of paramount importance that there be adequate measures designed to monitor a wide range of impacts that the plan explain what will be done if the monitoring shows some portion of the plan to have gone wrong. We, therefore, request that this portion of the Forest Plan be substantially strengthened, especially with respect to the monitoring of timber harvests. #7

In conclusion, we find that Alternative C appears to better then the others offered, providing a better balance than the choice preferred in the draft Forest Plan. #8

Sincerely,

Lynn Beard
K. Scott Beard

PARK VILLAGE #25
Moscow, Idaho
83843

234

Response No. 1 and Response No. 3

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 2 and Response No. 4

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, intial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

Response No. 2 and No. 4 (Con't.)

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5

We have received numerous public comments concerned with the budget developed to implement the Forest Plan which is based on Alternative G in the Final Environmental Impact Statement. To understand the role of the annual budget, it is important to remember that this Plan is a long-term multiple-resource management plan for the Nez Perce National Forest which will be revised every 10 to 15 years.

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Response No. 5 (Con't.)

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 6

To facilitate the FORPLAN analysis, the Forest's landbase is stratified into analysis areas comprised of lands with similar biological and physical characteristics, and similar management costs and returns. Forest Plan analysis is generally not specific enough to isolate the parts of analysis areas that are suited vs not suited for timber production. However, many tentatively suitable acres deemed unsuitable in specific alternatives occur in large blocks and are shown as such in the maps provided for each alternative.

It is possible to locate the smaller areas of unsuitable lands with the computer data base reports and the large scale maps of the specific land units on file in the Forest Supervisor's Office. Since it is not required by the regulations and would be a very time-consuming and expensive task, we do not intend to map all of the unsuitable lands in each alternative.

The proposed timber sale schedule for the next 10 years is detailed in Appendix J and gives information on expected harvest volumes, acres to be harvested, harvesting methods, specific locations, and amount of road construction. In addition, the proposed sales and major road building projects have been mapped for the preferred alternative and are available in the Forest Supervisor's Office for inspection. No timber harvest is scheduled for land identified as unsuitable.

Response No. 7

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 7 (Con't.)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 8

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 234

Response No. 8 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

HURLEY, LESTER & OSEBOLD, M.D.'S
ORTHOPAEDIC SURGERY

JOHN H. HURLEY, M. D.
EDWARD L. LESTER, M. D.
WILLIAM R. OSEBOLD, M. D.

226 MEDICAL CENTER BUILDING
SOUTH 820 McCLELLAN STREET
SPOKANE, WASHINGTON 99204
(509) 747-3107

#235

May 24, 1985

Forest Plan
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Gentlemen:

I need to register with you my concern about the spending of millions of tax dollars on new logging roads that are planned in the Nezperce National Forest. This forest land is very rich in wildlife but poor in timber. Spending vast amounts of money to build new logging roads would simply ruin valuable wildlife habitat and have an adverse impact on outfitters and guides whose businesses depend on this forest land being kept in a wilderness setting. #1

Timber harvests of 75 million board feet would be in balance with the other uses of the Nezperce National Forest and would not require large scale advanced road building. #2

In particular, I would ask that the valuable wildlife habitat areas of Meadow Creek, Lower Noble Creek, Mallard Falls, West Meadow Creek and Jersey Jack be excluded from roading and clearcutting. #3

As population pressures mount in our country, lands such as the Nezperce National Forest become a truly evermore valuable national treasure. I urge you to please consider the preservation of our fisheries and game habitats and watersheds for future generations of Americans whose voices are not heard today.

Thank you very much for your consideration.

Sincerely yours,

W Osebold, MD

William R. Osebold, M. D.

WRO:pvb

cc: Representative Tom Foley
House Office Building
Washington, D. C. 20515

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

LETTER 235

Response No. 1

The comment presented here raises the issue of spending tax dollars to construct roads for timber harvest at the expense of wildlife habitat and outfitters and guides.

The issues raised here are complex and there is no easy answer. Competitive issues such as road building/timber harvests, big game (elk) habitat, and outfitter/guide operations exist and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced (timber) and nonpriced (acres of wildlife habitat improvement) outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs is required to help decisionmakers select an alternative which provides a balanced management approach and maximizes Net Public Benefits.

For more information on these issues and the tradeoff analysis, please see Chapter II, Section 16 of the Environmental Impact Statement.

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for either the West Meadow Creek roadless area or a portion of the Silver Creek/Pilot Knob roadless area during the first decade. In addition, the Rapid River, and East Meadow Creek roadless areas will continue to be managed with no additional roads. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential. In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

No road management policy or direction was explicitly developed in the proposed Forest Plan. The Final Plan contains explicit Forestwide standards and management direction to develop, implement, and enforce road closures.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

Response No. 1 (Con't.)

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 2

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Response No. 3

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

#236

Tom Kovalicky
NezPerce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

May 14, 1985

Mr. Kovalicky:

After reading over your forest plan, I felt that I should remind you of a few things that you have forgotten or ignored in your forest plan.

Five years ago when the push was on for more wilderness in Idaho, we ended up with 900,000 acres of wilderness on the NezPerce National Forest. Now you want to make more of this land inaccessible to people that don't have the time, money, or physical capability to enjoy this land. I don't believe that the NezPerce National Forest needs 1.1 million acres for roadless recreation when you already have 900,000 acres that I call roadless recreation and you call wilderness. #1

I do not believe that the general public wants the East Side of Meadow Creek (1845D), or Rackliff-Gedney (1841) in roadless recreation, but if that is what is going to happen to it, the least that you could do is to accelerate the entry into the West Side of Meadow Creek (1845C), Jersey Jack (1921), and similar areas. #2 #3

I was born and lived in Idaho for 25 years. For the last 11 years I have been living in Clarkston, Washington.

I have worked in the timber industry for the last 16 years and I feel that because of my profession (Forest Technician) that I have more to lose than most people if you do not maintain an allowable cut that will keep the existing mills in operation. #4

Therefore, I believe that you should go with alternative G. or G1. #5

Truly Yours

Robert M. Kennedy
2523 Stafford Drive
Clarkston, WA 99403

LETTER 236

Response No. 1, Response No. 2, and Response No. 3

No additional wilderness is recommended in the Forest Plan.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 4

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to ensure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

Response No. 4 (Con't.)

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 5

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 237

Tom Kovalicky
Nezperce National Forest
Route 2, Box 475
Grangeville, ID

Dear Mr. Kovalicky,

I have been a resident of Idaho County for 34 years. I spend a great deal of my recreation time in the Nezperce NF. I hunt in and around the clearcut areas east of the town of Clearwater. My years of successful deer and elk hunts well outweigh my years of unsuccessful hunts. It is my firm belief that properly managed logging in the Nezperce NF enhances both wildlife and the Forest, itself. #1

Being an employee of Idapine Mills, Inc., I am well aware of the economical impact that would occur if additional forest timber is not allowed to be harvested. #2

I do not believe that individuals or organizations from outside this area should be allowed to influence a decision such as the one to be made concerning Nezperce NF usage. Many outside opinions and influences are putting many area residents' livelihood at stake. #3

In closing, I recommend that all non-wilderness RARE II areas be roaded and managed for all uses including timber production, particularly the west side of Meadow Creek, 1845C, and the annual harvest be raised to 120 million bd.ft. #4 #5

Sincerely,

L. John Gunter

LETTER 237

Response No. 1

We agree that with proper management and a balanced approach, the forest can support healthy wildlife populations and produce timber. Proper management is the key and we believe we have prescribed this in our Forest Plan. Assuring adequate spacing between cutting units, encouraging browse production in opening, closing roads, and in some cases delaying entries into areas are some of the ways timber harvesting and wildlife management can be made compatible.

Response No. 2 and Response No. 5

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

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While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 237

Response No. 3

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Response No. 4

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#238

May 23, 1985

Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Tom:

I have lived in Idaho County for 50 years. My job is related to the lumber industry.

In my opinion we already have enough roadless and wildnerness areas, which in the most part will never be used. I would like to see all non-wildnerness Rare II Areas be roaded and managed for all uses including timber production and harvest. #1 #2

I would like to see the allowable cut increased to 120 million board feet on the Nezperce National Forest over the next five years. We cannot have anymore sawmills closed in our area. #3 #4

We need to increase the sustained yield on the Nezperce. Especially on the West side of Meadow Creek--I would like to see it opened up to timber production and harvest. #5

Sincerely,

Jim D. Hardin

Jim D. Hardin
255 Park St.
Grangeville, ID 83530

LETTER 238

Response No. 1, Response No. 2, and Response No. 5

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

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The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 238

Response No. 4

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues dicussed in Appendix A.

#239

George K. Elliot
314. W. So. 2nd
Grangeville, Idaho
93530

To Tom Kovalicky
Nezperce National Forest

Dear Mr. Kovalicky

This letter is to inform you that I support Alternative G, although I feel that the average timber harvest should be raised from 102 million board feet to 120 million board feet. This would assure that the mills and loggers have an ample supply of timber to maintain production levels and assure that no more jobs are lost. #1 #2 #3

The timber products industry has given way to wilderness and roadless areas often enough to show our concern and willingness to be fair to everyones' concerns. Other groups would seem to have the entire forest for their own uses and don't care if it costs a lot of local people their livlihood. If such hunters want to come to Idaho #4

to hunt with a guide and pack outfit let them. They have almost a million acres of wilderness in the Nezperce National Forest alone for a few thousand hunters. Most people do not have the means or ability to travel into the wilderness very far and roads make at least parts of the forest accessible. Elk avoid roads so I do not see how roads on the West Side of Meadow Creek -1845-C are going to hurt the elk population. #5

As a mill worker and hunter I think Alternative G is the best plan for all and lets hope that it is a lasting agreement.

Sincerely Yours

George K. Elliot

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

Response No. 3 (Con't.)

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues dicussed in Appendix A.

Response No. 4

The Forest Plan attempts to strike a balance between the competing interests of wilderness and timber management.

No additions to the current wilderness system are recommended in the Forest Plan.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 5

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Response No. 5 (Con't.)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

#240

Judy Kaye Elliot
314 West South 2nd
Grangeville Idaho
83530

Tom Kovalicky
Nezperce National Forest
Rt 2 Box 475
Grangeville Idaho 83530

Dear Mr. Kovalicky:

Untouched wilderness filled with majestic towering pines; bordered by crystal clear streams, flashing brook trout swimming in the shallows; splendid deer and elk resting in the shady undergrowth, timid squirrels and rabbits scampering through the bushes makes a pretty picture poster but it spells death to this local community and the area under the jurisdiction of the Nezperce National Forest.

As a community that is supported by the timber industry we can not sign our death warrent by allowing more timber land to become #1

classified as roadless / Rare II areas. We need the timber and related industries to support this community. #1 #2

Please support Alternative 6!!! #3

We need this plan which will preserve our forests as well as the timber industry. We need Alternative 6 as a plan which provides a viable compremise between towering pines and a profitable local economy. We also need to increase the average timber harvest in Alternative 6 from 102 million board feet to 120 million board feet. Alternative 6 is the only solution to this complex wilderness / timber industry issue. #4

Alternative 6 is the best plan. Do not sign a death warrent for the communities in the Nezperce National Forest Area. Please support Alternative 6!!

My family and I have lived in this area all of our lives and we have spent many hours in the

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forest but we can not survive as paper doll people in a pretty picture poster forest. We need a working, growing, changing forest that will accomadate a vibrant community with a profitable timber industry as well as clean water, towering pines and abondant wild life.

Support Alternative G for the life of this community!!

Judy Kaye Elliot

LETTER 240

Response No. 1

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2 and Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 240

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitablity of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

5/23/85

#241

Dear Mr. Kovalicky:

I am writing my Second letter in Response to your Nezperce Draft Forest Plan,

I was irked into writing this letter, because of the News Article I heard on KORT - 5/22/85 — From The Idaho Conservation Group. they Propose only cutting 75 million Board Feet of lumber each year, because they say we (Lumber mills in this area) don't need that much because we didn't use the amount we had in the past few years, In Response to this, you certainly most know that the Lumber Industry in these past few years has been greatly depressed — No wonder we didn't use it / If we are cut Back to 75 million Board Feet per year — One Saw Mill In this area will most definitly will be shut down — (more depression + hardship for the people in our area.) #1

The Conservation Group also states That Roads and logging depress the Elk population — B. S.

I am an active Elk Hunter and Know for a fact that Logging an area makes it easier for Elk to mulitply — they like #2

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These more open areas /

Also Roads in these areas don't Hurt the Elk population, it's the Hunters on the Roads that do / — Let the Logging + Lumber Industry have the Roads they need on the West Side of Meadow Creek. (1845-C), then close the Roads and protect the Elk, with your Iron Gates or maybe put out a Reward for anyone caught behind them) #3 #4

Again I would like to express my opinion of the letters from outside of our area — such as these Quackes — From Florida + California — the Senator from Ohio — that don't even know what's going on out here / They don't have to live + work here so they don't care or understand what will happen / #5

Your Plan G-G / — seems the Fairest to me — a few million more feet of timber to revive the Lumber Industry would greatly be appreciated by most people I'm Sure / #6

Sincerely Yours,

Dan [illegible]

205 South Meadow
Grangeville 83530

Response No. 1

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

Response No. 2 (con't)

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic signficantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

Response No. 3

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Response No. 4 (con't)

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Response No. 6

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

Response No. 6 (con't)

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#242

May 29, 1985

Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Sir:

I wish to comment on the proposed Forest Service Plan. I have been a resident of Idaho County for 34 years. I have raised three children and all attended Idaho schools. Their support and food came from a job in the timber industry.

My father was a laborer in the timber industry. All my life has been involved in this type of economy. I know what effect sawmills have on the area. It is not negative.

About 15 years ago I had the joy of visiting a lake about 50 miles above Spokane, where I lived when I was small. When we lived there the whole area was logged off, yet when I saw it about 20 years later the trees were grown up and I could not find where some of the mill houses had been. There was hardly a trace of the evidence of a sawmill after just 20 years. Timber is to be used and it can be renewed. #1

I feel there should be no more wildnerness and roadless areas in Idaho. We have enough. Let us use what God has given us and replant for the generations that will follow; if we are allowed jobs from it, and not made to leave! #2 & 3

I truly believe to waste and burn it is to be held responsible some day before our maker. To cutoff more jobs in this area is cruel, but it will happen if more area is set aside for the rich and lazy play boys! #4

Sincerely,

Wilma A. Oltman

Wilma Oltman
Star Rt., Box 30
Grangeville, Ida 83530

LETTER 242

Response No. 1

Timber is one of the valuable resources on the Nez Perce. The purpose of the Forest Plan is to determine the mix of resources from the Forest that will maximize the total benefits to the public. Part of that mix includes harvesting timber in areas and using methods that are compatible with other resources. We do plan to use the timber, as you suggest, but with some limitations to assure that all resources are considered and protected.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

LETTER 242

Response No. 4 (Con't)

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

#243

Tom Kovalicky
NezPerce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky,

I have lived in the Lewiston area all my life. I have worked in the Lewiston area for the past 18 years and supported a family for 17 of those years. I have worked at a variety of jobs over the years, however each job I have had has been related, directly or indirectly, to the lumber and timber industry.

During the Central Idaho Wilderness Bill hearings, I submitted written comments on several Rare II roadless areas in the NezPerce National Forest. While I did not agree with all the land allocations made in this Bill, I thought that the wilderness-roadless area question had been settled in the NezPerce until at least the end of the century.

I was shocked to discover that the Forest Service preferred alternative G. Gl., has three Rare II areas proposed for roadless management. Your data says that two of these areas, East Meadow Creek and Rackliff-Gedney, contain over a billion board feet of standing timber. I would think, in view of the massive wilderness areas already in existance on the NezPerce National Forest, that you would want to manage the remaining land for all of the other multiple uses including timber production, especially productive areas such as Rackliff-Gedney and East Meadow Creek.

Please understand that I am not an anti-wilderness or anti-roadless area advocate. In fact I own seven horses and have hunted in wilderness-roadless areas for several years and hope to continue for many years in the future. However, my first priority has to be the economic well being of my family. I feel that the NezPerce has contributed more than its share to roadless area recreation for the Northern Idaho and should now turn its attention to supplying jobs to enable area residents, myself included, to continue living in the area to enjoy the North Idaho lifestyle. #1 #2

Yours Very Truly

John H. Dinke
2130 Allen Drive
Clarkston 99403.

LETTER 243

Response No. 1

No additional wilderness is recommended in the Forest Plan.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

S. E. 320 Dexter
Pullman, WA. 99163
May 28, 1985

#244

Mr. Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

In the Nezperce Forest Plan we support Alternative C because: #1
1) it protects more roadless areas
2) it has a lower timber cut and fewer miles of roads
3) it provides for more protection of wildlife and fish
4) it would be more in line with the current budget
5) it best provides for the long range needs of outfitters and recreationlists.

1. Roadless Areas. All six of the roadless areas in the Nezperce Forest are worthy of protection from logging and roads. All of Meadow Creek must be protected. #2 Ideally, it should be part of the existing wilderness. In the long run we hope that #3 Meadow Creek will be added to the Wilderness System.

In the meantime, all of the watershed of Meadow Creek must be designated as a roadless area in the Plan. Meadow Creek is a major tributary of the Selway River. The water quality must remain high for the fishery and to maintain the water quality of the Selway. Roads and logging will degrade the water quality of Meadow Creek and this is unacceptable. Wildlife, fish, water quality, and recreation values are far more important than any timber values. To my eye, the timber looks marginal at best and most stands look uneconomic at worst.

Marginal timber, steep slopes, granitic soil, roads, and long haul distances make not only for below cost sales but, more important, for the destruction of a whole watershed.

2. Timber Cut. This lower timber harvest level of 74 mbf for the first ten years is the most prudent for several reasons: #4

A. it gives time to observe where the timber market will be both in volume and value--hopefully the situation will be clearer in 10 years. If more timber is needed, then adjustments can be made. If not, then at least unnecessary roads and sites will not have been built and harvested.

B. this figure is not much below the figure of sales actually sold/harvested.

C. this period of time could be used to develop plans to utilize more fully prime timber sites in the forest. Studies have shown that if such prime timber producing sites were utilized to the maximum, then current or projected harvest levels could be met without going into roadless areas. Has the Nezperce Forest included this study/concept in the Plan?

244

D. your projections for harvest level and output values seem to be too high. #5 Current conditions of the interest rate, housing market, foreign imports, restrictions on exports, the movement of timber companies to the southeast, obsolete mills, high transportations costs to mills and from mills to markets, the greater availability of timber from private lands, and below cost sales all point to a more conservative estimate for the first 10 year timber harvest.

E. has the Nezperce Forest used Section 6K of NFMA in evaluating timber sites? #6 If it has, we can't find it in the documents. 6K states that in developing land management plans the Forest Service should "identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors..." If this section had been used then none of Meadow Creek would be considered for timber harvest because of the physical damage, the lack of economic return, and the pertinent factor that outfitters will be forced out of business. #7

F. a lower cut means fewer roads which in turn means less damage to the forest and its values of wildlife, fish, and ecological integrity. It also means less "hard" money spent from the U.S. Treasury which will help lower the federal deficit. #8

3. Wildlife and Fish. Optimum levels of wildlife and fish are achieved with the least disturbance. Timber harvest and roads, no matter how carefully done, upset the balance and diminish fish and wildlife. Although these don't have the clear cut dollar #9 values of timber, they are valuable, and NFMA does reaffirm multiple-use resources "not chosen primarily because they will give the greatest dollar return or the greatest output of timber". Does the Plan address this section of NFMA? If so, we #10 can't find it in the documents.

4. Budget. The budget for Alternative C will be about what the current budget is. This seems to be a more realistic way to begin the first 10 years of the plan considering the fluctuation that can occur under different administrations and varying national economic conditions. It is always more reliable and predictable to request a similar budget than one that is higher as in Alternative G.

5. Recreation. The most recent and comprehensive studies on tourism in Idaho indicate that it is now the third industry in the state. While the timber industry continues to decline, tourism expands and it is projected to continue to grow in the years ahead. Because the Nezperce Forest has some of the most spectacular scenery in the state and some of the best hunting and fishing, it is a reasonable assumption to project that outfitting and recreation will continue to grow. Has this been taken fully into the planning process? While no one has a corner on accurate predictions, it does seem obvious to us that recreation in the Nezperce Forest will increase and #11 the demand for timber will decrease. We feel that the Plan does not give enough weight to recreation values and it is a glaring fault. At least Alternative C comes closer than G.

6. Other Concerns.

A. As I understand the lodgepole pine/mountain beetle relationship it goes like this: the lodgepole grows fast on burnt over sites, matures at 80 years, if burned the cones are opened and seeded, at 80-100years it can become infested with beetles and destroyed which will provide more fuel if burned, and at this point a new cycle begins. Cutting down infested stands to save them sounds too much like a Vietnam War concept. Why not controlled burning rather than new roads and cutting? Wouldn't this achieve the same result without the degrading effects of roads? The Plan should address this. #12 #13

B. Planned roads should be site specific and the public should be fully informed about location, cost, and who pays for it. For example, is the Noble Creek and the Mallard Falls roads really necessary--and who pays for them? Has the public been fully informed? We have not. #14 #15

C. Accurate and regular monitoring (of stream silt, for example) must be done and the public must be kept informed. A budget must be maintained and the forest must have the courage to informthe public of failures. No cover-ups! #16

D. Mr. Kovalicky, while we are impressed with your openness and committment to honestly implementing the final Plan, what happens to the Plan with a new supervisor who may not be as honest as you? As far as we can see there is no safeguard for the public in this vital matter. #17

E. Again there is the important matter of the credibility of regeneration figures. Dale Champion, in the San Francisco Chronicle, April 13, 1985, reports that there is widespread falsification of records involving tree planting and timber stand improvement on several of California's National Forests. Records were falsified because target goals couldn't be met. Personnel figured their careers would be threatened if they didn't doctor the records. What assurance does the public have about the future accuracy of regeneration records on the Nezperce Forest? #18

F. In the years ahead we hope you will change the direction of the Forest Service from commodity oriented to true multiple use--where each resource has equal weight regardless of economics. Our feeling is that a majority of Americans support this even though they don't write. A lot of people are concerned about the direction the Forest Service is going and they do support a change of direction. #19

The Nezperce Plan needs revision as indicated above. Our support of Alternative C and our comments represent many thoughtful hours of discussion and work. We believe our ideas can help lead to a revised and better balanced Plan that will benefit more people both now and for future generations. We appreciate your serious consideration of our views and your efforts to develop and implement an improved Plan. You have our support and please feel free to call on us if we can be of further help.

Sincerely yours,

Ron & Mimsi Wise

Ron and Mimsi Wise

LETTER 244

Response No.1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2 and Response No. 3

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage. In addition, the Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

The reason for not recommending more land for wilderness designation is not because of the existing acres of wilderness on the Forest, but because those areas that would make valuable contributions to the National Wilderness System have already been designated as wilderness by Congress.

Also, one of the criteria to be considered in recommending an area for wilderness is the uniqueness of its ecosystem. None of the roadless areas on the Nez Perce would add a unique ecosystem to the wilderness system; it would be adding more acres of ecosystems already included in the wilderness system.

Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 5

The harvest levels projected in the proposed Forest Plan were based on certain assumptions. Included in these are the assumption that all of the timber supplied by the Nez Perce would be purchased (horizontal demand curve), timber prices and future price trends could be predicted using 1975-1980 market data.

Since the draft Plan was released, further analysis has been done altering some of these assumptions and modeling the forest with revised constraints. Timber values have been updated based on market data from 1975-1984. Based on this further analysis, parts of the proposed plan have been revised.

Response No. 6

In addition to stating several requirements for the Forest planning process, including the section on determining land suitability as you have mentioned, Section 6 of the National Forest Management Act also directs the Secretary of Agriculture to write regulations to provide directions for implementing the other parts of Section 6. This was done and appeared in the Federal Register as 36 CFR Part 219. The specific section dealing with land suitability is section 219.14. We believe we have followed the process and meet the requirements for determining and identifing suitable lands as set forth in these regulations. See Appendix D in the FEIS for additional information in suitability.

Response No. 7

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 8

It is true that lower harvest levels generally require less road construction. The effect these roads have on the Forest is determined by a number of factors including the location, the mitigation measures applied to the road, and its long-term management. In the Forest Plan, standards have been developed to assure that the fish and wildlife objectives for an area can be met with the amount of road construction necessary to accomplish the timber objectives. In addition, road management direction that has been added to the Final Forest Plan includes a significant amount of seasonal and permanent road closures that will alleviate many of the conflicts between roads and wildlife habitat.

Response No. 9 and Response No. 10

Alternative G was selected as the "Preferred Alternative" because it, in the Forest's opinion, is the alternative which maximizes "net public benefits" in an environmentally sound manner. "Net public benefits" are measured by both quantitative and qualitative criteria rather than a single measure or index. For a detailed discussion of the tradeoff analysis which included both market and nonmarket goods and services, see Chapter II of the Final EIS.

Response No. 11

Many participants in our planning effort have suggested that the sections of the DEIS and Plan dealing with recreation and tourism should be strengthened. We agree. Better statistical information on actual and potential recreation use is being developed, and additional analysis is being done on the economic contribution of outfitters and guides who operate on the Forest.

Response No. 12

Our long-range goal in pest management is to develop an integrated pest management strategy that focuses on creating and maintaining stand conditions unfavorable to insect epidemics. We do not believe that cutting infested stands will stop the beetle epidemic; however, harvesting and other control actions such as trapping can slow the spread of the insects and create management options to minimize the impacts of the infestation not only on timber, but on other resources as well. Through our harvesting and control activities we hope to create a mosaic of stands of varying ages and with greater species diversity than currently exists. Increasing the age as well as the species diversity in the lodgepole pine Forest type will reduce the susceptibility of future stands to large scale infestations. All control actions will be implemented in accordance with the applicable standards for other nontimber resources in the area.

Response No. 13

Prescribed (controlled) burning of insect-infested trees is not the best alternative to controlling the Forest insect problem. There are costs associated with burning such as construction of firelines, and burning and holding crews. Burning also involves a great deal of risk. Harvesting of these insect-infested trees will derive benefits such as wood products and firewood. A part of the Forest Service objective is to provide wood products for the American people. Burning of insect-infested merchantable timber would not accomplish this. Sediment from roads is a problem, but sediment from timbered slopes denuded by fire can also be a major concern.

Response No. 14

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system to log the total area. Reviewers of these plans should be aware that this has not been ground reviewed nor reflects the exact number or placement of the final system which may not be complete for 100 years in the future, nor, does it specify the closure scheduling that will be developed with initial entry.

These plans are approximately 60 percent complete for the Nez Perce, and number 77 plans with at least 2 maps per plan. The volume of reproduction would be astronomical to publish for every reviewer. These Area Transportation Plans do not show the exact location, but represent a total roading concept with alternatives. As roads are built, others ill be closed leaving the system totals to remain near constant throughout the planning cycle. Alternative G calls for construction of approximately 4,460 miles of road. Permanent closures will close a like number.

Timber planning is scheduled on a 10-year planning cycle with at least the first five being data collection and additional analysis periods. During year 5, the project plans are developed to formulate an analysis area. At this time an Environmental Assessment is completed and the final project development plan is incorporated with an update to these ATPs.

ATP maps are on file at the Supervisor's office and a copy generally can be reviewed at any District office.

Response No. 15

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 16

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Response No. 16 (Con't.)

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 17

The Final Forest Plan, once approved, will be in effect until it is revised, regardless of who the Forest Supervisor is. I view the Forest Plan as a "contract" with the public. While someone else may have different management style or philosophy, this "contract" cannot be altered without following the processes set forth in the regulations. Also, the public will be continually advised of what we learn as we implement and monitor the Forest Plan. Thanks for your trust in us!

Response No. 18

The case you mention is unfortunate and casts a cloud of suspicion over all of the agency's employees, the majority of whom are honest and conscientious in their work. Periodic field reviews of projects are scheduled annually that would pick up any falsely claimed work. One of the best ways to avoid situations where employees feel pressured to do this sort of thing is careful planning of projects with periodic reviews to identify problem areas early. Also, if the responsible managers, generally the District Rangers, are involved enough with activities on their districts, they are aware of what is being accomplished on the ground and can verify the accomplishments. We feel that these factors help assure that the recordkeeping on the Nez Perce will be accurate and truthful.

Response No. 19

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

Response No. 19 (Con't.)

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

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- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 245

John Kennedy
3506 8th Street E.
Lewiston, ID 83501

May 14, 1985

Tom Kovalicky
Nezperce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

I have read the current Nezperce Draft Forest Plan. I am totally against any more roadless/wilderness areas. #1

This area, East Meadow Creek, 1845E, Rackliff-Gedney, 1841, should be used as multi-use areas for all people concerned, logging, recreation, etc. I am sure that if enough effort by all people concerned will work for a common goal to utilize these areas in question, we can keep all the industry in northern Idaho, all Idaho areas surviving. #2

I have lived in Idaho the past 40 years. I have been in the work force the past 27 years, and whatever type of work I was involved in was and is based on the timber industry in some way.

In short, we have to keep the timber base as broad as possible to keep the tax base, job base that is needed to keep Idaho an area of opportunity. #3

Yours Truly,

John Kennedy

LETTER 245

Response No. 1, Response No. 2, and Response No. 3

As part of the Forest planning process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Leroy a Oliva Stevens
1022 Crook Street • Grangeville, Idaho 83530

#246

Mr. Tom Kovalicky.

As a resident of this area for 60 years, I want to say we already have enough wilderness area. #1

The mills need all the saw logs they can get to keep the men employed, and taking the mature trees for harvesting, seems like a good idea. #2

I have hunted elk and deer for the past 40 years and from my experience I find that roads have no effect on animals. They stay around and cross a road, the same as they cross any other trail, be it an outfitters trail or just plain walking trail. #3

We do need to keep our sawmills operating, our welfare rolls are big enough now.

Sincerely

Oliva Stevens

LETTER 246

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 246

Response No. 3

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

Dear Sirs: #247

I hope to see more Logging increased in Nez Perce National Forest. #1

I'm all for a certain amount of wilderness, but, to endanger many Jobs and the welfare, Education for our Dependents, im against. #2

I have lived in this area off and on since 1948.

With all due respect to the Nezperce forest service i would like to see more Timber harvest in 1845-c. #3

We as a group, of the united states are doing our part in bringing the economy of this country back.

I think as a democratic republic we can, or you can find a solution by helping all parties involved.

630 10th #2
Clarkston 99403

Sincerely
Wendell H Goldsworthy

LETTER 247

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

LETTER 247

Response No. 3

The option of scheduling timber harvesting in West Meadow Creek was considered in several of the alternative management plans studied for the Nez Perce National Forest. Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Tom Mavalicky
Nezperce National Forest

5/15/85
#248

Our jobs depend on the timber from the Nezperce Forest. I would prefer to have the allowable cut increased to around 120 million board feet the next five years. I have lived here 59 years, all my life. #1 #2

We believe cutting the timber and replanting is the only way to go for future. After reproduction areas that have grown up always are just as good or better hunting than the cut aside areas. #3

Dale Rose
Marge Rose
324 E. N. 7th St.
Grangeville 83530

LETTER 248

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

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Response No. 3

Numerous research efforts on elk and timber management throughout the Northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk, and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduce use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

#249

Dear Mr Kovalichy

Read your Nezperce National Overview Proposed Forest plan - Draft Inviromental Statement

Since I work for Idapine mills and this would affect my job and Income. #1
I would like to see the allowable cut increased from 102 mil. BF to 120 mill per year to assure adequate timber to sustain the saw mills production in this area. #2

I also feel we have enough public land set aside for wilderness. #3
there fore I would like to see all non wilderness and Rare II areas be roaded and managed for all uses including timber production. Under Alternative G. #4
almost 1.1 million acers would be decidcated to roadless back country recreation, there should be similar commitment to roaded recreation for people with out the time or money to enable them to injoy the back country recreation.

Sincerely
Theodore A Myroll
611 South D

LETTER 249

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 3

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 4

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

E. I. ROBERTSON
P. O. Box 27
Nampa, Idaho 83651

5/28/1985

#250

Mr. Tom Kovalicky,
Supervisor Nezperce National Forest
Route 2 Box 425
Grangeville, Idaho 83530

Dear Mr. Kovalicky:

I am very much opposed to opening up the roadless area of the back-country until there is a market for the timber in each area opened. #1

At the present time the timber that the logging companies have already bought is not being harvested, areas that have been roaded are not being bid on, so untilthere is a market for that timber, there is no reason to build roads to it. We need those roadless areas to try to preserve our fish and game habitates. #2

Also with our huge federal debt, now is not a time for unneeded spending.

Thank you.

Truly yours,

E. I. Robertson

LETTER 250

Response No. 1

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time fro completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

Response No. 2

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

LETTER 250

Response No. 2 (Con't.)

Based on additional analysis and public comments received during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for either the West Meadow Creek roadless area or a portion of the Silver Creek/Pilot Knob roadless area during the first decade. In addition, the Rapid River and East Meadow Creek roadless areas will continue to be managed with no additional roads. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential. In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

May 21, 1985
#251

Tom Kwalicky, Supervisor
Nezperce National Forest
Rt 2. Box 475
Grangeville, Idaho 83530

As an employee of Idaho Mills since 1966 and a life long resident of Idaho County, I am very personally concerned with the management plan for the Nezperce National Forest.

It is crucial to the continued operation of the remaining area mills that the allowable cut be increased to 120 MMBF over the next five years. A large portion of the residents of this area depend on the mills for their livelyhood. #1

I feel strongly that Idaho has more enough roadless Wilderness. However, Forest Service management of the East Meadow Creek - 1845 O and Rockliff-Sydney - 1841 - is acceptable if timber harvest is accelerated on all other Rare II areas - particularly the West Side of Meadow Creek - 1845-C. #2 #3

Roadless Wilderness is unreachable by the vast majority of us - both physically and financially. Only the idle wealthy are able to enjoy "roughing it" in a Wilderness with no roads.

I strongly urge that all non-wilderness Rare II areas be roaded and managed for all uses - including timber production.

Sincerely

Yvonne Kaufman
717 Hake Apt 7
Grangeville ID 83530

LETTER 251

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2, Response No. 3, and Response No. 4

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Comment No. 252

Dear Mr. Kovalicky:

This letter is concerning all of the RARE II roadless areas in the Nezperce Forest.

It is my understanding that the packers and guides would like the west side of Meadow Creek-1845-C left as a roadless area. With this in mind I would like to comment on this.

I am 29 years old and was born and raised in this area. In the past 15 years I have spent countless hours in the mountains, mostly in the Nezperce. Out of that 15 years I have killed 11 bull elk and a deer every year. In my experience in hunting most of the big game I have bagged has been close to or in a logged area. #1

I don't like to see the mountains logged and then left open, but I do like to see it logged and then all of the roads closed to motorized travel. #2

The logging creates new growth for all the animals to feed on and the new brush provides good cover during hunting season also.

I work for Idapine Mills in Grangeville and have for the past 9 years. In this time there has been a lot of logging done and in the past few years it seems the elk and deer population is on the upswing.

The timber that is mentioned in area 1845-C is needed to sustain jobs in this area. If it is left roadless it looks like a mill in this area will fold up. That doesn't bother the packers amd guides any though, anyway it doesn't seem to as they can up the tourist trade. #3

Mr. Krough pays $250,000 per month in wages if tourist trade is going to pick up the slack it will have to bring $3,000,000 per year above and beyond what it already is in just this area. I don't think this is possible.

The packers and guides already have 900,000 acres of wilderness with only about 3,000 people using packers and guides per year. That's a lot of acres per person. #4

Let us open area 1845-C up and use it for public use as well as timber harvest. #5

/s/ Thomas J. Ash

LETTER 252

Response No. 1

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk, and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduce use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

The wildfires during the 1920's and 1930's created thousands of acres of high quality elk habitat in northern Idaho. Elk herds subsequently increased to their highest levels ever during the 1950's. Because of increased roading and access into this high quality habitat, and because of increased hunting pressure, elk populations declined steadily during the 1960's and early 1970's. Major changes occurred in both Forest Service and Idaho Department of Fish and Game management strategies for elk during the mid-1970's. The Forest Service began closing roads and limiting access into elk habitat. The Idaho Department of Fish and Game changed from general either-sex hunting to bulls-only hunting and to permit hunting in some units. Because of these changes, elk populations have shown a steady increase since 1975.

Response No. 2

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Response No. 2 (Con't.)

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Response No. 3 and Response No. 5

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

As you point out, 3,000 people using 900,000 acres is a lot of acres per person. However, many people visit these areas besides those who go with outfitters and guides. Also, the kinds of experiences these people seek depend on having a lot of acres.

The outfitter industry in Idaho makes an important economic contribution to the State and provides a valuable service to people recreating in our backcountry. The nature of their business is such that it requires a large area of operation. Generally, their use is not impacted on the site and those same areas are used by the outfitted public as well as those of us that do it ourselves.

#253

Ken Cox
Po. Box 341
Grangeville, Id.
83530

Dear Mr. Kovalicky:

This is my comments on the Nez Perce National Forest Plans.

I live in Grangeville Idaho, and work in Ida-Pine Mills. I help make the lumber that our out of state & out of town Environmentalist build their homes with. I have been working at my job for over seven years, and I take pride in the quality of my work.

I use the Nez Perce Nat. Forest for recreation, and for getting in my winter supply of fire wood. Without wood heat my electric bill would be unbarable.

I am a successful Elk + Deer hunter in the Nez. Perce Nat. Forest.

over

Without the roads and clearcuts that I use, I would not be able to collect my Big Game or Fire Wood.

I also enjoy fishing + mushroom hunting and photography in the Nez Perce Nat. Forest.

For me to continue to enjoy living and working in the town of Grangeville, I must protect my job at Ida Pine Mills. To protect my job and hundreds of other jobs, which depend on timber harvest in the Nez. Perce Nat. Forest I am asking for an increase on the allowable timber harvest to approx. 120 million board feet on the Nez. Perce Nat. Forest over the next five years. #1

I feel that the West Side of Meadow Creek - 1845-C - with its large standing inventory of timber should be harvested. #2

It would improve the hunting and fishing for those of us who can't afford a pack string of horses, or to pay a guide to take us in.

And it would greatly improve the economy of Grangeville and all of the other towns which depend on logging and mill workers in this area.

Sincerely

Kenneth A. Cox

LETTER 253

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

LETTER 253

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#254

Dear Tom Kovalicky 5/23/85

I have been a resident of Idaho County for 12 years. Four of them were spent working for the U.S. Forest Service, the last eight I have worked for the Grangeville Sawmill. Joipine Mills Inc.

All the wilderness have greatly affected the sawmills in the North West. The lumber industry is very unstable and our futures are very shaky. We must try to get the proposed Plan of 120 million board feet a reality. This would help to secure our jobs and future in Idaho. #1 #2

Thank you

Tommy Lee Stockton

Rt. 1, Space 16
Grangeville 83530

LETTER 254

Response No. 1

A key factor considered while developing the Forest Management Plan was the level of timber harvest. Several different levels of timber harvest and other resource outputs were considered in the alternative management plans, including five that were greater than or equal to 120 million board feet (MMBF) annually over the next 10 years.

The overall objective of Forest planning is to produce a package or mix of resources that maximizes benefits to the public. Benefits include outputs that can be objectively measured and assigned a price as well as those that are subjectively measured and valued. After evaluating the public responses and the overall Forest situation, a final resource package with a timber harvest level of approximately 100 MMBF annually was selected. While this amount of timber harvest is significantly lower than the 120 MMBF you requested to be considered as the timber harvest level, we feel it is reasonable based on considerations for fish, wildlife, and recreation, as well as timber. The lower timber level was necessary to meet legal requirements for some resources as well as providing the level of outputs and services that seem to be the most responsive to the public overall.

A primary goal of the Forest Plan (Chapter II, page 1) is to "provide a sustained yield of resources that will support the economic structure of local communities..". During the public comment period many people pointed out that the volume of Nez Perce National Forest timber actually utilized over the past 10 years was approximately 85-95 MMBF annually. The volume of timber scheduled by the selected management plan should be sufficient to sustain the local wood products industry near current levels. Timber outputs are projected to increase in the second decade, although the current Forest Plan will be revised in 10 years to assess conditions existing at that time.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest-related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

Response No. 2 (Con't)

It should be noted that Community Stability is one of 10 issues identified in the Planning process (see Appendix A of the EIS). Competitive public issues, management concerns, and resource opportunities exist, and it is impossible to fully meet all wants and desires at the same time. By examining an array of priced and nonpriced outputs, it becomes possible to see what is given up and what is achieved as a range of alternatives is explored. An understanding of the tradeoffs between alternatives is required to help decisionmakers select an alternative which maximizes net public benefits. The mixes of priced and nonpriced outputs resulting from each alternative are a direct result of the various attempts to resolve the public issues discussed in Appendix A.

#255

5-15-85

Dear Mr. Tom Kovalicky

I have been a lifetime resident of Grangeville, Idaho. It upsets me very much to hear about all the activities who want to do make most of the decisions about our forests. #1

I have one child and another on the way. I would love to raise both of them here and have them graduate from my high school.

I feel we have enough of our public lands set aside for wilderness. I would like to see enough of the remaining roadless area opened up for logging to assume a yield of at least as high as suggested in the proposed forest plan. #2 #3

Our jobs and futures depend on this. #4

Sincerely,

Rhonda Sonnenberg
Stockton

Route 1, Space 16
Grangeville 83530

LETTER 255

Response No. 1

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

LETTER 255

Response No. 4

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

105 School St.
Cascade, Idaho 83611

May 28, 1985

#256

Tom Kovalicy, Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicy,

This letter concerns plans under consideration for future management of the Nezperce National Forest. I have used this Forest for many years for camping, fishing, and hunting. I would like to see it managed with a wilderness management system in order to provide high-quality outdoor recreation opportunities. #1

A management plan that allows the greatest possible area of roadless elk habitat would be compatible with these opportunities. #2

At the present, Forest Service policy appears to undervalue a user day when estimating dollar values of outdoor recreation activities. The old dollar values for user day are no longer accurate or appropriate. They should be modified before your office makes its decisions about management alternatives. #3

I urge you to select alternative H when you make a final decision. Thank you for your attention. #4

Yours sincerely,
Frances Forest
105 School St.
Cascade, Id. 83611

LETTER 256

Response No. 1

We appreciate your comments and strive to do as you suggest. Please remember that our charter requires us to do more than provide recreation. Timber, grazing, and other consumptive resources are also important in the National Forest System.

Response No. 2

Based on public comments during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for West Meadow Creek roadless area or a portion of the Silver Creek roadless area during the first decade after the Final Plan is implemented. In addition, Rapid River and East Meadow Creek are assigned to roadless management. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential.

In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

Response No. 3

We updated our timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

Response No. 3 (Con't.)

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 4

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

Response No. 4 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Box 683
Cascade, Idaho 83611
May 28, 1985

Tom Kovalicy, Supervisor
Nezperce National Forest
Rt 2, Box 475
Grangeville, Idaho 83530

#257

Dear Mr. Kovalicy

I am writing about the plans being considered to guide the future management of the Nezperce National Forest. I have camped, hiked, fished, hunted and boated on the Forest. I suggest that the Forest be managed to provide high quality outdoor recreation opportunities with a wilderness management system. I would like to see management favor the greatest amount of roadless elk habitat. #1 #2

I also feel that the Forest Service currently places far too low a dollar value on outdoor recreation activities such as hunting, fishing, camping, hiking and boating. The dollar values used by the Forest Service should be changed prior to making any decisions between management alternatives. #3

Please consider Alternative H when making the final decision. Thank you for the opportunity to comment on the draft forest plans. #4

83611

Sincerely, Ed Bottum

LETTER 257

Response No. 1

We appreciate your comments and strive to do as you suggest. Please remember that our charter requires us to do more than provide recreation. Timber, grazing, and other consumptive resources are also important in the National Forest System.

Response No. 2

Based on public comments during the review period for the Proposed Forest Plan, no timber sales or road construction activities are planned for West Meadow Creek roadless area or a portion of the Silver Creek roadless area during the first decade after the Final Plan is implemented. In addition, Rapid River and East Meadow Creek are assigned to roadless management. Therefore, all elk summer range within these roadless areas, approximately 251,000 acres, will be managed at nearly 100 percent potential at least through the first decade. This is in addition to the acres of elk summer range that will be managed at 75 percent of potential.

In addition, all elk summer range within the three Wildernesses on the Forest will be managed at nearly 100 percent of potential because of the absence of roads.

Response No. 3

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Response No. 3 (Con't.)

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 4

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

Response No. 4 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 258

I would like to comment on the Draft Plan for the Nezperce Forest.

I feel my job is at stake here and that alone gives me the right to voice an opinion. More so than someone from New York or Florida. I have lived here for 40 years, made my home here, hunted here, fished here, and now find that some newcomers are trying to lock up more land into roadless areas when there has been an agreement reached concerning this same land serveral years ago. Why is it that a mere handful of people are allowed to put 40 peoples jobs in jeopardy and possibly force the closure of a sawmill with arguments that are not true. #1 #2

If the cut is dropped to 74.5 MM from the proposed 102 MM feet there will be a loss of jobs.

It is not true the elk and roads can't co-exist because they can. I have hunted in units 14 and 15 and 16 and have been successful in all three where there was access by road. #3

I don't know much about fish but I do know that I don't want to give up my job for some fish I won't be fishing for anyway. Those same fish are being gillnetted on the Columbia anyway. #4

Lastly if those people (packers and outfitters) want a private playground let them go to some other part of the world. #5

/s/ Ray Brady
1415 Scott
Grangeville, ID 83530

LETTER 258

Response No. 1

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

LETTER 258

Response No. 3

Many differences in opinion are generated with the road/elk issues. The only consistent opinion is that motorized vehicles harass wildlife during early spring, calving periods, and during hunting season. This is mitigated by road closures throughout the management direction within the Plan.

The road management planning will eliminate motorized vehicle access in most cases during periods of harassment and allow for access during timber harvest or wood gathering periods. Most new timber harvest roads will have seasonal or permanent road closures in place at completion of the harvest schedule, and during periods of no activity the road will remain permanently closed.

Response No. 4

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rational will not be greater than the stated objective.

Response No. 5

We are sorry you feel the way you do, the outfitter industry makes an important economic contribution to the State of Idaho and provides a valuable service to the recreationists they serve.

Comment No. 259

5-23-85

Dear Mr. Kovalicky,

I am real concerned about the Forest Service wanting to take more timber land out of harvest. I have lived in Idaho all my life and I have made my living from the timber industry. #1

The last few years I have seen the market change so much that mills all over Idaho have had to cut back or close altogether. If the Forest Service takes more timber off the market more jobs will be at stake. I have hunted in the Elk City area for the past 32 years and since the area has been logged the elk herds have been multiplying. #2 #3

My wife and I spent 5 days horseback in the Meadow Creek Drainage last fall and it is obvious that lots of the timber is dying from over age. I would like to see the timber harvested then close the roads to motor vehicles. It is getting so you can hardly ride a horse up the trails in this area. As the dead trees keep blowing down. I believe Idaho needs more jobs, not less, and to do this we can't lock up more timber. #4

/s/Alvin Blankenship

LETTER 259

Response No. 1

Approximately the same number of acres are available for timber management under the new Forest Plan as were available under the previous Timber Management Plan. Many of the areas that will be managed primarily for fish, wildlife and recreation under the Forest Plan were previously classified as marginal or unregulated timber lands. Few of the marginal acres and none of the unregulated acres were used to calculate the potential timber yields for the Forest in previous plans. Similarly, areas where the primary management emphasis is for fish, wildlife, and dispersed recreation in the Forest Plan were considered as not available for timber management when determining the potential yield.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Response No. 2

Community Stability is one of the issues that was considered in the development of the alternatives and in the selection of the proposed alternative (Alt. G). Maintenance of a viable economic base (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonpriced benefit (see Appendix B in the EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, Nez Perce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

Response No. 3

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

Response No. 3 (con't)

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk, and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduce use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

The wildfires during the 1920's and 1930's created thousands of acres of high quality elk habitat in northern Idaho. Elk herds subsequently increased to their highest levels ever during the 1950's. Because of increased roading and access into this high quality habitat, and because of increased hunting pressure, elk populations declined steadily during the 1960's and early 1970's. Major changes occurred in both Forest Service and Idaho Department of Fish and Game management strategies for elk during the mid-1970's. The Forest Service began closing roads and limiting access into elk habitat. The Idaho Department of Fish and Game changed from general either-sex hunting to bulls-only hunting and to permit hunting in some units. Because of these changes, elk populations have shown a steady increase since 1975.

Response No. 4

As mentioned in Response No. 1, scheduled timber harvests will be deferred in the Meadow Creek drainage for the next 10 years.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

Response No. 4 (con't)

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

#260

Dear Ms. Kovalicky:

I am a concerned mill worker from Grangeville. I am for the way the Forest Service is trying to manage the forest.

As far as I can tell, the Forest Service is keeping the Nez Perce Forest well kept. I am for the "Alternative Plan G." I think that West side of Meadow Creek should be opened to logging, Hunting, and Backpacking. Keeping the West side of Meadow Creek closed, will hurt the working industry, and the enjoyment of tourism. #1 #2

Cutting down the percentage of the logging industry will severely hurt the people of the Mill Industry. It would cause a lot of people to move to better and more economic places. This would severly affect Grangeville and Elk City business. #3

I have hunted with horses in the mountains of Idaho for Elk and Deer. Having the open grass country for feeding purposes is what logging would do in thinning out the undergrowth. #4

I don't think that the people from another state have a real moral right to say what we can or can't do in our Idaho Forest. #5

Sincerely
Vickie Cannon
713 North A
Grangeville 83530

LETTER 260

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Numerous research efforts on elk and timber management throughout the northwest since the early 1970's have demonstrated two general principles:

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk, and use by elk is not necessarily eliminated totally, disturbances caused by traffic significantly reduce use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

The wildfires during the 1920's and 1930's created thousands of acres of high quality elk habitat in northern Idaho. Elk herds subsequently increased to their highest levels ever during the 1950's. Because of increased roading and access into this high quality habitat, and because of increased hunting pressure, elk populations declined steadily during the 1960's and early 1970's. Major changes occurred in both Forest Service and Idaho Department of Fish and Game management strategies for elk during the mid-1970's. The Forest Service began closing roads and limiting access into elk habitat.

The Idaho Department of Fish and Game changed from general either-sex hunting to bulls-only hunting and to permit hunting in some units. Because of these changes, elk populations have shown a steady increase since 1975.

Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

#261

May 29, 1985

Tom Kovalicky, Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Sir:

I am 38 years old and born and raised in Idaho. The lumber industry is what I make a living at, and I have a family of five who depend on it.

I feel all Rare II areas outside of wildnerness should be roaded and managed with timber harvest included. As of now you are proposing a level of harvest of 102 million annually and others are wanting to cut that back to around 74 million bd. ft. #1

I have been sawing in the mill for 12 years now and with what we cut into lumber we need more timber harvest. I believe we should have at least 120 million bd. ft. annually. #2

I understand that the West Side of Meadow Creek, 1845C, has a large standing inventory. I would like to see this area opened up for timber harvest as needed to give us the sustained yield we will need. #3

As far as roads go I've hunted the Nezperce since I was 14. I've hunted where the are roads and many new ones have been added, and I can't see any substantial affect it has had on deer or elk. #4

I can't believe the government would allow a few packers to influence the decisions of the forest service on how to manage the forest lands. The small handful of out of state hunters should not be allowed to have any input on the matter, as they most likely don't have any interest in the Forest Industry anyway. #5

They don't do the community any good (as lumber industry helps put money into educational programs, etc.). The out of state hunters just contribute to the packers pocketbooks and could care less about the timber industry.

I think the matter should be up to the people in the sorrounding areas and not some out of state groups who could also care less about our livlihood in the timber industry.

As far as I'm concerned the packers and out of state hunters just want their own private playground at our (wood workers) expense. I feel this wildnerness program has gone far enough and far to many people have been put out of work because of it.

It's time the government woke up and sees where their real problem lies. Roads (when constructed) help people see more of this beautiful forest, and I don't believe it bothers the habitat of the animals that much. Why lock everything up and let its real beauty go to rot!! #6

Once again I agree with your Alternative G with maybe a little more of an allowable cut and would like to see more land opened to multiple use management.

Sincerely,

Robert Aiken
1404 Scott

Grangeville, ID

LETTER 261

Response No. 1 and Response No. 3

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Numerous research efforts on timber management throughout the Northwest since the early 1970's have demonstrated two general principles.

1. Removing timber by logging or by any other means such as fire results in an increase in grass, forbs, and shrubs that can be eaten by big game and other wildlife. Therefore, where food is scarce, logging can be beneficial to elk because it results in an increase in their food supply. However, logging can be detrimental to elk when it is so intense in an area that hiding cover is significantly reduced, security areas are eliminated, or units are excessively large.

2. These studies present consistent and overwhelming evidence that vehicular traffic on Forest roads evoke an avoidance response by elk. Although habitat near roads is not denied to elk and use by elk is not necessarily eliminated totally, disturbance caused by traffic significantly reduces use of an area by elk. Increased access due to open roads also increases vulnerability of animals to legal harvest as well as to poaching.

An assumption used in the "Guidelines for Evaluating and Managing Summer Elk Habitat" is that gates are 70 percent effective in reducing motorized disturbance. This accounts for a minimum level of administrative use and some violations of road closures and trespass. In the Guidelines we assume disturbance is reduced by 90 percent if roads are closed with permanent barriers such as tank traps, removing bridges, or tearing up and revegetating road beds.

The wildfires during the 1920's and 1930's created thousands of acres of high quality elk habitat in northern Idaho. Elk herds subsequently increased to their highest levels ever during the 1950's. Because of increased roading and access into this high quality habitat, and because of increased hunting pressure, elk populations declined steadily during the 1960's and early 1970's. Major changes occurred in both Forest Service and Idaho Department of Fish and Game management strategies for elk during the mid-1970's. The Forest Service began closing roads and limiting access into elk habitat. The Idaho Department fo Fish and Game changed from general either-sex hunting to bulls-only hunting and to permit hunting in some units. Because of these changes, elk populations have shown a steady increase since 1975.

Response No. 5

Because National Forests are owned jointly by all Americans, we are obligated to consider the views and feelings of all citizens interested in the management of the Forest.

Response No. 6

Many differences in opinion are generated with the road/elk issues. The only consistent opinion is that motorized vehicles harass wildlife during early spring, calving periods, and during hunting season. This is mitigated by road closures throughout the management direction within the Plan.

The road management plan calls for closing at least the same amount of roads as are constructed leaving no more than 1 mile per square mile of road per suitable timber acreage. This closure policy will eliminate motorized vehicle access in most cases during periods of harassment and allow for access during timber harvest or wood gathering periods. Most new timber harvest roads will have seasonal or permanent road closures in place at completion of the harvest schedule, and during periods of no activity the roads will remain permanently closed.

Roads are enjoyed by many users and will continue to be used along collector and arterial systems. Road management objectives will close local systems when timber harvest activities are not present. The Forest network of roads will be continually analyzed to evaluate the users and their needs while maintaining the mitigation effects for other resources.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Response No. 6 (Con't.)

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

#262

May 23, 1985

Dear Mr. Kovalicky,

I have worked in the lumber industry for the past ten years. In that time I have seen many changes, from thousands of acres locked up, to a number of lumber mills shut down, one of which I spent five years

I personally feel we now have enough wilderness lands. If we continue to add more roadless areas to the Nezperce National Forest, it will not only shut down more mills but also starte a ripple effect that will be felt all over north Idaho. For every job lost at a local mill it effects five to ten other jobs somewhere down the line. #1 #2

I understand the Packers & Guides Ass. is pushing hard for alternative C., which I feel is totally ridiculous.

I personally am for alternative G. Your #3

2

own reports show that alternative G is by far the best in helping the local commuities, The winter elk range and the range forage production. The fish habitat is the same in each alternative (C + G). Alt. G does have about 400 miles more roads to be built.

If you, Mr. Kovalicky, decide on any alternative that is below the 1986 you will be going against your own recommendation.

In reading the "Overview" I was pleased to see that the Forest Service preferred to keep the cut the same as the past ten years, and to recomend that the remaining 302,343 roadless acres will be opened to roaded Development. Also that if allowable sale quantity cannot be met, elk summer habitat objectives will be adjusted to meet the timber sale objectives and exploration for and

3

and development of mineral resources will be encoraged.

The local economy is depending on the 102m cut, if we don't get it the communities die and the standard of living drops. The packers and guides can't even begin to put the money into the local economy that the mills do. #4

So in closing I would like to push hard for alternative G and the immediate opening of Meadow Creek West 1245C for the health and welfare of the local communities. #5

Sincerely,

Scott C. Wasem

Scott C. Wasem
Rt. 1, Box 28
Branquille 83530

LETTER 262

Response No. 1

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 2 and Response No. 4

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

Response No. 3 (Con't.)

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 5

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Comment No. 263

May 27, 1985

Dear Sirs:

I am writing in response to the Nezperce National Forest Plan.
I first of all question the long term plans for building a road at such an outstanding price to the tax payer. Particularly when that will not be returned from future timber sales. *1

Of your proposals I favor Alternative C with these specifics. NO roading of lower Noble Creek and Mallard Falls areas. These are wildlife and fish habitats that need protection. I would like more specific information on where roads are to be built. *2 *3 *4

/s/ Anthony L. Dolphin
1414 South Winter Rd.
Spokane, WA 99212

RESPONSE TO LETTER 263

Response No. 1

Road construction prior to a timber sale or advanced roading is the exception rather than the rule in the timber harvest/road building program. Road construction prior to a timber sale contract is undertaken only after appropriate analysis and documentation is completed under NEPA guidelines.

The timber sale process is comprised of a series of steps beginning with identifying a general sale area and ending with the award of a a timber sale contract. This process generally covers a period of 5 to 10 years to allow for data gathering, analysis, and execution of the site-specific activities. During the data gathering and analysis phase, an area transportation plan is prepared or reviewed for the area to assure that the transportation system meets long-term needs, is cost efficient, and is compatible with other resource objectives.

The Forest Service has been directed through laws and regulations to build only the roads necessary and to the standard required to remove the timber volume on the timber sale. Frequently these roads are built through the purchaser credit program; the purchaser is given dollar credits for timber volume based on the work accomplished on road construction/reconstruction projects. This process allows the Forest Service to offset the costs of developing the road system for future timber management, however, initial returns to the U.S. Treasury are reduced.

Roads built to higher standards to meet multiple use objectives or to facilitate multiple entries are constructed under a program commonly referred to as capital investment. These construction projects are done separately from the timber sale and are awarded prior to the timber sale contract to allow sufficient time from completion and eliminate needless delays. Capital investment projects are funded based on need and economic return.

LETTER 263

Response No. 1 (Con't.)

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

Response No. 2 (Con't.)

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 3

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

Response No. 4

Area Transportation Planning (ATP) portrays alternative road schema that would give the reviewer a proposed roading system for any drainage on the Forest. The road schema shows the most economical transportation system for the total area. Reviewers of these plans should be aware that they have not been ground reviewed and therefore do not necessarily reflect the exact placement of the final system which may not be complete for 100 years. Also, the ATP's do not specify the closure scheduling that will be developed with initial entry.

ATP maps are on file at the Supervisor's office and a copy can be reviewed at any District office.

5/28/85

#264

Forest Supervisor
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Id. 83530

Supervisor,

These are my comments for the record concerning the Draft Nezperce National Forest Plan:

First, I ask that you plan for a more realistic budget, one that would call for the building of many fewer roads. The cost, both financially and aesthetically is much too much. #1

Second, set timber harvest levels at 75MMBF/year range, and stop the wasteful advance roading - roadbuilding based on the false assumptions that demand and timber prices will rise to meet new supply. #2 #3

There should be no roads in lower Noble Creek and Mallard Falls areas. #4

Third, provide the public with frequent and clearly stated information in the monitoring of timber harvest impacts. #5

The final plan should better evaluate the impact of road development on outfitters, and research natural areas. #6

Finally, I ask that the Plan would leave all of the Meadow Creek drainage alone & that all of the existing uses continue. Meadow Creek is the most important roadless area on the Nezperce Forest. It offers vital elk habitat, has highly erosive soil, & has little standing timber. Road building in Meadow Creek will waste taxpayer dollars, harm the fine hunting & fishing there, and put outfitters out of business. #7

Sincerely,

Melinda Crawford
825 Camas
Moscow, Id. 83843

FOREST SERVICE
NEZPERCE NAT'L FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

Response No. 1

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this volume is more than you suggested, it can be achieved while meeting the other resource objectives established in the Plan including increases in the percentage of potential fish habitat and big-game wildlife habitat. Harvest entries into currently undeveloped areas will be carefully controlled to meet water quality objectives and critical wildlife habitat. Further harvests in currently developed areas will be planned to maintain areas for old growth and big-game security cover.

Response No. 3

We updated our timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 4

Lower Noble Creek and Mallard Falls areas are part of the Frank Church-River of No Return Wilderness which precludes any road construction or timber harvesting activities. The Mallard Drainage is adjacent to the Gospel-Hump (Jersey-Jack) Assessment Area. The Forest Service will complete an Environmental Impact Statement (EIS) for the Gospel-Hump (Jersey-Jack) and Mallard Creek areas with a biological evaluation, economic analysis, and cumulative effects analysis before any road construction or timber harvesting activities are scheduled. This process is scheduled to be completed before 1990.

LETTER 264

Response No. 5

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

Also, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 6 and Response No. 7

Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American cultural values. Also, road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for 8,000 acres that do not lie in the West Meadow Creek drainage.

#265

Tom Kovalicky,

I support the Nezpurce National Forest Management Plan alternatives G-G1. #1

I understand that a large portion of the land sets in East Meadow Creek. I also understand that the packers and guides would like this area to remain roadless. I find this very unfortunate. If this area were to remain roadless many of the people of Idaho who enjoy the woods for camping and also work, such as logging would be unable to. I know that the guides and packers make their living in this area but they forget that they are not the only ones who make their #2

living in the woods. My husband is employed at a local mill and if areas such as this are closed to logging then the Timber Industry will soon be gone. We have already seen many mills close and have experienced many lay offs. I worry about the existance of the Timber Industry in this area as it is now and with more areas becoming roadless and wilderness areas the Industry will soon become extinct in Central Idaho. #3

Sincerely,
Sally Wassmuth
226 East So. 6th
Grangeville, Idaho
83530

FOREST SERVICE
NEZPERCE NATIONAL FOREST
GRANGEVILLE, IDAHO
MAY 30 1985
RECEIVED

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The East Meadow Creek roadless area would be very difficult to road economically. This area will be managed without additional roads for high quality dispersed recreation, and to meet fishery and wildlife objectives.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

HUNTING FISHING SCENIC

Idaho Outfitters' & Guides' Association, Inc.

P. O. BOX 95 BOISE, IDAHO 83701

RESOLUTION

#266

Whereas, We the Idaho Outfitters and Guides Association believe that we should be recognized as an important, valuable, recreational industry to the State of Idaho and Forest Service; and

Whereas, We the Idaho Outfitters and Guides are determined to preserve our states natural resources, pristine areas, wildlife and wild and untamed rivers; and

Whereas, Our current back country units should be protected against loss of our extended back country hunting dates and trophy game, therefore.

Resolved, That it is the sense of this meeting that the Idaho Outfitters and Guides Association notify the Nezperce National Forest and demand that the outfitting industry be recognized. #1

Resolved, That the Idaho Outfitters and Guides Association address the Nezperce National Forest and recommend that they abandon their proposed alternative plan "G" and adopt alternative plan "H". #2

Harold Thomas SB

Harold Thomas, President

LETTER 266

Response No. 1

Tourism and recreation, including outfitter and guide operations, are growing industries in the regional economy. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1987-1996). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

Tourism and recreation should continue to grow. A shift in the types of activities offered and the quality of recreational opportunities will occur. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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Response No. 2 (Con't.)

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#267

BUGLE POINT OUTFITTERS
MIKE DALY
P. O. BOX 164
ELK CITY, IDAHO 83525
PHONE: (208) 842-2413

May 23, 1985

Forest Plan
Nezperce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

Attention: Forest Planning Team

We have attended numerous meetings and studied the DEIS and proposed Forest Plan and the entire process has been an education. We want to commend all the forest personnel for giving us the utmost courtesy and prompt assistance with our concerns. We feel the following statements are highlights of conflicting issues that would be detrimental to our personal business, the outfitting and tourism industries as well as the local communities and national fisheries industry.

It is my professional opinion as a Registered Professional Civil Engineer, that the technology nor economics are available to construct roads and harvest timber in West Meadow Creek without causing irreversible damage. I also question the suitability of these lands to muliple use. #1

Current trends in Washington, D.C. are to reduce our national debt. It is an unreasonable projection that the Forest Service will receive an increase of 15 to 20% in annual budgets. An increase in roads budget would be needed to build the proposed 300% increased miles of roads that Plan "G" proposes. Roads in Morth west Meadow Creek would cost a minimum of four times hard money roads currently constructed outside this drainage and only be predicted to mitigate 60 percent sedimentation with the application of best management practices and strict monitoring of all contractural agreements (page C-84 DEIS). #2

Chapter II page 11-12 (proposed plan) indicates that current Lands System Inventories and Soil Surveys are not completed. The 1975-76 Land System Inventory indicated that a major portion of the north west corner of West Meadow Creek was associated with the Wallace Schist bedrock and is classified as mass wasting. Geology studies stated, "Steepness of slopes, ground water, bedrock and soil conditions are major factors affecting slope stability. Where planes of weakness in bed rock such as joints or fractures, foliation planes or fault

planes have an adverse attitude, road building or timber activity could be hazardous". The survey which covered the major part of the West Meadow Creek indicates a high percentage of hazardous area due to combinations of these factors.

Appendix K pages K-10 and K-16 schedule timber sales into the headwaters of Dent Creek and Little Boulder Creek during 1989 and 1992, with road entries prior to these dates. Forest Service Study (Pfankuch, 1975) evaluated Dent, Little Boulder, Anderson and a portion of Five Mile Creeks stream channel conditions as poor and incapable to adjust and recover from potential changes in flow and/or increases in sediment production.

Chapter III, page 111-47 of the proposed Forest Plan and the Forest Plan Management Area Map designates the aforementioned creeks management intent 12B with goals to manage for roaded natural recreation. Given the past geology studies and land system inventories, in conjunction with the monitoring and evaluation requirements assigned to Management 12, it is impossible to mitigate 90 percent fishery habitat. Meadow Creek contributes 16% of the Selway's 47% Steelhead wild fish smolts to the forest. After considering past years disease situation and the current reduced steelhead return, the value of Meadow Creek should be greatly escalated. #3 #4

Proposed Forest Plan, timber schedule (K-10) to be harvested during 1989 in Green Ridge will dramatically affect the moose population in the region, as well as other wildlife. The Green Ridge area contains Pacific yew stands that have been referred to as larger diameters and thrive in greater density than probably anywhere in the Northern Rockies. This stand of Pacific yew has an overstory of mature grand fir that when removed will destroy the Pacific yew and serve to destroy prime moose habitat.

Timber harvest projections are based on unrealistically inflated timber uses. Currently the timber industry is in a decline and economic futures do not project any stabalization of this industry for the next ten years. This economic forecast cannot be blamed on wilderness, roadless areas or the lack of viable timber. Because of the high value of our American currency, it has become more advantageous for the foreign timber industries to be able toassume a large portion of the timber market. The United States witnessed this same trend with our steel and oil industries just a short few years ago. We sympathize with the timber industries #5

267

economic dilemma and as concerned citizens, would offer any assistance that we as an industry could provide. However, we do not see any resolve in continuing to offer an inflated timber volume when supply and demand is currently in a regression. This would also reduce the need of spending Capital Investment monies on roads that could be utilized to balance our national deficits. National Forest Timber Values for 1984 (Source: U.S. Forest Service Public Affairs Office, Washington, D.C.) show that the monies received for timber in Oregon and Mississippi are three times greater in value than monies received in Idaho. Large investments in the timber industry will occur in Oregon and Mississippi where a greater return on the investment is possible. The state of Idaho is currently in an economic imbalance where their natural resources are concerned (Revenues to State - timber #5, tourism #3, ITC survey 1984) and desperately needs time to adjust to new trends.

We respectively ask the Nezperce Forest Planning Team to carefully reconsider all the natural resources on the forest and to address current trends and values. Also, we ask the Forest Service to address the Outfitting Industry as a viable industry in their planning process and to include outfitting and tourism in the Forplan. #6

Upon careful review of all alternatives offered, we recommend the Nezperce National Forest adopt Alternative "C". If Alternative "C" is not totally acceptable, we suggest modifing Alternative "G" by reducing the volume of timber offered to a reasonable level (75 to 85 mmbf) and delaying road entries into unroaded areas to maintain our valuable back country units such as East and West Meadow Creek, Jersey Jack, Big Mallard and Silver Creek-Pilot Knob. Once existing roadless areas are roaded, Idaho Fish and Game will be forced to shorten the hunting season. This in turn will take revenue away from the state which should also be included in the economic evaluations. #7 #8

Through the upcoming months, we would appreciate the opportunity to work on a planning team or in any manner the Forest Service proposes to resolve conflicting interests.

Sincerely,

Mike and Karen Daly
Bugle Point Outfitters

cc: Tom Kovalicky, Supervisor Nezperce National Forest
Jerry Conley, Director Idaho Fish and Game, Boise
Dwight Kilgore, Acting Region #2 Supervisor, Lewiston
Idaho Outfitters and Guides Board, Boise
Idaho Outfitters and Guides Association, Boise

LETTER 267

Response No. 1

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 2

The Forest Plan provides the management direction needed to implement activities and programs described in the Plan. Implementation requires moving from an existing land-use management program with a budget and schedule of activities, to the level of management outlined in the Plan. The schedule for some of the resource activities is in Appendix J of the Plan. Cost estimates, based on these schedules, are reflected in out-year budget proposals. These proposals are reported upward through the agency and the department to Congress who makes the final budget allocations. Once Congress sets these levels, agency budgets are adjusted accordingly and funding is provided to the Forests.

The Forest Supervisor has the authority to change the implementation schedule to reflect any differences that arise as a result of differences between the planned budget levels and the actual appropriated funds. Changes in the implementation schedule will be considered an amendment to the Plan, but will not be considered a significant amendment unless the changes significantly alter the long-term relationships between resources and services as portrayed in the Forest Plan.

Related to this are concerns that some projects, such as road construction or timber harvesting, may not be funded to levels necessary to provide the mitigation described in the Plan for protecting and enhancing other forest resources, such as water, fish or wildlife. This issue is discussed in Chapters II and III of the Forest Plan. If a project cannot meet the objectives outlined in the Plan for all effected resources due to inadequate funds or other reasons, an analysis will be conducted to determine if other mitigation measures are available that will meet the objectives, if the scale or scope of the project can be adjusted to meet other objectives, or if the project should be deferred. All of these actions could result in an adjustment to the implementation schedule and an amendment to the Forest Plan.

Response No. 3

Road construction, timber management, and the maintenance of high water quality can be accomplished together. The key to this combination is effective timing and spacing of projects, sediment mitigation measures, limiting the amount of activity in any one drainage so that management-derived sediment does not exceed the transport capacity of the stream, and, most importantly, a high level of understanding and cooperation between all resource managers involved. Our proposed fisheries/water quality objectives are based upon these factors and represent the level of sediment which can be reached and still obtain the desired level of fish production. The cumulative impacts to fish habitat by following this rationale will not be greater than the stated objective.

Response No. 4

The concern raised here is over how the Meadow Creek roadless area should be managed in the Forest Plan. The comment presents the idea that the anadromous fish value within this area is greater than the timber and roaded recreational values.

Due to the public concern over the area, the Forest management team has decided to delay timber harvesting and road building activities in a portion of this roadless area in the first decade (1987-1996). The portion which will be considered for development in this period is to the west of the hydrologic divide between Meadow Creek, the Red River drainage, and the American River drainages.

The Plan is scheduled to be reviewed after the first decade. Those areas that were not developed will be evaluated to determine the most optimal allocation of the lands for multiple resource management.

Response No. 5

In response to this concern, we decided to update the timber price projections and the values for timber and wildlife/recreation for the purpose of doing a sensitivity analysis on land assignments, scheduled activities, and present net value (PNV). The updated timber price projection and resource values were incorporated into the FORPLAN model. A sensitivity analysis using current and updated projections and values was performed on the Max PNV benchmark, and Alternatives D and G (Preferred Alternative).

Summarizing the results of the analysis, the updated value and real price increases for timber do have a significant effect on the contribution of timber to the present net value. With just updated timber values and real price increases, wildlife and recreation opportunities contribute more to present net value (PNV) than timber.

Response No. 5 (Con't.)

However, there is not such a significant effect on the assignment of land to other prescriptions in the FORPLAN model. There are several reasons for this. Certain levels of these outputs are specified as constraints based on the objectives of the alternative being analyzed. In many cases, the only choice FORPLAN has is a timber prescription, or a minimum level prescription. In order to achieve other multiple-use objectives such as deer/elk winter range, old growth, and retention and partial retention visual objectives, prescriptions are "assigned" to specific areas. The resulting non-timber outputs are then valued outside of the FORPLAN model and combined with PNV calculated in the FORPLAN alternative.

Another reason is that prescriptions, even though negative with the updated timber values, are selected in the FORPLAN solution. This is due to the allowable cut and scheduling constraints placed on the model.

A third reason is that the prescriptions chosen are still positive, but not as positive as with the original timber values and real price increases.

For more information on the sensitivity analysis using updated timber price projections and values, please see Appendix D of the EIS.

Response No. 6

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities. An input/output model called IMPLAN was used to estimate direct, indirect, and induced impacts on these business sectors and the regional economy overall.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1987-1996). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The importance of the tourism/recreation industry, of which outfitter/guide operations is an element, should continue to grow. What will occur is a shift in the types of activities offered and the quality of recreational opportunities. For more information on outfitter/guides and recreation, see Chapter II, Sections 16-18; Chapter III, Section B; Chapter IV, Sections 3-4; and Appendix B, Section V in the EIS.

LETTER 267

Response No. 7 and Response No. 8

After evaluating all public comments on the Proposed Forest Plan and Draft EIS, and doing additional analysis, it is felt that Alternative G represents the best balance for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in approximately 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide.

- Prescribed burning of deer/elk winter range is being increased from 2,700 acres to 5,000 acres per year in the plan period (1987-1996).

- Road building and timber harvesting activities are not scheduled in the West Meadow Creek roadless area for the plan period.

- Road building and timber harvesting activities are not scheduled in approximately 13,000 acres of the Silver Creek-Pilot Knob roadless area for the plan period in order to protect the cultural and religious values of the area for the Nez Perce Tribe.

- The Final Forest Plan provides for an allowable sale quantity (ASQ) of timber of 100 MMBF per year in the plan period (1987-1996). This is a 2 percent reduction from the draft preferred alternative.

#268

Post Office Box 87
WhiteBird, Idaho 83554
May 30, 1985

NezPerce National Forest
Route #2, Box 475
Grangeville, Idaho 83530

Attention: Tom Kovalicky
Forest Supervisor

Dear Tom:

In response to the proposed NezPerce National Forest Plan:

The Grazing Advisory Board has strong feelings on the following subjects:

1. Please refer to page V-12 in relation to the comments on elk winter range. It should be considered in the plan that a large percentage (50% or better) of the elk winter range in the Salmon River Canyon is private land. We find that the figure of 93% of lost winter range because of cattle use is far too high! The whole tone of this paragraph is that cattle and elk are not compatible, when in fact, the elk numbers have risen significantly over the past four years with the same numbers of cattle. #1

   As for social interaction, it is common for elk and cows to mix on the summit range. In many instances cattle use <u>increases</u> elk numbers, as the elk follow the livestock. They use salt put out for cows, they prefer the seeded grasses that livestock use, they are drawn to grazed areas just like cows are because the feed is not as rank and they are the same as cattle in that they are drawn to the openings created by logging.

   The plan indicates there is a <u>loss</u> of elk capacity (42%) when in fact there has been a significant <u>increase</u> in actual elk numbers over the last few years while cattle numbers haven't changed significantly.

2. Refer to Page 11-20.

   History showed that early day ranching and wolves did not mix. Based on this we oppose any plans to bring in or increase wolves in this area. #2

#268

3. Refer to Page 111-40

   In some cases a good rotation grazing system will improve a riparian area. This will require concentraing a large number of livestock in a relatively small area for a short period of time. This is the opposite of what is stated in the plan. #3

   The plan states that livestock may be excluded from riparian areas or improvements built to protect these areas. Under what standards would this be done? In other words, who is going to make this judgement? Should a case like this ever come up we feel that Forest Service people with a good range background should be involved in any decision. #4

4. Refer to Page 111-58

   The plan states that sufficient forage for wildlife will be assured when determining livestock needs. How much horse sense will be applied to this decision? Who will be asked to determine how much forage is sufficient? #5

5. Refer to Page 111-66 and V-22

   Where the plan refers to emphasizing investments in structural and non-structural range improvements, the plan needs to emphasize <u>good economics</u> of that investment as well. In other words range improvements that cannot show a favorable cost/benefit ratio should not be required. #6

6. Refer to Page V-20

   The plan states that 24,000 acres of suitable range are vacant because of conflict with watershed and wildlife. Where are these acres located? Is it possible that those acres are vacant because of economics, the older ranchers retiring, poor access, etc.? Is conflict with wildlife and watershed viable reasons for not having stock on these areas today? In recent years the Grazing Board considered looking at some vacant allotments with the idea of restocking them. We feel this may still be a valid approach. #7

#268

7. Refer to Page V-21

Under Relationships With Other Resources:
This is a very negative paragraph. In many cases good livestock management can be of great benefit to other land uses, such as making more palatable forage available to wildlife and reducing grass and brush competition on tree planting areas. #8

We feel that the existing paragraph under Relationships With Other Resources should be deleted.

8. Refer to the Guidelines for Evaluation and Managing Summer Elk Habitat in Northern Idaho on Page B-1. #9

We totally disagree with these guidelines! The guidelines should be entirely re-evaluated with a representative number of ranchers on the guidelines committee! How can it be justified that there were no ranchers on the original committee yet the private sector of the logging industry was heavily represented? The guidelines as written have or may have a significant effect on several local livestock operations.

Our specific comments on the guidelines as written are as follows (Page 7):

Item #19: Experience has shown us that social conflict between elk and cattle on the NezPerce National Forest is not a significant factor. Recommend this paragraph (#19) be deleted. #10

Item #21: More than just the wildlife aspect should be considered when it comes to determining the importance of habitat. #11

Item #23: Livestock grazing has been occuring on elk calving areas between May 1st and July 15th in this country since cattle came here. Our experience has shown weather or not cattle graze the elk calving areas makes little difference on the elk population. #12

The guidelines show a picture of cattle with the caption stating that when cattle appear the elk will move. Again this relates a negative feeling about cattle. Why not emphasize the positive side of grazing.

Sincerely,

Don Heckman

DON HECKMAN, Chairman
NezPerce Grazing Advisory Board

LETTER 268

Response No. 1

Please note that the Forest Plan, Chapter V, states that loss of carrying capacity is 93 percent on winter range that is grazed at a high intensity of livestock grazing, that 74 percent of the total elk winter range is not grazed by livestock, and that total loss of carrying capacity is about 20 percent when averaged across all winter range on the Forest. These figures are based on range management data on acreage that is grazed under various intensities of livestock management, data on livestock utilization of key species under the different intensities of livestock management, and data on the amount and location of livestock range and elk winter range that is common to both. These data are on file at the Supervisor's Office.

Response No. 2

We appreciate the concern that you have expressed regarding the return of wolves to the Nez Perce Forest. As you know, wolves are listed as an endangered species under the Endangered Species Act. They are protected by both federal and state law. A goal of the proposed Forest Plan is to provide habitat to contribute to the recovery of wolves in accordance with an approved recovery plan. A recovery plan for the wolf was approved by the Secretary of Interior in 1980. This plan identified all of central Idaho as a recovery area for wolves. A recovery goal for wolves in all of central Idaho has tentatively been established at 10 adult pairs.

We believe that the Forest Service and the livestock producers can, together, develop a well-coordinated program that will accomplish wolf recovery in central Idaho that is acceptable to all concerned.

Response No. 3

We agree that good rotation grazing systems will improve riparian areas. At the present time, very few riparian areas are considered in poor or fair condition due to livestock grazing on the Forest. The range standards in the plan have been rewritten and now read "Maintain riparian habitat in good condition by maintaining or developing rotation grazing systems and structural improvements." (See Chapter III of the Forest Plan.)

Response No. 4

The line officer (District Ranger) will usually make this judgment based upon recommendations from resource specialists that have responsibility for managing the riparian-dependent resources. We have in our Forest Plan standards and management area direction that will help us make this judgment.

Response No. 5

Interdisciplinary teams made up of various resource managers will determine forage needs for both livestock and wildlife. This mode of operation is now well-established in the Forest Service.

LETTER 268

Response No. 6

All range improvements should show a good cost/benefit ratio for that money invested. This is the reason the Forest Service developed a methodology for cost-effective analysis of range allotment projects in 1981. It is currently being used for all range projects costing over $5,000.

Response No. 7

The vacant 24,000 acres of suitable range are located on four allotments, all of which are located along the Big Salmon River from Wind River to Whitewater Ranch. You are correct in assuming that these allotments are vacant because of poor economics, forest succession following fire, older ranchers retiring, poor access, and steep topography. The Plan will be changed to reflect this.

Response No. 8

If the livestock industry economics improve significantly, these allotments could once again support livestock grazing.

Response No. 9

These guidelines were developed jointly between the USDA Forest Service, the USDI Bureau of Land Management, the Idaho Department of Fish & Game, and the Plum Creek Timber Company. The guidelines are an attempt to coordinate logging, road building, and livestock grazing with elk habitat preferences. The use of these guidelines should decrease the conflicts between elk habitat management and timber and road building activities.

Response No. 10 and Response No. 11

We agree that social conflict between elk and cattle on the Nez Perce is low. This is probably because there are very few areas where livestock are overgrazing their range. Through continued good range management practiced by our livestock permittees, forage conflicts will be kept at a minimum.

Response No. 12

Elk calving areas, which are predominately riparian areas, are important to both elk and cattle. They provide water, high nutritional forage during lactation, and security for elk. Since both species are very attracted to these areas, overuse can take place. Our goal for these areas is to maintain proper utilization and provide cover and security for elk calves prior to, during, and shortly after gestation. In some riparian areas this can be best accomplished by delaying livestock use until after July 1.

Comment No. 269

May 29, 1985

Tom Kovalicky
Forest Supervisor
Nezperce National Forest
Grangeville, ID 83530

Dear Tom:

Subject: Response to the Proposed Nezperce National Forest Plan.

I appreciate the opportunity to respond to this very important plan. I don't like the negative slant given toward grazing in some parts of the plan. I have been involved with grazing on the Slate Creek District for about 30 years and find some statements or suggestions in the plan that definitely need toned down.

Page 11-12 - Comments on elk winter range. There is no consideration to the fact that over 50% of the elk winter range in the Salmon River Canyon is on private land. 93% of elk winter range lost to cattle is wrong. If this is true, how could there have been a steady increase in elk numbers on the lower portions (all of unit 14) in the past 30 years. The fact is that cattle and elk do run together and prosper together. The same applies to elk numbers on summer range - grazing of livestock and logging are responsible for the increase of elk. Elk follow livestock because of grazed off forage, too little grasses and salt. #1 #2 #3

page 11-20 - There is no way a rancher can welcome the return of the wolves. History has shown that livestock and wolves don't mix. This could become a serious problem in the future. #4

page 111-58 - The plan states that sufficiant forage for wildlife will be assured when determining livestock needs. Who will say? We need wording such as having USFS range staff and ranchers from the area in on the decision making. I fear this may be left up to only game experts. #5

page 30-31 - The names of those that contributed written comments. I find that from the private sector very few except for the timber industry. It disturbs me very much not to see names of ranchers or of the Nez Perce Grazing Advisory Board on this list. I strongly recommend that there be someone from the ranching business included in the decision of range and elk management. #6

Sincerely,
/s/ Don Heckman
Heckman Ranches Inc.
P.O. Box 87
White Bird, ID 83554

LETTER 269

Response No. 1

We agree that the Environmental Impact Statement (EIS) should address the amount of winter range on private ground along the Salmon River north of Riggins. A discussion of this is incorporated into Chapter III of the Final EIS.

Response No. 2

Please note that the draft Plan (page V-120) states that loss of carrying capacity is 93 percent on winter range that is grazed at a high intensity of livestock grazing, that 74 percent of the total elk winter range is not grazed by livestock, and that total loss of carrying capacity is about 20 percent when averaged across all winter range on the Forest. These figures are based on range management data on acreage that is grazed under various intensities of livestock management, data on livestock utilization of key species under the different intensities of livestock management, and data on the amount and location of livestock range and elk winter range that is common to both. These data are on file at the Supervisor's Office.

Response No. 3

Elk and cattle do utilize similar ranges and have similar diets. With good rotation grazing systems and proper forage allocations, elk and cattle can benefit from each others' grazing by providing more nutritional forage.

We believe the primary reason elk populations have increased so dramatically since 1975 is the Idaho Fish and Game Department's decision to stop cow elk hunting. Logging has also created more forage for elk and cattle.

Response No. 4

We appreciate the concern that you have expressed regarding the return of wolves to the Nez Perce Forest. As you know, wolves are listed as an endangered species under the Endangered Species Act. They are protected by both Federal and state law. A goal of the proposed Forest Plan is to provide habitat to contribute to the recovery of wolves in accordance with an approved recovery plan. A recovery plan for the wolf was approved by the Secretary of Interior in 1980. This plan identified all of central Idaho as a recovery area for wolves. A recovery goal for wolves in all of central Idaho has tentatively been established at 10 adult pairs.

We believe that the Forest Service and the livestock producers can, together, develop a well-coordinated program that will accomplish wolf recovery in central Idaho that is acceptable to all concerned.

LETTER 269

Response No. 5

Interdisciplinary teams made up of various resource managers will determine forage needs for both livestock and wildlife. This mode of operation is now well-established in the Forest Service.

Response No. 6

The Proposed Forest Plan and Draft Environmental Impact Statement (DEIS were sent to all of those who requested them and all comments received were evaluated and used in arriving at the Final Preferred Alternative.

#270

TOM KOVALICKY, SUPERVISOR
NEZPERCE NATIONAL FOREST
ROUTE 2, BOX 475
GRANGEVILLE, IDAHO 83530

MR. KOVALICKY:

IT HAS COME TO MY ATTENTION THAT CONSIDERATION IS BEING GIVEN TO THE CLOSING THE WEST SIDE OF MEADOW CREEK FOR ROAD BUILDING. THAT ACTION WOULD BE DISASTEROUS FOR MY EMPLOYER - BENNETT LUMBER CO. OF CLARKSTON. I HAVE BEEN EMPLOYED BY BENNETT'S FOR SEVEN YEARS NOW SO I AM NATURALLY CONCERNED ABOUT THIS DEVELOPEMENT. IT IS ESSENTIAL TO THE CONTINUED ECONOMIC HEALTH OF MY EMPLOYER THAT THE WEST SIDE OF MEADOW CREEK BE AVAILABLE FOR LOGGING. #1

THE REASON I WORK AT BENNITTS IS BECAUSE MY FAMILY'S BUSINESS - THE JOHN HOENE IMPLEMENT CORP. IS BANKRUPT DUE TO THEIR LOGGING CUSTOMERS' CONTINUED AND LONGSTANDING FINANCIAL PROBLEMS. MY FAMILY & MYSELF HAVE SUFFERED CONSIDERABLY IN THE PAST SEVERAL YEARS DUE TO TIMBER INDUSTRY PROBLEMS. PLEASE - GIVE ME AND MY EMPLOYER A BREAK ON THE WEST SIDE OF MEADOW CREEK.

SINCERLY YOURS,

Dennis M. Hoene
Hoene
1110 14th
Clarkston WA 99403

LETTER 270

Response No. 1

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

#271

May 31, 1985
Rt. 2 Box 323
Grangeville, Idaho 83530

Forest Plan
Nezperce National Forest
Route 2 Box 475
Grangeville, Idaho 83530

We welcome the opportunity to respond to the draft proposal for the Nezperce Forest knowing that many experts have worked hard to develop alternatives. It is hoped that whatever plan is adopted will allow for continued public input and close Forest Service monitoring. #1

We would submit our interest in seeing Alternative C implemented. Our main concern is increased timber harvest and road building. To increase timber harvest to the proposed levels of Alternative G seems unwise for the environment in general and of limited value to the local economy in view of past statistics. The addition of many miles of road encroaches on fragile lands and threatens quality fisheries and wildlife habitat which are, in our opinion, ultimately of greater lasting importance than timber lands that are often of marginal quality and value. #2 #3

As natives of this area we have spent twenty-five years together visiting the Nezperce Forest on its roads, trails and cross-country in all seasons. A great deal of time has been spent in the area of the American River headwaters, i.e. Lick Fork, Limber Luke and West Fork. We find it a unique area that appears to have a balanced habitat for elk - marshy meadows for calving, natural mineral licks and timbered areas for cover (very marginal as marketable timber). We have witnessed heavy development (use and abuse) over these years in close proximity to this area and feel that additional development will have a very negative effect on wildlife habitat and fisheries (the last couple of years we have been gratified to see the return of the salmon but often dismayed at seeing heavy silt in the streams due to logging associated activities. #4

It seems to us that the multiple-use concept very frequently gives priority to logging and road building in unsuitable environments while wildlife and fisheries suffer. We would like to see a plan implemented that would give a better balance. Please consider adopting Alternative C for the future of the Nezperce Forest. #5

Sincerely,

Roger & Janice Inghram

Roger and Janice Inghram

LETTER 271

Response No. 1

The monitoring requirements for the Forest Plan are outlined in Table V-1, Forest Plan Monitoring Requirements. These requirements address the items to be maintained, data sources, expected precision and reliability, frequency of measurements, reporting period, and acceptable variables.

zlso, the discussion in Chapter V, Section D - Monitoring and Evaluation, has been expanded, and Section E - Budget, has been added to better explain the relationship between the Forest's budget and the monitoring program.

Appendix O has been added to the Final Plan which describes in more detail the monitoring requirements.

In addition, the decision was made that every year the Forest will prepare a monitoring and evaluation report which will summarize the results of the past year's monitoring program.

Response No. 2

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

Response No. 2 (Con't.)

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 3

The level of timber harvest planned in the first decade in the Preferred Alternative (108 million board feet) represents a slight increase in the timber harvest level over the past 10 years. The importance of many of the lands to be entered for fish, wildlife, and water quality has been recognized and is reflected in the mitigation measures and practices to be applied to projects in those areas. These are outlined in the Forest Plan in chapters III and V.

Response No. 4 and Response No. 5

We agree that the upper American River drainage is suffering from excessive sedimentation. The cause is past logging, roading, and mining activity. We propose to manage this drainage in the future by first improving the habitat by removing the excess sediment and correcting damage done by placer mining. A proposal to improve this habitat has been approved for Forest Service, Bureau of Land Management, and Bonneville Power Administration funding in the summer of 1986. Secondly, we intend to limit future development so that fish habitat potential will not drop below 90 percent. This is the highest objective that can be set for a drainage that is also designated for other resource development.

We agree that the philosophy represented by statements in the Proposed Plan and Draft Environmental Impact Statement (EIS) such as "...summer elk habitat objectives will be lowered to the extent necessary to allow for the allowable sale quantity to be met" is contrary to the goal of the proposed alternative (G) and is incompatible with sound big-game management and recovery of threatened and endangered species. This philosophy was based on the Forest's

Response No. 4 and Response No. 5 (Con't.)

prioritization of the importance of fisheries, timber, and wildlife relative to one another. Fisheries was given highest priority and wildlife third priority. We realize this was an artificial and unnecessary prioritization that led to statements of philosophy such as this. Be assured that we do not consider the wildlife resource to be in third place behind fish and timber, but rather all three are critically important resources on the Nez Perce Forest. Secondly, the ratio of elk summer habitat located within the Forest's non-wilderness lands is approximately 1:0.2. Given this fact, we thought that we would have the latitude to reduce summer habitat objectives and still maintain the quantity and quality of summer habitat to carry a summer population that is compatible with the carrying capacity on winter habitat.

You will notice several changes in the Final Plan that will significantly reduce the chance of conflict between elk management objectives and timber and road management
objectives.

1. No road management policy or direction was explicitly developed in the proposed Forest Plan. The Forest Plan establishes management policy and direction for the development, implementation, and enforcement of road closures. This appears in Chapter II, Forestwide management direction, in the Forest Plan.

2. Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

3. The Final Plan shows a development schedule for the Gospel-Hump (Jersey-Jack) and the Mallard Creek roadless areas (1921 and 1847, respectively). However, no entry will be made into these areas until a site-specific Environmental Impact Statement is prepared. This will permit a more detailed analysis of the cumulative effects, management opportunities, and management strategies for these areas than is possible with a Forestwide Environmental Impact Statement.

The elk management objectives will be met. The flexibility to reduce elk objectives to meet timber objectives at the project level no longer exists. Elk objectives and timber objectives will be monitored as discussed in Chapter V of the Plan. If monitoring these resources indicate a serious conflict that precludes meeting the objectives of either resource, modification of either timber or elk objectives will be made only through an amendment to or revision of the Plan.

May 30, 1985 #272

Dear Mr. Kovalicky,

I am writing in concern with the Nezperce Forest Plan. I have lived in the Kamiah Kooskia area for the past 10 years and my husband has worked in and been involved with the timber industry for the past 15 years.

Now, as you know the Nezperce Forest currently has 900,000 acres of wilderness, the Forest Plan would include an additional 176,000 acres of roadless with no timber harvest. Most of this land is in East Meadow Creek and Rackcliff-Gedney area. I would like to see all non-wilderness Rare II areas be roaded and managed for all uses including timber production. This would give everyone a chance to visit these areas, not just the pack packers and hikers and hunters. #1

#272

Now, we cannot afford to have anymore sawmills closed in our area.

My husband and I feel you are doing a good job with the Nezperce Forest and will make the right decisions concerning these issues.

Sincerely,
Norma Spencer

P.O. Box 691,
Kamiah, Id. 83536

LETTER 272

Response No. 1

A primary goal of the Forest Plan (Chapter II) is to "provide a sustained yield of resources that will support the economic structure of local communities." These resources include the amount of timber available for harvest as well as fish and wildlife populations and recreational opportunities. In determining the management of the roadless areas, the mix of resource outputs were evaluated in light of the economic as well as environmental impacts. The volume of timber scheduled over the next 10 years by the Forest Plan should be sufficient to sustain the local timber industry near current levels.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Comment No. 273

Dear Mr. Kovalicky:

This is to let you know that I support your Forest Plan for the Nez Perce Forest, except in a few areas.

I have lived and worked in this area for the past 10 years. My job depends on timber from the Nez Perce Forest. I feel we have enough of our public lands set aside for wilderness. I would like to see enough of the remaining roadless areas opened up for logging to assure a sustained yield of at least as high as suggested in the proposed forest plan. I would ask that you let all non-wilderness Rare II areas be roaded and managed for all uses including timber production. #1

Tom, we cannot afford to have anymore sawmills closed in our area. What ever you do please don't lower the suggested allowable cut.

Sincerely,

/s/ Robert Spencer
P.O. Box 691
Kamiah, ID 83536

RESPONSE TO LETTER 273

Response No. 1

A primary goal of the Forest Plan (Chapter II) is to "provide a sustained yield of resources that will support the economic structure of local communities." These resources include the amount of timber available for harvest as well as fish and wildlife populations and recreational opportunities. In determining the management of the roadless areas, the mix of resource outputs were evaluated in light of the economic as well as environmental impacts. The volume of timber scheduled over the next 10 years by the Forest Plan should be sufficient to sustain the local timber industry near current levels.

The annual allowable sale quantity set forth in the Forest Plan is 100 mmbf. Out of the 16 roadless areas (471,743 acres), only Rackliff-Gedney (Nez Perce portion), Rapid River (Nez Perce portion), and East Meadow Creek (169,009 acres) will be managed with no additional roads in order to meet fish, wildlife, and water quality objectives. Other roadless areas will be available for multiple use including timber production. This includes the Silver Creek/Pilot Knob and West Meadow Creek roadless areas. Entry is deferred in West Meadow Creek until after the first decade because of immature timber, poor economics, and high road costs. Entry is deferred in the Silver Creek/Pilot Knob area until the Forest Service can come to an agreement with the Nez Perce Indian Tribe on how much land must be kept undisturbed to preserve the religious significance of the area.

#274

May 24, 1985

Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Forest Supervisor:

Alternative D with its 157MMBF annual timber harvest in the first decade is the one we need. Next is alternative E harvest cut in the first decade of 127MMBF. I cannot see how the industry can get along on the 102MMBF. Whatever we do lets not get any more wilderness. #1

Sincerely,

Toivo Pottala
704 Lincoln
Grangeville, ID 83530

Toivo Pottala

LETTER 274

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 275

Tom Kovalicky
Nezperce National Forest
Rt. 2, Box 475
Grangeville, ID 83530

Dear Mr. Kovalicky,

This letter is to inform you of my family's support of Alternative G and G1 in the Draft Nezperce Forest Plan. We personally believe that a multiple use approach, ie. timber harvest, recreation, fishing, etc. of this national forest as a whole would best serve the interests of both the local and national citizenry and economics. #1

We also support the development of West Meadow Creek 1845C to maintain or increase timber harvest on the Nezperce. We also recommend a 120-130 MMBF annual cut this first decade. #2 #3

We also generally support road closures, but would like to see certain roaded and future roaded areas, suitable for camping and fishing be opened during July and August. #4

/s/ Mr and Mrs Michael Edmonds
Junction Lodge Star Rt.
Grangeville, ID

RESPONSE TO LETTER 275

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

LETTER 275

Response No. 1 (Con't.)

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

Response No. 3 (Con't.)

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 4

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

Response No. 4 (Con't.)

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Dear Mr. Koualicky,

#276

After reviewing your Draft Forest Plan I support alternative G. #1

Dennis L Cox
Box 241
Elk City, Idaho
83525

LETTER 276

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#277

Tom Kovalicky
Nezperce Nat. Forest.
Rt. 2 Box 475
Grangeville, Id. 83530

Dear Mr. Kovalicky

I am currently employed in the Timber Industry. I live in a town that the only source of Income for me is in timber, and for that matter the whole town.

And after going over the Draft Forest Plan. I am in support of alternative G. I hope that you will consider the Impact that your dicision will have on the ELK City Area. #1

I thank you for reading this letter and hope that every thing will be done to satisfy everyone Involved.

Sincerely
Gregg L. Bailey
Gregg L Bailey

LETTER 277

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".
- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).
- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.
- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.
- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.
- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.
- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.
- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 277

Response No. 1 (Con't.)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#278

May 13, 1985

Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho 83530

Mr. Kovalicky;

I am writing this letter to you to express my concerns for the proposed Draft Environmental Impact Statement for the Nezperce National Forest.

I think your selection of the G or G1 Alternative is a good choice, but further consideration should be given to the fact the dependent mills have a capacity of 135 MM of logs per year. Some of these mills have secured close to 50% of their timber requirement from private, BLM, or State of Idaho sources in the last 10 years. These same mills are becoming more dependent upon the Nezperce Forest in the future because the other sources are either fully utilized or in the case of private ownership, the supply will be greatly reduced. #1

Greater pressure is expected from other purchasers from nearby forests because of the expected reduction in their National Forest Sales. Therefore I strongly urge you to consider raising annual log sales to an average of at least 120 MM to 140 MM per year for the first decade. #2

Another concern is the lack of any plan to enter Rackliff-Gedney 1841 (Nezperce portion) 55,463 acres, and East Meadow Creek 1845D, 94,203 acres. The Congressional Language attached to the Central Idaho Wilderness Bill intended these areas to be released to multiple use including timber harvest. Further consideration should be given to some sales within these areas during the first decade. #3

Timber sales should be designated at the lowest cost possible while giving consideration to siltation, big game, etc. Rules for logging should not be such as to cause an unbearable cost to the timber purchaser. #4

Profit by the Government is not a consideration. If it was, the most profitable alternative would be to sell the National Forest. Admininstration cost of the Forest will always be born by the taxpayer. #5

278

Timber harvest reduces this cost, compared to what the cost would be without a harvest. The Government receives monies from road construction employees, the contracting company, the logging employees, the logging company, the mill employees and their company. There are about two other support jobs for every one provided by timber harvest and milling, such as doctors, grocer, car sales, etc. #5

The land base for timber harvest is shrinking every time there is a debate concerning the Nezperce Forest. The timber industry has compromised and given up land base in the past to where timber harvest emphasis is now proposed on 26% of the Forest. I am against this reduction and strongly urge restoring the base to what the Congressional Language in the Central Idaho Wilderness Bill called for. #6

I would appreciate hearing what the final Environmental Impact Statement will be or if additional input is desired.

Sincerely,

Kenneth T. Kolar

Kenneth T. Kolar
Box 155
Elk City, Idaho 83525

Response No. 1 and Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

We have carefully considered the specifics of the Central Idaho Wilderness Act in our analysis of the roadless areas. There are differing opinions on the direction contained in the Act versus the notes of the Congressional Committee. In any event, we feel that the multiple use direction is met in the selected Forest Plan.

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Response No. 4 and Response No. 5

Agency costs were estimated for the 150-year planning period for all benchmarks and alternatives. Costs were developed by Forest Service personnel in conjunction with developing standards and guidelines for management prescriptions. Agency cost estimates were determined for all management activities, classified for management activities, and classified according to FSH 1309.11, Management Information Handbook (MIH) codes. These individual MIH costs were further combined to define management practices for recreation, wilderness, wildlife, soils, facilities, and protection.

The issue of high road costs and deficit timber sales has become a national concern. In the past three years, overall timber related costs including road construction costs have not been recovered by Forestwide timber sale receipts. This has been a management concern and emphasis is being placed on reducing timber management and related costs. Regional Forester direction requires that additional project level analysis be done for each timber sale (including associated road construction) over one million board feet. This is to assure that the sale has been designed with the most cost-effective measures possible in keeping with environmental concerns. Still, it may not be possible to avoid incurring "below-cost sales" due to the overall objectives of the Preferred Alternative. For further information, refer back to Chapters I, II, III, and IV of the Final Environmental Impact Statement.

Response No. 6

In the Forest Plan, approximately 42 percent of the Forest will be managed for sustained yield timber production. This represents 86 percent of the land that was tentatively suitable for timber production.

Dear Mr Kovalicky,

#279

This is in reference to the Draft Environmental Impact Statement for the Nez Perce National Forest.

I support Forest Alternatives G and G1. #1

I do not support any more wilderness areas, plus I feel the West Meadow Creek area should be included in the timber harvest area. #2

Ron Schaffer

Box 377
Elk City, Idaho
83525

LETTER 279

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 279

Response No. 2

No additional wilderness is being recommended for the Forest. Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

5-11-85

#280

Dear Mr. Kovalicky,

I am writing in reference to the Draft Environmental Impact Statement for the Nez Perce National Forest.

I support Forest Alternatives G and G1. #1

I believe the West Meadow Creek area should be included in the timber harvest area. Then I do not support any more wilderness areas. #2

Vickie Schaffer
Box 377
Elk City, Idaho
83525

LETTER 280

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 280

Response No. 2

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. Other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only the 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade.

Comment No. 281

Dear Mr. Kovalicky,

I support Forest Alternatives G and G1. I also think that the West Meadow Creek timber should be harvested. The roads used to log the timber should be closed to people's public use. #1 #2 #3

/s/ Kathy A. Heitzman

RESPONSE TO LETTER 281

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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LETTER 281

Response No. 1 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Response No. 3 (Con't.)

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

Comment No. 282

Dear Mr. Kovalicky;

I support both Alternative G and G1. NO more wilderness should be added! Timber should be harvested at West Meadow Creek close the needed logging road and monitor it. #1 #2 #3 #4

/s/ Betty L. Heitzman
Box 228

RESPONSE TO LETTER 282

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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LETTER 282

Response No. 1 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nezperce and recommended that no additional acres be added to the wilderness system at this time.

Response No. 3

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 4

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Response No. 4 (Con't.)

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

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$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

May 28, 1985

#283

Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Rt. 2, Box 475
Grangeville, Idaho, 83530

Dear Mr. Kovalicky;

Reference: Draft Environmental Impact Statement for the Nezperce Forest

I support Forest Alternative G + G1. #1

James E. Morley
P.O. Box 270
Elk City, Id. 83525

LETTER 283

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Comment No. 284

Tom Kovalicky, Forest Supervisor
Nezperce National Forest
Route 2, Box 475
Grangeville, ID 83530

Mr. Kovalicky:

The economy of Idaho depends a lot on the lumber industry. If more timber is locked up and more mills shut down this is going to hurt Idaho. We do not need this. Idaho cannot survive on tourism alone. #1

I believe a plan can be initiated to the benefit of all. Therefore I think the Forest Service, Lumber Industry and Outfitters should work together.

I support Alternative G and G1. #2

Sincerely,

Anne Kolar
P.O. Box 155
Elk City, ID 83525

RESPONSE TO LETTER 284

Response No. 1

Tourism/recreation, including outfitter/guide operations, is a growing industry in the State of Idaho and within the regional economy that this Forest influences. For the 1984-85 season, 26,572 recreation visitor days could be attributed to outfitter/guide operations on this Forest.

In response to public concerns, additional analysis was done to estimate impacts from each alternative on jobs and income for the timber, outfitter/guide operations, and other recreational activities.

The results of this analysis, based on the data and assumptions used for the IMPLAN model, show that the local timber industry has a dominant influence on the local economy in the first decade of the planning period (1986-1995). In the fifth decade, outfitter/guide operations and other recreation activities grow significantly in regard to jobs and income.

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

LETTER 284

Response No. 1 (Con't.)

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

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Response No. 2 (Con't.)

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

5-28-85

#285

Dear Mr. Kovalicky

I have lived in Elk City a good many years, and am interested in keeping a good economic base in this area. #1

I support Alternative G, including development of West Meadow Creek 1845C. #2

Dalphine Reyburn
Box 175
Elk City, Idaho 83525

LETTER 285

Response No. 1

Community Stability is one of the issues that was considered in the development of the alternatives and i the selection of the proposed alternative (Alt. G). Maintenance of a viable economic abase (Community Stability) to insure the continued existence of historical trades and professions within the resource-dependent communities is a nonproceed benefit (see Appendix B in EIS in regard to nonpriced benefits) of National Forest management.

In considering this issue, alternatives were evaluated by comparing changes in employment resulting from increases or decreases in Forest resource outputs with base year (1980) employment of the regional economy (Idaho, Lewis, NezPerce, and Clearwater Counties). This evaluation also compared changes in employment by alternatives to key Forest related economic sectors (Timber, Outfitters & Guides, and other Recreation). Please refer to Chapter II and Appendix B of the EIS for methodology and results of analysis.

Response No. 2

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

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Response No. 2 (Con't.)

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

#286

Elk City Idaho.
May 28. 1985

Dear Mr. Kovalicky
After reviewing your Draft Forest Plan I generally support prefered Alternative G However the Forest should not get harvest level too low during the 1st. decade.
I recommend an annual cut of timber 120 to 130 MMBF. Lets use our renewable resource. #1

James W Rugburn
Box 175 Elk City
83525

LETTER 286

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 1 (Con't.)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

May 28, 1985.

Tom Kovalicky Forest Supervisor
Nezperce National Forest
Rt 2, Box 475
Grangeville, Idaho 83530

#287

Dear Mr Kovalicky,

Reference: Draft Enviromental Impact Statement for the Nezperce Forest.

I support Forest Alternives G. + G1.
More log volumes should be harvested on the Nezperce. #1

Catherine E Marley
P.O. Box 270
Elk City, Idaho
83525

LETTER 287

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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#288

Andy W. Rose
Box 402
Elk City, ID

I sanppoint Forest Alternatvies G and G1. #1

No additional Widerness and roadless area. #2

I do support going in to West Meadow Creek with consideration to closing roads be for hunting Season.

I liked this Idea but now I hear that the packers in this Area.

The "Daylees" said thay would go for roads. but closed before hunting Season "but not now"

I work for the mill in Elk City. I'm 34 years old and I have five kids my support comes form the mill in Elk City And most the people work at the mill and depend on the income from the mill to feed thier familys. The mill needs the timber and the town needs people. #3

The packers get people that shoot at anything that moves. They make big camps that look like Hobo areas, and they want to complain about logging! and roads in to areas. Last year I saw hunter after hunter come in to this area. Then they did not go to the packers camps. For the last ten year the mills have been geting there timer form private sorces at least 50% at times.

The ammount of roads going in to these areas is very small acording to plan G + G1

The logger need timber and the mills need to make lumber and the products that come form wood right down to the paper I write on.

thank for reading my letter.

Sincerley. Andy W. Rose
5/26/95

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

Road construction and timber harvest activities will not be scheduled in the West Meadow Creek roadless area during the first decade, except for approximately 8,000 acres that do not lie in the Meadow Creek drainage. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.

LETTER 288

Response No. 3

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#289

Dear Mr. Kivalicky

After Reviewing your Draft Forest Plan.

I can Generally support Prefered alternative G. #1

I Beleive The west side of Meadow Creek should Be Cut. #2

I also oppose Anymore Wilderness For The State of Idaho #3

Gary Ridenour
Gary Ridenour
Box 388
Elk City Idaho
83525

LETTER 289

Response No. 1

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LETTER 289

Response No. 2

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I Can generally Support prefered alternative G. #1

I believe the west Side of Meadow Creek Should be Cut. I also appose anymore Wilderness for the State of Idaho. #2 #3

Penny Ridenour
Box 388
Elk City Id
83525

LETTER 290

Response No. 1

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Response No. 3

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May 29, 1985

#291

Dear Mr. Kovalicky,

Reference: Draft Environmental Impact Statement for the Nezperce Forest.

I support forest Alternatives G and GI. #1

More Volumes should be made available for harvest on the Nezperce. #2

Additionally, I feel that these roads should be rotationally opened for the ~~[illegible]~~ common people to be able to get firewood in summer months only. Then the roads wouldn't be hurt, the packer shouldn't scream, and dead falls cleared. #3

Sincerely:
Timothy A. Heitzmann Sr.
Timothy A. Heitzmann Sr.

Debra Heitzmann

P.O. Box 254
Elk City 83525

LETTER 291

Response No. 1

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The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 3

Your suggestion to allow access on roads during periods when wildlife and soils would not be adversely affected is a good one; however, it is not possible in all cases because the intent of some road closures is to maintain undisturbed areas for wildlife habitat after timber sale activities are finished. In these cases, it may be possible to allow the road to remain open for a short period following the timber sale to allow for firewood gathering. We recognize the importance of an available supply of fuelwood to the local population and will continue to try to provide opportunities for gathering wood consistent with the other resource objectives.

Comment No. 292

Reference for Forest Plan

Dear Mr. Kovalicky,

I have lived in the area for 22 years and I feel we need to support Forest Alternatives G and G1. And I think more volumes should be made available for harvest on the Nezperce. #1 #2

/s/ Dee Brown
Rt. 1 Country Crt.
Grangeville, ID 83530

RESPONSE TO LETTER 292

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 292

Response No. 1 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 2

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Comment No. 293

I support Forest Alternatives G and G1, but would like to see more logging areas available to the Elk City and Red River Districts. #1

/s/ Dorothy J.Lovell

RESPONSE TO LETTER 293

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 293

Response No. 1 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Harvest levels on individual Ranger Districts may vary slightly from year to year, but is basically determined on the same basis as the Forest annual harvest is; the availability of timber for harvest and multiple-use considerations. Harvest levels on Elk City and Red River are expected to stay about the same or increase slightly over the next 10 years.

Comment No. 294

I support Alternatives G and G1, but would like to see more logging areas available to the Elk City and Red River Districts. #1

/s/ Robert L. Lovell

RESPONSE TO LETTER 294

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres; the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

LETTER 294

Response No. 1 (Con't.)

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Harvest levels on individual Ranger Districts may vary slightly from year to year, but is basically determined on the same basis as the Forest annual harvest is; the availability of timber for harvest and multiple-use considerations. Harvest levels on Elk City and Red River are expected to stay about the same or increase slightly over the next 10 years.

#295

Dear Mr. Kovalicky:

I support Forest alternatives G and G 1.
More volumes should be made available for harvest on the Nezperce. #1

Jerry Rape
Box 142
Elk City 83525

LETTER 295

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

- Prescribed burning of deer/elk winter range was increased from 2,700 acres to 5,000 acres per year during the Plan period (1988-1997).

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- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 1 (con't)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#296

Reference: The Forest Plan

After reviewing your draft plan I agree with alternative B, or similar plan. #1

More log volumes should be made available on the Nezperce Forest, with continued multiple use practices. The forest has enough Wilderness, we don't want more. #2

David Smart - Den. Del - Elk City

LETTER 296

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

- Fish/water quality objectives were increased in 64 drainages; anadromous fish potential will be managed at 87 percent of habitat potential Forestwide. This was done to make Alternative G consistent with the Idaho Department of Fish and Game's "Anadromous Fisheries Management Plan, 1985-1990".

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- Road construction and timber harvesting activities are not scheduled in the West Meadow Creek roadless area during the Plan period (1988-1997), except for approximately 8,000 acres that do not lie in the Meadow Creek drainage.

- Approximately 13,300 acres of the Silver Creek-Pilot Knob roadless area will be managed without roads for high quality fisheries, water quality, wildlife, dispersed recreation, and protection of Native American religious and cultural values.

- The Rackliff-Gedney roadless area will be managed with road improvements and additions. Approximately 11,000 acres will be available for timber management. The remaining 38,000 acres of tentatively suitable lands will be managed to meet wildlife objectives using prescribed burning.

- The allowable sale quantity (ASQ) of timber was increased from 102 MMBF to 108 MMBF per year in the Plan period (1988-1997). One MMBF is the result of an increase in suitable acres, the other 5-MMBF increase is a non-interchangeable component linked specifically to timber that does not meet minimum saw timber utilization standards. Included in this non-interchangeable component is live and dead material that can be utilized for pulp, lumber, and other merchantable products. This is a 6-percent increase from the Draft Preferred Alternative ASQ.

- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

LETTER 296

Response No. 1 (con't)
The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

Response No. 2

As part of the Forest Planning Process, we evaluated the current resource situation on the Nez Perce and recommended that no additional acres be added to the wilderness system at this time.

#297

Dear Mr. Kovalicky,

I have lived in the ElkCity area for 20 years or more and I wish to see continued multiple use practices.

I support Forest Plan G. #1

Ralph O Crocker
Box 295
Elk City, Idaho 83525

LETTER 297

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- In the Draft Preferred Alternative, some riparian acres were included in the suitable timber base and some acres were assigned minimum level management. For consistency, all riparian acres are included in the suitable base. A site-specific analysis of the suitability of each area for timber management will be made during implementation following the objectives and management standards in the Forest Plan.

- Visual Quality Objectives along trails in the John's Creek area have been increased.

#298

Ref: Forest Plan

Dear Mr. Kovalicky,

I have lived in the Elk City area over 20 years and I wish to see continued economic growth remain here.

I generally support Alternative G, however should maintain an annual cut of 120-130 MMBF. #1

Harold C Bell
Box 411
Elk City. Idaho

LETTER 298

Response No. 1

After evaluating all public comments on the Proposed Forest Plan and Draft Environmental Impact Statement (EIS), and doing additional analysis, it was felt that Alternative G represents the best balance of resources for the Nez Perce National Forest. However, there were some changes made to Alternative G as a result of public comment. These changes are summarized below:

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- Visual Quality Objectives along trails in the John's Creek area have been increased.

Response No. 1 (con't)

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

While this amount is only a slight increase from the current level, we feel it is reasonable based on the amount of timber needed to maintain local industry and the need to protect other forest resources.

A primary goal of the Forest Plan (Chapter II, page 1), is to "provide a sustained yield of resources that will support the economic structure of local communities...". During the public comment period, many people pointed out that the volume of Nez Perce Forest timber actually sold over the past 10 years averaged 85 MMBF per year. The Idaho Timber Supply Study evaluated total forest resources in the state by region, and while private, industrial forest lands cannot sustain the harvest level of the past few years, the amount available from the Nez Perce Forest and other sources should be sufficient to meet future demand. Timber outputs in the Plan are projected to increase over the next 30 years, however, the current Plan will be revised in 10 to 15 years to assess the conditions and demand at that time.

#299

Tom Koslicky
Nezperce National Forest
Rt. 2 Box 475
Grangeville, Ida 83530

Rt. 1, Box 49A
Kooskia 83539

Dear Mr. Koslicky,

after reviewing your Draft Forest plan
I can generally support preferred alternative E.
However Forest should not get harvest level
to low during 1st decade; Recommend 120-130 mmbf
annual cut 1st decade. #1

Support development of West Meadow Creek 1845C to
maintain or increase cut on Nezperce Forest.
I question Division not to road Rackliff Gedney and
East Meadow Creek in view of massive existing #2
Wilderness. If roaded and timber harvested properly
there would not be any adverse conditions created
for Fish or wildlife.

I strongly recommend closing all logging roads
as soon as the logging is finished. Any violation #3
" " " " would be punished to the maximum

LETTER 299

Response No. 1

The level of timber harvest was one of the major issues considered in selecting an alternative for the Forest Plan. A wide range of harvest levels were considered ranging from 74 MMBF per year to 196 MMBF per year during the first decade.

The overall goal in the forest planning process is to maximize the total net benefits to the public. These benefits include those that can be measured and assigned a price, such as timber, as well as those that cannot be measured as easily or assigned a dollar value, such as water quality and wildlife. After evaluating all of the public comments received on the draft Plan, the Idaho Timber Supply Study, and the impacts on other resources, an allowable sale quantity of 108 MMBF was selected for the first decade.

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Response No. 2

Only 126,846 acres will be managed with no additional roads instead of the 169,000 acres proposed in the Draft Plan. Rapid River, East Meadow Creek, and Silver Creek-Pilot Knob will be managed with no additional roads in order to emphasize fish, wildlife, and water quality, and to protect Native American religious and cultural values. All other roadless areas, including Rackliff-Gedney and West Meadow Creek, will be available for multiple use including timber production. However, only 8,000 acres in the West Meadow Creek roadless area that do not lie in the Meadow Creek drainage will be available for scheduling timber harvest and road construction during the first decade. Timber harvesting in the Meadow Creek drainage would be uneconomical because of the relatively small size of the timber and the amount of road construction required. Older, larger stands of timber are located in scattered pockets that could not be accessed during the Plan Period and still meet the fishery and water quality objectives for the area. This area will remain in the suitable timber base and timber harvesting is projected to be scheduled after the Plan period.

Response No. 3

Road closures are very controversial with Forest users. The Forest Service in the past has lacked the ability and support of the public, and of the judicial system to enforce road and area closures. The Forest, in an attempt to eliminate some of the problems, will be utilizing closure techniques that eliminate access to the facility by obliterating the travelway. This will help in most cases, but will not eliminate the trespass and vandalism that roads and their closure devices receive.

The Forest Service needs your help in this enforcement by your active support with closure policies and information from you regarding vandalism or trespassing. We now have a cooperative program with Idaho Fish and Game and CAP (Citizens Against Poaching) hotline for the public use in reporting vandalism or breaching of closure devices.

The Nez Perce is emphasizing road closures through an inform and involve process. Through this educational process we should achieve credibility with the public and judicial systems. If this process doesn't work, timber harvesting and associated roading may not be compatible with multiple use management. Road closures are necessary to provide quality of all resources.

Alternative G, as presented in the Plan, was not explicit as to having considered a road closure policy or providing the direction for uniformity in closure policies.

Road closures are an integral part of road management. All resources and the effects of roads are analyzed. Mitigation for roads and their effects usually takes place during the design and construction phases. The most effective mitigation, to most resources, is the road closure policy and its timely completion with the scheduled activities.

An Access Management Plan will be implemented to monitor and evaluate the effects of access on forest resources and the ability of the transportation system to accomplish the designed use. As measuring or monitoring tools, Forest access management will use two indices to monitor change over time. These indices will allow us to compare between points in time, between areas, and between alternate access management schemes or proposals. The indices are Road Density and Distribution.

Road Density is an index used to measure the effects of road construction and use on lands scheduled for timber harvest in the Forest Plan. These areas are where the effects of roading and use will be concentrated. This index is determined by:

$$\frac{\text{Equivalent miles of road (on entire Forest)}}{\text{Suitable Forest Land in Square Miles}}$$

Response No. 3 (con't)

Equivalent miles of road is a single mile of a given road type (main, secondary or primitive), and its respective status (open, temporarily closed or completely closed), expressed as a coefficient of its relative impact on elk potential use. This is compared against one mile of open main road.

Distribution is an index used to measure the ability of the road and trail system to distribute users. It can be computed using road miles, trail miles, or road and trail miles to show changes over time and estimate effects on various user groups. This index is determined by:

$$\frac{\text{Equivalent road and trail miles}}{\text{Forest land (including Wilderness) in Sq. Miles}}$$

Access facilities will be maintained to the level commensurate with use, user type, user safety, and facility-resource protection.