



**File Code:** 1570  
16-01-00-0009

**Date:** April 5, 2016

Brad Smith  
Idaho Conservation League  
PO Box 2308  
Sandpoint, ID 83864

Dear Mr. Smith:

This letter is in response to your objection regarding the St. Joe Travel Plan, on the Idaho Panhandle National Forest. District Ranger Matthew Davis, the Responsible Official, and I, as the Objection Reviewing Officer, have read your objection; and reviewed the Environmental Assessment (EA), and the draft Decision Notice. This letter details my response to your objection based on my review of the project in accordance with 36 CFR 218, *Project Level Predecisional Administrative Review Process*.

The regulations allow for a meeting between objectors and the Reviewing Official. I appreciated the opportunity to hear from you in person at our meeting on Friday, March 25<sup>th</sup>, 2016. You reiterated your concerns regarding bull trout habitat at specific trail crossings, and motorized use in wilderness study areas - particularly Grandmother Mountain. No resolution was reached during our meeting, and I have revisited the information for the areas you are most concerned about.

After considering your issues, and suggested remedies as specified by 36 CFR 218.11(b), my responses are as follows:

You allege that the draft DN violates the Travel Management Rule because it fails to minimize effects to bull trout, and further allege a violation of the Endangered Species Act (ESA) because the project does not do enough to protect bull trout.

My review finds the project will result in decreased levels of sediment entering streams within the project area; the key habitat indicator identified as having the potential to be influenced by the project in the Fisheries Report. While the project does not eliminate every motorized route or every motorized stream crossing, the analysis demonstrates based on field reviews that remaining crossings have little likelihood to affect bull trout; therefore, effects have been minimized and the proposed designations will adequately protect resources.



The biological assessment does conclude that there is potential for direct mortality at motorized crossing locations; however, after formal consultation the U.S. Fish and Wildlife Service (USFWS) determined the project is, "Not likely to Jeopardize the Continued Existence of the Bull Trout or Adversely Modify its Critical Habitat." This is not an ESA violation.

Finally, I find that these draft DN and ESA findings did not rely on inaccurate information, as you claim. The EA (pg. 129) simply misstated "streams" for "drainages," in the statement "Reduction of 54 motorized stream crossings in bull trout occupied streams." An additional error occurred elsewhere under the description of regulatory consistency where the documentation inadvertently used a prior existing condition to quantify motorized routes and stream crossings (EA pp. 128-129). These misstatements are being corrected. However, these errors in the EA do not change the analysis or the resulting conditions of the proposed designations, and did not form the basis of the USFWS determination and project findings. The USFWS's findings were based on the resulting motorized routes, which include the reduction in motorized stream crossings that occurred in recommended wilderness after the new Forest Plan was approved. My staff is working with the USFWS and will follow up with additional documentation (PF: PI-345). I find that these misstatements are minor and have no impact on the project analysis or ESA outcome.

You also allege a NEPA violation because the EA fails to consider an alternative exclusive to non-motorized trail designations in the Grandmother Mountain Wilderness Study Area (WSA), as you recommend.

My review finds that the District Ranger did consider an alternative to prohibit motorized use in the WSA (EA pg. 21). This alternative was considered but eliminated from detailed study. It would not be consistent with the Forest Plan which states that, "Existing uses that were in place prior to acquisition by the Forest Service will continue" (Forest Plan pg. 49). Single-track motorized use is consistent with management on the adjacent lands managed by the Bureau of Land Management (EA pg. 70). Annual monitoring of motorized trails on National Forest System lands in the WSA have not indicated any resource damage that would require a change in the current designation (PF: REC-57). The continuation of existing single-track motorized use, with no expansion of new uses, is consistent with maintaining the suitability of the area as required by law, and as defined in the 2013 Forest Plan FEIS (pg. 487) and 2015 Forest Plan.

The wilderness evaluation for the Grandmother Mountain IRA (which includes the WSA) determined that this area's suitability for recommendation as wilderness is limited due to its moderate availability rating, complex boundary, and intermixed ownership (FP EIS pg. 470, FP EIS Appendix C pp. 146-147). This determination is consistent with BLM management of the WSA, which also did not recommend it for wilderness.

My review finds no rationale for considering an alternative to change management of the WSA.

I have reviewed the project in light of your objection and find the project complies with all applicable laws and the Forest Plan. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available (36 CFR 218.11(b)(2)).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Farnsworth', written over a printed name.

MARY FARNSWORTH  
Forest Supervisor

cc: Ray Smith, Matthew Davis, Karl Dekome, Lynette Myhre