

Forest Service Nez Perce -Clearwater National Forests Supervisor's Office

903 3rd Street Kamiah, ID 83536 208-935-2513 Fax: 208-935-4275

File Code: Date:

1920

July 26, 2018

Dear Forest Planning Participant;

Thank you for your continued engagement in Forest Plan Revision. Over the last year, we have taken time to speak with you all regarding the direction of the Nez Perce-Clearwater Forest Plan. This past winter we emphasized collaboration on alternatives to analyze in an Environmental Impact Statement (EIS). We attended multi- and single-day collaboration sessions, we spoke with interest groups and county governments, we held live webinars and posted recorded versions of webinars to our webpage, we attended Clearwater Basin Collaborative meetings and met with state agencies and the Nez Perce Tribe, we fielded nearly a thousand written comments from across the country and answered numerous phone calls, and we asked our employees at every level of the organization to engage in conversations with those of you that wanted more information. By all accounts, the conversations we have had since 2012-and, in particular, over the last year-have helped to frame the Forest Plan Revision process. Your comments directly influence the concepts and the content in the Forest Plan as we continue to move forward.

We asked you all to assist us in developing alternatives, specifically determining what range of components we should consider. Alternatives are different ways of looking at how resources are managed to deal with unresolved conflict among available uses for the land we care for, and reflect the wide variety of perspectives you all have. The environmental, social and economic impacts of each alternative will be analyzed in an EIS. All alternatives must be consistent with existing law, regulation and policy; in particular, the 2012 Planning Rule (36 CFR Part 219). Furthermore, alternatives must all contribute to ecologic and social sustainability and must assist the Forest Service in doing our part to sustain rural communities and economies.

From the information you provided, we have developed alternatives that respond to most of the perspectives and concerns you all raised. While no one alternative may capture your views precisely, we took the information you gave us and developed a range of alternatives to respond to the Issue Statements and other important resource concerns. The analysis of these alternatives will look at each piece's contribution and impacts individually. In doing so, my decision following the Final Environmental Impact Statement and objection period (scheduled for 2020), may include pieces of multiple alternatives without doing an analysis on an infinite array of alternatives.

In the attached document you will find an overview of the four action alternatives we intend to analyze in the Draft EIS, estimated for release in the spring of 2019. Additionally, we have put together a document describing how the most common comments led to the development of the alternatives. While this document captures the majority of the comments we heard, we





understand and appreciate that not every perspective or comment is captured. Our intent was to summarize common themes we heard throughout the public engagement process and describe how those themes contributed to the development of the alternatives presented.

If you have questions regarding Forest Plan Revision, please contact Zach Peterson, Forest Planner, at 208-935-4239 or <u>zacharyapeterson@fs.fed.us</u>.

Sincerely,

CHERYL F. PROBER

Forest Supervisor

# Contents

Dra	ft Environmental Impact Statement Alternatives for Analysis	3
$\Diamond$	Description of the Alternative Themes	3
	Alternative W	3
	Alternative X	3
	Alternative Y	3
	Alternative Z	4
$\Diamond$	Alternative Overview Tables	5
Rec	ommended Wilderness Allocation	10
$\Diamond$	No (additional) recommended wilderness areas	10
$\Diamond$	Additional recommended wilderness areas	10
$\Diamond$	The Great Burn	11
Wil	d and Scenic River Suitability	12
$\Diamond$	No suitable Wild and Scenic Rivers	12
$\Diamond$	South Fork and North Fork Clearwater rivers should be/should not be suitable	12
$\Diamond$	Protect the right rivers for the right reasons	13
$\Diamond$	Use a "systems approach"	13
Acc	ess and Recreation Opportunity Spectrum	14
$\Diamond$	Additional motorized access is important	14
<b>\(\rightarrow\)</b>	Areas on the National Forest should be free of motorized use	15
$\Diamond$	Mountain bikes (and other mechanized uses) need to be considered	15
For	est Vegetation Desired Conditions	16
$\Diamond$	Old-growth	16
$\Diamond$	Snag and live tree retention	. 16
Tim	ber Harvest and Restoration	17
$\Diamond$	Timber harvest should be increased; a rate of attainment to meet desired conditions should be stated	17
$\Diamond$	Natural processes should be used to move towards desired conditions	. 17
Big	game Habitat and Elk Security	. 18
<b>\(\rightarrow\)</b>	Big game habitat and quality forage is a major driver	. 18
$\Diamond$	Elk security plan components are necessary	. 18
Aqu	ratic Ecosystems	. 19
$\Diamond$	Additional protection for aquatic ecosystems are needed	. 19

Other	r Comments	20
$\Diamond$	Standard and guidelines	20
$\Diamond$	National Historic Landmark	20
$\Diamond$	Mining rights	21
٥	Monitoring plan	22

# Draft Environmental Impact Statement Alternatives for Analysis

#### Description of the Alternative Themes

Four action alternatives were developed based on internal and external input, including collaboration on alternative development during the winter of 2017/2018.

All alternatives to be analyzed in the Draft Environmental Impact Statement (DEIS) met a minimum bar of being ecologically, socially and economically sustainable per the 2012 planning rule. Furthermore, each alternative contributes to rural prosperity and other Department of Agriculture Strategic Goals.

Alternative themes and the thought process behind their development are described below:

#### Alternative W

Resources and land allocation on the Nez Perce-Clearwater are not mutually exclusive. We believe it is possible to have high levels of timber harvest, sustain rural economies, recover listed fish and wildlife species, provide clean air and clean water and provide habitat for viable populations of wildlife species all at the same time. For instance, areas evaluated for recommended wilderness are independent from most areas that provide for timber harvest due to the Idaho Roadless Rule. As such, it is possible to recommend all or nearly all Idaho Roadless Rule Areas for recommended wilderness and have a very high level of timber outputs.

This thought process led to the idea of a "have it most" alternative. This alternative has higher levels of recommended wilderness coupled with a higher timber output and a faster rate of movement towards forest vegetation desired conditions. Forest vegetation desired conditions would be minimally met within 30 years. Areas not selected as recommended wilderness allow for motorized use, including in the roadless areas. Wild and Scenic Rivers stem from a collaborative approach that looks at rivers outside the wilderness. The intent is to couple items that may otherwise be viewed as being mutually exclusive.

#### Alternative X

Alternative X responds to a number of state and local plans, which call for fewer or no areas of recommended wilderness<sup>1</sup>, fewer or no suitable wild and scenic rivers and higher timber outputs. In this alternative zero areas are recommended as wilderness. The Idaho State Rivers Program is used as a surrogate to continue to protect key tributaries to the North and South Fork Clearwater Rivers while not pursuing Wild and Scenic River Suitable status on any river. Forest vegetation would be within the lower bound of the desired conditions within 20 years.

#### Alternative Y

Alternative Y provides for intermediate level of recommended wilderness and moves towards forest vegetative desired conditions in 50 years. Historic snowmobiling areas in the Great Burn are removed from consideration as recommended wilderness (boundary change), but within the areas moving forward as recommended wilderness we do not authorize any uses that may preclude designation as wilderness in the future. This alternative also looks at the major rivers not designated in the Wild and Scenic Rivers Act (the North Fork Clearwater and South Fork Clearwater) as suitable for inclusion in the WSR system.

<sup>&</sup>lt;sup>1</sup> The Idaho County Natural Resource Plan calls for zero recommended wilderness on the Nez Perce-Clearwater National Forest. The Clearwater County Natural Resource Plan acknowledges that some limited areas of recommended wilderness may be an acceptable tradeoff if other items benefiting rural economies are increased, such as increased timber production.

#### Alternative Z

Alternative Z was crafted to respond to requests to have an alternative in which natural processes dominate over anthropogenic influence. In this alternative a proposal for recommended wilderness that was brought forward by a group of national and state wilderness advocacy groups was [mostly] carried forward. Additionally, rivers were viewed as part of a larger system and major tributaries to our largest rivers will be analyzed as being suitable for inclusion in the wild and scenic rivers system. Areas in Idaho Roadless Rule Areas will not be opened up for additional motorized use (current motorized use would not be impacted). Reliance on natural process would warrant a slower movement towards forest vegetation desired conditions (anticipated 100 years or longer). Timber outputs would also be lower and near a lower threshold needed to provide for economic sustainability and sustain rural economies. Additional plan components related to snag guidelines, live tree retention and elk security are included that limit uncertainty regarding how and where these features will be located on the landscape.

# Alternative Overview Tables

Table 1. Action Alternative Overview

Resource Topic	Alternative W	Alternative X	Alternative Y	Alternative Z
	Bighorn-Weitas, Hoodoo, North	None	Mallard Larkins, Hoodoo with	Hoodoo, Mallard-Larkins, East
Recommended	Lochsa Slope, Mallard-Larkins,		Boundary change to create GA	Meadow Creek, Rapid River,
Wilderness	East Meadow Creek, Moose		for snowmobiling, East Meadow	North Fork Spruce-White Sands,
	Mountain, Rapid River, North		Creek, Rapid River	Sneakfoot Meadows , Meadow
	Fork Spruce-White Sands,			Creek-Upper North Fork;
	Sneakfoot Meadows, Meadow			Rawhide
	Creek-Upper North Fork			
	No non-conforming uses that	N/A	No non-conforming uses that	Some non-conforming uses
Uses that are	would likely preclude		would likely preclude	allowed, including bicycles and
inconsistent	designation. Bicycles and over-		designation. Bicycles and over-	chainsaws. No over-the-snow
with the	the-snow winter travel		the-snow winter travel	winter travel permitted.
Wilderness Act	prohibited.		prohibited.	
-uou)				
conforming				
uses) <sup>2</sup>				

<sup>2</sup> See Table 2, Proposed Allowable Uses in Recommended Wilderness by Alternative for details

Resource Topic	Alternative W	Alternative X	Alternative Y	Alternative Z
	John's Creek, Meadow Creek,	Zero Suitable:-manage 21	Johns Creek, Meadow Creek,	Systems Approach <sup>3</sup> : Bostonian
Wild and	Kelly Creek, North Fork Kelly,	rivers in the South Fork and	South Fork Clearwater, North	Creek, Boundary Creek,
Scenic Suitable	South Fork Kelly, Middle Fork	North Fork Clearwater	Fork Clearwater, Kelly Creek,	Caledonia Creek, Graves Creek,
Rivers	Kelly, Cayuse Creek, Weitas	Basins consistent with the	North Fork Kelly, South Fork	Weitas Creek, Kelly Creek, North
- 1	Creek, Little North Fork, Fish	Idaho Department of Water	Kelly, Middle Fork Kelly, Cayuse	Fork Kelly Creek, Middle Fork
	Creek, Hungery Creek, Salmon	Resources State of Idaho	Creek, Weitas Creek, Little North	Kelly Creek, Little North Fork;
	River (12)	Rivers Program direction	Fork, Fish Creek, Hungery Creek,	Upper Lochsa River, Crooked
			Salmon River (14)	Fork, Colt Killed, Big Sand, Storm
				Creek, North Fork Storm Creek,
				South Fork Storm Creek, Fish
70				Creek, Hungery Creek; Meadow
-	11			Creek, East Fork Meadow Creek,
				Buck Lake Creek, Running Creek,
				Bear Creek, Cub Creek, Brushy
				Fork Creek, Moose Creek, North
				Fork Moose, West Moose Creek,
				East Fork Moose Creek, Rhoda
				Creek, Wounded Doe Creek;
				Johns creek, Silver Creek; Salmon
				River, Bargamin Creek, Sabe
				Creek ( <b>36</b> )
	All Backcountry Restoration	More motorized access,	Motorized loop opportunities	Use Draft ROS DCs; West
Access and	Idaho Roadless Areas are	motorized loop	expanded in MA 2	Meadow Creek (less American
Recreation	suitable for motorized uses in	opportunities expanded in		River watershed) as non-
Opportunity	ROS	MA 2		motorized except cherry stems
Spectrum				on current DRAMVU open roads
(ROS)				
ciassilication				

tributaries critical to the functioning of the system. A premise of the systems approach is that protection of the headwaters and tributaries in turn protects the <sup>3</sup> The Systems Approach looks to view the rivers as systems rather than individual segments and finds suitable the major tributaries to our largest rivers and major rivers.

Resource Topic	Alternative W	Alternative X	Alternative Y	Alternative Z
Timber Output Restoration PTSQ	220-241 million board feet (mmbf) annually	Departure from the Sustained Yield Limit: 241-261 mmbf annually	130-150 mmbf annually	60-80 mmbf annually
Timber Harvest Acres annually	12,600 acres	18,900 acres	7,500 acres	3,700 acres
Prescribed Natural Fire Acres annually	5,500 acres	8,250 acres	3,300 acres	1,650 acres
Aquatics	Aquatic and Riparian Conservation Strategy (ARCS)- to be developed collaboratively with the Nez Perce Tribe, Idaho Department of Fish and Game and Regulatory Agencies	Aquatic and Riparian Conservation Strategy (ARCS)- to be developed collaboratively with the Nez Perce Tribe, Idaho Department of Fish and Game and Regulatory Agencies	Aquatic and Riparian Conservation Strategy (ARCS)- to be developed collaboratively with the Nez Perce Tribe, Idaho Department of Fish and Game and Regulatory Agencies	Aquatic and Riparian Conservation Strategy (ARCS)- to be developed collaboratively with the Nez Perce Tribe, Idaho Department of Fish and Game and Regulatory Agencies
Mining	Refer to 1872 General Mining Act. More recommended wilderness and more wild and scenic rivers may cause additional conflict or restrictions on mineral extraction and development.	Refer to 1872 General Mining Act. Reduces potential conflict with mineral extraction and development by finding fewer rivers suitable and recommending less wilderness.	Refer to 1872 General Mining Act. Reduces conflict to mining from recommended wilderness areas by altering boundaries around concentrated areas with unpatented claims. South Fork and North Fork Clearwater River suitability findings may prevent loosening of regulations on those rivers.	Refer to 1872 General Mining Act. Reduces conflict to mining from recommended wilderness areas by altering boundaries around concentrated areas with unpatented claims. Potentially increases conflict with additional suitable Wild and Scenic Rivers.

						г
Re	Resource Topic	Alternative W	Alternative X	Alternative Y	Alternative Z	
	Elk and Big	Promote Elk available forage	Forage production is	Elk Habitat security is desired but	Elk habitat security is favored	_
	Game	and increase summer	maximized and movement	specific measures are not	over development of forage	
		nutritional value.	towards desired conditions	prescribed, forage development		
		Elk habitat security is desired	is prioritized. Elk habitat	occurs at a moderate pace in line		
		by specific measures are not	security is desired by	with acres of timber harvest and		
		prescribed.	specific measures are not prescribed.	prescribed fire.		
		Fisher habitat desired	Fisher habitat desired	Fisher habitat desired conditions	Additional plan components to	_
	1040	conditions specified	conditions specified	specified	limit amount of fisher habitat in	
- 1					openings that may be avoided by	_
ieti	ירקו				fisher	
del	יפח	A faster rate of movement	The fastest rate of	A moderate rate of movement	A less complex ecosystem that	
1 %	C	towards desired conditions	movement towards DCs as	towards DCs and NRV provides	moves at a slower pace toward	
ilb	200	(DCs) as informed by the	informed by the NRV	some benefit to generalist	desired conditions as informed	
!/V		Natural Range of Variability	benefits most generalist	species	by the Natural Range of	
'	sheries	(NRV) benefits most generalist	species.		Variability (NRV) may provide less	
		species.			habitat for generalist species	_
		A faster rate of movement	The fastest rate of	A moderate rate of movement	Additional legacy habitat	
		towards DCs as informed by	movement towards DCs as	towards DCs and NRV provides	retention requirements such	_
	54	the NRV may reduce some	informed by the NRV	some benefit to specialist species	increased retention of snags and	
	Other	available habitat on 25% of the	benefits may reduce		live trees may benefit specialist	
	specialist	forest.	available habitat for some		species. Additional mid aged and	
	sheries		specialist species on 25% of		late aged forests are likely	
			the forest.		resulting from a slower rate of	
					movement towards NRV.	

Table 2. Proposed Allowable Activities in Recommended Wilderness by Alternative

Proposed Activities in Recommended Wilderness Areas	No Action	Alternative W Allowed in Re	Alternative X	Alternative Y	Alternative Z
Motorized Travel (summer and winter)	No	No	N/A	No	No
Mechanized Travel	No	No	N/A	No	Yes
Motorized and mechanized tools for public use	No	Yes	N/A	No	Yes
Aircraft landing for recreational use	No	No	N/A	No	Yes

# Recommended Wilderness Allocation

#### ♦ No (additional) recommended wilderness areas

#### What we heard

Many expressed concern that additional recommended wilderness areas were not warranted. Some felt the current designated Wilderness areas are already the best possible wilderness areas for designation. Others stated that by percentage, we have a very high amount of designated Wilderness areas compared to other forests/regions/states. Many were concerned with the loss of recreational opportunities (including motorized [including over the snow] and mechanized uses) that may come with additional recommended wilderness areas. Similarly, citizens and elected officials are concerned with the negative economic impact that may be realized by counties by recommending wilderness areas. Also mentioned was the perspective that the Idaho Roadless Rule (IRR) has successfully maintained many of the wilderness characteristics of these areas (as demonstrated in the Wilderness Evaluation).

#### How we respond in the alternatives

An alternative (Alt. X) will be analyzed that responds to these concerns and incorporates comments from both Idaho and Clearwater counties.

This alternative will analyze zero recommended wilderness areas.

### ♦ Additional recommended wilderness areas

#### What we heard

Many commented that we have some of the largest remaining roadless expanses in the U.S. and that those should be protected by recommending them for a wilderness area designation. Many felt that the IRR does not adequately protect the Idaho Roadless Areas (IRAs) due to the allowance of motorized travel within them. A few wanted all or most IRAs to be recommended as wilderness areas. Many more wanted a large number of roadless areas, but not all, to be recommended. Many wanted specific areas to be recommended for a variety of ecological and social reasons. National and state wilderness and conservations groups developed a proposal for recommending areas that have the fewest conflicts and the greatest benefit to preserving wilderness character.

#### How we respond in the alternatives

An alternative (Alt. W) will be analyzed that considers recommending ten IRAs, totaling 855,126 acres, for wilderness area designation. This will include Bighorn-Weitas, Hoodoo, North Lochsa Slope, Mallard-Larkins, East Meadow Creek, Moose Mountain, Rapid River, North Fork Spruce-White Sands, Sneakfoot Meadows and Meadow Creek-Upper North Fork. Additionally, uses that may be considered non-conforming should these areas be designated as Wilderness by Congress in the future would not be permitted.

An alternative that recommended all 34 IRAs as wilderness areas has been considered but will not be analyzed in detail.

#### ♦ The Great Burn

#### What we heard

Most conversation regarding recommended wilderness areas was about the Great Burn (also known as the Hoodoo IRA). Many, including the Great Burn Study Group and regional, state, and national wilderness and conservation advocacy groups, want the Great Burn to continue to be recommended for Wilderness designation until it becomes designated by Congress. Opportunity for solitude and habitat for wildlife, including connecting a corridor from the Greater Yellowstone area north into Idaho, Montana, and Canada, were some of the many reasons stated for recommendation. Many see this area as one of largest roadless areas with some of the best wilderness character in the lower 48.

Others did not want to see motorized or mechanized recreational opportunity curtailed in the area. While some snowmobilers enjoy riding on groomed trails, this area provides some of the best opportunity in the lower 48 for a primitive, backcountry experience that provides solitude, challenge and appreciation of scenery according to many snowmobilers. We were also asked to consider the Lolo portion of the roadless area (closed to snowmobiling) in how we develop alternatives. Little if any, winter, non-motorized use has been observed by snowmobilers in this area, who do not view this as a user conflict in the winter season. Some felt that if the area has been recommended but not designated by congress in the last 30+ years that it is not foreseeable that congress would act this time and should be managed for multiple uses rather than as recommended wilderness.

Mountain bikers also expressed desired to have access to this area as a primitive cycling opportunity. Mountain bikers discussed that while their preference would be to be allowed in the whole of the recommended wilderness area, if that were not practicable, cherry stems allowing them to get into the heart of the area and giving the ability to access the wilderness characteristics of the area would be a fair compromise.

The Mineral County commissioners would like to see the area open for snowmobiling because of the economic benefit to their nearby communities. In particular, curtailing over-the-snow use by snowmobiles was the biggest issue noted with recommending wilderness area designation. Possible compromise solutions were discussed, including creating a geographic area that allows for snowmobile use on a portion of the area (roughly 10 percent). Other possible solutions include to not recommend the area for Wilderness designation or to recommend it but allow over-the-snow use to continue. The impact of snowmobiling on wildlife, particularly on mountain goats, was questioned.

#### How we respond in the alternatives

Alternative X will not recommend the Great Burn as a designated Wilderness area and will be analyzed. Two alternatives (Alt. W and Alt. Z) will be analyzed that will recommend the Great Burn as a designated Wilderness area. A fourth alternative (Alt. Y) will recommend the Great Burn as a designated Wilderness area with a modified boundary and will create a geographic area where over-the-snow use is permitted on the northern and southern portions (known as the Goose Creek and William Lake areas).

# Wild and Scenic River Suitability

#### No suitable Wild and Scenic Rivers

#### What we heard

Many, including elected officials and the county commissions of both Idaho and Clearwater counties, felt that we already have the best of the best designated as Wild and Scenic Rivers. They said that no other rivers rose to the level of the Lochsa, Selway, Middle Fork Clearwater, and Salmon rivers. Some suggested that current protections on the rivers, such as PACFISH, the Clean Water Act, and the Endangered Species Act, do enough to protect the outstandingly remarkable values (ORVs) of these rivers. Others expressed that the Act was originally meant to protect against dam construction and that dam construction is not likely to be considered on any river on the National Forest. There was widespread agreement that people did not want to see a dam constructed on the North Fork or South Fork Clearwater (or other major rivers) and would support limitations on dam construction. A considerable discussion regarding unintended consequences of suitability, eligibility, or designation brought into question how rivers would be managed and if a suitable finding would curtail forest management, interstate commerce, recreation, and other activities within and outside the corridor. These limitations and their relevance to the economies of local communities was discussed by several, including the county commissions of Idaho and Clearwater counties. These organizations and others discussed how they felt the Wild and Scenic Rivers Act has been used by some to reduce management and reduce economic opportunities beyond the intention of the original Act. This perception has led to a marked decrease in support from local elected officials, as stated by the Clearwater and Idaho Boards of County Commissioners.

The State of Idaho Rivers Program, managed by the Idaho Department of Water Resources, was brought up by the public as providing a possible alternative to a suitability finding. Dam construction is inconsistent with rivers managed under the Idaho Rivers Program. The State of Idaho Department of Water Resources prefers that National Forests manage rivers under this program and not pursue federal designation.

#### How we respond in the alternatives

An alternative (Alt. X) will be analyzed that does not find any of the 89 eligible rivers suitable for Wild and Scenic designation. This alternative will use the direction in the State of Idaho Rivers Program for management of these rivers. This alternative is consistent with the State of Idaho, Clearwater County, and Idaho County plans.

# South Fork and North Fork Clearwater rivers should be/should not be suitable What we heard

A point of debate was the suitability of the South Fork Clearwater River and the North Fork Clearwater River. At first glance, these rivers are the largest rivers in the basin that are not currently designated, have the most historical documentation regarding potential dam construction sites, have the most ORVs, and are viewed by many as the most likely to be designated Wild and Scenic by Congress.

Alternatively, these rivers are the lifeblood of many residents in Clearwater and Idaho counties and beyond. Several towns rely upon these rivers for their economic vitality. Possible impacts from reducing vegetation management may include impacting economies, reducing the ability to manage forest health, and curtailing efforts to prevent large wildfires from impacting towns. Interstate commerce, maintenance of the power line corridor on the South Fork Clearwater River, opportunities for recreation, and impact to mining rights and mining claims were also noted as concerns.

#### How we respond in the alternatives

For Alternative Y, the South Fork Clearwater and North Fork Clearwater rivers will be analyzed as suitable. For the three other alternatives (Alt. W, Alt. X, and Alt. Z), these two rivers will be analyzed as not suitable. These three alternatives are consistent with the recommendations from both Idaho and Clearwater counties. Following a determination of suitability, these rivers would no longer be managed as eligible. Each alternative has a different theme and responds to a different set of values the public has. Additionally, each alternative has resource protections that vary. As a result, Wild and Scenic River Suitability varies by alternative to address differences in resource protections and to respond to differing social values.

#### Protect the right rivers for the right reasons

#### What we heard

During the eligibility process, several rivers rose to the top for consideration. These rivers have multiple ORVs, have the potential for dam construction (as documented in historic documents showing validated dam construction sites), and are located outside designated Wilderness areas. These rivers are generally considered the "best", i.e. being the most outstandingly remarkable as defined by the Act, within their respective subbasins. These rivers also tend to have the most support for a finding of suitable. Additionally, rivers within designated Wilderness were not included as Wilderness is generally the more restrictive of the two designations and would fully protect ORVs (except for dam construction, which while technically possible in Wilderness with Presidential Approval, is not seen as likely or foreseeable).

#### How we respond in the alternatives

Two alternatives (Alt. W and Alt. Y), would find a number of these rivers suitable (12 rivers and 14 rivers, respectively). These rivers include Johns Creek, Meadow Creek (Selway tributary), Kelly Creek, North Fork Kelly Creek, Middle Fork Kelly Creek, South Fork Kelly Creek, Cayuse Creek, Weitas Creek, Little North Fork River, Fish Creek, Hungery Creek and the portion of the Salmon River managed by the Forest Service that is not already designated. Alternative Y also includes the North Fork and South Fork of the Clearwater River, as discussed previously.

#### Use a "systems approach"

#### What we heard

Rivers should not be thought of only as individual rivers or river segments, but rather as river systems. Connectivity of high quality aquatic systems is important for fisheries,

wildlife and recreation. The Nez Perce-Clearwater National Forests has some of the best aquatic habitat and rivers in the country. An alternative should be developed that finds many (or most) of the rivers suitable, with a preference on the rivers with the greatest contribution to their sub-basin.

#### How we respond in the alternatives

An alternative (Alt. Z) will be analyzed that considers the system of rivers and finds 36 rivers suitable. These rivers are the major tributaries to the largest rivers on the National Forest and generally have multiple ORVs, including fish, wildlife, cultural, and recreational values.

The rivers included in this alternative include: Bostonian Creek, Boundary Creek, Caledonia Creek, Graves Creek, Weitas Creek, Kelly Creek, North Fork Kelly Creek, Middle Fork Kelly Creek, Little North Fork, Upper Lochsa River, Crooked Fork, Colt Killed, Big Sand, Storm Creek, North Fork Storm Creek, South Fork Storm Creek, Fish Creek, Hungery Creek, Meadow Creek, East Fork Meadow Creek, Buck Lake Creek, Running Creek, Bear Creek, Cub Creek, Brushy Fork Creek, Moose Creek, North Fork Moose, West Moose Creek, East Fork Moose Creek, Rhoda Creek, Wounded Doe Creek, Johns Creek, Silver Creek; Salmon River, Bargamin Creek, Sabe Creek.

An alternative finding all 89 eligible rivers suitable was considered but will not be analyzed in detail.

# Access and Recreation Opportunity Spectrum

#### ♦ Additional motorized access is important

#### What we heard

Motorized recreation is very important to people in this area. Local economies are very connected to motorized recreation and its participants. Additional opportunities for motorized recreation should be available in the future. Of particular importance is the opportunity for additional loop systems, including motorized loops of varying length and skill level. In each recreation opportunity (roaded modified, semi-primitive and primitive), there is a desired to be able to access these opportunities with a motorized vehicle in both the winter and summer.

#### How we respond in the alternatives

An alternative (Alt. W) will be analyzed that provides for all backcountry restoration IRAs (other than those recommended for wilderness area designation) to be suitable for motorized use. An alternative (Alt. X) will increase motorized access and specifically allow for additional loop opportunities for motorized users on the National Forest. Alternative Y will also allow for an increase in motorized loop opportunities. These three alternatives all respond to Idaho and Clearwater county plans, to varying degrees. Over-the-snow opportunities will remain the same in all alternatives with the exception of recommended wilderness areas (which vary by alternative) and the Great Burn in Alternative Y.

#### Areas on the National Forest should be free of motorized use

#### What we heard

Some areas of the National Forest should remain free of motorized use. In addition to additional recommended wilderness areas, other areas should not allow motorized use in both the summer and winter seasons. Keeping areas free of motorized use is important for solitude of visitors, to reduce visitor conflict, and to provide habitat for wildlife.

#### How we respond in the alternatives

An alternative (Alt. Z) will be analyzed that maintains the current system of designated motorized routes outside of the recommended wilderness areas in this alternative. Alternative W, though it allows for additional motorized recreation in areas not recommended as wilderness areas, would have the most recommended wilderness and thus have the largest increase in non-motorized areas of all the alternatives. An alternative that would prohibit motorized use in all IRAs was considered, but will not be analyzed in detail.

# Mountain bikes (and other mechanized uses) need to be considered

#### What we heard

Mountain bikes are a much more prevalent use on the National Forest than previously thought. Mountain bikers desire the ability to ride in all recreation opportunity settings, including roaded natural, semi-primitive, and primitive. Mountain bikers desire loop opportunities of varying length and difficulty levels. Mountain biking opportunities should interconnect across the forest; for example, connecting the North Fork to the Lochsa River south to the Selway River (outside the Selway-Bitterroot Wilderness boundary). Areas such as Pot Mountain and Bighorn-Weitas include trails maintained for motorized trail bikes that are suitable for mountain bike use. Shared use is acceptable at lower use levels, but if motorized trail users are displaced from other areas, concentrations of use could cause future conflicts. Bikes should not be thought of and grouped with motorized users. Alternatives should consider allowing mountain bikes into recommended wilderness areas. Conflicts between mountain bikers and other user groups are due to a few isolated individuals and the bike community is actively working to reduce conflict and spread awareness.

#### How we respond in the alternatives

Common to all alternatives will be the acknowledgement of mountain biking as a popular activity on the National Forest, and there will be a desired condition to see an increase in the number of loop opportunities of various lengths in all recreational settings.

Alternative Z will allow bicycles in recommended wilderness areas.

# Forest Vegetation Desired Conditions

## ♦ Old-growth

#### What we heard

Some discussed old growth as an important ecological feature that should be emphasized and felt fragmentation of old growth should not occur. They also felt a specific amount of old-growth across the forest should be required by the Forest Plan. Some felt that old-growth should be inviolate, rejecting the concept that it can be "fixed."

Others felt that the vegetation desired conditions adequately provide for old-growth across the National Forest and that no specific amount should be required above and beyond moving toward the Natural Range of Variability. Some suggested managing beyond the culmination of Mean Annual Increment, rather than focusing on old-growth, would be a better approach to providing similar ecological benefits as those provided by old-growth. Being able to manage within old growth is important to maintain, perpetuate, and increase amounts of old growth, especially in ponderosa pine ecosystems.

#### How we respond in the alternatives

The no action alternative sets a specific desired amount of old-growth across the Forest and identifies all types of old growth as equally important ecological features. All action alternatives will consider managing old growth as part of a larger forested ecosystem within the context of vegetation desired conditions. All action alternatives also limit fragmentation of old-growth by only allowing road building through old growth in locations optimal to reducing conflicts with other resources (such as reducing aquatic concerns).

# ♦ Snag and live tree retention

#### What we heard

Some people expressed that the proposed numbers for snag retention may be too low for some wildlife species. Live tree retention may be inadequate for future snag retention for wildlife habitat and soils productivity.

Others said that there is no shortage of snags on the National Forest. They suggested examining snag retention at a larger scale than the project level. It was also mentioned that the Forest Service should speak about the safety hazard of snags in a real way and acknowledge that snags along roads and inside harvest units are often incompatible with goals of reducing risk to human life and safety and compliance with OSHA regulations.

#### How we respond in the alternatives

The no action alternative will continue to measure snags at the unit level. Three action alternatives will consider snags as part of a larger scale, specifically at the subwatershed scale (approximately 30,000 to 40,000 acres). These action alternatives will require minimum snag retention, with a preference for snags in the largest size class and will require retained live trees. These snags and retained live trees will be aggregated and measured at sub-watershed scale. One alternative (Alt. Z) would require several

additional snags per acre to be retained in the 10-inch and larger size class, and would measure snag retention across the harvest units in aggregate within a project area. Alternative Z will also require additional live trees to be retained within harvest units, with a preference on the largest size class.

#### Timber Harvest and Restoration

 Timber harvest should be increased; a rate of attainment to meet desired conditions should be stated

#### What we heard

Timber harvest in the front country should be the primary tool to meet vegetation desired conditions, and timber harvest should also be used as a tool in Idaho Roadless Areas where it is practical to do so and where it is permitted by the Idaho Roadless Rule. The pace and scale of restoration needs to be increased. A steady, increased and predictable supply of timber is necessary to support local economies and sustain rural communities. Timber harvest and conservation of other resources are not mutually exclusive. Many indicated that the rate of progress towards meeting desired conditions needs to be discussed. The idea of a restoration acres objective in lieu of the traditional timber volume objective was discussed. A few wanted to a see an alternative that departs from the sustained yield limit (also known as a departure alternative) in order to address the scale of need for restoration.

#### How we respond in alternatives:

Alternatives will vary based on the rate of attainment of desired conditions. Alternative X will be based on moving into desired conditions within 20 years and will be a departure alternative. Alternative W will consider volume and restoration acres required to be consistent with forest vegetation desired conditions in 30 years. Alternatives Y and Z will do the same in 50 and 100 years, respectively. Alternatives W, X, and Y will explicitly state that wildfire or prescribed fire will not be relied upon to move towards desired conditions in Management Area 3. All alternatives allow timber harvest consistent with the Idaho Roadless Rule. Meeting forest vegetation desired conditions within the specified time period is possible in each alternative, and is within the foreseeable fiscal capacity of the unit when all tools and approaches are utilized, including Good Neighbor Authority, Farm Bill authorities, etc. While the PTSQ is large in some alternatives, these harvest levels are based on acres of disturbance needed to meet forest vegetation desired conditions and do take into account other resource considerations such as wildlife habitat, fisheries concerns and water quality.

Natural processes should be used to move towards desired conditions
 What we heard

Some people said natural processes should be relied upon to meet desired conditions for forest vegetation. Timber harvest should be limited, fire (both prescribed and wildfire) should be used to meet desired conditions, and the rate of attainment of desired conditions should be longer and de-emphasized. Some suggested that timber

harvest does not adequately replicate natural processes and that timber harvest and fisheries and wildlife protections may be mutually exclusive.

#### How we respond in the alternatives

Alternative Z considers a lesser rate of timber harvest with fewer outputs and fewer acres treated than the other action alternatives, and is lower than the no action alternative. Alternative Z also suggests that natural ignitions of fire will be routinely used to meet desired conditions in the roaded front country, not just in the backcountry and wilderness

An alternative that had a lower timber volume output than alternative Z, or a longer period until attainment of desired conditions, was considered but will not be analyzed in detail.

# Big game Habitat and Elk Security

Big game habitat and quality forage is a major driver

#### What we heard

Habitat for big game is important to many people. Most suggested elk are a critically important species on the forest. A few suggested that moose, bighorn sheep and deer should also be emphasized. Some suggested that increases in available summer nutrition are the biggest contributions to elk population growth that could be made by the Forest Plan. Others suggested both summer and winter habitats are important. A few felt that big game populations are too high, citing concern that browse is hit too hard. Some felt big game habitat should be managed with natural processes, and that habitats should not be managed to meet other agency objectives. Some advocated for active management but specified that some practices such as spring burning or some timber management practices do not produce nutritional forage, and that timber management does not always produce forage in places that benefit big game.

#### How we respond in the alternatives

Alternatives W, X, and Y increase the pace and scale of attainment of desired conditions for forest vegetation. All alternatives include an increase in early successional forest within the vegetation desired conditions, which will result in an increase in forage production. Habitat improvement projects that increase forage (including increases in summer nutrition) for big game, and in particular elk, will be provided primarily through a combination of timber harvest, prescribed fire, natural fire, and fuels treatments, all of which will help to move towards vegetation desired conditions forest-wide. Specific practices to produce big game forage are more appropriately addressed in the management approaches section of the document rather than alternatives.

#### ♦ Elk security plan components are necessary

#### What we heard

Several comments, including from the Idaho Department of Fish and Game and from the Nez Perce Tribe, expressed that elk habitat effectiveness and security is an important part of elk habitat management because road access affects elk distribution, habitat use, bull

elk survival, hunter access to big game, hunter success, hunter numbers and hunter density. These factors can affect bull-to-cow ratios, which then impact elk fertility and reproduction. They suggest that plan components need to be included that address both elk security and habitat effectiveness.

Some members of the public expressed support for Idaho Department of Fish and Game's recommendations without giving a recommendation, deferring to their expertise. Other members of the public felt that some measures to restrict road building to benefit elk were appropriate, but offered no specific recommendations. Others expressed that they had motorized concerns for elk and all wide ranging carnivores and suggested road density restriction standards should be included for the benefit of both elk and carnivores. They also advocated that elk security areas should include winter range considerations. Some did not see a need to provide security guidelines, but suggested if the forest did include security measures, they should not focus on providing hiding cover given the rapid rate at which vegetation grows, and suggested that security areas be smaller than currently applied, and only apply in Management Area 3.

Some expressed that elk security does not drive elk populations and that it is the state's role to manage populations, not the Forest Service. They felt that elk populations were driven by vegetation conditions and predation and felt that road density restriction measures for elk complicate predator management. Some did not want elk security measures because of a desire for greater access and easier elk hunting opportunities. Others were against elk security measures because of the adverse effects they have on economic considerations such as timber production, and because motorized access and motorized recreation could be limited.

#### How we respond in the alternatives

The no action alternative includes current elk security measures as written in the 1987 Forest Plans. Alternative Z will include elk habitat effectiveness and security measures that are more flexible than those in the 1987 plans and addresses some public concerns. Other alternatives will not require meeting specific thresholds as a surrogate for providing elk security. Alternatives W, X and Y retain desired conditions to benefit Elk in several ways, including providing for habitat to meet life history needs and to provide for security but do not state a number in which it is assumed these requirements are met. In these alternatives Implementation to meet these desired conditions is left to the local managers and interdisciplinary teams to integrate needs for elk security into a project. All alternatives will be consistent with the recent travel plans in Management Area 3. These travel plan decisions took elk security into account and take specific measures to improve elk security in some areas.

# Aquatic Ecosystems

Additional protection for aquatic ecosystems are needed
 What we heard

Many people said that the aquatics plan components are not sufficient to ensure recovery of listed species. Some felt they were not adequate to maintain existing stream conditions. Some mentioned that the current protections under PACFISH and INFISH are more protective than what was proposed. Specifically, the riparian management zones (RMZs) and riparian management objectives (RMOs) were of concern.

#### How we respond in the alternatives

A group chartered by the Regional Forester, including representatives from the Forest Service Regional Office, the Nez-Perce-Clearwater National Forests, the National Marine Fisheries Service, the Fish and Wildlife Service, the Idaho Department of Fish and Wildlife and the Nez Perce Tribe has been tasked with developing plan components for the revised forest plan. These plan components will assist in meeting recovery goals of listed fish and will be consistent across all action alternatives. It is presumed that the resulting aquatics plan components will be as protective as PACFISH if not more so in an effort to recovery listed species. The chartered group has been asked to work towards reaching consensus by early fall. Additional details will be shared as they become available.

#### Other Comments

# ♦ Standard and guidelines

#### What we heard

Some said that additional standards and guidelines should be included as plan components.

#### How we respond in the alternatives

Standards and guidelines under the 2012 Planning Rule are required and also meant to be restrictions on activities. Both are mandatory constraints. Standards and guidelines are included in every alternative. Some alternatives may have more restrictive or more detailed guidelines. However, to be consistent with the 2012 Planning Rule, the desired end state, known as desired conditions, are the focus of the plan. Standards and guidelines are reserved for situations where consistency with law or regulation is uncertain without them, or where obtainment of desired conditions would not be possible without additional restrictions.

#### National Historic Landmark

#### What we heard

The National Historic Landmark (including the Lolo Trail, Lewis and Clark Historic Trail and Nimiipuu Trail) is extremely important on a local, regional, and national scale. While most agree that preservation of the trail within the landmark is important, perspectives vary regarding management of the trail and how to best preserve it. Many would like to see timber harvest prohibited in the landmark corridor, and some would like to see this limitation expanded to the viewshed. A few question how the integrity of the corridor will be maintained without some timber harvest to move towards a more historical forested vegetation community.

Some would like to see the trail become more accessible for period appropriate recreation such as hiking and horseback riding. Maintenance of the actual trail, and allowing for use of the trail by hikers and horseback riders, is important. Others are happy with the way the current infrastructure (roads) accesses and interprets the trail and are concerned that maintenance of the trail itself may impact its integrity.

#### How we respond in the alternatives

Prohibition of timber harvest within the designated corridor is consistent with the Idaho Roadless Rule and will be consistent across all alternatives. Limiting timber harvest within the viewsheds is an alternative considered that will not be analyzed in detail, as are alternatives allowing for additional road construction or timber harvest within the corridor. Alternatives will include desired conditions for the trail to be navigable by typical 19th century modes of travel.

#### ♦ Mining rights

#### What we heard

Mining and mineral extraction is extremely important to many people in the area. Mining is seen as an economic driver and a way of life for many. Others consider it a popular recreational activity. People are concerned that the Forest Plan would either be inconsistent with the General Mining Act of 1872 or further curtail mineral exploration and extraction. Wild and Scenic River designation or suitability findings were of concern for mining near or within water courses, including suction dredging. Access to mining claims in recommended wilderness areas was also discussed. Many said that access to mineral deposits, specifically rare earth metals, was in the interest of national security and submitted research and reports to support that finding. Several other topics outside the scope of the Forest Plan were brought forward and will be addressed outside of Forest Plan Revision.

#### How we respond in the alternatives

All action alternatives will clarify that this Forest Plan in no way supersedes, modifies, or replaces the General Mining Act of 1872. Desired conditions stating the perpetuation of mining as a cultural, economic, and recreational activity will be included in all alternatives.

An alternative (Alt. X) will not find any rivers suitable for inclusion in the Wild and Scenic Rivers System, as discussed previously. One alternative (Alt. X) will not recommend any IRAs for Wilderness designation that include unpatented mining claims. A second alternative (Alt. Y) would only have one IRA (Hoodoo) recommended for Wilderness designation that has unpatented claims within the boundary. Strategic mineral deposits and areas with potential mineral deposits were taken into consideration during alternative development as well. Alternatives with less recommended wilderness and fewer wild and scenic rivers have less potential conflict between mineral extraction and land preservation.

#### ♦ Monitoring plan

#### What we heard

Monitoring is an important part of the Forest Plan. It is difficult to ascertain how restrictive plan components should be without knowing the monitoring strategy. Monitoring is needed to provide for adaptive management. Some said that with a detailed monitoring plan, we may be able to do more. Others said that without a detailed monitoring plan, a higher reliance on standards and guidelines may be needed.

#### How we respond in the alternatives

A monitoring plan will be included in the Draft EIS. This monitoring plan will tier to the Regional Broad Scale Monitoring Strategy (BSMS). The BSMS will answer bigger scale monitoring questions (such as vegetative conditions, habitats or recreation trends across forests or the Region). The BSMS will utilize existing data available for large areas, such as FIA plots and remote sensing data. The Forest monitoring plan will answer questions at a finer scale (Forest, basin and sub-basin scales). This monitoring plan may include additional data collection to answer local questions, but will again utilize available information and remote sensing data when possible.