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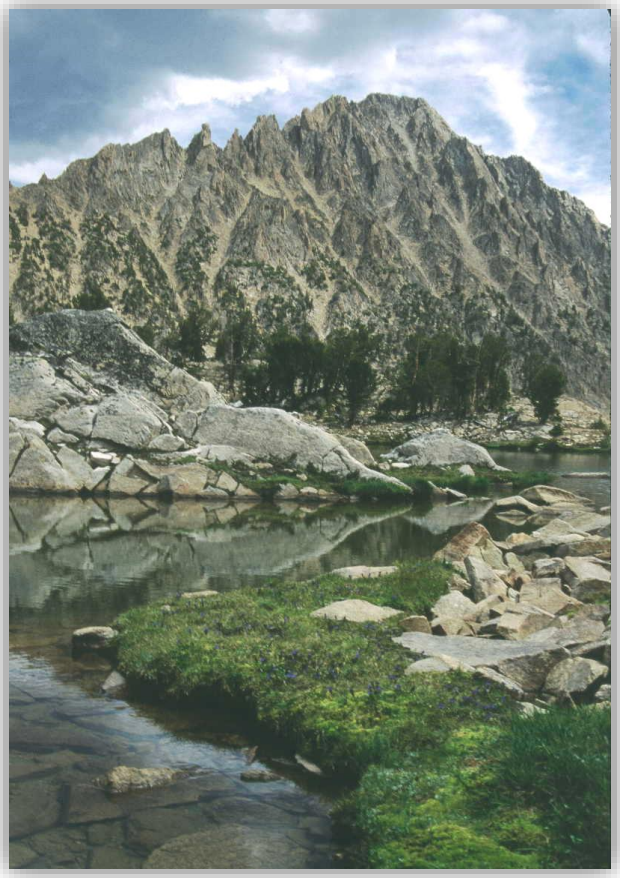
Forest Service Bureau of Land Management

Hemingway-Boulders
and
Cecil D. Andrus-White Clouds
Wilderness Management Plan Environmental Assessment

Sawtooth National Forest, Sawtooth National Recreation Area
BLM, Idaho Falls District, Challis Field Office

August 21, 2018



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Description: Castle Peak in the Cecil D. Andrus-White Clouds Wilderness

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Acronyms, Initialisms, and Abbreviations

AFWA	Association of Fish & Wildlife Agencies
ATV	all-terrain vehicle
BA	biological assessment
BE	biological evaluation
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
EA	environmental assessment
EIS	environmental impact statement
EO	Executive Order
ESA	Endangered Species Act
FEIS	final environmental impact statement
Forest Plan	Land and Resource Management Plan
Forest	Sawtooth National Forest
FSH	Forest Service Handbook
FSM	Forest Service Manual
GHG	greenhouse gas
GPS	Global Positioning System
IDFG	Idaho Department of Fish and Game
IDEQ	Idaho Department of Environmental Quality
IDT	Interdisciplinary Team
IMPROVE	Interagency Monitoring of Protected Visual Environments
LAU	Lynx Analysis Unit
MA	Management Area
MBTA	Migratory Bird Treaty Act
MIS	Management Indicator Species
MIST	minimum impact suppression tactics
MOU	Memorandum of Understanding
MPC	Management Prescription Category
MRA	Minimum Requirements Analysis
NEPA	National Environmental Policy Act
NFS	National Forest System

NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NRA	National Recreation Area
ORV	Outstandingly Remarkable Values
RMP	Resource Management Plan
RNA	Research Natural Area
ROS	Recreation Opportunity Spectrum
SAR	Search and Rescue
SGCN	Species of Greatest Conservation Need
SHPO	State Historic Preservation Office
TMDL	Total Maximum Daily Load
USC	United States Code
USDA	United States Department of Agriculture
USDI	United States Department of Interior
USFWS	United States Fish and Wildlife Service
UTV	utility vehicle
VQO	Visual Quality Objectives
WAQV	Wilderness Air Quality Values
WMP	Wilderness Management Plan
WSA	Wilderness Study Area (BLM designation)

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1. Introduction

Section 101 of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act designated 158,767 acres within Blaine and Custer counties, Idaho, as the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. The designating legislation requires the United States Department of Agriculture Forest Service and United States Department of Interior Bureau of Land Management (BLM) to manage the wilderness areas in accordance with the Wilderness Act.

The introduction to the *Hemingway-Boulders and Cecil D. Andrus-White Clouds Wilderness Management Plan* (WMP; USDA Forest Service and BLM 2017) for these wilderness areas provides a detailed Purpose and Need for the Proposed Action and additional background information for the wilderness areas. The wilderness management direction described in the WMP forms the Proposed Action analyzed in this environmental assessment (EA).

1.1. Scope of the Wilderness Management Plan

Planning for wilderness involves translating the Wilderness Act, enabling legislation, agency policy, and regulations into a WMP. A WMP provides direction for a specific area and guides the preservation, management, and use of the wilderness to ensure that wilderness is unimpaired for future use and enjoyment as wilderness.

The WMP provides the primary management direction for the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness. Given their proximity, comparable natural resources, similar broad management issues, and administrative jurisdiction, incorporating the administration of these two areas into a single plan is appropriate. This WMP was jointly prepared by the Forest Service and BLM. Each agency has jurisdictional authority for separate portions of the Cecil D. Andrus-White Clouds Wilderness, whereas the Hemingway-Boulders is entirely managed by the Forest Service.

The WMP contains comprehensive descriptions of the wilderness areas and proposed management direction relating to specific resources. It defines an acceptable range of desired resource and social conditions by identifying zones. An EA will subsequently follow the WMP to describe and analyze potential impacts relating to proposed management direction and alternatives.

The WMP does not repeat guidance already contained in existing laws and policies (e.g., the Wilderness Act, Endangered Species Act (ESA), or Clean Water Act and existing federal regulations). It does not describe the methods, the “how to,” or the schedule of implementing the direction, nor does it describe the day-to-day or operational actions to be carried out when managing the wildernesses. The rate of implementation and potential management activities depend on the annual budgeting process. A Minimum Requirement Analysis (MRA) and National Environmental Policy Act (NEPA) analysis will be conducted to support management decisions made at the site-specific level. All actions are supplemental to and will be consistent with wilderness laws, regulations, and policies, which must be further consulted in the event of unforeseen issues.

1.2. Purpose of and Need of the Wilderness Management Plan

The purpose of a WMP is to provide management direction for preserving wilderness character by identifying the conditions and opportunities that will be managed for within wilderness, creating specific standards and guidelines for managing wilderness resources and activities. The Wilderness Act (Section 4) requires that “… each agency administering any area designated as wilderness shall be

responsible for preserving the wilderness character of the area." Although wilderness character is a complex idea and is not explicitly defined in the Wilderness Act, the qualities of wilderness character are described as follows (Landres et al. 2015):

- **Untrammeled**—Area is unhindered and free from intentional actions of modern human control or manipulation.
- **Natural**—Area appears to have been primarily affected by the forces of nature and are substantially free from the effects of modern civilization.
- **Undeveloped**—Area is essentially without permanent improvements or the sights and sounds of modern human occupation.
- **Outstanding opportunities for solitude or a primitive and unconfined type of recreation**—Area provides outstanding opportunities for recreation in an environment that is relatively free from the encumbrances of modern society and for the experience of the benefits and inspiration derived from self-reliance, self-discovery, physical and mental challenge, and freedom from societal obligations.
- **Other Features of Value**—Area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. Though not required of any wilderness, where they are present, they are part of that area's wilderness character and must be protected as rigorously as any of the other four required qualities.

The need for the Proposed Action stems from the signing of Public Law 114-46, which changed the management direction of these areas. For the Forest Service portions of the two wilderness areas, the change was from recommended wilderness to designated wilderness. The BLM portion of the Cecil D. Andrus-White Clouds Wilderness was previously managed as the Boulder Creek Wilderness Study Area (WSA).

Additionally, as directed by the Sawtooth National Recreation Area and Jerry Peak Wilderness Act, "Not later than 3 years after the date of enactment of this Act, the Secretary of Agriculture and the Secretary of Interior shall collaboratively develop WMPs for the wilderness areas."

1.3. Decision to be Made

Based on the analysis herein, the Forest Service and BLM will decide whether to manage the wilderness area solely according to legislative and regulatory requirements, or whether to implement a WMP that provides additional direction to manage approved uses while ensuring adequate protection and preservation of resources and values, as well as providing mitigation for potential impacts to those resources and values.

The WMP provides the Forest Supervisor of the Sawtooth National Forest and the BLM District Manager with a basis on which to make an informed decision. Following review of the WMP and this EA, the Forest Supervisor and BLM District Manager, as appropriate, will decide to do one or more of the following:

1. Approve an amendment to the Sawtooth National Forest Land and Resource Management Plan (Forest Plan) as proposed in this document. This decision would result in a non-significant Forest Plan amendment.
2. Approve management proposals as presented in one of the alternatives or a combination of alternatives analyzed in this document.

3. Determine that the proposed actions or certain proposed actions in this document may cause significant impacts (as defined in 40 CFR 1508.27) that would require developing and approving an environmental impact statement (EIS) prior to implementation.

1.4. Public Involvement and Tribal Consultation

The scoping period for the draft WMP occurred November 21, 2016 through January 31, 2017 (71 days). In December, three open house meetings were offered to the public in Challis, Stanley, and Ketchum, Idaho. Several news outlets included the scoping period information, including News 8 and the *Idaho Mountain News*. The agencies also posted information on their respective webpages and social media. During this scoping period, 70 comment letters were received.

The Forest Service meet with the Shoshone-Bannock Tribes in January and November 2017 and at regular technical meetings for updates.

The Forest Service attended Wings and Roots meetings with the Shoshone-Paiute Tribes throughout development of the WMP. The WMP was introduced to tribes in November 2016 at the Wings and Root Meeting, and the tribes were provided an overview of the proposed WMP in February 2017, with a follow-up in April 2017.

Coordination with Custer County Commissioners and the Custer County Natural Resource Advisory Committee occurred throughout the planning process. Representatives from each agency attended the monthly Custer County Commissioners meeting, with discussions regarding the planning process initiating shortly after the designation of the wildernesses. The Forest Service and BLM provided the Commissioners with a briefing on the WMP on November 18, 2016, prior to the scoping period.

The Forest Service also provided Blaine County Commissioners with updates regarding the planning process. During the scoping period, Forest Service and BLM staff provided a briefing to the Commissioners on January 3, 2017.

The Forest Service and BLM met with Idaho Department of Fish and Game during the scoping period on December 7, 2016.

The 30-day opportunity to comment on the proposed WMP (per 36 CFR 218, Subparts A and B) occurred October 27 through November 27, 2017, and included public meetings in Mackay, Challis, Stanley, and Ketchum. A legal notice was issued in the *Times News*, the paper or record on October 27, 2017. During this time, 33 parties submitted comments.

Additional coordination between the agencies and the Custer County Commissioners occurred on August 8, 2017, to discuss the wilderness plan process, and October 17, 2017, prior to the start of the comment period.

The agencies provided a monthly newsletter, beginning in October 2016, via email to stakeholders to provide regular planning updates.

1.5. Issues

Input was solicited from Forest Service and BLM staff and through public scoping opportunities where issues were identified and discussed. The issues have been categorized into two types: 1) key issues and 2) issues not analyzed in detail.

Issues serve to highlight effects or unintended consequences that may occur from the Proposed Action and alternatives. Issues are analyzed in detail in the EA. The Forest Service and BLM identified one primary topic raised during scoping: WMP strategies may affect wilderness character. As described under the Purpose and Need above, wilderness character encompasses several qualities—untrammeled, natural, undeveloped, opportunities for solitude, or a primitive and unconfined type of recreation—and may include other features of value.

1.5.1. Issues Not Analyzed in Detail

The following issues were not analyzed in detail because they are outside the scope of this project; are already decided by law, regulation, policy, Forest Plan/RMP, or other higher-level decision; are irrelevant to the decision to be made; or are conjectural and not supported by factual evidence or scientific evidence.

- Wilderness Designation—The wilderness areas were designated by Congress through the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act. Designation of wilderness is not under review within the WMP or this EA. The boundaries of the wilderness were set through passage of the Act and are not open to review through this planning process.
- Prescribed Fire—Consideration of prescribed fire is guided by BLM and Forest Service wilderness policy. No current proposals exist to implement prescribed fire in the wildernesses.
- Predator Control—BLM and Forest Service wilderness policy allow for predator control programs on a case-by-case basis for certain reasons. Control methods are designed to focus on individual animals.
- Fish Stocking—In cooperation with the State of Idaho, fish stocking is guided by BLM and Forest Service wilderness policy and guidance of the Association of Fish and Wildlife Agencies (AFWA) agreement.
- Dark Sky Preservation—This region is located within a high-quality dark sky region. The WMP recognizes night skies as a value within the wilderness. No proposed actions within the WMP would affect night sky quality.
- Hunting and Fishing—Hunting and fishing regulations are written and enforced by the State of Idaho.
- Trapping—Trapping is an acceptable use of wilderness, subject to federal and State laws and regulations.
- Livestock Grazing and Allotment Management Plans—Grazing of livestock, where established prior to August 7, 2015, shall be administered in accordance with Section 4(d)(4) of the Wilderness Act; Section 102(e) of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act; the grazing guidelines in House Report 96-617; and Appendix A of House Report 101-405.
    - Further, Section 102(e)(2) of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act allows for voluntary donation (partial or whole) of grazing permits and leases leading to termination of the permit or lease. This process is outside the scope of the WMP.

- Fort Bridger Treaty of July 3, 1868—The Shoshone-Bannock Tribes have ancestral treaty rights to uses of the Sawtooth National Forest, including the wilderness areas. The relationship of the United States government with American Indian tribes is based on legal agreements between sovereign nations. The Fort Bridger Treaty of July 3, 1868, reserved the hunting, fishing, and gathering rights of tribal members on "all unoccupied lands of the United States so long as game is present thereon." This right applies to all federal lands administered by the BLM and Forest Service.
- Travel Management—Transportation and travel management of routes and designations outside of designated wilderness are outside the scope of this plan and will be addressed through separate travel management planning.
- Recommended Wilderness—Those portions of recommended wilderness that were not designated as wilderness in the Sawtooth National Recreation Area and Jerry Peak Wilderness Addition Act will continue to be managed as recommended wilderness as identified in the Forest Plan until they are reevaluated through the Forest Planning process.
- Socioeconomics of Wilderness Designation—Various parties have expressed concerns regarding the economic impact of the wilderness designation; however, these two wildernesses were designated in 2015 by Congress with P.L. 114-46, and analysis of the wilderness designation is not within the scope of this EA. Analysis of the impacts of the actions presented in the alternatives are provided below.
- Dogs on Leash—Scoping comments suggested requiring dogs on leash within the wildernesses to minimize disturbance to wildlife, specifically big game. However, Idaho Statute (Section 36 1101) protects big game from harassment by dogs.

2. Alternatives

This section presents three alternatives in comparative form, defining the differences between each alternative and providing a clear basis for the choice between options by the decision-maker. The project alternatives described here 1) meet the Purpose and Need of the project; 2) address issues raised; and 3) meet (or modify, in the case of the Forest Plan amendment) the direction established in the Forest Plan and the Challis Resource Management Plan (RMP). See Table 2 for a comparison of the alternatives.

This section includes the standards and guidelines from the WMP that are not already established by law (e.g., the Wilderness Act) or policy. Some of the direction is from Agency-specific policy but is included here if it would be new direction for the other Agency, which is not explicitly stated in that Agency's policy direction.

2.1. Alternatives Considered but Eliminated from Detailed Analysis

One alternative, the No Action Alternative, was considered. An alternative that does not protect wilderness character as required by the Wilderness Act and the enabling legislation may not be fully considered. In other words, a "no management alternative" is not viable.

This alternative was eliminated from detailed analysis because, a true No Action Alternative would not comply with law or policy because the Forest Service and BLM are required to manage designated wilderness according to standards that were not in effect prior to the designation. Further, enabling legislation requires the agencies develop "wilderness management plans for the wilderness areas" (P.L. 114-46).

2.2. Management Direction Common to all Alternatives

The following management actions are expressly authorized in the Sawtooth Forest Plan and are deemed necessary for the proper management of the designated wilderness areas. As such, this management direction is incorporated into all alternatives.

2.2.1. Sawtooth National Recreation Area General Management

- Manage lands to ensure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the associated recreational values in accordance with Public Law 92-400.
- Management, utilization, and disposal of natural resources on federally owned lands (such as timber, grazing, and mineral resources) shall be allowed only insofar as their utilization does not substantially impair achievement of the purposes for which the recreation area was established. (As a management approach, "Substantial Impairment" is defined as that level of disturbance of the values of the Sawtooth National Recreation Area (NRA) that is incompatible with the standards and guidelines of the Forest Plan. The proposed activities shall be evaluated as to: 1) the period of impact; 2) the area affected; and 3) the importance of the impact on the Sawtooth NRA values. Use process guidance in Appendix I of the Forest Plan to assist in determining compliance with this standard.)

2.2.2. Eligible Wild and Scenic Rivers

- Manage the eligible Wild and Scenic River corridors to their assigned classification standards and preserve their outstandingly remarkable values (ORVs) and free-flowing status until the rivers undergo a suitability study and the study finds them suitable for designation by Congress or releases them from further consideration as Wild and Scenic Rivers.
- The full range of fire suppression strategies may be used to manage wildfires. Emphasize strategies and tactics that minimize the impacts of suppression activities on the river classifications, ORVs, and wilderness character.
- Wildland fire (prescribed fire and/or wildfire) may be used as management tools in any river corridor as long as ORVs and wilderness character are maintained within the corridor.

2.2.3. Recreation Resources

- Prohibit constructing new trails unless determined to be the minimum necessary to protect wilderness character.

2.2.4. Rangeland Resources

- For FS-administered allotments, livestock fences must provide for big-game passage.
- For FS-administered allotments, forage utilization for riparian areas will not exceed 30% use of most palatable forage species or must retain a minimum 6-inch stubble height of hydric greenline species.

2.2.5. Forest Service–specific Direction

The following direction would apply to the Forest Service-managed portions of the two wildernesses under all three alternatives based on the Forest Plan or Forest Service policy. This direction would be new

for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness, and is proposed for Alternatives A and B.

Wilderness

- Manage vehicle access points to prevent unauthorized vehicle use by posting appropriate boundary signage and blocking or rehabilitating unauthorized routes.

Recreation Resources

- Manage winter recreation to minimize conflict with high-elevation wildlife species, including mountain goats and wolverine.

Rangeland Resources

- Water use for irrigation to maintain livestock grazing operations will be in accordance with existing water rights issued by the State of Idaho with priority dates predating the wilderness designation.

2.3. Management Direction Common to Alternatives A and B

Much of the Proposed Action is common to Alternatives A and B. Key distinctions between Alternatives A and B include the direction regarding pack goat management to minimize risk of contact with bighorn sheep and recreation management (e.g. group sizes, campfires, stock use, and permit system).

2.3.1. Wilderness

- Use locally sourced native seed or plants where reseeding or replanting is determined necessary.
- Manage vehicle access points to prevent unauthorized vehicle use by posting appropriate boundary signage and blocking or rehabilitating unauthorized routes.
- Assess impacts and determine if management actions are needed to maintain wilderness character (see “Wilderness Monitoring” section) if campsites and travel encounters increase by 10% or more over two reporting periods.
- Assess impacts and determine if management actions are needed to maintain wilderness character if recreation site condition class increases by 5% or more over two reporting periods (see “Wilderness Monitoring” section).
- Assess impacts and determine if management actions are needed to maintain wilderness character if total miles of user-developed routes (i.e., unauthorized trails) increase by 3% or more over two reporting periods (see “Wilderness Monitoring” section).
- Ensure management activities are consistent with wilderness zone descriptions.
- Use natural openings for helicopter landing areas when needed for fire or emergency operations to avoid impacts to wilderness character and minimize intrusions.

2.3.2. Wildlife Resources

- Continue to work cooperatively with IDFG to reduce the risk of disease transmission or other stressors between bighorn sheep and domestic animals.

2.3.3. Recreation Resources

- Prohibit shortcutting trail switchbacks on foot or with recreational stock.
- Prohibit tethering recreational stock within 200 feet of lakes, streams, and springs, with the exception of agency provided tie-up sites where topography does not allow for tethering more than the 200 feet from lakes, streams, and springs.
- Limit tying of recreational stock to live trees to a maximum of one hour.
- Prohibit grazing by recreational stock within 200 feet of lakes, streams, or springs.
- Require human waste to be buried and covered, at least 200 feet from water, campsites, and trails; or packed out.
- Manage winter recreation to minimize conflict with high elevation wildlife species including mountain goats and wolverine.
- Remove the following trails from the Forest Service Trail inventory.
  - Cecil D. Andrus-White Clouds Wilderness:
    - NFS trail 674—Above O'Caulkins Lake to Warm Springs Creek (NFS trail 671 junction; 3.9 miles)
    - NFS trail 684—Wickiup Creek (6.7 miles)
  - Hemingway-Boulders Wilderness:
    - NFS trail 113—The upper 5.2 miles of the South Fork of the East Fork of the Salmon River
- Prevent human/wildlife encounters by emphasizing proper camping techniques and food storage and containment.
- Discourage off-trail route marking and remove user-created route markers (e.g., stacked rocks, flagging).
- Encourage use of no trace fires (i.e. use of fire pans or fire blankets).

Commercial Services

- Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment. (Current direction may be found FSH 2709.14, Chapter 53.1c (3), FSM 2320.13g, and BLM H-2930-1, BLM 6340 B.2.(i).)
- Authorize assigned campsites for outfitters and guides in Zones 3 and 4 only and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas.
- Ensure operating plans for priority use and temporary use outfitting and guiding permits direct outfitters to model appropriate wilderness practices and incorporate awareness of wilderness values in their interaction with clients and others.

2.3.4. Scenic Environment

- Build facilities and structures, when needed for resource protection, out of natural materials that blend into the natural environment.
- Do not consider visual conditions changed by natural events and processes as detrimental to scenic qualities.

2.3.5. Heritage, Archaeological and Cultural Resources

- Develop a management strategy that includes, but is not limited to, education/interpretation or signage outside of wilderness, or natural barriers to prevent additional damage if monitoring reveals that damage is occurring to cultural, archaeological, or historic resources. The wilderness specialist and archaeologist, in consultation with sovereign tribal governments and the State Historic Preservation Officer, will work together to develop the management strategy.

2.3.6. Rangeland Resources

- Water use for irrigation to maintain livestock grazing operations will be in accordance with existing water rights issued by the State of Idaho with priority dates predating the wilderness designation.

2.3.7. Fire Management

- Determine actions for each wildland fire that are consistent with protecting wilderness character while providing for firefighter and public safety and considering the impacts to private property and developed facilities in surrounding areas.
- Avoid locating temporary wildfire management support facilities (e.g., spike camps, landing areas) in wilderness. When considered necessary, all efforts will be made to use areas with pre-existing impacts outside of Zone 1. Responder safety will be the first consideration when making this determination.
- Minimize suppression impacts to wilderness character by using Minimum Impact Suppression Tactics (MIST) and assigning Resource Advisor(s) with knowledge, training, and/or experience in wilderness management. Return disturbance caused by suppression actions to as natural a condition as possible.

2.3.8. Lands and Special Uses

- Consider the direction for each zone when evaluating a proposal; zone direction may influence where and how approval is granted.

2.3.9. Wilderness Education and Interpretation

- Interpretive information may be included on trailhead information signs or communicated elsewhere outside of wilderness but will not be located on signs in wilderness.
- Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations.
- Communicate rules and regulations primarily outside of wilderness.

2.3.10. Search and Rescue

- Use the flow chart in Appendix 1 for approval of motorized and mechanized emergency response.
- Use natural terrain features for helicopter landing areas. Care should be taken that vehicles used in search and rescue (SAR) operations do not transport invasive species or cause unacceptable resource or social impacts. Immediately address any resource damage resulting from SAR operations.

2.3.11. Management Zones

- Management zones are established as indicated in Table 1:

Table 1. Management Zones

Cecil D. Andrus-White Clouds	Hemingway-Boulders
96% Zone 1	99% Zone 1
3% Zone 2	<1% Zone 2
<1% Zone 3	<1% Zone 3
<1% Zone 4	<1% Zone 4

2.4. Management Direction Common to Alternatives A and C

2.4.1. Recreation Resources

- Maintain the voluntary registration system.

2.5. Alternative A—Proposed Action

The Proposed Action is described in detail in the WMP. Alternative A proposes management actions to address issues identified above and protect wilderness character. This section details direction specific to Alternative A.

2.5.1. Wildlife Resources

- Require the following measures from the North American Packgoat Association to minimize contact between bighorn sheep and domestic goats used for packing:
  - All pack goats will be on leads or have leads attached to their collar or halter at all times.
  - All pack goats will be tethered at night within 30 feet of humans.
  - If bighorn sheep are observed within 100 yards of a potential camping area, pack goat users will take all reasonable measures to move their campsite to a different area. Hazing techniques may be used to deter bighorn sheep from moving closer to campsites if necessary.
  - Pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group.
  - When bighorn sheep are using trails for travel pack goat users will move off the trail 100 yards. If that distance is not attainable, the pack goat user will travel back along the trail away from the bighorn sheep and exit the trail when the 100-yard distance can be reached. Pack goat users will stay off the trail until bighorn sheep have passed. If visibility is limited to less than 100 yards up

trail, a pack goat user will go to the trail and observe for bighorn sheep before continuing with pack goats.

- When accessing browsing areas and water, a pack goat user will check for the presence of bighorn sheep before allowing access for pack goats. Whenever possible, water access will be limited to areas of unlikely bighorn sheep use.
- In event that direct contact of a pack goat and a bighorn sheep is observed, the location and as much of a description as is possible of the sheep and incident will be written, photographed if possible and reported to the appropriate agency as soon as reasonably possible.
- If any pack goat becomes lost, missing or separated from the owner and herd every effort will be exhausted to locate and recover the lost pack goat. If the owner is unable to locate and recover the lost pack goat, contact the Sawtooth NRA by telephone immediately. A full disclosure of all available information will be provided including: the last known location (GPS coordinates, legal description, geographic location, name or number of trail or trailhead), the circumstances that resulted in it becoming lost, a description of the pack goat, and any equipment that it was carrying.
- Pack goats are prohibited within Pack Goat Exclusion Area. The boundary was modified to provide clarity for pack goat users by following trails, and natural geographic features, such as ridgelines and drainages.

2.5.2. Recreation Resources

- Limit group size to a maximum of 12 people. (See exception for Native American tribes in the Tribal Rights and Interests section.)
- Limit the combined number of recreational stock in one group to 14 head of stock.
- Only allow campfires below 8,800 feet elevation and within 200 yards of Walker Lake, Island Lake, Upper and Lower Chamberlain Lakes (9,477 and 9,197 feet), and Boorn Lakes.
- Prohibit recreational equine stock use within the following drainages: Slickenslide Creek above Quiet Lake; Boulder Chain Lakes Creek above Lodgepole Lake; Gunsight Creek; Bighorn Creek; and Big Boulder Lakes, excluding Walker and Island Lakes.

2.6. Alternative B—Natural-Focus

Alternative B (Natural-Focus Alternative) stresses protecting the natural and untrammeled qualities of wilderness character with measures aimed at protecting wildlife, vegetation, soils and opportunities for solitude by applying restrictions on visitor use, and recreation. This section details the direction specific to Alternative B.

2.6.1. Wildlife Resources

- Pack goats are prohibited.

2.6.2. Recreation

- Limit group size to a maximum of 8 persons in Zone 1, and a maximum of 12 persons in Zones 2, 3, and 4. (See exception for Native American tribes in the Tribal Rights and Interests section.)

- Limit the combined number of pack in saddle stock in one group to a maximum of 10 animals in Zone 1, and a maximum of 14 animals in Zones 2, 3, and 4.
- Only allow campfires in Zones 3 and 4.
- Prohibit recreational equine stock use, within the following drainages: Slickenslide Creek, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes.
- Establish a mandatory permit system (free, self-issue) to educate users of regulations, and determine use levels and patterns.
- Establish a mandatory permit system obtainable from a FS/BLM office for groups of 8 or more people or with recreational stock that will remain overnight.

2.7. Alternative C—Minimal Management

Alternative C (Minimal Management) represents the least restrictive direction for managing the wilderness areas. Requirements or restrictions imposed in this alternative are generally those that are specifically mandated by law (e.g., Wilderness Act, Sawtooth NRA Additions Act, Sawtooth NRA Act, and others); policy; or existing Forest Plan direction. Direction from Management Areas (MA) 03 and 04, East Fork Salmon River/White Cloud and Big Wood River, respectively, would continue to apply to the NFS portions of the two wilderness areas, if in conformance with the Wilderness Act, the Sawtooth NRA Additions Act, and other law and policy. However, this direction would be new on the BLM-managed portion. Conversely, there is direction that would also be new on the NFS portions of the wilderness areas. The following direction is specific to Alternative C.

2.7.1. Recreation Resources

- Trails are maintained at the “time of designation” level.

2.7.2. Wilderness Education and Interpretation

- Educate users of pack goats on measures for reducing the risk of disease transmission with bighorn sheep, as recommended by the North American Packgoat Association.

2.7.3. Management Zones

- Zones are not established. Recreation resources would continue to be managed under the Recreation Opportunity Spectrum (ROS) on the NFS portions only. The ROS class would be changed to primitive on the NFS portions.

2.7.4. Forest Service–specific Direction

The following direction would apply under Alternative C to the NFS portions of the two wildernesses. This direction would be new for the BLM-managed portion.

Recreation Resources

- The following are prohibited:
  - Having greater than 20 persons in a group.

- Being in the area with a combined number of recreational stock in excess of 25 animals.
- Shortcutting trail switchbacks on foot or with recreational stock.
- Building, maintaining, attending, or using campfires within 200 yards of the following lakes: Cirque, Cove, Sapphire, Sheep, Slide, Tin Cup, Gunsight, Four Lakes Basin, Scree, Shallow, Castle, and Chamberlain 9849.
- Tethering recreational stock within 100 feet of springs, lakes, or streams.
- Tying recreational stock to live trees for periods longer than one hour.

Fire Management

- Avoid locating temporary wildfire management support (e.g., spike camps, landing areas) in wilderness.

2.7.5. Bureau of Land Management–specific Direction

The following direction would apply under Alternative C to the BLM-managed portions of the Cecil D. Andrus-White Clouds Wilderness. This direction would be new for the NFS portions of the two wildernesses as Forest Service policy does not explicitly include this direction.

Fire Management

- Suppression impacts to wilderness character should be minimized by using MIST and assigning Resource Advisor(s) with knowledge, training and/or experience in wilderness management. Disturbance caused by suppression actions should be returned to as natural a condition as possible.

Table 2 presents a comparison of the standards and guidelines for each alternative.

Table 2. Comparison of alternatives

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Wilderness			
Standards	Use locally sourced native seed or plants where reseeding or replanting is determined necessary.	Same as A	No direction
Standard	Manage vehicle access points to prevent unauthorized vehicle use by posting appropriate boundary signage and blocking or rehabilitating unauthorized routes.	Same as A	Existing Forest Plan direction; applies regardless of alternative. This direction would be new for BLM.
Standards	Assess impacts and determine if management actions are needed to maintain wilderness character (see “Wilderness Monitoring” section) if campsites and travel encounters increase by 10% or more over two reporting periods.	Same as A	Index of Encounters per FS Technical Guide; 10% change in the index value indicates a change in trend. (Applies across both wilderness areas.)
Standards	Assess impacts and determine if management actions are needed to maintain wilderness character if recreation site condition class increases by 5% or more over two reporting periods (see “Wilderness Monitoring” section).	Same as A	Index of Recreation Sites within Primary Use Areas per FS Technical Guide; 5% change in the index value indicates a change in trend. (Applies across both wilderness areas.)
Standards	Assess impacts and determine if management actions are needed to maintain wilderness character if total miles of user-developed routes (i.e., unauthorized trails) increase by 3% or more over two reporting periods (see “Wilderness Monitoring” section).	Same as A	Miles of Unauthorized Trails per FS Technical Guide; 3% or greater change in number of miles indicates a change in trend. (Applies across both wilderness areas.)
Standard	Ensure management activities are consistent with wilderness zone descriptions.	Same as A	No direction
Guideline	Use natural openings for helicopter landing areas when needed for fire or emergency operations to avoid impacts to wilderness character and minimize intrusions.	Same as A	No direction

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Wildlife Resources			
Standard	Prohibit pack goats within Pack Goat Exclusion Area, as described in Figure 4 of the WMP. The boundary was modified to provide clarity for pack goat users by following trails and natural geographic features, such as ridgelines and drainages.	Pack goats are prohibited.	No direction

Standard	Require the following measures from the North American Packgoat Association to minimize contact between bighorn sheep and domestic goats used for packing: • All pack goats will be on leads or have leads attached to their collar or halter at all times. • All pack goats will be tethered at night within 30 feet of humans. • If bighorn sheep are observed within 100 yards of a potential camping area, pack goat users will take all reasonable measures to move their campsite to a different area. Hazing techniques may be used to deter bighorn sheep from moving closer to campsites if necessary. • Pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group. • When bighorn sheep are using trails for travel pack goat users will move off the trail 100 yards. If that distance is not attainable, the pack goat user will travel back along the trail away from the bighorn sheep and exit the trail when the 100-yard distance can be reached. Pack goat users will stay off the trail until bighorn sheep have passed. If visibility is limited to less than 100 yards up trail, a pack goat user will go to the trail and observe for bighorn sheep before continuing with pack goats. • When accessing browsing areas and water, a pack goat user will check for the presence of bighorn sheep before allowing access for pack goats. Whenever possible, water access will be limited to areas of unlikely bighorn sheep use. • In event that direct contact of a pack goat and a bighorn sheep is observed, the location and as much of a description as is possible of the sheep and incident will be written, photographed if possible and reported to the appropriate agency as soon as reasonably possible.	Pack goat measures are not applicable, as pack goat are prohibited under the following standard.	No direction

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
	• If any pack goat becomes lost, missing or separated from the owner and herd every effort will be exhausted to locate and recover the lost pack goat. If the owner is unable to locate and recover the lost pack goat, contact the Sawtooth NRA by telephone immediately. A full disclosure of all available information will be provided including: the last known location (GPS coordinates, legal description, geographic location, name or number of trail or trailhead), the circumstances that resulted in it becoming lost, a description of the pack goat, and any equipment that it was carrying.		
Standard	Continue to work cooperatively with IDFG to reduce the risk of disease transmission or other stressors between bighorn sheep and domestic animals.	Same as A	No direction
Recreation Resources			
Standard	Limit group size to a maximum of 12 people. (See exception for Native American tribes in the Tribal Rights and Interests section.)	Limit group size to a maximum of 8 persons in Zone 1, and a maximum of 12 persons in Zones 2, 3, and 4. (See exception for Native American tribes in the Tribal Rights and Interests section.)	The following is prohibited: a) Having greater than 20 persons in a group. Existing Forest Plan direction; new direction for BLM.
Standard	Limit the combined number of recreational stock in one group to 14 head of stock.	Limit the combined number of recreational stock in one group to a maximum of 10 animals in Zone 1, and a maximum of 14 animals in Zones 2, 3, and 4.	The following is prohibited: b) Being in the area with a combined number of recreational stock in excess of 25 animals. Existing Forest Plan direction; new direction for BLM.
Standard	Prohibit shortcutting trail switchbacks on foot or with recreational stock.	Same as A	The following is prohibited: c) Shortcutting trail switchbacks on foot or with recreational stock. Existing Forest Plan direction; new direction for BLM.

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Standard	Only allow campfires below 8,800 feet elevation and within 200 yards of Walker Lake, Island Lake, Upper and Lower Chamberlain Lakes (9,477 and 9,197 feet), and Boorn Lakes	Campfires are only allowed in Zones 3 and 4.	The following is prohibited: d) Building, maintaining, attending, or using campfires within 200 yards of the following lakes: Cirque, Cove, Sapphire, Sheep, Slide, Tin Cup, Gunsight, Four Lakes Basin, Scree, Shallow, Castle, and Chamberlain 9849. Existing Forest Plan direction; not applicable on BLM portion.
Standard	Prohibit tethering recreational stock within 200 feet of lakes, streams, and springs, with the exception of agency provided tie-up sites where topography does not allow for tethering more than the 200 feet from lakes, streams, and springs.	Same as A	The following is prohibited: e) Tethering recreational stock within 100 feet of springs, lakes, or streams. Existing Forest Plan direction; new direction for BLM.
Standard	Limit tying recreational stock to live trees to a maximum of one hour.	Same as A	The following is prohibited: f) Tying recreational stock to live trees for periods longer than one hour. Existing Forest Plan direction; new direction for BLM.
Standard	Prohibit grazing by recreational stock within 200 feet of lakes, streams, or springs.	Same as A	No direction
Standard	Require human waste to be buried and covered, at least 200 feet from water, campsites, and trails; or packed out.	Same as A	No direction
Standard	Prohibit recreational equine stock use within the following drainages: Slickenslide Creek above Quiet Lake; Boulder Chain Lakes Creek above Lodgepole Lake; Gunsight Creek; Bighorn Creek; and Big Boulder Lakes, excluding Walker and Island Lakes.	Recreational equine stock use is prohibited within the following drainages: Slickenslide Creek, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes.	No direction
Standard	Manage winter recreation to minimize conflict with high elevation wildlife species including mountain goats and wolverine.	Same as A	Existing Forest Plan direction; new direction for BLM.

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Standard	Remove the following trails from the Forest Service Trail inventory. • Cecil D. Andrus-White Clouds Wilderness: Trail #674—Above O'Caulkins Lake to Warm Springs Creek (#671 junction; 3.9 miles); Trail #684—Wickiup Creek (6.7 miles); and • Hemingway-Boulders Wilderness: Trail #113—the upper 5.2 miles of the South Fork of the East Fork of the Salmon River.	Same as A	Trails are maintained at the "time of designation" level.
Standard	No direction	Establish a mandatory permit system for all users (free, self-issue) to educate users of regulations, and determine use levels and patterns.	No direction
Standard	No direction	Establish a mandatory permit system obtainable from a FS/BLM office for groups of eight or more people or with recreational stock that will remain overnight.	No direction
Guideline	Prevent human/wildlife encounters by emphasizing proper camping techniques and food storage and containment.	Same as A	No direction
Guideline	Discourage off-trail route marking and remove user-created route markers (e.g., stacked rocks, flagging).	Same as A	No direction
Guideline	Encourage use of no trace fires (i.e. use of fire pans or fire blankets).	Same as A	No direction
Guideline	Maintain the voluntary registration system.	No direction	Same as A
Guideline	Encourage use of temporary stock containment systems and require tree-saver devices to minimize tree damage.	Same as A	No direction

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Recreation—Commercial Services			
Standard	Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment. (Current direction may be found FSH 2709.14, Chapter 53.1c (3), FSM 2320.13g, and BLM H-2930-1, BLM 6340 B.2.(i).)	Same as A	Existing Forest Service policy; new direction for BLM.
Standard	Authorize assigned campsites for outfitters and guides in Zones 3 and 4 only and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas.	Same as A	No direction
Standard	Ensure operating plans for priority use and temporary use outfitting and guiding permits direct outfitters to model appropriate wilderness practices and incorporate awareness of wilderness values in their interaction with clients and others.	Same as A	No direction
Scenic Environment			
Guideline	Build facilities and structures, when needed for resource protection, out of natural materials that blend into the natural environment.	Same as A	No direction
Guideline	Do not consider visual conditions changed by natural events and processes as detrimental to scenic qualities.	Same as A	No direction
Heritage, Archaeological and Cultural Resources			
Guideline	Develop a management strategy that includes, but is not limited to, education/interpretation or signage outside of wilderness, or natural barriers to prevent additional damage if monitoring reveals that damage is occurring to cultural, archaeological, or historic resources. The wilderness specialist and archaeologist, in consultation with sovereign tribal governments and the State Historic Preservation Officer, will work together to develop the management strategy.	Same as A	No direction; additional NEPA/MRA would be required for site-specific actions.

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Rangeland Resources			
Standard	Water use for irrigation to maintain livestock grazing operations will be in accordance with existing water rights issued by the State of Idaho, with priority dates predating the wilderness designation.	Same as A	Existing Forest Service policy; new direction for BLM.
Fire Management			
Guideline	Determine actions for each wildland fire that are consistent with protecting wilderness character while providing for firefighter and public safety and considering impacts to private property and developed facilities in surrounding areas.	Same as A	No direction.
Guideline	Avoid locating temporary wildfire management support facilities (e.g., spike camps, landing areas) in wilderness. When considered necessary, all efforts will be made to use areas with pre-existing impacts, outside of Zone 1. Responder safety will be the first consideration when making this determination.	Same as A	Avoid locating temporary wildfire management support (e.g., spike camps, landing areas) in wilderness. Existing Forest Service policy; new direction for BLM.
Guideline	Minimize suppression impacts to wilderness character by using MIST and assigning Resource Advisor(s) with knowledge, training, and/or experience in wilderness management. Return disturbance caused by suppression actions to as natural a condition as possible.	Same as A	Existing BLM policy; new direction for Forest Service.

Direction	Alt A—Proposed Action	Alt B—Natural-Focus	Alt C—Minimum Management
Lands and Special Uses			
Standard	Consider the direction for each zone when evaluating a proposal; zone direction may influence where and how approval is granted.	Same as A	No direction
Wilderness Education and Interpretation			
Standard	Interpretive information may be included on trailhead information signs or communicated elsewhere outside of wilderness but will not be located on signs in wilderness.	Same as A	No direction
Guideline	Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations.	Same as A	No direction
Guideline	Communicate rules and regulations primarily outside of wilderness.	Same as A	No direction
Guideline	No direction.	Same as A	Educate users of pack goats on measures for reducing the risk of disease transmission with bighorn sheep, as recommended by the North American Packgoat Association.

Direction	Alt A—Proposed Action		Alt B—Natural-Focus	Alt C—Minimum Management
Search and Rescue				
Standard	Use the flow chart in Appendix 1 for approval of motorized and mechanized emergency response.		Same as A	No direction
Guidelines	Use natural terrain features for helicopter landing areas. Care should be taken that vehicles used in SAR operations do not transport invasive species or cause unacceptable resource or social impacts. Immediately address any resource damage resulting from SAR operations.		Same as A	No direction
Management Zones				
	Management zones are established:		Same as A	Zones are not established. Recreation resources would continue to be managed under the ROS. The ROS class would be changed to primitive on the Forest Service portions.
	Cecil D. Andrus-White Clouds: 96% Zone 1 3% Zone 2 <1% Zone 3 <1% Zone 4	Hemingway-Boulders: 99% Zone 1 <1% Zone 2 <1% Zone 3 <1% Zone 4		

2.8. Compliance with Laws, Regulations, Executive Orders, and State Statutes

Management actions contained in the WMP comply with requirements of the Wilderness Act, and the *Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act*, as well as other applicable laws, regulations, and executive orders.

2.8.1. Endangered Species Act

The ESA (16 USC 35 §§1531 et seq. 1988) provides for the protection and conservation of threatened and endangered plants and animal species. A project-specific ESA list was generated from the U.S. Fish and Wildlife Service (USFWS 2017) Information for Planning and Conservation web site (http://ecos.fws.gov/ipac) and is available in the project record. The current list identifies 1 threatened species (Canada lynx [*Lynx canadensis*]), 1 proposed species (wolverine [*Gulo gulo*]) and 1 candidate species (whitebark pine [*Pinus albicaulis*]) (USDI FWS 2017). All alternatives were assessed to determine their effects on threatened and endangered plant and animal species. (See section 3.4, "Wildlife," and section 3.5, "Botanical Resources" of this EA.)

The following fish species currently listed as threatened on the Sawtooth NRA: spring/summer Chinook salmon, steelhead trout, and bull trout (Forest MIS species). In addition, Snake River sockeye salmon in the Salmon River are listed as endangered and the westslope cutthroat trout and Wood River sculpin are listed as a Region 4 Sensitive species. These species, with the exception of sockeye Salmon, occur or have critical habitat delineated within the wilderness areas. A BA and BE are currently being prepared. Preliminary determinations to ESA listed species, Sensitive species, and their critical habitat in or adjacent to the wilderness planning area is no effect.

No threatened or endangered plant species were identified on the project-specific ESA list; however, there is one candidate plant species, whitebark pine, on the list. The botany technical report and BE prepared for this project indicated that implementation of the Proposed Action would benefit whitebark pine.

2.8.2. Tribal Consultation

Tribal governments have a unique legal and political relationship with the United States government as reflected in the United States Constitution, treaties (including the Fort Bridger Treaty of 1868), statutes, court decisions, executive orders, and memoranda. The relationship imparts a duty on all federal agencies to consult, coordinate, and communicate with American Indian Tribes on a government-to-government basis. Because Indian Tribes can be affected by the policies and actions of the Forest Service and BLM in managing the lands and resources under its jurisdiction, the agencies have a duty to consult with them on matters affecting their interests. Because of this government-to-government relationship, efforts were made to involve local tribal governments and to solicit their input regarding the proposed action.

2.8.3. National Historic Preservation Act

The NHPA requires federal agencies to consider the effects of their activities and programs on historic properties. Federal activities and programs are defined as "undertakings" by the

36 CFR 800 regulations implementing NHPA Section 106. Historic properties are significant cultural resources included in, or eligible for inclusion in, the NRHP.

None of the action alternatives would be expected to have any direct or indirect effects on historically significant sites. Any of the action alternatives would be determined to have "No Adverse Effect" to historic resources. Concurrence from the Idaho State Historic Preservation Office (SHPO) will be obtained before a decision on this project is made. The cultural resource technical report is available in the project record.

2.8.4. Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) decrees that all migratory birds and their parts (including eggs, nests, and feathers) are fully protected. Under the MBTA, taking, killing, or possessing migratory birds is unlawful. "Take" is defined in the MBTA to include any attempt at hunting, pursuing, wounding, killing, possessing, or transporting, by any means or in any manner, any migratory bird, nest, egg, or part thereof. A migratory bird is any species or family of birds that live, reproduce, or migrate within or across international borders at some point during their annual life cycle. The original intent of the MBTA was to put an end to the commercial trade in birds and their feathers, an activity that had wreaked havoc on the populations of many native bird species. On January 17, 2001, President William Clinton signed Executive Order (EO) 13186, directing executive departments and agencies to take certain actions to further implement the MBTA (FR Vol. 66, No. 11, January 17, 2001). The Bald and Golden Eagle Protection Act affords additional protection to all bald and golden eagles.

In direct response to the EO, the Forest Service and USFWS entered into a memorandum of understanding (MOU) to promote the conservation of migratory birds (USDA Forest Service and USDI FWS 2008). One of the steps outlined for the Forest Service in the MOU is applicable to this analysis: "Within the NEPA process, evaluate the effects of Agency actions on migratory birds, focusing first on species of management concern along with their priority habitats and key risk factors." The Forest Service additionally agreed, to the extent practicable, to evaluate and balance benefits against adverse effects, to pursue opportunities to restore or enhance migratory bird habitat, and to consider approaches for minimizing take that are incidental to otherwise lawful activities.

All action alternatives proposed would comply with the MBTA" In addition, this project complies with EO 13186 because the analysis meets agency obligations as defined in the MOU (USDA Forest Service and USDI FWS 2008) designed to complement EO 13186. Migratory bird species are analyzed and discussed in the wildlife technical report, with supporting information provided in the project record. If new requirements or direction result from subsequent interagency MOUs pursuant to EO 13186, this project would be reevaluated to ensure consistency.

2.8.5. Environmental Justice and Socioeconomics

In accordance with EO 12898, all action alternatives were assessed to determine whether they would have disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority or low-income human populations. The percent of the Custer County population categorized as minority (American Indian (0.6%), Black (0.0%), Asian (0.0%), Native Hawaiian/Pacific Island (0.4%), multi-racial (1.1%), other

(0.4%)) was 2.5% in 2015, and was less than the 8.3% for the State of Idaho (U.S. Department of Commerce, 2016). The percent American Indian was lower for Custer County (0.6%) than for the State (1.3%) in 2015. The percent of families living in poverty was higher for Custer County (14.5%) compared to the State (10.9%).

The percent of the Blaine County population categorized as minority (American Indian (0%), Black (0.1%), Asian (1.2%), Native Hawaiian/Pacific Island (0.3%), multi-racial (1.2%), other (7.4%)) was 10.2% in 2015, and was higher than the 8.3% for the State of Idaho (U.S. Department of Commerce, 2016). The percent American Indian was lower for Blaine County (0.0%) than for the State (1.3%) in 2015. The percent of families living in poverty was lower for Blaine County (8.2%) compared to the State (10.9%).

Given the nature of the proposed action and demographics of the area, disproportionate human health and environmental effects on minority or low-income communities are not projected.

2.8.6. Climate Change

Though climate-driven increases of fire and insect infestations are likely to reduce carbon storage in western forests (Ryan et al. 2012), the management proposed in Alternatives A, B, and C would not contribute to greenhouse gas (GHG) emissions. The intact habitats found in the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wilderness areas help to sequester carbon.

Direct and indirect effects of the action alternatives to the resources covered in this document are not expected to produce measurable changes to climate. With respect to all the natural processes and resources, there are no effects that when combined with past, present and reasonably foreseeable actions that would cumulatively affect the analysis area. Recommendations to address climate change include the development of a toolbox of management options, reduction of existing stresses, creation of resistance and promotion of resilience that enable ecosystems to adapt to climate change (Joyce et al. 2008). Alternatives A, B and C contain components of all those recommendations. Examples of these components from the proposed Plans that address maintaining healthy ecosystems more resilient to climate change are identified below:

- 2107 Promote the natural quality of wilderness character by allowing natural process to dominate.
- 2130 Ensure that the air quality over the Wilderness is protected from pollution in excess of established standards.
- 2133 Identify Wilderness Air Quality Values (WAQV) in an Air Quality Management Plan.
- 2137 Protect soil, water, riparian and aquatic resources to preserve wilderness character.
- 2134 Evaluate potential effects of proposed pollution sources from activities outside the wilderness for violation of Class II Prevention of Significant Deterioration standards within the wilderness.
- 2138 Maintain soil quality and long-term soil productivity by maintaining soil porosity, organic matter, hydrologic function (e.g., infiltration, water table, drainage, percolation), and buffering capacity (e.g., soil filtering and chemical regulation properties).

- 21151 Ensure research conducted in wilderness improves wilderness stewardship, provides benefits to society and science, and contributes to the preservation of wilderness character.
- 2142 Allow natural ecological processes to define the composition and abundance and distribution of native biotic communities.
- 2148 Allow natural processes and the forces of natural selection to be the primary factors determining the diversity of wildlife and fish species and their habitats.

Qualitatively, the nature of wilderness management and additional protections provided by the proposed Plans for each alternative would help maintain resiliency and protect soil, water, air, botanical, wildlife, fisheries and riparian resources from additional human caused effects. Future management under all alternatives would allow these resources to respond to natural processes.

2.8.7. Consistency with Existing FS and BLM Land Use Plans

As discussed in the WMP, the Proposed Action conforms to the goals, objectives, and decisions of the Challis RMP. The Sawtooth Forest Plan will be amended through approval of the WMP.

3. Affected Environment & Environmental Consequences

This chapter summarizes and compares the environmental effects of the alternatives relative to the factors used in determining significance. Addressing environmental effects this way focuses this assessment on pertinent effects necessary to make a decision, allowing for a concise document as directed by the Council of Environmental Quality's regulations for implementing NEPA (40 CFR Parts 1500–1508).

The Hemingway-Boulders and Cecil D. Andrus-White Clouds Wilderness Management Plan Project has limited context and intensity (40 CFR 1508.27), individually or cumulatively, to the biological, physical, social, or economic components of the human environment. This project would have no adverse effect upon consumers, civil rights, minority groups and women, prime farmland, rangeland and forestland, and wild and scenic river corridors. Tribal notification and subsequent consultation processes completed from November 2016 through April 2017 have not identified any adverse effects to tribal interest and rights associated with the proposed action or alternatives, including to American Indian religious or cultural sites.

The ecology, inventory, and management of ecosystems are complex and developing disciplines. However, central ecological relationships are well established, and a substantial amount of credible information about ecosystems' biological and physical resources and social/economic interests within the project area are known. The alternatives were evaluated using the best available information and science.

Estimates suggest that Forest Service wilderness visitation increased roughly 3.2% per year between 2005 and 2012 (Holmes et al. 2015). Idaho Department of Labor projects that Idaho's population will grow 15.3% from 2015 to 2025, an annual growth rate of 1.4%, nearly three times as high as the national growth rate. 64% of use in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness is from Idaho. Thus, increased visitation in the

Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses can be anticipated over the life of this plan.

3.1. Resources Not Analyzed in Detail

Forest Service and BLM management strategies presented in each of the alternatives have the potential for producing negative and positive effects to various resource conditions. The proposed direction assigns goals, objectives, standards, and guidelines to NFS and BLM-administered lands that provide management emphasis, direction, and tools for future activities. The interdisciplinary team (IDT) analyzed the potential effects, positive and negative, that could occur from management activities based on the goals, objectives, and standards allocated by alternative. Upon completion of their analyses, the IDT found none of the proposed alternatives would measurably affect the following resources: air quality, aquatic resources, cultural resources, fire management, rangeland resources, scenic environment, soil resources, or mineral resources. Therefore, these resources are not analyzed in detail but are summarized below.

Analysis regarding potential additions to the National Wilderness Preservation System, including the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses, were presented and analyzed in the *Inventoried Roadless Areas* section of Chapter 3 of the Final Environmental Impact Statement (FEIS) for the Boise National Forest, Payette National Forest, and Sawtooth National Forest Land and Resource Management Plan Revision (Forest Plan FEIS; USDA Forest Service 2003).

3.1.1. Air Quality

Management under each of the proposed alternatives would not adversely affect air quality as none of the direction would increase air pollutant concentrations. This MA lies within Montana/Idaho Airsheds ID-17 in Custer and Blaine counties, Idaho. The Idaho Department of Environmental Quality (IDEQ) will continue to regulate air quality in the state. The Forest Service will continue to participate in coordinated smoke management as a member of the Montana/Idaho State Airshed Group for wildland fire, minimizing or preventing smoke impacts while using fire to accomplish land management objectives.

3.1.2. Aquatic Resources

Management proposed under the alternatives would not quantifiably impact aquatic resources of the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses. Effects on aquatic resources would primarily be related to trampling on trail corridors, in camp areas, and in meadows, as well as fish stocking, which is directed by American Fish and Wildlife Agencies (AFWA) policy. These effects would continue to be measurable at a localized level, but undetectable at the overall landscape scale of the wilderness areas. Overall, the management actions proposed under these alternatives would maintain, and possibly improve, current aquatic resource conditions within the wilderness areas.

The aquatic resources within these areas have previously been analyzed for management to maintain wilderness characteristics when the area was managed as recommended wilderness, and, as such, any of the proposed alternatives would remain within the effects previously analyzed in the 2003 Forest Plan FEIS (USDA Forest Service 2003). A small portion of the Cecil D. Andrus-White Clouds Wilderness lies on land managed by the BLM, Idaho Falls

District, Challis Field Office. These 459 acres, or 0.5% of the entire wilderness area, were not previously analyzed under the Proposed Forest Plan Amendments, 2011 Wildlife Conservation Strategy, Phase 1: Forested Biological Community Environmental Assessment; however, this section of BLM-administered land is within the uplands of the Little Boulder Creek subwatershed and contains no live water or riparian areas. Therefore, the alternatives analyzed here would not contribute to effects on aquatic resources.

Due to the planning area being previously analyzed to maintain wilderness characteristics, as well as the inconsequential and unmeasurable impacts from the different alternatives to aquatic resources from this action, no further analysis is deemed necessary.

3.1.3. Heritage, Archaeological, and Cultural Resources

Proposed management of the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses under each of the alternatives would not adversely affect cultural resources. The 2003 Forest Plan FEIS analyzed cultural resources across the area encompassed in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas to be managed in a manner to preserve and protect eligible, potentially eligible, and historic properties listed on the National Register of Historic Places (NRHP).

The variability in management proposed under the alternatives would not adversely affect cultural resources because any future proposed federal undertaking within either wilderness boundary would follow 36 CFR Part 800 regulations implementing Section 106 of the NHPA cultural resource protection analysis. Indeed, the importance of cultural resource protection is written into the WMP. Features of historical value “must be protected as rigorously as any of the other four required qualities” (untrammeled, natural, undeveloped, and outstanding opportunities for solitude or a primitive and unconfined type of recreation). If an NRHP-eligible historic property is discovered within the wilderness boundaries, that site may be designated as a feature of historical value. Because no measurable differences in effects to cultural resources would occur under the different alternatives, no further analysis of heritage resources is needed.

Agencies will ensure protection of historical values by enforcing all relevant laws, including the Antiquities Act of 1906 and the Archaeological Resources Protection Act of 1979 (ARPA). Informational signs regarding cultural resource protection laws will be posted as needed in appropriate places outside of the Wilderness boundaries.

3.1.4. Fire Management

The fire regime within the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses can be characterized as having relatively infrequent fires, yet fire extent can be large when wildfires do occur. Fire return intervals across much of each wilderness range from 60 to 300 years for the Hemingway-Boulders Wilderness and 70 to 300 years for the Cecil D. Andrus-White Clouds Wilderness. The current fuels and vegetation conditions reflect effects from fire exclusion, as well as other disturbances. Given the broad range of historical fire intervals and the effects of fire exclusion and other disturbances, moderate-to-high fire severity can be expected when large fires occur.

The Forest Plan FEIS (USDA Forest Service 2003) previously analyzed fire management across the area encompassed in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas to maintain wilderness characteristics, including an analysis of

vegetation conditions, fuels, and fire regimes, and any of the proposed alternatives would remain within the effects previously analyzed. Fire management direction proposed for these areas is reflective of and driven by current agency policy for both the Forest Service and BLM. The fire management–specific goals, objectives, standards, and guidelines for the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses are dictated by national policy contained in Forest Service Manuals (FSMs) 2320 and 5100, BLM Manual 6340, and the Wilderness Act of 1964. Because of this directed management policy, no variability is proposed under any of the alternatives.

A small portion of the Cecil D. Andrus-White Clouds Wilderness lies on land managed by the BLM. These 459 acres, or 0.5% of the entire wilderness area, was not previously analyzed under the 2003 Forest Plan FEIS. However, fire management activities on these acres would be similar to activities on surrounding NFS lands, and these acres would be impacted in the same manner. Due to the area being previously analyzed to maintain wilderness values and the fact that the proposed direction is dictated by existing agency policy for fire management, no further analysis is needed.

3.1.5. Lands Special Uses

No lands-based, non-recreation special use permits are authorized within the wilderness areas. Special use permits may, however, be authorized for existing water diversions and associated facilities, research permits, and commercial filming and photography.

Three existing diversions (Bowery, Deer Creek, and Last Chance) lie near the wilderness boundary. One water diversion (Deer Creek) is known to be located within the wilderness, and another may be (Bowery Creek). The number and type of diversion-related facilities in wilderness that require a permit will depend upon the final boundary survey.

Special use authorizations for scientific research and commercial filming and photography are occasionally authorized in the wilderness areas. The number and type of permits, which are generally short-term, temporary authorizations, vary from year to year. They may be allowed in wilderness so long as the proposed activity is appropriate for realizing the recreational or other wilderness purposes of the wilderness, is consistent with management direction, is compatible with wilderness values, and no reasonable alternative exist to achieve the same outside wilderness.

Management of diversion(s) would continue to be guided by law (e.g., the Wilderness Act) and policy (FSM 2323.43d, BLM 6340 1.6.C.16). No proposals are included within the WMP that would affect the ownership or legality of the diversion(s).

Research activities within wilderness are guided by agency policy (FSM 2324.4 and BLM 6340 1.6.C.14). Nothing in the WMP further affects this special use. Similarly, commercial filming in wilderness is guided by policy (FSH 2709.11 45.51b and BLM Manual 6340 1.6 C. 4, or most current policy), with no additional management direction provided in the WMP.

Management of non-recreation special uses within the wilderness areas will continue to be guided by law and policy; therefore, there is no need for additional analysis in this EA.

3.1.6. Scenic Environment

Proposed management under each of the alternatives would not adversely affect the scenery resource. Scenic standards for wilderness allow for natural ecological changes to the characteristic landscapes of the area. Allowing low visual-impact recreational facilities, defined by the exclusive use of native materials and minimal (to imperceptible) disturbance, are permitted.

3.1.7. Soil

The proposed alternatives would not measurably affect soils because each of the proposed management alternatives limits future soil disturbing activities to preserve wilderness character, and any future action would be subject to NEPA analysis which incorporates best management practices that would preserve soil resources. The Forest Plan FEIS analyzed soil resources across the area encompassed in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas to be managed in a manner to maintain wilderness characteristics, and any of the proposed alternatives would remain within the effects previously analyzed in the Forest Plan FEIS (USDA Forest Service 2012).

Impacts, such as barren and compacted soils in areas of high use from hikers, campers, and recreational stock, to soils from recreation would continue. Campfires cause limited and localized impacts due to soil sterilization and gathering of fire wood, and fine materials for fire starting would remove organic matter from the soil surface that provides nutrients to the soil during decomposition. However, due to the scale of effects to soils being insignificantly small and unmeasurable, a measurable difference between the alternatives would not result.

A small portion of the Cecil D. Andrus-White Clouds Wilderness lies on land managed by the BLM. These 459 acres, or 0.5% of the entire wilderness area, were not previously analyzed under the Forest Plan FEIS. However, the soil resource on this area is similar to the surrounding NFS lands and would be affected similarly under each of the alternatives.

Due to the soil resources for the area being previously analyzed to maintain wilderness characteristics, the insignificantly small and unmeasurable impacts from any new management to further maintain wilderness characteristics, and no measurable differences in impacts from the alternatives, no further analysis of soil resources is necessary.

3.1.8. Rangeland Resources

The project area contains part or all of three cattle allotments, two sheep allotments, and the Ketchum-Stanley sheep driveway.

The rangeland resources within the wilderness areas have previously been analyzed for management to maintain wilderness characteristics and, as such, the proposed alternatives would remain within the effects previously analyzed in the 2003 Forest Plan FEIS (USDA Forest Service 2003).

A small portion of the Cecil D. Andrus-White Clouds Wilderness lies on land managed by the BLM. These 459 acres, or 0.5% of the entire wilderness area, was not previously analyzed under the Forest Plan FEIS. However, the rangeland resource within this area is similar to the surrounding NFS lands and would be affected by management for wilderness character similarly.

The Wilderness Act of 1964 states "…and (2) the grazing of livestock, where established prior to September 3, 1964, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Changes made to term grazing permits regarding livestock number, kind, class, period of use, and/or grazing management would normally be made after the analysis and decision process, unless expressly authorized under an administrative action. Because livestock grazing is not affected simply by the designation of wilderness, rangeland resources would continue to be managed in accordance with the terms and conditions included in the most current term grazing permit, Forest Plan, analysis document(s), allotment management plan, and/or annual operating instructions. The variability in management proposed by the alternatives would not affect livestock grazing within the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses in a measurable way because the grazing of livestock, where established prior to August 7, 2015, shall be administered in accordance with Section 4(d)(4) of the Wilderness Act; Section 102(e) of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act; the grazing guidelines in House Report 96-617; and Appendix A of House Report 101-4053.3.3. Irrigation is analyzed in more detail in section 3.3.3.

Due to the area being previously analyzed to maintain wilderness characteristics, the insignificantly small and unmeasurable effects from any new management to further maintain wilderness character, and no measurable differences in effects from the alternatives, no further analysis of rangeland resources is needed.

3.1.9. Minerals and Geologic Resources

The federal government classifies all minerals as either leasable, locatable, or saleable, depending on the laws governing their disposal. While mining claims for locatable minerals may occur on NFS lands, the mineral estate is managed by the BLM. The Forest Service has established regulation and policy pertaining to mineral resources to foster and encourage sound mineral development while protecting and managing surface resources. Subject to valid existing rights, all federal lands located in the wilderness areas are withdrawn from all forms of mineral entry, location, and patent.

Public Law 92-400 congressionally designated the Sawtooth NRA in 1972 and withdrew from mineral entry those federal lands a part of the Sawtooth NRA now included within the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act (P.L. 114-46). Fifty-five unpatented mining claims determined to have valid existing rights per the 1972 withdrawal date exist within the Cecil D. Andrus-White Clouds Wilderness area. Three unpatented mining claims existed within the Boulder-Hemingway Wilderness at the time of designation but have since been abandoned and closed. Currently, no active mineral exploration or mining occurs within either wilderness.

The largest block of unpatented lode claims occurs within the Baker Lake region of the Cecil D. Andrus-White Clouds Wilderness Area. American Smelting and Refining Company has maintained these claims since their location date of 1968. Unpatented lode claims associated with the former Hoodoo Mine are still considered active by the BLM. The Hoodoo Mine last operated in the early 1980s and produced concentrates of lead and zinc with a byproduct of silver. The boundary of the Cecil D. Andrus-White Clouds Wilderness excludes the lode claims that include surface features associated with the former mine (mine dumps, tailings, and surface facilities) and incorporates 17 of the lode claims associated with the larger claim block. The development potential associated with these lode claims is considered relatively low and, while

valid existing rights were established as of the 1972 withdrawal prior to the acceptance of a Plan of Operation, validity of the discovery of valuable minerals would need to be verified by the Forest Service as to the 2015 priority date set by P.L. 114-46.

No active or pending mining claims were identified for the subject BLM-administered land in the Cecil D. Andrus-White Clouds Wilderness Area.

Abandoned mine land features can become an attractive nuisance on the landscape as they tend to attract public curiosity but may potentially pose a hazard to the public. Three federal lode mining claims belonging to the Falling Star group were abandoned by operation of law shortly after the 2015 designation of the Hemingway-Boulder Wilderness. Inspections by Forest Service minerals administrators have documented the occurrence of a partially collapsed adit and small miners cabin within the area of the abandoned claims. Access to this area is via the East Fork of the Salmon River Road to West Pass Creek. The area lies approximately 4 miles beyond the trail end at West Pass Creek within the Hemingway-Boulder Wilderness.

The Sawtooth National Forest is continuing to address the site condition associated with the abandoned Hoodoo Mine at the end of the Slate Creek Road. Trail access into the Cecil D. Andrus-White Clouds Wilderness area exists immediately within the vicinity of the former mining area. While lode claims associated with the Hoodoo site span the wilderness boundary, continued restoration efforts at the site would not impact wilderness character.

As per the Wilderness Act, “Nothing in this Act shall prevent within National Forest wilderness areas any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if such activity is carried on in a manner compatible with the preservation of the wilderness environment. Furthermore, in accordance with such program as the Secretary of the Interior shall develop and conduct in consultation with the Secretary of Agriculture, such areas shall be surveyed on a planned, recurring basis consistent with the concept of wilderness preservation by the United States Geological Survey and the United States Bureau of Mines to determine the mineral values, if any, that may be present; and the results of such surveys shall be made available to the public and submitted to the President and Congress.” In accordance with policy, the Forest Service must ensure surveys are conducted as much as practicable without the use of motorized equipment or mechanical transport.

Mineral collection and “rock-hounding” type activities that involve only very minor surface area disturbance are acceptable provided they are non-commercial, only occur with non-motorized collection methods, and are compatible with the preservation of the wilderness environment. The Forest Service can evaluate these activities with a geologic exploration permit or an interagency agreement (FSM 2820). Collecting paleontological resources may be considered under new permitting requirements specified at 36 CFR 291 if specific conditions are prescribed for the protection of the wilderness environment. Additional stipulations pertaining to the gathering of information of resources other than minerals are specified at 36 CFR 293.15.

Given there are no pending or active mineral actions in the subject areas and the WMP does not restrict rock-hounding, effects to the mineral resource include the inability to explore for or develop leasable, saleable, or locatable minerals within the Boulder-Hemingway Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. However, these effects are the consequence of legislation and Congressional act, not the result of the wilderness planning process; therefore, no effects to mineral resources would occur from any of the alternatives. While valid existing rights relative to locatable minerals do occur within the Cecil D. Andrus-White Clouds Wilderness,

specific measures to determine validity would need to be undertaken prior to the Forest Service's acceptance of a Plan of Operations.

3.2. Past, Present, and Reasonably Foreseeable Future Actions

NEPA requires analysis and disclosure of potential cumulative effects—the impact on the environment that results from the incremental impact of an action when added to other relevant past, present (ongoing), and reasonably foreseeable actions (those for which there are existing decisions, funding or identified proposals, but that have not yet been implemented), regardless of what agency or person undertakes such actions (40 CFR 1508.7). Cumulative effects analyses are carried out in accordance with 40 CFR 1508.7 and *The Council on Environmental Quality Guidance Memorandum on Consideration of Past Actions in Cumulative Effects Analysis*, dated June 24, 2005.

Past activities were considered by each resource area assessed and are incorporated into the baseline conditions disclosed in the affected environment for each resource. Cumulative effects disclosures for each resource addressed present, ongoing, and reasonably foreseeable actions that fell within the cumulative effects analysis area identified for the resource. Past and present actions include livestock grazing-related activities; wildlife management actions (predator control); treatment of invasive weeds; mining; fish stocking; wildfire; wildfire suppression; research projects (vegetation sampling/collection, bighorn sheep research); recreation activities (dispersed and developed camping, system/non-system route construction/development, hiking, biking, motorcycle, snow machine, hunting, fishing, trapping, commercial outfitting and guiding); search and rescue; water diversion structures and their operation; timber harvest and fuels treatments; personal firewood cutting; construction and use of system and non-system roads; construction and use of motorized and non-motorized trails; pesticide and herbicide application; recreation and non-recreation special use permitted activities; activities associated with the Idaho Department of Transportation, including operation of material sources for road construction and maintenance, transport of material sources from outside the cumulative effects boundary, highway maintenance in the right-of-way consisting of clearing of vegetation in the right-of-way, drainage cleaning and installation, herbicide application, sanding, and snowplowing; operation of the Sawtooth Fish Hatchery, a fish weir on Redfish Lake Creek, and Camp Stanley on State land within the Sawtooth NRA; mining operations on private lands; livestock grazing operations on State and private lands; residential and commercial developments on private lands; private land fuels reduction projects; diversions and the associated irrigation on State and private lands; and operation and maintenance, including vegetation management, along utility rights-of-way. All of these actions are expected to continue into the foreseeable future. See individual specialist reports (available in the project record) for additional information.

3.3. Wilderness

3.3.1. Introduction

The wilderness resource is integral to the project's Purpose and Need. The potential for WMP strategies affecting wilderness character was identified as an issue for analysis through internal and external public scoping. Direction presented in the WMP covered by law or policy is not further discussed or analyzed here.

This section addresses the effects of the proposed WMP, including the Proposed Action and alternatives, on wilderness character. The two wildernesses occur within the boundaries of the Sawtooth National Forest and the Idaho Falls District, Challis Field Office of the BLM.

Federal agencies managing wilderness are mandated to protect wilderness character per Section 4(b) of the Wilderness Act. In the relevant part, the Act states: "Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area." Although wilderness character is a complex idea and is not explicitly defined in the Wilderness Act, the qualities of wilderness character are described as follows (Landres et al. 2015):

- ***Untrammeled***—Area is unhindered and free from intentional actions of modern human control or manipulation.
- ***Natural***—Area appears to have been primarily affected by the forces of nature and are substantially free from the effects of modern civilization.
- ***Undeveloped***—Area is essentially without permanent improvements or the sights and sounds of modern human occupation.
- ***Outstanding opportunities for solitude or a primitive and unconfined type of recreation***—Area provides outstanding opportunities for recreation in an environment that is relatively free from the encumbrances of modern society, and for the experience of the benefits and inspiration derived from self-reliance, self-discovery, physical and mental challenge, and freedom from societal obligations.
- ***Other Features of Value***—Area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. Though not required of any wilderness, where they are present they are part of that area's wilderness character and must be protected as rigorously as any of the other four required qualities.

The *untrammeled, natural, undeveloped*, and *outstanding opportunities* qualities were chosen as analysis indicators for this section as identified during scoping. The *other features of value* wilderness quality was not included as an indicator because it was not indicated as an issue for analysis during scoping.

The spatial boundary for analyzing direct, indirect and cumulative effects to wilderness character is the boundary of each wilderness because the Wilderness Act and the mandate to preserve wilderness character apply to that area.

The temporal boundary for analyzing direct, indirect, and cumulative effects depends on whether the effect would be temporary, short-term, or long-term. For example, temporary (0–3 years) effects on solitude could occur during an encounter with another person or group during traveling or camping, short-term effects (3–15 years) could occur from treatment of invasive weeds, and long-term effects (15+ years) resulting from the permanent closure of an area could have lasting effects on the wilderness character.

3.3.2. Affected Environment

Resource Indicator and Measure 1: Untrammeled

The Wilderness Act states that wilderness is "an area where the earth and its community of life are untrammeled by man." As described in *Keeping It Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System* (*Keeping it Wild* 2; Landres et al. 2015), the untrammeled quality could be affected by actions that intentionally control or manipulate the components or processes of ecological systems within wilderness. Intentional manipulation is defined as follows (Landres et al. 2015, p. 34):

> *…'intentional manipulation' means an action that purposefully alters, hinders, restricts, controls, or manipulates the 'the earth and its community of life,' including the type, quantity, or distribution of plants, animals, physical resources (such as air, water, or soil), or biophysical processes (such as fire) inside a designated wilderness.*

Portions of the Cecil D. Andrus-White Clouds Wilderness and Hemingway-Boulders Wilderness areas have had some degree of human control or manipulation of the biophysical environment occur before and since their designation as wildernesses. Authorized past actions which affect the untrammeled quality of the wilderness include trail and road construction; historic mining; management of wildland fire (8 prescribed burns between 1983 and 2010); stocking of indigenous and non-indigenous fish in lakes and streams; collaring or tagging fish and wildlife species; livestock grazing and associated structures (2 exclosures, 5 fences); and water diversions.

Untrammeled and natural qualities are often linked in an inverse way because actions taken to improve the natural quality are also intentional manipulations that degrade the untrammeled quality (Landres et al. 2015). An example is the Sawtooth and Boise National Forests Invasive Species Project (USDA Forest Service 2016) which allows for the management option of chemical, biological, or hand treatment to control the spread of noxious and invasive nonnative plants in wilderness. These invasive species displace and can ultimately replace entire native plant communities. Removing invasive nonnative plants is a form of trammeling, but its goal is to restore the natural ecosystem in the wilderness, thereby revealing the inherent challenge in managing wilderness.

Resource Indicator and Measure 2: Natural

The Wilderness Act states that wilderness is, "protected and managed so as to preserve its natural conditions." As described in *Keeping it Wild 2*, analysis of the natural quality focuses on human-caused change to the natural environment within the wilderness, specifically with reference to plants, animals, air and water, and ecological processes (Landres et al. 2015, p. 40). The natural quality of the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas is mostly intact.

Plants

Vegetation ranges from mountain sagebrush to whitebark pine ecosystems. Some changes to the native vegetation composition have occurred in portions of the wilderness, including the introduction of invasive plant species, exclusion of fire, livestock grazing impacts, and recreational impacts. Whitebark pine stands near recreation sites have been affected by firewood

gathering, structure building, and stock tethering. Whitebark pine snags and dead branches are often used for fuelwood or to build campsite structures. For additional information, see the vegetation technical report available in the project record.

Animals

The varying elevations in the area provide important habitat for a wide array of wildlife species. The wildernesses provide habitat for Chinook salmon, steelhead cutthroat trout, and strong local populations of bull trout. Wood River Sculpin occur in portion of the southern Hemingway-Boulders Wilderness.

Many of the high alpine lakes within the wilderness areas have hatchery-stocked recreational fisheries, with species including cutthroat trout, and non-native eastern brook trout, golden trout, rainbow trout, and artic grayling. These lakes have been regularly stocked to provide fishing opportunities. Aquatic habitat around these lakes is functioning at risk in some localized areas due to past and present impacts from trail alignments, dispersed recreation, livestock grazing, and historic mining. Native fish and amphibian populations are at risk from the presence of non-native fish species and the habitat impacts described above.

The Wickiup-Sheep, Big Boulder Creek, Upper East Fork Salmon, Germania Creek, Slate Creek, Prospect-Robinson Bar, Swimm-Martin, Upper Warm Springs, North Fork Big Wood-Murdock, and Upper North Fork Big Wood River subwatersheds have been identified as important to maintaining or restoring strong populations of native species and the recovery of listed fish species.

Shrublands are used by pronghorn antelope, elk, mule deer, and moose in spring, fall, and winter and greater sage-grouse during late summer. Area forests provide habitat for ESA-listed Canada lynx and a number of Region 4 Sensitive species, including northern goshawk, flammulated owl, great gray owl, boreal owl, three-toed woodpecker, Townsend's big-eared bat, gray wolf, and fisher. Several migratory bird species and pileated woodpecker, a management indicator species (MIS), also occur in the area. High-elevation alpine areas provide habitat for bighorn sheep in the spring and summer and mountain goats year-round. The MA also provides habitat for wolverine, which is proposed for ESA listing. Much of the area provides nesting and foraging habitat for migratory land birds and general habitat for wide-ranging mammals, such as bear and mountain lion. Gray wolves were re-introduced into central Idaho in 1995 and 1996, and several packs have used portions of the wilderness areas since then. See the wildlife technical report for more information (project record).

Air, Water, and Ecological Processes

Historically, a full suppression strategy has been used on most fires, altering natural vegetation, including whitebark pine. Over the last two decades (1997–2016), 23 wildfires have burned 10,921 acres of the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. Seventeen of these fires were caused by lightning (74%) and six were caused by campfires (26%). Most acreage burned in the last 20 years occurred during the 2005 Valley Road Wildfire, which burned into what is now designated as the Cecil D. Andrus-White Clouds Wilderness. There have also been several Fire Use incidents or wildfires managed under a strategy that doesn't call for full perimeter control. See the Fire Resource Memo in the project record for more information.

Current regulations limit the size of groups to 20 people and recreational stock to 25 head (except for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness where no restriction exists), greater than most campsites can accommodate without unacceptable impacts to resources, including campsite expansion and development of unauthorized user-created routes, particularly within sensitive environments such as the high alpine lakes. Even with these limitations, recreational stock use and recreational grazing at high elevation lakes is affecting soil; vegetation, including whitebark pine; riparian processes; and aquatic biota. Wilderness rangers regularly report encountering unburied human feces, garbage, and other sanitation issues, with increasing use and no human waste regulation in place.

Across both wilderness areas, some campsites and stock tie areas are denuded of dead and downed wood and living trees have been damaged by recreationists. In elevations above 8800 to 9000 feet, whitebark pine is the predominant tree species, and recreationists use it for fuelwood and tying stock. Campfire rings and associated scars and trash appear throughout the area, including at low use and sensitive high alpine areas. A relatively short season exacerbates social and physical resource degradation by concentrating use.

High and concentrated recreational use has resulted in soil compaction, fire scarred rock, loss of and damage to vegetation and ground cover, and increased erosion. Campsites at some popular destination sites, predominantly Boorn Lakes, Chamberlain Lakes, Boulder Chain Lakes, Big Boulder Lakes in the Cecil D. Andrus-White Clouds Wilderness, have been used for decades. Though these sites show many effects from intense and heavy use, they are the sites stabilized and resilient to additional use within the perimeter of impact. The concern in these wilderness areas is the expansion of these existing sites and proliferation of new sites.

The project area contains part or all of three cattle allotments, two sheep allotments, and the Ketchum-Stanley sheep driveway. An estimated 2,138 acres are considered capable for livestock grazing. See the rangeland resource technical report in the project record for additional information.

The 2 wilderness areas comprise portions of 5 watersheds in the Upper Salmon River and 3 watersheds in the Big Wood River Subbasins. The major streams in the planning area are the East Fork Salmon River, Warm Springs Creek, Slate Creek, Big Boulder Creek, Little Boulder Creek, Germania Creek, West Pass Creek, as well as the North Fork of the Big Wood River. Water Quality Integrity ratings for the subwatersheds vary from high (functioning appropriately) to moderate (functioning at risk) to low (not functioning appropriately), with the vast majority being moderate.

The Clean Water Act stipulates that States are to adopt water quality standards. Included in these standards are provisions for identifying beneficial uses, establishing the status of beneficial uses, setting water quality criteria, and establishing Best Management Practices (BMPs) to control non-point sources of pollution. The IDEQ has not yet formally designated beneficial uses for the streams within the Wilderness planning areas. However, IDEQ presumes that most waters in Idaho, including those within the wilderness areas, will support cold water aquatic life as well as primary or secondary contact recreation beneficial uses (WQS § 101.01a).

Localized accelerated sediment impacts from dispersed recreation, livestock grazing, and historic mining have occurred in the subwatersheds. Three of the 18 subwatersheds in this planning area were listed in 2012 as having impaired water bodies under Section 303(d) of the Clean Water Act: Slate Creek, Wickiup-Sheep, and Harden-Rough Creek. The pollutant of concern was

sedimentation/siltation for the Harden-Rough waterbodies as well as not meeting criteria for combined habitat/bio-assessments (cold water aquatic life & salmonid spawning) for the Slate and Wickiup-Sheep waterbodies. No TMDL-assigned subwatershed/waterbodies occur in the project area.

The Cecil D. Andrus-White Clouds and Hemingway-Boulders Wildernesses lie within Montana/Idaho Airsheds ID-17 in Custer and Blaine counties, and are located within a state designated Class II airshed regulated by the Environmental Protection Agency (EPA) as required by the federal Clean Air Act. They are bracketed by the nearby Sawtooth Wilderness, Craters of the Moon National Monument, and the Selway-Bitterroot Wilderness, all federal Class I areas. The highest level of protection from air pollution impacts is provided to these Class I areas, which are monitored through visibility monitoring by Interagency Monitoring of Protected Visual Environments (IMPROVE) sites. These three IMPROVE sites are reasonable approximations of visibility conditions in west-central Idaho, including the Cecil D. Andrus-White Clouds and Hemingway-Boulders Wilderness areas, and have documented good visibility with periodic reductions during periods of active wildfire (UC Davis IMPROVE Report 2014).

In addition, data from lichen monitoring (one most air-pollution sensitive groups of terrestrial organisms) indicate an absence of air pollution-related issues (St. Clair 2013). Analysis of snow collected at Banner and Galena Summits shows generally low concentrations of contaminants (Ingersoll 2016). Another key component of the nearby Sawtooth and Frank Church-River of No Return Wilderness air quality monitoring has been lake chemistry sampling, which is very diagnostic of atmospheric chemistry in sensitive lakes. Mebane and Gurrier (2006) identified changes in lake chemistry in their 2006 report that may have been the result of drought, but air pollution or other unidentified factors were not ruled out; more recent reports have not been produced. These data are reflective of conditions in less sensitive Challis volcanics bedrock as well as the more sensitive granitic bedrock of the Idaho Batholith found within the wildernesses.

See the wildlife, fisheries, fire, rangeland resources, and vegetation technical reports (available in the project record) for more detailed descriptions of the current conditions for the natural wilderness character.

Resource Indicator and Measure 3: Undeveloped

As described in the Wilderness Act, wilderness is “an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation,” with “the imprint of man’s work substantially unnoticeable.” The Wilderness Act identifies “expanding settlement and growing mechanization” as the forces that cause wild country to become occupied and modified and clarifies in Section 4(c) that “there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation.”

For the most part, these wildernesses show few signs of human habitation and permanent improvements. Developments—such as range fences, developed springs, troughs, and abandoned or unauthorized vehicle routes and mining debris—are scattered across the wildernesses. Generally, these developments are few and far between considering the vastness of the landscape. Emergency administrative authorizations for motorized/mechanized use occur for fire suppression and SAR operations.

Recreational infrastructure degrades the undeveloped, the solitude and the primitive and unconfined recreation qualities, but because their primary purpose is related to recreation, they are considered and analyzed only in the latter quality. This organization is consistent with *Keeping It Wild 2* (Landres et al. 2015).

Both wildernesses have permanent improvements and built structures that give the sense of human occupation, such as fences and troughs. The undeveloped quality is degraded by the presence of these developments, structures, or installations. Range improvements include 2 water troughs, portions of 5 fences (approximately 0.8 miles), and 2 exclosures in the Upper East Fork Allotment[1] within the Hemingway-Boulders Wilderness and 1 exclosure, 1 fence (approximately 0.3 miles), and 2 water troughs in the Lower East Fork Allotment within the Cecil D. Andrus-White Clouds Wilderness. The closed Warm Springs Meadow Allotment, which also overlaps a portion of the Cecil D. Andrus-White Clouds Wilderness, contains portions of 4 fences (approximately 0.5 miles total), which may have been affected by the 2005 Valley Road Fire. At least one water diversion extends into the Hemingway-Boulders Wilderness (depending on the boundary survey, other diversions may also occur in the wildernesses). These developments are allowable, non-conforming uses under the Wilderness Act. The Forest Service and BLM are required to allow these uses to continue within the framework of their existing authorizations or new authorizations as specifically outlined by law and policy while minimizing impacts to wilderness character. Generally, these developments are few and far between considering the vastness of the landscape.

No motorized trails or roads were closed because of wilderness designation. However, all trails were closed to mechanized use, including some previously used by mountain bikers. Some use continues illegally, primarily on Castle Divide (NFS trail 047) and Antz Basin/Warm Springs (NFS trail 671).

The sights and sounds of motorized and mechanized uses can penetrate the wilderness and affect a visitor's experience. In some places, roads and motorized trails define the boundary of the Cecil D. Andrus-White Clouds Wilderness and Hemingway-Boulders Wilderness areas; notably Rough Creek (NFS trail 647), Garland Lakes/Martin Creek (NFS trails 646 and 648), Germania Creek (NFS trail 111), Frog Lake Loop (NFS trails 047 and 682), South Fork of the East Fork of the Salmon River (NFS trail 112), and North Fork Wood River Road. Slate Creek and West Pass Creek Roads and Warm Springs Trail "cherry-stem" into the wilderness. Pre-existing vehicle routes accessing dispersed campsites, and unauthorized, user-developed routes intrude on the wilderness boundaries and degrade wilderness character. Some areas of concern include the North Fork of the Big Wood River, Upper East Fork of the Salmon River, Lower Warm Springs, and Slate Creek. During the winter, snowmobilers are drawn to high-elevation heavy snowpack found in the wilderness, and boundaries are difficult to sign. These factors present a range of management challenges, including the potential for motorized or mechanized incursions.

The undeveloped quality is also degraded by those rare occasions of authorized motorized equipment usage (e.g., chainsaws, helicopter landings) that are either used during emergency incidents or are authorized as the minimum tool to implement a planned activity as determined in

[1] This allotment was retired on 8/28/17, and is closed to grazing in perpetuity.

a Minimum Requirements Analysis (MRA). Over the past 30 years, prior to wilderness designation, authorizations were given for trail maintenance projects, the transportation of construction materials for recreational facilities, and to remove non-conforming structures and mining debris. Most recently, in 2010, large structural bridge materials were delivered by truck to the accessible Murdock Trail.

Historic activities beginning in the 1870s, such as mining and ranching, have left related installations or structures that may be considered for historical value. Mining and prospecting historically occurred in the Big Boulder Creek, Washington Basin, Germania Basin, Cherry Creek and West Pass Creek areas. Fifty-five unpatented mining claims in the Cecil D. Andrus-White Clouds Wilderness were determined to have valid existing rights per the 1972 withdrawal date. Three unpatented mining claims existed within the Hemingway-Boulders Wilderness area at the time of designation but have since been abandoned and closed. Currently, no active mineral exploration or mining occurs. Mining mills, cabins, and placer mining remains are found in several drainages. Historic ranching and recreation activities are represented by several log structures, but an extensive cultural resource survey has not been conducted to determine their number or significance.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

The Wilderness Act states in Section 2(c) that wilderness has, "outstanding opportunities for solitude or a primitive and unconfined type of recreation." *Keeping it Wild 2* describes primitive recreation as follows (Landres et al. 2015, pp. 55–56):

> *Primitive recreation requires self-reliance, as well as travel that is unassisted by mechanical or motorized equipment. Many different types of structures, installations, and developments are constructed to facilitate access or use of the wilderness, to improve visitor safety, or to protect other wilderness resources from visitors. Facilities designed for these reasons are categorized as recreational in this monitoring strategy and occur in many wildernesses. Examples are: system trails, trail signs, bridges, stock tie facilities.*

Wilderness protection provides the visitor an opportunity to experience unconfined recreation in undeveloped, primeval, and natural conditions. In an ideal world, these conditions would coalesce. Unfortunately, recreation leaves a footprint, or impact, on wilderness lands. No restrictions currently exist on where people travel or the total number of people who may enter the wilderness. One person from each group is requested to sign in at the registration box located at each trailhead. The following prohibitions were issued for the Boulder-White Clouds recommended wilderness in 1996 (Special Order 0414-04-034) to protect natural conditions and users' wilderness experiences, and are in effect today:

a) Having greater than 20 persons in a group
b) Being in the area with a combined number of recreational stock in excess of 25 animals
c) Shortcutting trail switchbacks on foot or with recreational stock
d) Building, maintaining, attending or using campfires within 200 yards of the following lakes: Cirque, Cove, Sapphire, Sheep, Slide, Tin Cup, Gunsight, Four Lakes Basin, Scree, Shallow, Castle, and Chamberlain 9,849'
e) Tethering recreational stock within 100 feet of springs, lakes or streams

f) Tying recreational stock to live trees for periods longer than one hour

The Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness provide outstanding opportunities for solitude and primitive, unconfined recreation. The varying topography of the wildernesses and relatively few trails provide excellent opportunities for solitude. In addition, a range of recreational experiences can be found, including short day hikes, plentiful backpacking options, multi-day pack trips, or off-trail scrambles allowing for exploration and discovery. A variety of dispersed recreational activities occur throughout the area, including hiking, backpacking, stock packing, hunting, fishing, horseback riding, backcountry skiing, wildlife viewing, photography, mountaineering, and other pursuits.

Approximately 88.5 miles of trail occur within the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas, ranging from a minimally developed Class 1 trail to a more developed Class 3 trail (22.2 miles of Class 1; 37.6 miles of Class 2; and 28.5 miles of Class 3), providing a variety of wilderness trail opportunities (for trail standards see USDA Forest Service [2008], *Trail Class Matrix*). Additionally, both wilderness areas offer extensive opportunities for off-trail exploration that supports opportunities for challenge, risk, and solitude.

Few recreational developments are found in the MA. Trail structures are typically limited to puncheons and turnpikes made of native materials; however, two structural timber bridges were installed as part of an accessible trail development on Murdock Creek Trail in the Hemingway-Boulders Wilderness prior to designation. In an effort to concentrate impacts caused by recreational stock, 7 stock tie areas are identified in high-use portions of the Cecil D. Andrus-White Clouds Wilderness. These sites are provided with either hitching posts or cable highlines. Signs are placed at trail junctions and to identify stock tie areas. Campsites are undesignated, primitive sites with no permanent developments, such as toilets or constructed firepits. Developments including wall tents, outhouses, fences, a stock watering trough, and caches with cook gear and tools at 3 campsites assigned to stock outfitters provide visitors a less primitive experience.

Permitted livestock grazing may impact recreational experiences in areas where active allotments exist. Impacts include livestock waste, vegetation trampling and trails, negative interactions with guard dogs, and the presence of developments such as fencing and water troughs. For many visitors, all livestock encounters and related impacts and structures listed detract from the wilderness experience, but some detract more often than others. For example, Johnson et al. (1997) found when examining wilderness visitor perceptions of grazing in wilderness that noticeable detractors were manure in campsites (88%), livestock encounters in camp (87%), livestock near streams and lakes (82%), and livestock on or near trails (78%).

Resource Indicator and Measure 5: Opportunities for Solitude

The Wilderness Act states in Section 2(c) that wilderness has, “outstanding opportunities for solitude or a primitive and unconfined type of recreation.” As described in *Keeping it Wild 2*, opportunities for solitude are affected by visitor use and certain characteristics of the setting (Landres et al. 2015, p. 53):

> *…encountering other visitors in wilderness, or seeing or hearing the signs of modern civilization, may detract from opportunities to experience solitude. Increasing visitation, human population growth (especially near wilderness), and areas of concentrated use within wilderness all have the potential to degrade opportunities for solitude. The opportunity to achieve solitude within the wilderness is a function of both the density of visitors, most of whom stay on established trails and preexisting campsites, and the opportunity to get away from those visitors and their impacts by going to more remote areas.*

The words solitude, primitive, and unconfined convey a certain visitor experience expectation, which may include, but is not limited to, experiencing natural sights and sounds, freedom, risk, the physical and mental challenges of self-discovery and self-reliance, and the use of traditional skills free from the constraints of modern culture.

Management presence typically includes 2–4 wilderness rangers, a Wildlands Education Coordinator, and 2 trail maintenance crews that split their time between the Sawtooth, Cecil D. Andrus-White Clouds, and Hemingway-Boulders wilderness areas. Several non-profit organizations lead volunteer trail maintenance and reconstruction projects. Volunteers and interns are also used to augment ranger patrols and support the Wildlands Education Program, providing information and education to users prior to their wilderness visit or while they are in the backcountry.

Visitor Use Patterns and Characteristics of the Wildernesses

Opportunities for solitude abound in both wilderness areas, though more readily in the Hemingway-Boulders Wilderness due to the limited access, rugged terrain, and few trails. These opportunities vary depending on the time and location of a visitor's trip. While visitors may experience frequent encounters with other visitors during certain times and places, those that choose less popular destinations, days of the week, or times of the year will easily find solitude in the wilderness. Because of the extended winter season, over 80% of use occurs in a very compressed timeframe (June–August) across both wilderness areas.

Opportunities for solitude vary by location and season within the Cecil D. Andrus-White Clouds Wilderness. Due to landscape and topographic features, most recreational use is funneled toward lake basins in sensitive, high-elevation areas. As a result, certain areas receive relatively high and concentrated recreational use, especially Boorn Lakes, Chamberlain Lakes, Boulder Chain Lakes, Big Boulder Lakes. The short summer season has the heaviest visitation (84%) while limited winter recreation occurs, largely guided backcountry skiing on the front range of the Boulder Mountains, and 12% of use occurs in the fall.

Due to their remoteness and primitive access routes, the off-trail, and northern portion of the Cecil D. Andrus-White Clouds Wilderness and the majority of the Hemingway-Boulders Wilderness see relatively few visitors and, as such, provide outstanding opportunities for solitude and primitive recreational experiences. Three of the five Hemingway-Boulders Wilderness trailheads are accessed from the North Fork Canyon Road, only 9 miles north of Ketchum/Sun Valley, receiving over 90% of visitor registration associated with that wilderness; over 95% of it as day-use.

Recreation site monitoring is one way to measure effects on wilderness character from visitors, as well as impacts to natural resources and visitor experience. A partial survey was conducted in

2003. All sites were re-inventoried and the survey was completed in 2016, identifying a total of 238 recreation sites.

Of the 224 recreation sites in the Cecil D. Andrus-White Clouds Wilderness, 29% recorded heavy-to-extreme impacts and 71% had light-to-moderate impacts. Of the 14 sites in the Hemingway-Boulders Wilderness, 14% had heavy-to-extreme impact levels and 86% recorded light-to-moderate impacts. In the Hemingway-Boulders Wilderness, 64% of the recreation sites are less than 500 square feet. Within the Cecil D. Andrus-White Clouds Wilderness, 51% of sites are less than 500 square feet and 17% are greater than 1,500 square feet.

Recreational stock use evidence (manure/feed or manure/feed/tree damage) occurs at 20% of the recreation sites in the MA. One-third of sites had damage to over 25% of the trees. Campfire evidence occurs in 89% of the recreation sites in the MA. Wilderness rangers cleaned over 1,000 fire rings and removed 650 inappropriate rings over a 12-year period.

Visitor encounter monitoring was completed for traveling and camping encounters in both wildernesses in 2016, using Forest Service protocol (Broom and Hall n.d.) to provide a baseline for future management. Just less than 1% of encounters made while traveling in the Hemingway-Boulders Wilderness and 3.5% in the Cecil D. Andrus-White Clouds Wilderness were off-trail, in proposed Zone 1. Most traveling encounters occurred in proposed Zone 4 (78.3% in Hemingway-Boulders Wilderness and 80.2% in Cecil D. Andrus-White Clouds Wilderness). Encounters in campsites (the number of other camping groups visible or audible from each occupied campsite) only occurred in the Cecil D. Andrus-White Clouds Wilderness where 84.6% occurred in Zone 4 and none occurred in Zone 1. Past visitor studies identified campsite interaction as having the most impact to a visitor's perception of solitude (Cole and Hall 2008).

The following visitor use information is based on data from the 2016 voluntary visitor registration system and wilderness ranger reports (available in the project record).

Total Use—A total of 2,908 individual groups registered at trailheads having potential access to the Cecil D. Andrus-White Clouds Wilderness and Hemingway-Boulders Wilderness with an average length of stay of 2.4 days. Seventy percent of those visitors registered at trailheads accessing the Cecil D. Andrus-White Clouds Wilderness and 30% registered at trailheads accessing the Hemingway-Boulders Wilderness. Over 50% of users registered either at the Fourth of July trailhead (32%), accessing the Cecil D. Andrus-White Clouds Wilderness, or the three North Fork Wood River Trailheads (24%), accessing the Hemingway-Boulders Wilderness. Sixty percent of registered visitor use in these wilderness areas is to the top 5 destinations: Boorn Lakes (17%), Chamberlain Lakes (12%), North Fork Wood River (12%), Murdock Creek (10%), and Boulder Chain Lakes (9%). Fifty-six percent of registered users were from Idaho, and over half of those were from Wood River Valley, Boise, Twin Falls, or Stanley.

Party Size—Regulations were implemented in 1996 establishing a group size limit of 20 persons and 25 head of recreational stock in the Boulder-White Clouds recommended wilderness. According to registration data, the typical group visiting the areas now designated as the Cecil D. Andrus-White Clouds Wilderness and Hemingway-Boulders Wilderness averaged 2.8 people per group. One percent of users traveled in groups of more than 12 people. Parties traveling with stock usually had a slightly larger group size, averaging 4 people, and an average of 4 head of stock per group. No groups occurred with more than 12 people or more than 14 head of stock. Past trailhead registration and wilderness ranger contacts indicate that some groups

exceed the current group size limit, particularly at popular destinations during the summer season.

Recreational Pack Stock Use—Of registered users, 1% traveled with stock, with a 1:1 person-to-stock ratio. No groups had more than 10 head of stock. Seventy percent of stock users accessed the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness from the North Fork Wood River (22%), Little Boulder (22%), Fourth of July (13%), and Rough Creek (13%) trailheads. North Fork trails, Hatchet Lakes, Boulder Chain Lakes, and Boorn Lakes were the most popular destinations. Wilderness rangers encountered 50 groups of overnight stock users between 2004 and 2016; 5 groups had over 8 head of stock, and 3 of these groups had more than 14 animals. Of 18 groups of day stock users, none had more than 14 head of stock, 1 group had more than 8 animals. In 2016, one group of 4 people registered with 13 goats going to Slide Lake[2].

Commercial Services

The Wilderness Act (Sec. 4(d)(6)) allows for commercial services, "to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes." Commercial outfitters can facilitate visitor access to wilderness for those individuals who may not be prepared to engage in a specific activity without the support of an experienced professional. Some of these reasons include the extent of preparation and equipment needed by visitors traveling from afar, physical limitations due to age or other conditions, safety concerns, or the desire to experience wilderness with skilled and knowledgeable guides.

To be issued a Forest Service Special Use Permit or a BLM Special Recreation Permit, outfitters are required to hold a current outfitter and guide license issued by the Idaho Outfitter and Guides Licensing Board.

Six outfitters hold priority use permits for operations in the Cecil D. Andrus-White Clouds Wilderness, five are administered by the Sawtooth NRA and one is administered by the Challis Field Office. Of these six outfitters, three also operate in the Hemingway-Boulders Wilderness. These outfitters offer guided hiking, mountain climbing, skiing, horse packing, hunting, and fishing opportunities. Two assigned outfitter campsites are located in the Cecil D. Andrus-White Clouds Wilderness and one is located in the Hemingway-Boulders Wilderness. These sites have some development, including tent and stock structures. Temporary use outfitting and guiding occurs in these areas as well. The type and amount of temporary outfitter and guide use varies from year to year.

One of the 2 climbing/skiing/hiking/backpacking outfitters reported a single trip into the Cecil D. Andrus-White Clouds Wilderness from 2006 to 2015. Most trips provided by a second outfitter were day-use ski trips in the Boulder Mountains. Reported use numbers weren't broken out by individual trips, nor was it evident whether or not they actually entered the Hemingway-Boulder Wilderness. Other than providing an average group size (4.5 people), usable data were lacking for these outfitters.

[2] Wilderness rangers encountered one group with 6 people and 4 pack goats at 4th of July Lake (outside, but nearby the White Clouds Wilderness) in 2006.

Travel by horseback in these lands, now designated as wilderness, is a traditional use with a long history. Much outfitted use is stock supported by 3 commercial outfitters in the Cecil D. Andrus-White Clouds Wilderness. There are different methods in which wilderness visitors are stock-guided. People can go for a day ride (7%); travel overnight with stock their entire trip (29%); take spot trips in which visitors ride in and are dropped off (30%); or hike in and have their gear dropped off, after which the stock leave (1%). Visitors may also be stock-supported for overnight hunting trips (33%). Commercially guided big game hunts occur in locations across the wilderness areas, including deer, elk, pronghorn, and bighorn sheep hunts.

These stock-supported outfitted trips serviced 246 groups in the Cecil D. Andrus-White Clouds Wilderness in the 10-year period between 2006 and 2015, for a total of 4,497 user days (averaging 450 user days per year). Drop camps typically had more clients per trip, averaging 6.8 persons. Most of the outfitted groups in the Cecil D. Andrus-White Clouds Wilderness had no more than 12 clients (96%) and 14 head of stock (90%). The average number of clients for these outfitted groups was 4.2, with an additional 1 to 4 guides per group. When guides are included in the group size, an additional 3 trips with more than 12 people occurred. Guides supplying drop camps are not included in overall group size, as they typically travel separately from their clients.

White Cloud Outfitters are the only stock outfitters with a special use permit in the Hemingway-Boulders Wilderness. During the 10-year period of 2006 to 2015, they provided 40 guided trips to the public with 462 total user days. These trips were exclusively overnight hunting trips and had an average of 2 guests with 1 to 4 guides, and generally occurred in the fall. None of these groups had more than 12 people (guides and clients) and 14 head of stock; 93% had no more than 10 people (guides and clients) and 12 head of stock.

Two campsites are assigned to stock outfitters in the Cecil D. Andrus-White Clouds Wilderness, one at Chamberlain Lake and one at Little Boulder Creek. The only assigned camp in the Hemingway-Boulders Wilderness is located on the South Fork of the East Fork River. These sites have some level of development, including tent frames, framed outhouses, jack fences, and caches with cook gear and tools. Many of these developments remain in place year-round. The Little Boulder Creek campsite received the highest outfitted use of all locations in the two wildernesses (35% or 85 trips). The second most popular site was Chamberlain Lake (17% or 41 trips). Walker Lake (8% or 24 trips) and Hatchet Lake (6% or 14 trips) were also popular destinations. Trip durations ranged from single-day to 21-day trips.

3.3.3. Environmental Effects

Direct and Indirect Effects

Alternative A—Proposed Action

The analysis presented in this Wilderness section looks at the direction presented in Chapter 2 by resource or topic and analyzes the effects of the direction to the qualities of wilderness character. Each aspect of the proposed WMP direction was considered for each indicator. For those resources or topics with no effects, they are not listed in this report. Additional detail may be found in the project record.

Resource Indicator and Measure 1: Untrammeled

In summary, the direction presented in the WMP (Alternative A) would ensure preservation of the untrammeled quality.

Wilderness

Direction proposed in the wilderness section of the WMP under Alternative A would not affect the untrammeled quality. Under Alternative A, no immediate effects from the proposed direction to use natural openings for helicopter landing areas for emergencies (Wilderness Guideline 2125) would occur. This direction may, in the long term, lead to fewer trammeling actions, as fewer cleared openings are established during emergency operations, comprising a minor benefit to the untrammeled quality.

Recreation Resources

Direction proposed in the WMP under Alternative A would maintain the untrammeled quality with respect to recreational activities. Small-scale campsite restoration and rehabilitation would continue, but the minimal soil and vegetation disruption would not intentionally control or manipulate "the earth and its community of life" inside wilderness. In a few areas, restoration may be necessary to meet new standards and guidelines. The scale of these efforts would determine whether they constitute trammeling or not.

Direction to limit new trail construction to only those circumstances determined the minimum necessary to protect wilderness character (Recreation Standard 2176) would preserve the untrammeled quality. Any new trail construction would be analyzed under site-specific NEPA and MRA.

Scenic Environment

Under the proposed action, direction would be implemented to ensure that natural events that affect scenic qualities are not considered detrimental to scenic qualities (Scenic Guideline 2197). This direction would prevent actions which may be considered trammeling (e.g., reseeding) to address natural events (e.g., a landslide or forest fire) solely to correct impacts to the scenic value. This direction would preserve the untrammeled quality.

Rangeland Resources

Under this alternative, irrigation would only be allowed where practiced prior to the designation of wilderness (Rangeland Resources Standard 21113). For the NFS portion of the two wilderness areas, this direction would have no effect, as it is existing policy (see FSM 2323.26b). For the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness this direction would be new. Irrigation is not a pre-existing activity. The direction would ensure preservation of the untrammeled quality by prohibiting future irrigation projects and associated hydrologic and vegetation manipulation.

Fire Management

Suppressing lightning-ignited wildfires removes one of the most important natural processes from fire-dependent ecosystems (Miller 2012). Deliberate decisions to suppress or actively manage a fire constitute "trammeling" actions in wilderness, which would negatively affect the untrammeled quality.

The proposed action includes a guideline (Fire Management Guideline 21131), which would preserve the untrammeled quality by ensuring potential effects to wilderness character are considered when responses to wildland fire are evaluated. This direction also helps ensure safety is not jeopardized to protect wilderness character. Similarly, having a resource advisor experienced with wilderness management (Fire Management Guideline 21134) may help to minimize effects by ensuring the wilderness resource is considered at the same time other resource values are considered during a wildfire.

Management Zones

This alternative proposes to establish Management Zones. Zoning is a method to prevent wilderness from changing from the very wild toward the not-so-wild side of the spectrum. Zone direction includes goals, desired conditions and standards for each zone. Zones were developed based on current conditions, current visitor use levels and patterns, and desired conditions to ensure no degradation to wilderness. Zone 1 is the most primitive with the least visitation, and Zone 4 includes the most heavily used areas with existing impacts. Under Alternative A, zones would be established as outlined in Table 1.

Looking specifically at the standards for the four zones, the direction in the zone standards would not affect the untrammeled quality because the direction would not lead to intentional actions that affect the earth and its community of life.

Resource Indicator and Measure 2: Natural

In summary, the direction presented in the WMP (Alternative A) would preserve the natural quality, and the recreational use restrictions would moderately improve the natural quality.

Wilderness

Under Alternative A, the natural quality would be maintained or improved by direction requiring reseeding or replanting using locally sourced native seed or plants (Wilderness Standard 2116) and using natural openings for helicopter landings in emergency or fire operations (Wilderness Guideline 2125). Using locally sourced, native seeds or plants for projects would better protect the natural quality by reducing the risk of introducing nonnative plants and using natural openings would minimize the effects (visual and physical) resulting from clearing helicopter landing areas in wooded or heavily vegetated areas.

Wildlife Resources

Incidences of pneumonia-related die-offs in bighorn sheep are frequently associated with the presence of domestic sheep and goats (George et al. 2008, Wehausen et al. 2011). Impacts to bighorn sheep populations degrades the natural quality of the wilderness.

Under Alternative A, pack goats would be prohibited within the modified Pack Goat Exclusion Area (Wildlife Resources Standard 2155) and persons using pack goats would be required to follow 9 management practices recommended by the North American Packgoat Association (Wildlife Resources Standard 2156). Pack goat use in the wilderness areas is low, as only one group traveling with 13 goats registered in 2016, and wilderness rangers reported no encounters with packgoats in the MA from 2004 through 2015. Establishing these standards and reducing the potential for interaction between species would benefit bighorn sheep and preserve the natural wilderness quality. See sections 3.4.3.1 and 3.4.3.2 on the environmental consequences to wildlife for more information on disease transmission and other effects to wildlife.

Recreation Resources

Under Alternative A, long-term minor-to-moderate benefits could occur to natural components (streamside habitat, lakeshores, vegetation, wildlife, soils, water quality) of the wildernesses because of proposed constraints on recreational activities. "A primary goal of protected area and wilderness management is to limit the areal extent of visitor impacts, the human 'footprint' of highly disturbed land. Of equal importance is limiting the severity of impact to levels that are not ecologically, managerially, esthetic, or functionally significant" (Marion et al. 2016). Alternative A is designed to achieve this goal by managing the types and locations of use and behaviors of users.

Group Size and Packstock Management

Wilderness managers are frequently concerned with recreational impacts to natural resources; any wilderness recreational use results in some level of impact to the natural resources. "Therefore, consistent with the goal of providing recreation opportunities, management can only limit impact, not prevent it. More consideration should be given to limiting use of wilderness that is still relatively lightly used and impacted—to see that it remains in that state" (Dawson and Hendee 2009).

In general, campsite impacts can vary based on the length of stay, the size of the party, and use of pack stock (Dawson and Hendee 2009). Stay limits would not change from current regulations under Alternative A.

Alternative A would limit group size to a maximum of 12 people (Recreation Resources Standard 2166) and a combined number of recreational stock[3] in one group to 14 head of stock (Recreation Resources Standard 2167), effectively limiting potential effects to the natural wilderness quality. Many studies illustrate greater environmental impacts are caused by large groups compared to small groups (Anderson et al. 1998; Hall and Cole 2007; Monz et al. 2000; Dawson and Hendee 2009). These studies often conclude that group size limits can "be effective at reducing unacceptable resource and visitor experience impacts" (Anderson et al. 1998).

Impacts are evident in existing recreation sites in high-use destination areas, such as Boorn Lakes, Chamberlain Lakes, Lower Boulder Chain Lakes and Island and Walker Lakes. These areas show concentrated and heavy use impacts, including large areas of barren compacted soil, scarred or dead trees, broken stream banks or lakeshores, large fire rings, and other "improvements" such as meat poles and furniture built from logs. Within the impacted area, these sites are stabilized and resilient to use and may generally accommodate group sizes of up to 12 people. Enlargement, however, is the "most common, detrimental, ongoing change to established recreation sites" (Cole 1989a). These established sites would not likely be expanded under this alternative, as they are more capable of accommodating the proposed maximum group size.

Recreation sites in more remote, less-disturbed areas, such as Four Lakes, Slickenslide Creek above Quiet Lake, upper Boulder Chain Lakes, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Walker and Island Lakes, and areas above 8,800 feet where campfires are restricted (Recreational Resources Standard 2169), would benefit under this alternative from the smaller

[3] Refer to wildlife heading within this wilderness section for effects analysis related to pack goat use.

group sizes, exclusion of equine stock in certain areas, and the elimination of campfires, as sites are less likely to become established.

Reducing and limiting visitor use as proposed under Alternative A would also minimize new impacts to vegetation, soils, and wildlife resources caused by visitors expanding into new camping locations. Furthermore, restoration efforts, when needed, would likely be successful as impacts would be less severe, improving the overall natural quality in these wildernesses.

Recreational impacts, and the limited success of restoration (without intensive management practices; Spildie et al. 2000), make managing recreational stock challenging, and point to a multi-layered approach to preserve the natural quality of wilderness character while continuing to provide opportunities for stock users. For example, Dawson and Hendee (2009) recommend in their wilderness management textbook that managers permit (equine) stock use as far as a stock camp at the first lake above the valley bottom, only allowing foot traffic only beyond the first lake. Through this compromise, horse riders are provided with access to the tributary valley without opening the entire string of lakes to the impacts typically associated with stock traffic. This recommendation is included in this alternative. The direction for the equine stock 6,058-acre closure area (Recreation Resources Standard 2174) would allow stock up to Lodgepole Lake in the Boulder Chain Lakes area and Island and Walker Lakes in Big Boulder drainage. Access above these lakes would be restricted to foot traffic.

In addition to the equine stock closure areas, Alternative A includes several standards to contain and eliminate trampling impacts in sensitive areas. Areas where recreational stock are tethered or graze for the night experience impacts over a much larger area than all other recreational impacts combined (Dawson and Hendee 2009). Immediate improvement to riparian soils and vegetation would be realized by limiting tethering (Recreation Resources Standard 2170) and prohibiting grazing recreational stock (Recreation Resources Standard 2171), within 200 feet of lakes, streams, and springs and by encouraging the use of temporary containment systems and require tree-saver devices (Recreation Resources Guideline 2183).

Overall, group sizes and recreational stock management direction would protect vegetation, particularly sensitive alpine and riparian vegetation; water quality; soils; and sensitive off-trail areas closed to equine stock travel. This direction would be moderately beneficial to the natural quality.

Campfires

Campfires are a challenging issue for managers because fires are an important part of many visitors' experience. However, campfires can result in aesthetic and ecological impacts (Reid and Marion 2005), such as blackening of rocks and soil, which is one of the longest-lasting, most visible human effects to the wilderness resource. Other effects include partially burned litter, unburned food, burnt tree roots, excessive amounts of rock and ash dispersed in campsite, soil compaction, or constructed facilities (e.g., makeshift furniture such as logs cut for seats). When effects to a site are too excessive, visitors may be displaced to other sites, increasing disturbance elsewhere (Reid and Marion 2005). These effects are the "imprint of man" on the landscape specifically mandated against in the Wilderness Act (Section 2c).

Alternative A would restrict campfires above 8,800 feet, and outside 200 yards of Walker, Island, Upper and Lower Chamberlain (9,477 feet and 9,197 feet), and Boorn Lakes (Recreation Resources Standard 2169). Campfire restrictions are supported by research, which recommends

prohibiting campfires at sensitive places, such as near the tree line where trees are scarce and slow-growing, to minimize environmental impacts (Cole and Dalle-Molle 1982). Campfire limitations above specified elevations protect slow-growing subalpine forests from the depletion of ecologically and scientifically important downed wood.

Specific to whitebark pine ecosystems, the rate at which firewood is consumed can easily and quickly outpace production (Cole 1989b). Campsites (and trails) in whitebark pine areas can also have a dramatic effect as impacts resulting from large groups or concentrated visitation would be long-lasting given the low resilience and low productivity of these habitats (Cole 1989b). Managing dispersed camping in this habitat "must be especially proactive. Management must strive to avoid problems rather than deal with them after they have occurred" (Cole 1989b).

Reid and Marion (2005) found that the number of damaged trees is reduced in areas with campfire bans compared to sites with no campfire management. They identify high-elevation areas with less wood availability and production as the most appropriate areas for campfire restrictions. Under Alternative A, campfires would be prohibited at elevations above 8,800 feet, reducing areas where visitors can have campfires from the entire Hemingway Boulders Wilderness to 41% of the Wilderness and from 99% of the Cecil D. Andrus-White Clouds Wilderness to 57% of the Wilderness.

Within the campfire closure area, 70% of the sites in the Cecil D. Andrus-White Clouds Wilderness showed evidence of tree felling or damage. The campfire restriction, which would decrease firewood collection of high-elevation whitebark pine and other alpine vegetation would protect the natural quality. The proposed campfire closure area encompasses much of the whitebark habitat (botanical technical report [project record]), and areas that wilderness rangers have identified as at risk to increased impacts, including Swimm Lake, Four Lakes, and Big Boulder Lakes. Visitors wishing to have a campfire may adjust their camp locations to below the elevation limits, resulting in a positive effect on geographic distribution of visitors to sites stabilized and resilient to additional use. Overall, the campfire restrictions would be moderately beneficial to the natural quality, particularly by protecting whitebark pine.

Human Waste

Wilderness rangers regularly report ongoing human waste and sanitation issues, with increasing use and no human waste regulation in place. Alternative A could have a slightly positive effect on water quality by requiring human waste to be buried at least 200 feet from water (Recreation Resources Standard 2173), which would reduce the possibility of waste entering water systems. Disposing of human waste in cat-holes is the most common method of human waste disposal and is preferred because it avoids or reduces the negative impact of visitors encountering feces or toilet paper, animal and insect transmission of pathogens, and water contamination after rainfall (Monz et al. 2000).

Off-Trail Marking

When user-created trails begin to develop, research suggests that recreational use should either be reduced, or trails should be designated to reduce the additional proliferation of routes and impacts. However, establishing official trails in the lightly used parts of wilderness may conflict with management objectives (Dawson and Hendee 2009). Consequently, minimizing the creation of social trails by minimizing their evidence is best. Under Alternative A, visitors would be discouraged from marking off-trail routes, and markers such as stacked rocks or flagging would

be removed (Recreation Resources Guideline 2180). This direction, in combination with limits on recreational equine stock use in areas without trails and a reduction in group size numbers, would reduce the risk of trampling sensitive vegetation and establishing user-created trails, thus preserving the natural quality.

Human/Wildlife Encounters

Encouraging proper food storage can help protect a variety of wildlife from habituation to humans, human food, and human interactions. Smaller animals (e.g., birds and rodents) are not as dangerous to humans as bears are when they become habituated to human food. However, habituation can profoundly affect any animal (Cole et al. 1987). Alternative A includes a guideline (Recreation Resources Guideline 2179) to emphasize proper camping and food storage techniques to prevent habituation and effects to wildlife, thereby benefiting the natural quality by protecting wildlife.

Commercial Services

Concentrating assigned outfitter campsites (Recreation Resources Standard 2190) within Zones 3 and 4 would maintain the natural quality of the wildernesses. Maintaining existing assigned campsites, all of which occur within Zones 3 and 4, and future considerations of new outfitter and guide assigned camps within Zones 3 and 4 would ensure protection of the more pristine areas of the wilderness in Zones 1 and 2.

Direction regarding modeling wilderness practices with clients (Recreation Resources Standard 2191) would help promote awareness of wilderness values and “Leave No Trace” practices, benefiting the natural quality, and also other components, of wilderness character.

<u>Scenic Environment</u>

Alternative A includes direction (Scenic Environment Guideline 2197) to ensure visual conditions changed by natural events are not considered detrimental to scenic qualities. This direction would preserve the natural quality, ensuring management actions are not taken for the sake of scenic qualities following a natural event that may be otherwise considered ‘unsightly’, such as a landslide or fire.

<u>Rangeland Resources</u>

Alternative A includes direction that only allows irrigation where it occurred prior to wilderness designation (Rangeland Resources Standard 21113). Under this alternative, this activity could not be considered in the future within the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness, as it did not occur there prior to the wilderness designation (this direction is an existing prohibition per Forest wilderness policy [FSM2323.26b]). This direction would protect the natural quality, specifically the natural hydrology, and vegetation.

<u>Fire Management</u>

Lightning-ignited wildfire is a natural disturbance process that has shaped vegetation across the landscape for centuries. While there may be valid reasons to manage a naturally ignited fire within wilderness, managing naturally ignited wildfire could affect the natural quality. Under Alternative A, ensuring wilderness character is considered during management, as described in Fire Management Guidelines 21131 and 21134, would reduce the likelihood of impacts, thereby preserving the natural quality.

Lands and Special Uses

When considering proposals for special uses, direction under this alternative (Lands and Special Uses Standard 21140) would ensure the natural quality is preserved in the more pristine portions of the wilderness by aligning potential project effects within the appropriate zone.

Search and Rescue

Decisions to allow the use of motorized or mechanized equipment or vehicles affect the natural quality by cutting or trampling vegetation, introducing invasive species, or causing noise that impacts wildlife. Under this alternative, direction for SAR operations would protect natural conditions.

The flowchart proposed under this alternative (Search and Rescue Standard 21160) considers law (Wilderness Act, Section 4(c)) and policy (FSM 2326 and BLM Manual 6340 1.6.C.17) regarding the use of motorized or mechanized equipment or vehicles and condenses them into a tool for the authorized officer to quickly make a legal and prompt decision regarding whether to use motorized/mechanized equipment or vehicles for a given operation. The flow chart is not new direction but rather is designed to allow for consistent, rapid responses during emergency situations. Consistently applying this tool would allow for decisions that consider visitor safety and wilderness qualities.

The number of sites created by clearing trees would be minimized using this decision-making process and direction emphasizing the use of natural clearings for the landing of helicopters (Search and Rescue Guideline 21163). Resource damage would be mitigated or rehabilitated, and care would be taken that vehicles (if used) would not spread invasive species. By approving the use of motorized and mechanized equipment or vehicles only when essential, natural conditions would be maintained.

Management Zones

Zoning is not explicitly addressed in the Wilderness Act, but any zone direction must conform to the Wilderness Act. While all zones must be managed to ensure wilderness character is preserved, the concept of zoning acknowledges that natural resources and recreational uses are not the same across the wilderness. Due to resource diversity, uses, and conditions, some management actions and standards may be prescribed for an entire wilderness, whereas many actions or standards would apply only to particular areas, sites, or zones (Haas et al. 1987).

Most visitor use (91%) occurs in Zones 3 and 4, which means these are the areas with the highest potential for impacts to the natural quality—vegetation, soil, water quality. Conversely, Zones 3 and 4 comprise <1% of the wildernesses, which means use is very concentrated in these locations.

None of the zone standards provide direction that would affect the natural quality of wilderness character directly, except for the direction specific to signs. Each zone allows for signs to be placed for resource protection (although in Zone 1, these instances would be extremely rare). This restriction would benefit the natural quality by protecting vulnerable or impacted natural resources, such as vegetation or wildlife.

Resource Indicator and Measure 3: Undeveloped

In summary, the direction presented in the WMP (Alternative A) would ensure preservation of the undeveloped quality of wilderness character.

Wilderness

Alternative A includes direction to manage vehicle access points to prevent unauthorized use (Wilderness Standard 2117), which would preserve the undeveloped quality by reducing the likelihood of unauthorized vehicle use.

Rangeland Resources

Alternative A includes direction that would only allow irrigation where practiced prior to the designation of wilderness (Rangeland Resources Standard 21113). For the NFS lands within the two wilderness areas, this direction would have no effect, as it is existing policy (see FSM 2323.26b). Within the BLM-managed 459 acres of the Cecil D. Andrus-White Clouds Wilderness, this direction would be new. Irrigation did not occur within this portion of the Wilderness prior to the wilderness designation. The direction would ensure preservation of the undeveloped quality from infrastructure required for these operations.

Fire Management

Direction to avoid locating temporary wildfire support in wilderness (Fire Management Guideline 21133) is established in Forest Service policy (FSM 2324.23) and would apply to most of the two wildernesses regardless of the WMP. This direction would be new for the BLM-managed portion of the wilderness. This direction would protect the undeveloped quality by avoiding the wilderness entirely, when possible. The additional clause (which is not established policy) to avoid Zone 1 and/or to use pre-existing disturbances when locating wildfire support in wilderness would ensure preservation of wilderness character, particularly the undeveloped quality.

Search and Rescue

During emergency operations within wilderness, using motorized and/or mechanized equipment or vehicles, such as helicopters, ATVs, motorcycles, wheeled liters, or motorcycles, would degrade this quality. These otherwise prohibited uses may be approved in accordance with law (Wilderness Act, Section 4(c)) and policy (FSM 2326, and BLM Manual 6340 1.6.C.17). Alternative A includes a flow chart (Search and Rescue Standard 21160), which takes direction from law and policy and condenses it into an easily navigated tool to be used by an authorized officer at time of emergency when a rapid response is needed. The flow chart would assist the decision-maker in promptly determining the necessity of motorized or mechanized use, thereby allowing responders prompt determination for means of access. Alternative A would ensure preservation of the undeveloped quality by implementing this decision flowchart. This flowchart has been in use for the Sawtooth Wilderness (also in the Sawtooth NRA and includes a portion of Blaine and Custer Counties) since 1998.

Management Zones

The goals and standards proposed for each zone are designed to avoid reacting only to problems already present. Instead, the zone direction assists in being proactive and helping to set a course toward the desired conditions. The standards for the four management zones assist with

protecting and potentially improving the undeveloped quality based on the conditions that existed at the time of designation and desired conditions for specific areas of the wilderness.

The standards for Zones 1 and 2 direct managers to remove or deny installations and facilities (with exceptions for valid existing rights, grazing facilities, historic/cultural facilities, or if determined to be the minimum necessary for administration of the area as wilderness), thus preserving the undeveloped quality. Further, the undeveloped quality may be improved under this direction, if an unnecessary, pre-existing facility were removed.

Management zone standards minimize installations, such as signs. Signs may be present for two reasons: resource protection or for routing or location of the visitor. Direction for Zones 1 and 2 would only allow temporary signs for resource protection, in rare instances. This direction would preserve the undeveloped quality across most of the wildernesses. In Zones 3 and 4, signs may be placed for resource protection, and since these two zones include about 91% of the visitation, there may be a higher likelihood for resource protection signs (based on a higher potential for resource impacts from concentrated visitor use). Also, these two zones are where most of the system trails occur, and the standards allow for occasional signs for visitors (e.g., at trail junctions).

For the above reasons, establishing zones would protect the undeveloped quality by minimizing installations in the more pristine portions of the wilderness.

Several standards and guidelines under other topic headings relate to zones and would help preserve the undeveloped quality (Wilderness Standard 2121, Recreation-Commercial Services Standard 2191, Fire Management Guideline 21133, and Lands and Special Uses Standard 21140) across the wildernesses. Also see the “Wilderness”, “Commercial Services”, “Fire Management” and “Lands and Special Uses” sections.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

In summary, the direction presented in the WMP (Alternative A) would lead to mixed outcomes that both improve and degrade opportunities for primitive and unconfined recreation. Overall, this alternative would lead to a moderate degradation to this quality from the proposed recreational use restrictions

<u>Wilderness</u>

Direction to minimize the unauthorized vehicle use (Wilderness Standards 2117) would not affect unconfined recreation, but would improve opportunities for primitive recreation, as routes on the landscape are considered facilities that would reduce self-reliant recreation.

<u>Wildlife Resources</u>

Restrictions on visitor use, such as limiting access to specific locations, limiting access at specific times, limiting certain activities, or limiting the stay duration, reduce the freedom of the visitor, which is a component of primitive and unconfined recreation (Anderson et al. 1998).

Alternative A includes 26,773 acres (29%) of the Cecil D. Andrus-White Clouds Wilderness where pack goats would not be allowed. This area is the core use area of the East Fork bighorn sheep herd from spring through fall. Approximately 6.4 miles of trail fall within the closure area and would no longer be available to pack goat users (see details in Appendix 1). This area

restriction would impact opportunities for primitive and unconfined recreation for pack goat users within this area. However, visitation by pack goat users is estimated to be quite low. Between 2004 and 2016, wilderness rangers documented encounters with visitors while on patrol, and no groups with pack goats were encountered. Based on 2016 registered use between the two wildernesses, only one group with pack goats registered with 4 people and 9 goats and a destination of Slide Lake.

A substantial overlap exists in the area where equine stock would be prohibited under this alternative; however, pack goat use would be allowed in the Boulder Chain Lakes and Slickenslide Creek areas, whereas equine stock would not.

In the remaining portion of the Cecil D. Andrus-White Clouds Wilderness outside the Pack Goat Exclusion Area and within the entire Hemingway-Boulders Wilderness, pack goat users would be required to adopt certain measures for handling goats. Pack goat users may be familiar with the North American Packgoat Association's measures (best management practices) and may voluntarily adopt these practices for reducing risk. However, the group size limit of 9 pack goats per group, or 3 goats per person, would negatively affect users wishing to have a larger group. These additional regulations (the 9 measures for reducing contact) constitute additional impacts upon a visitor's freedom of choice, creating a complex layering of regulations for the pack goat user.

While this alternative would implement various restrictions on pack goat use, continued use in the remaining portions of the wildernesses preserves the primitive quality of wilderness character. Using pack animals preserves the feelings of self-reliance, allowing users to travel to remote places.

Recreation Resources

A visitor's perception of recreating in an unconfined setting would be impacted by decisions that reduce visitor and stock group sizes, further restrict campfires, regulate the use of pack goats, constrain where stock can be grazed and tied, and limit where equine stock can travel. Spildie and others (2000; p. 99) state,

> One of the goals of wilderness recreation management is to avoid ecological impacts and provide opportunities for high-quality wilderness experiences. Another goal—which often conflicts with the former—is to provide access for these experiences and to avoid restriction and regulation, which can make experiences seem 'confined.' Conflict between these two goals usually results in some compromise of both.

Group Size and Packstock Management

Wilderness visitors value independence and freedom, thus, rules and restrictions reducing independence and spontaneity affect visitor use and experience. Minor to moderate negative impacts to opportunities for primitive and unconfined recreation would result from increased regulation. Specifically, Alternative A would limit group size to 12 people and recreational stock to 14 animals[4] (Recreation Resources Standards 2166 and 2167).

[4] Refer to wildlife heading within this Wilderness section for effects analysis related to pack goat use.

Alternative A would also impose regulations for managing recreational stock when tethering and grazing (Recreation Resources Standards 2170 and 2171) and would establish separate and overlapping areas where pack goats and equine stock would be prohibited (Recreation Resources Standard 2174).

As noted above, the goal of recreation management in wilderness is to avoid effects to the natural quality while allowing for visitor use and wilderness experiences. Education and regulation are the primary tools used to meet this goal. Typically, when education is ineffective, regulations may be established to protect natural features, preserve opportunities for solitude, and protect the primitive and undeveloped qualities of the area.

The magnitude of the effect of these restrictions on a visitor's sense of freedom may vary greatly depending on the degree of imposition or inconvenience the restriction has on the visitor and its duration and geographic extent. For instance, research has shown that visitors typically strongly oppose restrictions on day use (Hall et al. 2010). Other management actions, such as voluntary registration or prohibiting shortcutting of trails do not present substantial confinement of the visitor.

Acceptability of group size limits varies. Watson (1993) found that most users supported limiting group size and suggested a group size maximum of 10 people. Further, Martin and others (2009) summarize several studies and found that visitors are acceptable of restrictions, such as group size limits, "especially when such restrictions help improve or preserve social and/or resource conditions." A 2004 study in the Bob Marshall Wilderness complex found 57% of visitors felt that limiting group size to a maximum of 12 people was desirable, and an additional 6% found the limit desirable only in the more heavily used parts of the wilderness (Whitmore et al. 2004).

The standard for group size would ensure that encounters with large groups are reduced, although people who prefer to travel with a larger party size would need to adopt different strategies, such as breaking into smaller groups or choosing a different location for their visit. Since most visitors travel in groups of less than 12 in the wildernesses, this restriction is not expected to affect or displace many parties.

Based on information collected from trailhead registers in 2016 and wilderness ranger reports since 2004, the proposed group size limits would include most parties generally encountered within the 2 wildernesses, thereby accommodating most of visitor use. Visitors traveling with more than 12 people in a group accounted for <1% of total use. Further, <1% registered as traveling with recreational stock, with average group sizes of about 4 people and 4 head of stock. No groups registered as having more than 10 head of stock.

Some users, however, may be displaced to areas outside the wilderness. Popular areas outside of wilderness, such as Fourth of July and Washington Lakes, Warm Springs Meadows, Casino Lakes, and the Frog Lake Loop remain available for those wishing to travel in larger groups or those wishing to avoid other restrictions proposed under Alternative A.

In addition to accommodating most ongoing visitor use, this group size restriction is practical due to limited grazing areas and campsites that could accommodate larger groups. Communicating the group size restrictions would be simplified as they would be consistent with the nearby Sawtooth Wilderness, which is also managed by the Sawtooth NRA.

Groups larger than the proposed party size restrictions who wish to access wilderness with a commercial service provider would not be able to do so. In the Cecil D. Andrus-White Clouds

Wilderness, reported use by outfitter and guides (2006–2015) shows that 6% of groups had more than 12 people, and 10% of groups over that period had more than 14 head of stock. Conversely, no outfitter and guides reported use over the 2006–2015 period in the Hemingway-Boulders Wilderness that would have exceed the proposed groups size limits.

Recreational Stock Restrictions

Recognizing that the damage caused by recreational stock is generally much greater than that caused by hikers, and a very small proportion of visitors (<1% of registered visitation and outfitted use) benefit from or are associated with this impact, confinement of stock impacts (limiting where they can go) offers a reasonable compromise between providing stock users access to wilderness and confining the heavy impacts typically associated with stock use.

Visitors traveling with recreational stock would continue to have opportunities to travel on many maintained trails and in untrailed areas. Alternative A would prohibit equine stock use in 5 drainages (6,058 acres; 7% of the Cecil D. Andrus-White Clouds Wilderness). Managers have historically posted signs discouraging stock use above Lodgepole Lake to protect fragile vegetation. Under this alternative, 1.95 miles of Boulder Chain Lakes Trail 683 above Lodgepole Lake would also be closed to equine stock use.

These limits would affect recreational stock users traveling on and off-trail with horses and mules and would minimally affect the geographic distribution of stock users as most of these areas present topographic challenges and have not been frequently used by stock users, as evidenced in part, by the small number (7%) of recreation sites in the proposed closure area showing evidence of stock use.

Within the proposed equine stock closure area, only 7% of recreation sites (4 of 61) showed evidence of stock use (manure, feed, or tree damage), as compared to 21% of recreation sites (46 of 224) across the Cecil D. Andrus-White Clouds Wilderness. Of the 4 sites located within the closure area, 3 exhibit moderate impacts and 1 exhibits extreme impacts.

The restriction would have a positive effect on the experience of visitors who prefer to travel in areas without signs of stock use. On the other hand, those who wish to travel with their horses and mules in some remote parts of the wilderness would be negatively affected.

Under Alternative A, outfitters would also be prohibited from using horses or mules within the equine closure area. Assigned camps and other sites commonly used by outfitters are outside of the closure area, which would minimize direct effects on outfitters using those areas. Yet, outfitters would still be negatively affected, as would any clients wishing to be outfitted or guided into the closure area using equine stock.

A visitor's sense of freedom from managerial controls would be negatively affected under this alternative as portions of the Cecil D. Andrus-White Clouds Wilderness would be closed to equine stock use. Given the low equine use estimated in these areas, and the small portion of the wilderness encompassed by the restriction, the overall impact on this user group is anticipated to be low to moderate.

The standards for minimizing riparian damage by restricting tethering or grazing adjacent to water sources (Recreation Resources Standards 2170 and 2171) are also policies that would impact a recreational stock user's opportunity for unconfined recreation, although minimally.

Overall, under this alternative, opportunities for a primitive and unconfined recreation would be moderately, negatively affected for recreational stock users.

Campfires

Campfires are an especially challenging issue for public land managers because fires remain an important aspect of the camping experience, despite recent findings that show an increasing preference for cook stoves (Christensen and Cole 2000). An unregulated campfire policy maximizes a visitors' ability to enjoy a campfire, but impacts such as site proliferation and tree damage could be high.

Reid and Marion (2005), in their review of literature, concluded that campfire bans weren't necessarily effective in deterring visitors from building campfires or damaging trees; however, poor communication of policies may have been a factor. Based on the findings, they suggest management approaches should be based on specific area objectives and may vary by management zone. For example, permanent campfire bans in areas with insufficient wood production, such as in alpine elevations, are prudent and more easily justified.

The Maroon Bells-Snowmass Wilderness in Colorado recently changed to an elevation-based campfire closure. Wilderness rangers documented a substantial increase in compliance with the elevation-based closure versus a "tree line" or site-by-site closure. This success was somewhat attributed to the ease for visitors to understand the regulation (Nelson 2017).

Proposed campfire restrictions in the wildernesses would include elevations above 8,800 feet, and outside of 200 yards of Walker, Island, Upper and Lower Chamberlain (9,477 feet and 9,197 feet), and Boorn Lakes. Recreational campfires would be restricted on 78,709 acres: 40,124 acres (41%) in the Hemingway-Boulders Wilderness and 38,585 acres (57%) in the Cecil D. Andrus-White Clouds Wilderness. Many of the lakes in the Cecil D. Andrus-White Clouds Wilderness have been closed to campfires with varying success since 1996.

The restrictions would prohibit campfires in about half of the wildernesses and would affect the primitive unconfined opportunities within the wildernesses. However, many of the popular, heavily used, and resistant sites would remain open to campfire use. In general, people tend to have more campfires in sites along trails than in trail-less areas (Martin and Blackwell 2013), and much of the area encompassed by the restriction is in the trail-less portions of the wildernesses.

Opportunities for primitive and unconfined recreation are not required on every acre within the wilderness, and visitors wishing to camp with fire may adjust their planned routes and destinations to accommodate this restriction. Overall, this restriction would likely have moderate, negative impacts on primitive and unconfined recreation within the wildernesses.

Human Waste

The requirement to bury human waste under this alternative is a generally accepted technique (Cilimburg et al. 2000). While it is a management restriction on visitor behavior, it is a common recreation practice and of little impact on the visitor and their sense of freedom. When human waste is buried appropriately, not only is water quality protected, but visitor experience also improves.

Off-Trail Marking

Discouraging the public from marking off-trail routes may constrain some visitors, negatively affecting their feeling of freedom, while removing these markers would improve the primitive aspect of this quality, allowing users the challenge of discovering their own routes.

Permits

Under this alternative, users would be encouraged to continue voluntarily signing in at a trailhead registration box. Users are accustomed to registering at trailheads so no change to their primitive and unconfined experience from status quo would occur.

Commercial Services

Section 4(c) of the Wilderness Act prohibits structures and installations in wilderness. The direction specific to structures (Recreation-Commercial Services Standard 2189) would apply to the FS portion of the wilderness regardless of the wilderness plan, as it is established in policy. While the listed BLM policy (BLM H-2930-1, BLM 6340 B.2.(i).) alludes to managing outfitter and guide structures, the WMP direction would essentially be new direction for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. Reducing the duration of commercial outfitter installations and structures would improve the opportunities for primitive and unconfined recreation by minimizing facilities that reduce self-reliant recreation. This direction would continue to allow for realization of recreational experiences through guided activities, while minimizing the impacts from structures or installations on wilderness character.

Zones 3 and 4 were mapped to ensure all existing assigned outfitter and guide camps were within these zones. Standard 2190 ensures that any future assigned camp would be within those two zones to protect the opportunities for primitive recreation and desired conditions for Zones 1 and 2.

<u>Management Zones</u>

The agencies identified most of the wilderness as Zone 1, where visitors may have the greatest opportunity for primitive recreation away from trails, trail signs, and established campsites. Thus, preserving opportunities for primitive recreation across the wildernesses as they existed at the time of designation. However, conditions at the time of designation also included areas of heavy visitor use, concentrations of campsites with varying levels of impact, and popular destinations along system trails.

Establishing zones recognizes the spectrum of opportunity for primitive recreation across the wilderness at a site-specific level. The zone direction provides guidance to preserve these opportunities within each zone, such as direction for trail classes or no system trails. Overall, zone direction would benefit opportunities for primitive and unconfined recreation by protecting the opportunities as they existed across each wilderness at the time of designation.

Resource Indicator and Measure 5: Opportunities for Solitude

In summary, the direction presented in the WMP (Alternative A) would result in moderate improvement to solitude.

Wilderness

Remoteness from sights and sounds of human activity inside the wilderness is a component of opportunities for solitude. This component can be affected by encountering artificial clearings, as would be constructed for helicopter landings. Emphasizing use of natural openings for helicopter landings (Wilderness Guideline 2125) would minimize these impacts in the long term and preserve opportunities for solitude.

Wildlife Resources

This alternative includes an area (29% of the Cecil D. Andrus-White Clouds Wilderness) where pack goat use is prohibited (Wildlife Resources Standard 2155). Opportunities for solitude may negligibly improve in the pack goat closure area as this use is removed, leading to fewer visitor encounters. However, pack goat use within the wilderness is very low: only one group with pack goats registered in 2016 and no groups were encountered by wilderness rangers from 2011through 2016. This reduction in encounters (improvement to opportunities for solitude) would be extremely minor and would occur at the expense of opportunities for primitive and unconfined recreation (see above) for the pack goat user.

Recreation Resources

The Wilderness Act (Sec.2(c)) mandates the preservation of naturalness by its definition of wilderness as an area that "generally appears to have been affected primarily by forces of nature with the imprint of man's work substantially unnoticeable." Management actions that reduce the evidence of human presence (e.g., campsites without vegetation, fire scarred soils and rock, trees damaged by recreational stock and firewood gathering, unauthorized user-created routes, human waste and trash, and lakeshore damage from grazing) improve a visitor's sense of remoteness and feelings of solitude. By designating areas without campfires, removing markings on unauthorized trails, requiring proper disposal of human waste, and managing recreational stock use, Alternative A would protect a visitor's opportunity to experience wilderness in its natural state; thus, improving opportunities for solitude.

Group Size, Packstock Management, and Campfires

A visitor's sense of solitude and perception of risk, self-discovery, self-reliance, and remoteness from human civilization are affected by conflicts with other visitors, the presence of others, and the behavior of those visitors. According to research by Marion and others (1993) encounters with different types of visitors (e.g., large groups) with different styles of use (e.g., horse users) may affect visitors' experiences more than the sheer numbers of other parties. Such unwanted encounters often are one-sided effects to one type of visitor. For example, when hikers respond negatively to encounters with stock and the effects resulting from their use (e.g., waste on trails and campsites, insects, damage to vegetation).

Although large parties are a small percentage of use in the two wildernesses, their presence diminishes other visitors' experiences (Cole et al. 1995). User conflicts and evidence of use would be improved by the proposed group size reductions, restrictions in equine stock use in 6,058 acres of the Cecil D. Andrus-White Clouds Wilderness, and campfires above 8,800 feet, as the policies would reduce encounters, sights and sounds of other people. Encounters in the more remote, interior areas are more troubling to visitors than areas closer to the edge of the wilderness (Stankey 1973). The equine stock closure and campfire restrictions areas are in more remote portions of the wilderness where visitors have a high expectation for solitude.

Horse use and campfires often produce the most conspicuous impacts in a wilderness. Tree damage, trampling overgrazing may diminish a visitor's perception of naturalness. Actions to reduce impacts to the natural quality would improve opportunities for solitude. For example, restricting campfires in remote areas, and the confinement of equine stock impacts by eliminating their use in some remote areas and regulating recreational stock grazing within 200 feet of lakes, streams, or springs may improve visitors' wilderness experience and sense of solitude.

Whitebark pine are iconic in these high-elevation wilderness areas and their aesthetics contribute to a sense of wildness and isolation. Reduced impacts from campfire use to these trees would preserve this experience. Campfire evidence is present in 89% of campsites in the two wildernesses. Eliminating the visual effects of campfires, such as smoke, flame, blackened rocks and soil, campfire rings, and damaged trees, in remote areas would improve opportunities for solitude.

Human Waste

Under Alternative A, implementing requirements for the burial or removal of human waste would have a positive effect on solitude by eliminating the aesthetic concerns of encountering feces or toilet paper in the backcountry.

Commercial Services

Remoteness from sights and sounds of human activity inside the wilderness is a component of opportunities for solitude. This remoteness is affected by encountering structures or impacts from other visitors within wilderness, including campsite structures such as tables, chairs, or corrals. The Standard specific to structures for commercial services (Recreation-Commercial Services Standard 2189) would apply on the NFS lands within the wilderness areas regardless of the WMP, as those restrictions are established in policy (FSM 2323.13g). This direction would minimize, to one season or less, the duration of any future structures related to outfitter and guide operations on the BLM-managed portion of the wilderness, thereby preserving opportunities for solitude.

<u>Scenic Environment</u>

Facilities and structures in wilderness represent obvious evidence of human presence; however, rare situations exist where they are necessary for resource protection. Current direction for scenic values is to manage for the Visual Quality Objective (VQO) of preservation, with no evident management activities except for very low visual-impact recreation facilities, such as stock ties and trail structures. Alternative A would limit visual impacts to visitors by providing management direction for the use of natural materials, designed to blend in with the natural environment (Scenic Environment Guideline 2196). These limitations would protect opportunities for solitude by minimizing the visual presence of facilities.

Also, Alternative A includes direction that visual conditions changed by natural events and processes would not be considered detrimental to scenic qualities (Scenic Environment Guideline 2197). This direction would preserve the apparent naturalness of the landscape, enhancing visitor experience and sense of remoteness.

Rangeland Resources

Irrigation facilities could impact opportunities for solitude by increasing the sights of human occupation of the wilderness. Under this alternative, direction prohibiting irrigation where it did not occur prior to designation (Rangeland Resources Standard 21113) would be established. For the NFS lands within the two wilderness areas, this direction would have no effect, as it is existing policy (FSM 2323.26b).

For the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness, irrigation did not occur prior to designation; therefore, any future proposals for irrigation would be denied under this direction. This prohibition would preserve opportunities for solitude by removing the potential for this form of development.

Fire Management

Alternative A proposes direction to avoid locating fire support in wilderness. If locating fire support in wilderness is necessary, then it should be avoided within Zone 1 (Fire Management Guideline 21133) using MIST, resource advisors, and restoring disturbances (Fire Management Guideline 21134). This direction would benefit opportunities for solitude by minimizing the sights and sounds of human presence and disturbance within the wilderness, thus maintaining opportunities for solitude.

Lands and Special Uses

Lands and special use proposals (Land and Special Uses Standard 21140) would maintain opportunities for solitude by minimizing sights and sounds of human activity within the more pristine zones, in line with the desired conditions for each zone. However, if installations or obvious activities are authorized in Zones 3 or 4, effects to a visitor's sense of remoteness could occur. With higher visitation in Zones 3 and 4, a visitor's exposure to special land uses, such as installations or associated activities, would increase. Depending on the type of special use project proposed and where it is approved to be placed, this direction may aid preservation or lead to degradation of opportunities for solitude, which would be analyzed at a site-specific level in an MRA.

Search and Rescue

No SAR operations occurred in the wildernesses in 2016 (the first full year following designation), and pre-designation data are not available. However, managers estimate one SAR operation with motorized use occurs annually. Implementing the flow chart (Search and Rescue Standard 21160) would not directly affect opportunities for solitude. Indirectly, by allowing only the necessary use of motorized or mechanized emergency response, this direction would maintain opportunities for solitude. Similarly, implementing direction to use natural openings for helicopter landing areas and promptly addressing any resource damage resulting from SAR operations (Search and Rescue Guideline 21163) would also minimize the sights and sounds of human activity and presence within the wilderness.

Management Zones

The zone descriptions provide the transition from descriptions of existing condition to prescriptions for future conditions in specific areas. Through zoning, the intent is to allow for continued high recreational use in Zones 3 and 4, while preventing all areas of the wildernesses from sliding toward the same high level of use and lower level of opportunities for solitude.

Within the Cecil D. Andrus-White Clouds Wilderness alone, 224 campsites are identified, of which 206 (or 92%) occur in Zones 2, 3, or 4. These three zones comprise <3% of the wildernesses. In general, zone direction would help protect the opportunities for solitude across the wildernesses by minimizing the sights (impacts, developments) and sounds of other people within Zone 1. This restriction maintains the outstanding opportunities for solitude, as were present at the time of designation, across most of the two wildernesses.

Alternative B—Natural-Focus

Resource Indicator and Measure 1: Untrammeled

In summary, the direction presented in Alternative B would be the same as presented in Alternative A.

Wilderness, Recreation Resources, Scenic Environment, Rangeland, Fire Management, Lands and Special Uses, Search and Rescue and Management Zones

The effects of Alternative B on the untrammeled wilderness quality for wilderness, recreation, scenic resources, rangeland, fire management, lands and special uses, SAR, and management zones would be the same as described for Alternative A.

Resource Indicator and Measure 2: Natural

In summary, the direction presented in Alternative B would preserve and potentially lead to substantial improvement to the natural quality.

Wilderness, Commercial Services, Scenic Environment, Rangeland, Fire Management, Lands and Special Uses, Search and Rescue, and Management Zones

The effects of Alternative B on the natural wilderness quality for wilderness, commercial services, scenic resources, rangeland, fire management, lands and special uses, SAR and management zones would be the same as described for Alternative A.

Wildlife Resources

Prohibiting pack goats from the two wildernesses would reduce the risk of disease transmission in the MA, therefore protecting bighorn sheep populations and the natural quality. See sections 3.4.3.1 and 3.4.3.2 on the environmental consequences to wildlife below for additional information on disease transmission and other effects to wildlife.

Recreation Resources

Group Size and Packstock Management

Under Alternative B, group sizes would be limited to a maximum of 8 people in Zone 1, and a maximum of 12 people in Zones 2, 3, and 4. For recreational stock, the maximum allowable group size would be 10 animals in Zone 1, and a maximum of 14 animals in Zones 2, 3, and 4.[5]

As described under the effects for Alternative A, as group size increases, effects to biophysical resources (e.g., soil and plant communities) also increase (Cole 1983, Cole et al. 1997, Anderson

[5] Refer to wildlife heading within this Wilderness section for effects analysis related to pack goat use.

et al. 1998, Cole 2000, Monz et al. 2000). Large groups cause impacts in and around campsites, when traveling off-trail, and near water.

The group sizes vary by zone under Alternative B to protect the less-used, more pristine portion of the wildernesses located in Zone 1. Research has shown that larger group sizes have greater impacts in the pristine, less-disturbed areas than smaller groups (DeLuca et al. 1998, McEwen et al. 1996, Leung and Marion 2000). And, groups with equine stock tend to have greater impacts (e.g., soil erosion, tree damage) than hiker-only groups (Leung and Marion 2000, Cole 1983). In fact, trampling from horses can impact an area 8 times more from hikers (Dawson and Hendee 2009), and this impact is longer lasting in less resilient environments, such as alpine areas (Hartley 2000). Further, restoring damage is very difficult, pointing to the need to prevent damage before it occurs by reducing group sizes in the pristine, less-used areas of a wilderness (Spildie et al. 2000).

Group size limits would reduce pressure on natural resources. Disturbances caused by human and recreational stock presence would continue to exist; however, additional negative effects beyond the existing condition would not be expected. Existing trails and some campsites could accommodate the group sizes proposed under this alternative without additional impacts and without site expansion.

The zoning approach to group size limits, as described under this alternative, would protect most of the wilderness areas by reducing the group sizes in Zone 1 while continuing to allow slightly larger groups within the areas with established campsites and trails that can better accommodate the larger sizes. These group size limits would allow for moderate beneficial effects to the natural quality.

The various other standards and guidelines (locating recreational stock handling areas away from water sources, restricting equine stock use in certain areas, and minimizing impacts to live trees when tying stock outside of camp) would be the same as under Alternative A, benefiting the natural components, including water quality, soils, and vegetation.

Recreational Stock Use Restrictions

This alternative includes an equine stock closure area to protect fragile alpine soils and vegetation, including sensitive whitebark pine trees, riparian processes, and aquatic biota. Limiting where equine stock can go confines stock-related impacts and offers a reasonable compromise between providing horse riders with access to wilderness and confining the heavy impacts typically associated with recreational stock use (Dawson Hendee 2009). Much of the proposed area is already prohibitive for stock access due to extremely steep, rocky terrain.

This alternative differs from Alternative A by including the entire Slickenslide Creek drainage below and above Quiet Lake, in the closure area. In conjunction with group size reductions, Alternative B would protect vegetation; water quality; soils; and sensitive off-trail areas in an additional 1,232 acres that would be closed to equine stock use. This direction would be moderately beneficial to the natural quality.

Campfires

By only allowing campfires within Zones 3 and 4 (1,110 acres), Alternative B would protect alpine vegetation, specifically whitebark pine, and minimize general campfire effects (e.g., site establishment, trampling of vegetation, tree damage) across most of each wilderness. As noted above under Alternative A, campfire restrictions are supported by research (Cole and Dalle-

Molle 1982). Campfire limitations would protect slow-growing subalpine forests from depletion of ecologically and scientifically important downed wood, such as whitebark pine. Further, impacts to riparian vegetation would decrease and down and dead wood density could increase, which could increase overall soil productivity supporting resilient native vegetation communities and wildlife habitat. Where allowed, campfire use would continue to impact recreation sites.

Alternative B differs from Alternative A in that campfires would be allowed in only 1% of the two wildernesses. Under Alternative A, campfires would be allowed 41% of the Hemingway-Boulders Wilderness and 57% of the Cecil D. Andrus-White Clouds Wilderness. Therefore, Alternative B would better protect whitebark pine across the wilderness areas while still allowing campfire use in the areas that receive approximately 90% of visitor use. Overall, campfire restrictions would pose a moderate-to-high beneficial effect to the natural quality.

Resource Indicator and Measure 3: Undeveloped

In summary, the direction presented in Alternative B would be the same as discussed under Alternative A.

Wilderness, Recreation Resources, Commercial Services, Scenic Environment, Rangeland, Fire Management, Lands and Special Uses, Search and Rescue, and Management Zones

The effects of Alternative B on the undeveloped wilderness quality for wilderness, recreation, commercial services, scenic resources, rangeland, fire management, lands and special uses, SAR, and management zones would be the same as described for Alternative A.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

In summary, the direction presented in Alternative B would result in substantial impacts to opportunities for primitive and unconfined recreation, particularly for equine and pack goat users, and outfitted groups.

Wilderness, Commercial Services, Scenic Environment, Rangeland, Fire Management, Lands and Special Uses, Search and Rescue, and Management Zones

The effects of Alternative B on opportunities for primitive and unconfined recreation for wilderness, commercial services, scenic resources, rangeland, fire management, lands and special uses, SAR, and management zones would be the same as described for Alternative A.

Wildlife Resources

Opportunities for primitive and unconfined recreation for pack goat users would be eliminated under this alternative as this form of primitive recreation would be prohibited in both wildernesses to protect bighorn sheep from the potential for disease transmission. While use estimates based on visitor data indicate very low use by this group (one registered group in 2016 in the Cecil D. Andrus-White Clouds Wilderness), pack goat users would be highly impacted. Excluding an entire user group would displace that use elsewhere, depriving pack goat users the opportunity for wilderness experience in these two areas.

Recreation Resources

Wilderness protection provides the visitor an opportunity to experience unconfined recreation in undeveloped, primeval and natural conditions. In an ideal world, these objectives would align.

Unfortunately, recreation leaves a footprint on and can affect wilderness lands. Visitor impacts threaten to compromise wilderness management mandates for preserving and sustaining high quality natural environments and recreational experiences. Cole and McCool (2000; p. 1) state the following:

> Managers must seek a balance between the provision of access for visitors and protection from the problems associated with that visitation. They are challenged to find management approaches that maintain the sense of freedom, solitude, spontaneity, risk, and challenge that are considered fundamental to wilderness experiences. The ideal wilderness setting, where visitors have free access, experience minimal behavioral restrictions, and find undisturbed and uncrowded conditions is not always attainable. Managers must often choose among these desirable attributes. Resulting decisions—to deny access, restrict behavior, or allow further degradation—are always controversial.

A principle goal for managing wilderness visitation is to prevent avoidable effects and minimize those that are not. To achieve this goal, wilderness managers must effectively educate and regulate visitors while protecting all qualities of wilderness character.

Group Size and Packstock Management

Under Alternative B, group size would be limited to a maximum of 8 persons and 10 head of stock in Zone 1, and a maximum of 12 persons or 14 head of stock in Zones 2, 3, and 4. Zones 2, 3, and 4 include the destinations where the most (over 95%) visitor use occurs. The impacts to visitors in these zones would be the same as under Alternative A: people who prefer to travel with a larger party size would need to adopt different strategies, such as breaking into smaller groups or choosing a different location for their visit. The impacts to these user groups may be moderate (if they can split up) to high (if they are displaced elsewhere).

Since most visitors travel in groups of less than 12 in these wildernesses, this restriction is not expected to affect or displace many parties. Based on information collected from trailhead registers in 2016 and wilderness ranger reports since 2004, visitors traveling with more than 12 people in a group counted for <1% of the total use. Also, <1% of groups registered as traveling with recreational stock, with average group sizes of about 4 people and 4 head of stock. No groups registered as having more than 10 head of stock per group.

In Zone 1, however, the group size would be further reduced under this alternative to a maximum of 8 persons and 10 head of stock. Based on registration data from 2016, only 4% of groups registered with more than 8 people. Of these groups, the primary destinations were Chamberlain Lakes (18%), Boulder Chain (21%), Murdock Creek (21%), and Boorn Lakes (18%); none of these destinations are located within Zone 1. Only one group of over 8 people indicated a destination (Blackman Peak) in Zone 1. While groups may not have indicated a Zone 1 destination, visitors may—and likely do—visit Zone 1 areas by simply walking off-trail a short distance.

Cole and others (1987) have noted that party size limits larger than 10 people would likely have little social consequence, as median group sizes tend to be around 4 people. They continue that selecting a group size limit requires judgement, and no magical formula exists for determining the ideal number; however, group sizes of more than 10 people tend to have little ecological or social benefit. Conversely, for groups wishing to travel in larger groups, the effects of the smaller group size limits would be high.

The complexity of the group size restriction under this alternative is high and more onerous on the visitor. Administration of the varying group size restrictions would also be more difficult for the agencies. Over a relatively short distance, 3 or 4 varying group size limits would be in place from outside to inside the wilderness. Information would need to be conveyed regarding not only the group size limits, but also the spatial component of where they are established on the ground.

Groups larger than the allowed limits who wish to access wilderness with a commercial service provider would not be able to do so. In the Cecil D. Andrus-White Clouds Wilderness, outfitted use from 2006 through 2015 reported 1% of groups (clients and employees[6]) with more than 12 people, and 10% of groups had more than 14 head of stock. However, a higher proportion of outfitted/guided groups during that time were greater than 8 people (8%) and 10 head of stock (22%), as proposed for Zone 1. In the Hemingway-Boulders Wilderness, 5% of the use would be affected by the Zone 1 group size limits and no groups would be affected, based on past use, by the limits for Zones 2, 3, and 4 (Table 3).

Table 3. Outfitter and guide reported use (2006–2015) that exceeds group size under Alternative B for people and stock-supported services

Alternative B Groups Size Limits			Cecil D. Andrus-White Clouds Wilderness		Hemingway-Boulders Wilderness	
Zone	People (maximum)	Stock (maximum)	Reported use over the Proposed Limit (People)	Reported use over the Proposed Limit (Stock)	Reported use over the Proposed Limit (People)	Reported use over the Proposed Limit (Stock)
Zone 1	8 people	10 head	8% (20 groups)	22% (49 groups)	5% (2 groups)	5% (2 groups)
Zones 2, 3, 4	12 people	14 head	1% (3 groups)	10% (22 groups)	None	None

Other outfitters and guides provide support for skiing and climbing activities in the wildernesses. From 2006 through 2015, these groups averaged 4.5 people per group, with some groups, which had 15 to 16 people (uncertain how many groups) exceeding the proposed 8- or 12-person group size limit. However, as noted in the "Affected Environment" section, available data don't allow for more detailed analysis nor are they certain what percentage of this use entered the wilderness.

The group size restriction would impact 8% to 22% of outfitted use based on these historic use numbers, which could impact their operations. Clients would have to adjust their group sizes, particularly when traveling in Zone 1, or their destination, with some groups being displaced to outside the wildernesses. For example, some groups may travel and camp in Zones 2, 3, or 4, with their larger groups (9–12 people), and then would be required to split into smaller groups when traveling in Zone 1.

Under Alternative B, the impact to unconfined recreation for general visitors would be low, as most groups are within the groups size limits. Impacts to unconfined recreation for outfitters and

[6] These calculations exclude drop camp support. In drop camp situations, the employees travel separately from, and do not camp with clients.

guides and their clients would be moderate, given the percentage of historic use that would be affected by the more restrictive Zone 1 group size limit.

Recreational Stock Use Restrictions

As described under the resource indicator and measure 2 (natural quality) above, damage caused by recreational stock use is generally much greater than that caused by hikers. While only a very small portion (<1% based on 2016 register data) of visitors use stock, horseback riding and use of pack stock are traditional uses of the area and are intimately connected to western culture. A larger equine stock closure area is proposed under Alternative B than Alternative A, to protect fragile alpine and riparian vegetation. Additionally, some of the trails and terrain are inherently limiting to stock because of the steep and rocky landscape.

Under Alternative B, the equine stock closure area would be larger (7,290 acres) than under Alternative A (6,058 acres). The closure area would encompass 8% of the Cecil D. Andrus-White Clouds Wilderness (compared with 7% under Alternative A) and 16 more dispersed recreation sites than Alternative A. Within the proposed closure area, only 5% of recreation sites (4 of 77) showed evidence of recreational stock use, which further illustrates the low level of stock use at sites within the proposed closure area.[7]

Similar to Alternative A, this alternative would impose regulations for managing recreational stock when tethering and grazing (Recreation Resources Standards 2170 and 2171) and would establish separate and overlapping areas where pack goats and equine stock would be prohibited (Recreation Resources Standard 2174). The closure area to equine stock use would include an additional 1232 acres and 0.7 miles of Boulder Chain Lakes Trail 683 above Lodgepole Lake (see Appendix 3). Historically, managers have posted signs discouraging horses above this area because of the challenging terrain and to protect fragile vegetation. Under Alternative B, equine stock use would also be prohibited in the Slickenslide Creek drainage encompassing Quiet Lake, Noisy Lake, and Shallow and Scree Lakes. Stock access is already severely limited in this drainage as travel is extremely difficult due to the steep, challenging topography and lack of trails.

While stock use is high for outfitters and their clients, it is extremely low (>1% of visitors) in the Cecil D. Andrus-White Clouds Wilderness; thus, the potential impact to these users would be moderate. Restricting access to this portion of the Cecil D. Andrus-White Clouds Wilderness to equine stock use may appear inconsequential, as it only encompasses 8% of the Wilderness. However, this area includes a substantial portion of the central lake areas of the Wilderness. Equine stock use would be allowed access to Boulder Chain Lakes as far as Lodgepole Lake and Walker and Island Lakes via NFS trails, but access above these lakes or to the other lake basins encompassed in the closure would be by foot traffic only. Approximately 2.69 miles of Boulder Chain Trail 683 is within the equine stock use closure area, the rest of the area does not include trails. Traveling to and camping at the high elevation lakes is highly desirable and is frequently the primary destination. Some users may be completely excluded from these areas as a result. Under Alternative B, additional acres closed to use by equine stock users would increase the negative impacts to the unconfined opportunities in the Cecil D. Andrus-White Clouds Wilderness. However, given the low equine use estimated in these areas, and the challenge of

[7] Refer to wildlife heading within this wilderness section for effects analysis related to pack goat use.

access in this portion of the wilderness encompassed by the restriction, the overall impact on these user groups is anticipated to be low to moderate.

Stock use is integral to the services provided by several outfitter and guides (excluding the skiing and climbing guide services). However, most (>80%) of the destinations reported by outfitters and guides from 2006 to 2015 are located outside of the proposed restriction area (i.e., Chamberlain, Little Boulder assigned site, Walker Lake, Hatchet Lake, and South Fork assigned camp in the Hemingway-Boulders Wilderness). These destinations do not include day trip destinations or other stock-supported access into stock closure areas. Thus, this restriction would pose a moderate impact on the area available for these stock-supported commercial services to operate, especially for guided hunting trips. While some of the area within the proposed closure is desirable for hunting and other uses, much of the landscape within the closure area is extremely challenging or topographically prohibitive for stock use.

Campfires

Under Alternative B, campfires would only be allowed in Zones 3 and 4, which would be approximately 1% of the two wildernesses (1,110 acres) and which receives over 90% of the visitor use. Opportunities for having a campfire would still be available to visitors camping in those areas. Yet, the overall opportunity for campfires would be dramatically reduced under this alternative. While only 8% of visitor use is in Zones 1 and 2, those visitors wishing to camp with fire in the more remote areas of the wildernesses would be prohibited from doing so, resulting in a moderate, negative impact on primitive and unconfined recreation within the wildernesses

Permits

Two choices are presented in Alternative B for establishing a mandatory permit system. Both options would require users to obtain a free, self-issued wilderness use permit to educate users of regulations and determine use levels and patterns. The two options differ in that option 1 requires all visitors to have a wilderness use permit, and option 2 adds a requirement for groups of 8 or more people, or those with recreational stock that remain overnight to obtain their permit from a Forest Service or BLM office. Neither option would impose a quota system, limiting numbers of users.

Adding either permit requirement could degrade a visitor's sense of freedom; however, since the permit would be obtained prior to entry into the wilderness, the effect would be low for most users. While few studies exist on the topic, Hendee and Lucas (1973) found that most wilderness users favor, or at least do not object to, the concept of mandatory permits, registration, or related controls.

In the nearby Sawtooth Wilderness, also located in the Sawtooth NRA, a required permit system has been in place since 1998 and is a valuable education and monitoring tool. Groups of 8 or more people, or those with recreational stock that remain overnight are required to obtain their permit from a Forest Service office. These user groups have the potential for the greatest resource impacts. This system provides an opportunity to be proactive in educating visitors and communicating rules and regulations. These contacts have proven to be positive in that visitors arrive prepared with an understanding of how to minimize their impacts. A positive benefit for the user is that the interaction allows the Forest Service to share information to enhance their experience. Because permits would be available in person, through the mail or fax, or

electronically, the burden to the user would be low but would affect spontaneity, an important component of unconfined recreation.

Human Waste and Off-Trail Marking

The effects of Alternative B on the opportunities for primitive and unconfined recreation wilderness quality for human waste and off-trail marking would be the same as described for Alternative A.

Resource Indicator and Measure 5: Opportunities for Solitude

In summary, the direction presented in Alternative B would benefit opportunities for solitude based on improvements to naturalness and would result in limited improvements from visitor management actions.

Wilderness, Commercial Services, Scenic Environment, Rangeland, Fire Management, Lands and Special Uses, Search and Rescue and Management Zones

The effects of Alternative B on opportunities for solitude for wilderness, commercial services, scenery resource, rangeland resources, fire management, lands and special uses, SAR, and management zones would be the same as described for Alternative A.

Wildlife Resources

Prohibiting pack goat users under this alternative may have a negligible positive effect on opportunities for solitude by reducing the encounter rate, as this user group would not be within wilderness. Only one group registered in 2016, and wilderness rangers did not encounter any pack goat users during patrols within areas now designated wilderness from 2011 through 2016. Consequently, improvements to opportunities for solitude would be exceedingly low.

Recreation Resources

Group Size and Packstock Management

Wilderness visitors generally say that encountering large groups reduces the feelings of solitude—not seeing other people, privacy, and opportunity for contemplation. If too many other people are around, those visitors who desire solitude may have difficulty achieving it (Freimund and Cole 2001). However, visitor opinions differ on the importance of solitude. For some, the opportunity to visit is more important than having solitude on every trip. The most responsive management strategy, given the mandate in the Wilderness Act (Section 2c) to preserve outstanding opportunities for solitude and differing opinions on the importance of solitude, may be to emphasize preservation of solitude in the portions of wilderness that currently receive little use, and in the more heavily used locations, work to minimize excessive resource damage (Freimund and Cole 2001).

Wilderness offers opportunities for both on-trail and off-trail travel. Off-trail areas offer visitors the challenge of navigation and typically provide more opportunities for solitude in wilderness, as visitors tend to concentrate around trails and established campsites at popular destinations.

Under this alternative, the on-trail (i.e., in Zones 2, 3, and 4) group size would remain the same as under Alternative A: 12 people and 14 head of stock. Group sizes for both people and stock would be reduced in Zone 1, which contains most of the off-trail areas. These additional limits would affect the larger groups (those greater than 8 people or 10 head of stock), which account

for about 4% of groups (based on 2016 register data; no groups registered with more than 10 head of stock), when traveling off-trail (Table 4).[8]

Visitors expect higher encounter rates near trailheads and trails, particularly near the edge of wilderness where day use occurs. Therefore, encounters in the more remote, interior areas or at campsites are more troubling to visitors and impact feelings of solitude more (Stankey 1973). Large groups can have an even greater impact.

Zone 1 group size restrictions would greatly reduce the area in which larger groups are able to travel together, resulting in negative effects to opportunities for primitive and unconfined recreation to these larger groups (as described above). Smaller group sizes, however, would experience an improvement in opportunities for solitude, particularly those visitors who wish to have fewer encounters with other people. While few of the reported destinations in the 2016 register data are within the proposed Zone 1, a potential exists that any group may enter this zone at some point on their trip.

Table 4. Proposed zoning—percentage of each zone and visitor use by zone for the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses

Proposed Zone	Percentage of Both Wildernesses	Percentage of Visitors by Zone in the Hemingway-Boulders Wilderness	Percentage of Visitors by Zone in the Cecil D. Andrus-White Clouds Wilderness
1	98%	1%	4%
2	2%	10%	4%
3	<1%	12%	12%
4	<1%	77%	80%

For 2016, most of the visitation to the wildernesses was day use (62%), with the heaviest use in the Hemingway-Boulders Wilderness at the North Fork of the Big Wood River and Murdock Creek trails. Register data show that use on the Murdock Creek trail included several groups of more than 12 people (5 groups), whereas no groups of over 12 people registered at the North Fork trailhead. (Notably, 4 of the 5 groups that exceeded 12 persons at the Murdock Creek trailhead, also all exceeded the current group size limit of 20 people.)

Overnight use in the two wildernesses in 2016 included about 38% of all visits, with the Chamberlain Lakes, Boulder Chain Lakes, and Boorn Lakes receiving the highest overnight use (23%, 20%, and 22% respectively). About 1% of overnight use (10 groups; based on 2016 data) would be affected by the 12-person group size limit. Past visitor studies identified campsite interaction as having the most impact to a visitor's perception of solitude (Cole and Hall 2009; Broom and Hall n.d.).

Groups using the services of outfitter and guides would be more affected by the group size limits, as described above. On average, outfitter and guides (excluding skiing and climbing focused guides) historically provided 25 trips per year. Of these, an average of 3 groups per year exceeded the proposed group size limit of 10 people (when looking at clients and employees combined), and an average of 2 groups per year exceeded the 12-person limit. For stock

[8] Refer to wildlife heading within this Wilderness section for effects analysis related to pack goat use.

numbers, an average of 5 groups per year exceeded 10 head, and 2 groups per year exceeded 14 head. Excluding 2 to 5 outfitted groups per year would not dramatically decrease encounter rates, which is a measurable way to operationalize opportunities for solitude. Alternatively, these groups may simply split into smaller groups and travel and camp separately, which would have an overall negligible impact to opportunities for solitude.

Given that overall use would not be reduced and the recent number of groups over the proposed limits is quite low, there is little anticipated benefit to encounter rates from the group size restrictions proposed under this alternative. The same number of people may visit, and they may split into smaller groups.

For people who are disturbed by seeing large groups, the group size limits may increase their feelings of solitude in the wilderness, particularly in Zone 1 where impacts of seeing other groups, especially large groups, would be higher (Stankey 1973). Large groups primarily visit the Cecil D. Andrus-White Clouds Wilderness, and they tend to congregate in certain, popular locations within that wilderness. Most recreational use is concentrated over a 6-week period in the summer (between July 4 and the third week of August). Given this short window of use, concentrated at a few popular locations, the improvements to opportunities for solitude from reducing large groups would be substantial in these areas.

Encounters with different types of visitors (e.g., large groups) with different styles of use (e.g., horse users) may affect a visitor's experience more than sheer numbers of other parties (Marion et al. 1993). Such unwanted encounters often are one-sided impacts to one type of visitor, especially when hikers encounter recreational stock and impacts resulting from their use (e.g., waste on trails and campsites, insects, damage to vegetation). Restricting equine stock in certain areas and reducing the number of animals in a group would reduce these conflicts.

Actions to reduce effects to the natural quality would improve opportunities for solitude. Horse use and campfires often produce the most conspicuous impacts in a wilderness. Trampling and overgrazing may diminish a visitor's perception of naturalness. Confinement of stock impacts by eliminating their use in the equine closure areas may improve the sense of solitude in these areas.

Overall, opportunities for solitude would be preserved, or minimally improved, under Alternative B.

Campfires and Human Waste

Impacts from other users—the sights, sounds, and evidence of other humans being in the area—affect opportunities for solitude. As impacts from campfires and human waste are reduced, as described above under resource indicator 2 (natural quality), fewer signs of other visitors would be encountered under this alternative, improving opportunities for solitude.

Alternative C—Minimum Management

Resource Indicator and Measure 1: Untrammeled

In summary, Alternative C would result in potential degradation of the untrammeled quality due to lack of direction for various actions.

Recreation Resources

Under Alternative C, no changes to recreation management with no immediate effects to the untrammeled quality are proposed.

Existing recreation sites would remain, and additional campsites and user trails may proliferate. On a wilderness scale, effects from new campsites and user trails would be minor; however, in concentrated areas of use, natural processes could be degraded. Should these impacts occur on a large enough scale to have a substantial effect on natural processes, some manipulation of the environment, such as large-scale campsite restoration, may be considered to halt these occurrences, thereby degrading the untrammeled quality.

Lacking direction limiting new trail construction may result in trails being built for other purposes (e.g., convenience of the visitor). New trails, depending on the scale and scope of the construction, may impact the untrammeled quality. For example, a considerable length of trail requiring substantial cutting of trees or movement of earth would be considered a trammeling action. Any new trail construction would be analyzed under site-specific NEPA and MRA.

Scenic Environment

Under Alternative C, no direction would ensure that natural events affecting scenic qualities are not considered detrimental to scenic qualities. This lack of direction may result in efforts to address natural events, such as a landslide or forest fire, thereby taking action to manipulate or modify the event or to rehabilitate an affected area following a natural event. Additional trammeling actions could occur under this alternative.

Rangeland Resources

Under Alternative C, the direction limiting irrigation would not be established. Therefore, irrigation could be considered within the BLM-managed portion of the wilderness (it is an existing prohibition per Forest Service policy [FSM 2323.26b]). The potential effects that may occur would be analyzed in detail at the time a proposal to irrigate was submitted by a grazing permittee; however, if the activity were approved through a future MRA and NEPA analysis, impacts to the untrammeled quality by manipulating water flow and vegetation could occur.

No effects on the untrammeled quality would occur within NFS portions of the two wildernesses under Alternative C.

Fire Management

Not applying the direction proposed under Alternatives A or B could lead to decisions that do not fully address wilderness character and potentially result in trammeling actions.

Management Zones

Zones would not be established under this alternative. Instead, the ROS would continue to be use; however, the classification would be revised to primitive. ROS is not established for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. The direction under the ROS strategy in this alternative compared to the zoning strategy under Alternatives A and B does not directly correlate; making the comparison difficult. However, no effects to the untrammeled quality would occur from establishing the primitive ROS classification, because the Wilderness Act (and related regulations and policy) would continue to be followed, thus, protecting wilderness character.

Resource Indicator and Measure 2: Natural

In summary, Alternative C would lead to continued and increasing impacts to naturalness with recreational use.

Wilderness

Alternative C is silent on direction regarding reseeding/replanting and using natural openings for helicopter landings. Lacking this direction could increase impacts on the naturalness of the wildernesses by introducing nonnative vegetation or clearing vegetation from heavily wooded or vegetated areas for landing areas.

Wildlife Resources

Alternative C would provide no direction or standards for managing pack goats to reduce disease transmission between pack goats and bighorn sheep. Risk of contact and disease transmission from pack goats to bighorn sheep would remain unchanged from the existing condition. Die-offs of bighorn sheep would affect the natural quality. See the wildlife section below for more information.

The likelihood of increased wildlife disturbance, habituation, and food-conditioning would be greater without an emphasis on proper camping techniques, food storage, and containment (see the wildlife section below for additional information).

Recreation Resources

Wilderness rangers have reported recreational impacts since the mid-1990s, with increases in effects in off-trail areas, specifically Boulder Chain Lakes, Big Boulder Lakes, and Four Lakes Basin. These effects include new user-created trails, more campfire rings, increased vegetation damage, and poor sanitation (trash and human waste). Boorn Lakes, Chamberlain Lakes, Baker Lake, Lower Boulder Chain Lakes, and Walker Lake are specific areas identified as receiving high use with unacceptable effects, including proliferating fire rings, damage to trees from hacking and carving, nails in trees, game poles, garbage, and exposed human excrement. Damage to both living and dead whitebark pine, primarily associated with campfires and tying of stock, was also noted by wilderness rangers. Other recreational stock use effects included damage to lakeshores and meadows, live trees girdled, and exposed roots.

Many rangers spent multiple seasons patrolling the backcountry of the Boulder-White Clouds and the Sawtooth Wilderness, providing a long-term perspective from which to base their observations. Based on their observations over time, rangers consistently recommended restricting grazing near lakes, prohibiting campfires at high elevations, and reducing group size. Over the entirety of the wildernesses, direct negative effects on biological resources could occur from campsite and campfire proliferation, increased vegetation impacts, unregulated management of human waste, and surface disturbances.

Group Size and Packstock Management

Under Alternative C, no additional restrictions or requirements would be placed on the type or extent of recreational activities. Physical impacts from visitor use would likely increase, including hard-pan soil and total loss of vegetation, tree damage, campfire impacts, trash proliferation, and exposed human waste, degrading the natural quality of wilderness character. However, “some of the most serious impacts of recreation are not readily obvious to the casual observer. Vegetation removal, loss of organic horizons, and soil compaction alter decomposition

rates and nutrient cycling, changes that can severely reduce the resilience of these sites" (Cole 2000). At a wilderness scale, the impacts to water, wildlife, vegetation, and soils from visitor use would be expected to be minor, but in sensitive areas, such as upper lake basins and other off-trail destinations, the natural quality would be degraded over time without additional standards and guidelines for recreation management. In those areas, natural processes could be degraded.

Monz and others (2000; p. 266) reviewed various studies on group size and resource impact, and suggested, "In relatively undisturbed places, intense, concentrated use by a large group can cause substantial impact, while a small group exhibiting the same behavior over a similar square area might cause little significant impact to the soil and plant communities." Large groups can mitigate the effects of their size on soils and vegetation by breaking into small groups when traveling and camping (Monz et al. 2000). Without the additional protections from large group and stock use impacts that Alternatives A and B provide, areas currently receiving low-to-moderate use, such as the upper Boulder Chain Lakes and Big Boulder Lakes above Walker and Island Lakes, would likely experience increased degradation to vegetation and soils under this alternative.

When group sizes are set at high limits, they are ineffective at reducing resource impacts and protecting natural conditions (Cole et al. 1987). Disturbances caused by both human and recreational stock presence would continue to exist and likely expand, with a negative effect on the natural quality. Numerous studies have found that horses are more likely than hikers to cause accelerated erosion (DeLuca et al. 1998) and vegetation damage (Cole and Spildie 1998). Stock confinement near water and in camps and tying stock directly to trees cause impacts that affect the natural conditions and the experience of other wilderness visitors. Recreational stock grazing is not addressed under Alternative C, allowing for continued degradation of the natural quality.

Under this alternative, the current group size limits (20 people and 25 head of stock on NFS lands and no limits on BLM-managed lands within the Cecil D. Andrus-White Clouds Wilderness) would continue to be in effect. As the maximum allowable size of groups increases, the effectiveness of the restriction—in terms of reducing environmental effects—is reduced. Monz and others (2000) contend that limits of 15 to 25 people or stock limits are unlikely to alleviate impacts on the environment, particularly in less-used, more pristine areas. "If these groups do not employ strict minimum-impact techniques, they will need to find - or will create - very large impacted areas while camping and will cause observable impact in trail-less areas while hiking. This is particularly true when groups travel with horses and mules" (Monz et al. 2000, p. 266).

Current group sizes do little to protect the natural quality of the wilderness. High-use destination areas—Boorn Lakes, Chamberlain Lakes, lower Boulder Chain Lakes, Island and Walker Lakes—show impacts from concentrated and heavy use, including large areas of barren compacted soil, scarred or dead trees, broken stream banks or lakeshores, large fire rings, and other "improvements" such as meat poles and furniture built from logs. Enlargement of established recreation sites from large groups is "the most common, detrimental change" to established recreation sites (Cole 1989a). Expanding these established sites may occur under Alternative C, as large groups would continue to be allowed.

Recreation sites in more remote, less-disturbed areas, such as Four Lakes Basin, Slickenslide Creek drainage, upper Boulder Chain Lakes, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Island and Walker Lakes, would be at greatest risk for site

enlargement. New impacts would also be expected to vegetation, soils, and wildlife resources caused by visitors expanding into new camping locations. McEwan and others (1996) found that even when use is relatively low, sites used by stock can be more heavily impacted as compared to hiker use.

Also, areas where recreational stock are tethered or graze for the night see impacts over a much larger area than all other recreational impacts combined (Dawson and Hendee 2009). This alternative contains no specific direction to protect riparian habitats from stock use. No restrictions on tethering or grazing of recreational stock near water are included, which could lead to riparian, soil, and vegetation impacts. Nor is there direction to encourage the use of temporary containment systems and tree-saver devices, which could prevent to tree damage.

Continuing current group size limits, which includes no limits on the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness, may result in additional impacts to the natural quality as recreation sites are expanded and stock use near water sources impacts vegetation, soils, and water quality.

Campfires

As discussed above, campfires result in a variety of aesthetic and ecological impacts which account as the "imprint of man" on the landscape, as specifically mandated against in the Wilderness Act (Section 2c).

Under Alternative C, campfire restrictions would continue at some high elevation lakes; however, other sensitive alpine areas would not have the same protection. In addition to the obvious effects of campfires, felling trees or cutting limbs make trees more susceptible to insect and fungal attacks that can increase tree mortality (Reid and Marion 2005). Burning firewood changes the chemical properties of the soil (Marion et al. 2016) and can affect nutrient cycling for 50 to 70 years in localized areas (Reid and Marion 2005).

Whitebark pine is the primary tree species above 8,000 feet. The unique properties (rot resistance) and habitat (dry, cool environment; probability of natural fire is low) of whitebark pine allow remnant wood to survive for millennia (Stephenson and van Mantgem, 2005). Given that whitebark pine wood persists on the landscape for so long, even small impacts, such as burning in campfires or removal, can substantially impact these important biological resources over time.

The existing campfire restriction would continue to protect specific areas and resources. However, other areas, particularly areas with whitebark pine, would continue to be negatively affected.

Human Waste

No human waste regulations are currently in place, and human waste and sanitation are ongoing issues within the wildernesses. Under this alternative, there would be continuing impacts of visitors encountering feces or toilet paper, animal and insect transmission of pathogens, and water contamination after rainfall (Monz et al. 2000).

Off-Trail Marking

Off-trail route marking would not be prohibited under this alternative, allowing social trail impacts to proliferate with additional loss of vegetation and soil compaction. Over the long term,

the impacts to naturalness would be expected to increase, especially in less-resilient off-trail areas (e.g., alpine habitats).

Commercial Services

Alternative C does not include authorizing assigned campsites within Zones 3 and 4 and incorporating wilderness practices and values into interactions with clients. Lacking this direction could lead to additional impacts to the naturalness, as assigned camps could be approved in the more primitive areas of the wilderness. Ensuring outfitter and guides provide education and modeling of wilderness practices would minimize visitor impacts on the natural resources. Overall, a lack of direction may lead to minor, negative effects on naturalness.

Scenic Environment

Alternative C does not include direction ensuring that natural events, which may affect scenic qualities, are not considered detrimental to scenic qualities. This lack of direction may result in efforts to address natural events, such as a landslide or forest fire, thereby affecting the natural resources in the wilderness and negatively affecting naturalness.

Rangeland Resources

Under Alternative C, the direction regarding irrigation would not be established. Therefore, irrigation could be considered within the BLM-managed portion of the wilderness (it is an existing prohibition per Forest Service policy [FSM 2323.26b]). If the activity were approved, impacts to the natural quality would occur, specifically to the natural hydrologic patterns of the area and to vegetation. This type of project and its potential impacts would be analyzed in detail under site-specific NEPA and MRA, at a time a proposal to irrigate was submitted by a grazing permittee.

Alternative C would not affect the NFS portions of the wilderness areas because irrigation was prohibited prior to designation and continues to be prohibited by Forest Service policy.

Fire Management

Similar to the analysis described under resource indicator and measure 1 (untrammeled), fire may be actively managed under Alternative C. However, suppressing naturally occurring fire without consideration to wilderness character would impact the natural quality (e.g., alter natural fire regimes, vegetation, and habitat). Alternatives A and B require consideration of wilderness character and assignment of a resource advisor with wilderness experience, which would reduce the likelihood of unnecessary actions to manage naturally occurring fire within wilderness. Lacking this direction may result in negative effects to the natural quality under Alternative C.

Lands and Special Uses

The zone direction proposed under Alternatives A and B would not occur under Alternative C. No direct effects to naturalness would occur under this alternative. Indirectly, there may be increased chances for lands or special use proposals to be placed in the more primitive areas of the wilderness, which could impact naturalness.

Search and Rescue

Alternative C is silent on SAR topics, including approval of motorized emergency response and direction for equipment or vehicles used in SAR operations. The direction contained in the flow

chart is taken from law (the Wilderness Act, Section 4(c)) and agency policy (BLM Manual 6340 1.6.C.17 and FSM 2326), which would continue to apply under this alternative.

The flow chart proposed under Alternatives A and B condenses direction from law and policy to allow for a more rapid response in times of emergency to ensure the undeveloped quality, and therefore the natural quality, is preserved to the maximum extent possible. Lacking the flow chart is unlikely to measurably affect the natural quality, as the direction provided therein is policy.

Alternative C does not address equipment or vehicles used for SAR operations. Without the direction proposed under the Alternatives A and B, there may be an increased risk of spread of invasive species or clearing of landing areas and/or any damage resulting from SAR operations may be left unaddressed. This alternative would pose minor, likely localized, negative effects to the natural quality.

Management Zones

Management zones would not be established under this alternative. Instead, on the NFS lands, the management of the area would continue to be guided by ROS direction as established in the Forest Plan. However, the classification would be revised to primitive. ROS would not be implemented on the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness.

No direct or indirect effects to the natural quality would occur from continuing ROS on NFS lands. The Wilderness Act (and related regulations and policy) would have to be followed, thus, protecting wilderness character. However, the proactive guidance to protect the conditions existing at the time of designation and the desired conditions would be lacking. This lack of direction may result in various impacts to naturalness as the conditions in the wildernesses drift toward minimum standards that are based on the portion of the wilderness with lowest quality or a homogenizing effect on the quality and diversity of wilderness resources (Haas et al. 1987).

Resource Indicator and Measure 3: Undeveloped

In summary, Alternative C would not lead to immediate, direct impacts to the undeveloped quality; however, ongoing degradation to the quality may occur.

Wilderness

Alternative C would not address permanent roads (when valid right or permitted use ends) or unauthorized vehicle use within wilderness. No direct impacts would occur as no new structures or equipment or vehicle uses are proposed. Continued impacts to the undeveloped quality from routes would remain. Unaddressed effects from unauthorized vehicle use may lead to additional unauthorized vehicle use, with localized negative effects to the undeveloped quality.

Rangeland Resources

Under Alternative C, irrigation would not be prohibited within the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. No effect would occur within the NFS lands of the two wildernesses because this prohibition is existing policy (FSM 2323.26b). For the BLM-portion of the Cecil D. Andrus-White Clouds Wilderness, if a grazing permittee were to submit a proposal to irrigate, a subsequent MRA and NEPA analysis would provide detailed analysis. In general, however, effects to the undeveloped quality could occur if an irrigation project was implemented.

Fire Management

Wildfire support facilities (e.g., spike camps, landing areas) are to be located outside of the wilderness boundary whenever feasible per Forest Service policy (FSM 2324.23). However, under Alternative C, this direction would be lacking on the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. Given its size (459 acres), the need to locate wildfire support facilities in the BLM-managed portion of the wilderness is low, especially with its proximity to roads outside of the wilderness. Consequently, this alternative would be unlikely to impact the undeveloped quality of either wilderness.

Search and Rescue

Alternative C is silent on SAR topics, including approval of motorized emergency response and direction for equipment or vehicles used in SAR operations. This alternative may result in additional negative effects to the undeveloped quality because approval may not be as consistent without the availability of the quick reference guide to wilderness policy as compiled in the flowchart.

Management Zones

Zones would not be established under this alternative. Instead, management of the area would default to the ROS direction as established in the Forest Plan. No direction for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness would exist. No direct or indirect effects to the undeveloped quality would occur from continuing ROS direction because limitations on wilderness development found in the Wilderness Act and related regulations and policy would be followed, thus, protecting wilderness character.

For example, some portions of the wilderness would be described as Semi-Primitive Motorized or Roaded Modified under the current ROS system; however, motorized vehicles and equipment are prohibited per the Wilderness Act. This prohibition would remain in place regardless of alternative selected.

The direction regarding developments, as proposed in the zone direction under Alternatives A and B, would be lacking under this alternative, which could lead to additional signs or system trails being placed in the more pristine portions of the wilderness.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

In summary, Alternative C not result in immediate impacts on the FS-managed portions of the wildernesses. New visitor use restrictions (e.g., group size) would be implemented on the BLM-managed portion of the White Couds Wilderness, but impacts are considered to be low.

Recreation Resources

Group Size and Packstock Management

Alternative C is the least restrictive alternative and would provide the most freedom of choice to visitors. The opportunity for a primitive and unconfined type of recreation would continue to exist in its current form, including existing special regulations on the NFS portions of wilderness, such as group size for people and stock, campfires, and recreation stock management.

Alternative C does not include actions that would further reduce group and stock size limits, restrict campfires, reduce areas available to equine stock, or limit the use of pack goats. Providing for current levels of primitive and unconfined recreation without additional constraints to visitors may sacrifice the quality of the experience by compromising solitude and natural conditions. As a result, visitors may be displaced as overcrowding, conflict, and deteriorating biophysical conditions push visitors to seek their wilderness experience elsewhere (Hall and Cole 2007). Visitors seeking naturalness and solitude may seek new areas to recreate, either in a different part of the wilderness or outside of these areas.

Group sizes (people and stock) and pack stock management requirements would be maintained at current agency regulations under this alternative, which would benefit users desiring to experience the wilderness with a large group of people or stock support but may negatively affect wilderness visitors seeking solitude. Visitors who prefer to travel with stock would continue to be allowed to travel and graze unrestricted within the wilderness areas.

Campfires

Under Alternative C, current campfire restrictions would continue; restrictions would be enforced around several lakes within the NFS portion of the Cecil D. Andrus-White Clouds Wilderness. Those visitors who wish to experience a campfire would have more area available (99% of the Cecil D. Andrus-White Clouds Wilderness and 100% of the Hemingway-Boulders Wilderness) under Alternative C.

Off-Trail Route Marking

Unauthorized routes would continue to be marked with stacked rocks, flagging, or other markings, providing a feeling of security to some users; however, diminishing challenge and the sense of discovery for others.

Permits

Visitors would not be required to have a use permit; however, the voluntary free-use registration system would continue. This system has been in place for decades so no change to visitor experience would occur under this alternative.

Commercial Services

The presence of structures or installations in campsites reduces self-reliant recreation, which is the hallmark of primitive recreation. The standards presented under Alternatives A and B regarding authorization of only temporary structures necessary to meet the public need in a manner compatible with the wilderness environment would continue to apply to the NFS portion of the wilderness because those requirements are established policy (FSM 2323.13g).

Under Alternative C, this direction would not be explicitly applied to the BLM-managed portion of the wilderness; although BLM policy (BLM H-2930-1, BLM 6340 B.2.(i).) alludes to it. Lacking direction to minimize the presence and duration of commercial outfitter installations and structures would degrade the opportunities for primitive and unconfined recreation as additional facilities that reduce self-reliant recreation may be established. This impact would be negligible given the small size of the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness.

Management Zones

Zones would not be established under this alternative. Instead, management of the area would default to the ROS direction as established in the Forest Plan. No direction would exist for the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. No direct or indirect effects to the opportunities for primitive and unconfined recreation would occur from continuing ROS direction. The ROS direction would not result in regulations impacting unconfined recreation. The setting for Primitive and Semi-Primitive Non-Motorized ROS classes, which encompass the majority of the wildernesses, offer opportunities for solitude, remoteness, and risk, with a minimum of onsite controls and restrictions. These restrictions work in concert with Wilderness Act requirements to preserve wilderness character.

Resource Indicator and Measure 5: Opportunities for Solitude

In summary, Alternative C would result in continuing impacts to opportunities for solitude from large groups and recreational use. Less management direction overall may lead to additional impacts, or developments, which increase sights and sounds of other people.

Wilderness

Opportunities for solitude are impacted by sights and sounds of human activity, whether short term (e.g., other visitors on a trail) or long term (developments or resource impacts). Under Alternative C, no direction specific to using natural openings for helicopter landing areas would exist. As visitors encounter cleared landing areas, minor, localized negative effects on solitude would occur. These occurrences may increase under this alternative.

Recreation Resources

The Wilderness Act requires managing wilderness to provide "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Under Alternative C, crowding and conflict would not be mitigated, which would decrease opportunities for solitude over time, especially during periods of high use.

Group Size and Packstock Management and Campfires

Current direction for managing group size, recreational stock use, and campfires have beneficial impacts to primitive and unconfined recreation opportunities, but would not provide for the same level of solitude as under Alternative A. Under Alternative C, group size would continue to be limited to 20 people and 25 head of stock, with the exception of the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness where no restrictions related to group size exist. While large groups constitute a small percentage of use in the wildernesses, when encountered, visitors may experience a loss of solitude. Early research found that wilderness visitors felt that encountering large groups impacted the feeling of wilderness (Monz et al. 2000). More recent research has found inconclusive results regarding the impact of large groups on the wilderness experience (Monz et al. 2000).

Additionally, recreational stock use management is complicated, as it is an accepted, traditional use of wilderness. Dawson and Hendee (2009, p.453) state the following:

> Many hikers consider stock impacts inappropriate on the wilderness resource, and this, along with other inconveniences such as exposure to horse manure and moving off the trail to let horse users pass, creates conflicts between backpackers and horse users. These conflicts appear to be growing. Complaints about stock are the most common complaint in many wilderness areas. Horse/hiker conflict tends to be one-sided, with the hikers complaining more. Large parties are objectionable to persons in the typical smaller groups.

Conflicts between hikers and recreational stock use would not be addressed under Alternative C, and conflicts would likely worsen with additional visitor use.

Many of the effects associated with degradation of the natural quality can also detract from visitor experience and opportunities for solitude, as they are obvious signs of human presence and activity (e.g., fire rings, campsites with areas of barren soil, social trails, damage to trees from firewood collection and recreational stock, garbage and exposed human waste). With a rise in use, visitors would increasingly encounter these localized impacts, which could affect the rugged and remote feel of the wilderness areas in site-specific locations. However, opportunities in the majority of the wilderness landscape would largely remain unchanged.

A lack of restrictions on proper food storage and containment under Alternative C could lead to more human–wildlife encounters and an additional need for contact from rangers. These contacts are generally received positively, but for those seeking complete isolation, they could have a negative effect on their solitude.

Commercial Services

Without the direction for confining assigned outfitter camps to the less pristine portions of the wildernesses, Alternative C may lead to increased impacts on solitude because of increased sights and sounds of others.

Rangeland Resources

Under this alternative, no prohibition regarding irrigation would be established. There would be no effects within the FS-portions of the two wildernesses, because this prohibition is existing policy (FSM 2323.26b), which would apply regardless of the wilderness plan selected. On the BLM-portion of the Cecil D. Andrus-White Clouds Wilderness, if a future irrigation project were to occur, there could be additional sights (developments) of human occupation within the wilderness, potentially impacting opportunities for solitude.

Fire Management

Wildfire support facilities (e.g., spike camps, landing areas) are to be located outside of the wilderness boundary whenever feasible per Forest Service policy (FSM 2324.23). However, under Alternative C, this direction would be lacking on the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. Given its size (459 acres), the need to locate wildfire support facilities in this portion of the wilderness is low, especially with its proximity to roads outside of the wilderness. Consequently, this alternative would be unlikely to impact opportunities for solitude on either wilderness.

Lands and Special Uses

This alternative does not include direction for where lands and special uses projects may be placed. Lacking this direction may lead to additional sights and sounds of human activity within the more pristine areas, which could impact feelings of remoteness. Activities or projects

occurring in the more heavily used portions of the wilderness would have a higher likelihood of being encountered by visitors, which could also impact opportunities for solitude.

Search and Rescue

When encountered, resource impacts from SAR operations affect feelings of remoteness for visitors. Alternative C does not include the motorized approval flow chart. However, the direction contained in the flow chart is taken from law and policy and would apply regardless of the WMP. No direct effects to solitude would occur under Alternative C. Indirect effects may lead to minor, temporary effects on opportunities for solitude since the response time under Alternative C may be slower without the condensed flowchart.

Management Zones

Zones would not be established under this alternative. Instead, management would default to ROS direction as established in the Forest Plan. No direction would apply to the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness. No effects to the opportunities for solitude would occur from continuing ROS. Some portions of the wilderness are described as Roaded Natural ROS class; however, motorized vehicles and equipment are prohibited per the Wilderness Act. The ROS classes were established using certain distances from roads, and these buffers extend into wilderness, which may mean that sights and sounds of motorized use may be visible from portions of the wilderness due to the proximity to roads and trails outside the wilderness. While these sights and sounds constitute impacts on opportunities for solitude, this impact would occur regardless of the alternative selected.

Cumulative Effects

Alternative A

Resource Indicator and Measure 1: Untrammeled

Trail and road construction; historic mining; management of wildland fire; stocking of indigenous and non-indigenous fish; capturing, collaring or tagging fish and wildlife species; livestock grazing and associated structures; and water diversions have affected the untrammeled quality within the wilderness cumulative effects area. No cumulative negative effects to the untrammeled quality would occur under Alternative A since this alternative would benefit this quality.

Resource Indicator and Measure 2: Natural

Invasive species establishment, fire suppression, recreational use, fish stocking, and livestock operations have degraded vegetation and wildlife composition to varying degrees within the wilderness cumulative effects area. Conversely, treatment to remove invasive species has improved the naturalness of the area. Retirement of livestock grazing allotments (in accordance with the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act, P.L. 114-46) may improve naturalness by reducing the risk of spread of invasive species and other impacts associated with livestock grazing. No cumulative negative effects to the natural quality would occur under Alternative A since this alternative would benefit this quality.

Resource Indicator and Measure 3: Undeveloped

Construction and maintenance of range developments, water diversions, and various user-created or constructed routes have impacted the undeveloped quality within the wilderness cumulative effects area. Use of motorized equipment and mechanized transportation for recreational activities, emergency use such as wildfire, or SAR operations and for administrative use such as transportation of materials for trail construction have affected the undeveloped quality. No cumulative negative impacts to the undeveloped quality would occur since this alternative would benefit this quality.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

Recreational use, outfitter and guide activities, regulations on group size, campfires, recreational stock use, off-trail marking, and trail construction have affected opportunities for primitive and unconfined recreation within the wilderness cumulative effects area. User trails would no longer be marked, improving opportunities for primitive recreation. Cumulative effects are expected to be low-to-moderate to opportunities for primitive and unconfined recreation due to the additional regulations on visitors use (i.e., group size, campfire, recreational stock, and pack goat restrictions).

Resource Indicator and Measure 5: Opportunities for Solitude

Recreational use; federal projects with personnel on the ground (e.g., trail maintenance, monitoring, invasive species treatments); and developments (e.g., recreation facilities, livestock developments) have affected opportunities for solitude within the wilderness cumulative effects area. Alternative A would result in positive direct and indirect effects on opportunities for solitude and, therefore, would not contribute negative cumulative effects.

Alternative B—Natural-Focus

Resource Indicator and Measure 1: Untrammeled

The cumulative effects of Alternative B would be the same as described under Alternative A.

Resource Indicator and Measure 2: Natural

Invasive species establishment, fire suppression, recreational use, fish stocking, and livestock operations which may have degraded vegetation and wildlife composition to varying degrees within the wilderness have negatively affected the natural quality within the wilderness cumulative effects area. Conversely, treatment to remove invasive species has improved the naturalness of the area. Retiring livestock grazing allotments (in accordance with the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act, P.L. 114-46) may improve naturalness by reducing the risk of weed spread and other impacts associated with livestock grazing. No cumulative negative impacts to the natural quality would occur since this alternative would benefit this quality. Alternative B would be expected to alleviate some of the negative effects from recreational use over time.

Resource Indicator and Measure 3: Undeveloped

The cumulative effects of Alternative B would be the same as described under Alternative A.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

Regulations on group size, campfires, recreational stock use, off-trail marking, and trail construction have affected opportunities for primitive and unconfined recreation within the wilderness cumulative effects area.

The complexity of the group size restrictions under Alternative B would be onerous on the visitor; outfitters, guides, and their clients; and the agencies implementing the limits. In fact, within proximity to the wilderness and into the wilderness, users would be met with four different group size limits. Nearby BLM-managed and neighboring NFS lands have no group size limits, the portions of the Sawtooth NRA surrounding the wildernesses have limits of 20 people and 25 head of stock. Under Alternative B, group size limits would continue to decrease once visitors enter the wilderness to 12 people and 14 head of stock, and as they continued off-trail, group size limits would decrease further to 8 people and 10 head of stock.

Cumulative effects are expected to be moderate to opportunities for primitive and unconfined recreation due to the additional regulations on visitors use (principally group size, campfire, stock, and pack goat restrictions).

Resource Indicator and Measure 5: Opportunities for Solitude

Recreation; federal projects with personnel on the ground (e.g., trail maintenance, monitoring, invasive species treatments); outfitter and guide activities; developments (e.g., recreational facilities, livestock developments) have affected opportunities for solitude within the wilderness cumulative effects area. Alternative B would not result in adverse cumulative effects on opportunities for solitude.

Alternative C—Minimum Management

Resource Indicator and Measure 1: Untrammeled

Alternative C lacks the proactive direction presented under the other two alternatives and may lead to additional effects to the untrammeled quality related to trails, or range projects on the BLM-managed portion of the Cecil D. Andrus-White Clouds Wilderness when combined with past, present, and reasonably foreseeable actions. The scope and magnitude of effects would depend upon the specific actions taken.

Resource Indicator and Measure 2: Natural

Invasive species establishment, fire suppression, recreational use, fish stocking, and livestock operations have degraded vegetation and wildlife composition to varying degrees within the wilderness cumulative effects area. Conversely, treatment to remove invasive species has improved the naturalness of the area. Retirement of livestock grazing allotments (in accordance with the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act, P.L. 114-46) may improve naturalness by reducing the risk of spread of invasive species and other impacts associated with livestock grazing.

Alternative C would contribute to the cumulative negative impacts that already exist from recreational use of the wilderness.

Resource Indicator and Measure 3: Undeveloped

Construction and maintenance of range developments, water diversion(s), and various user-created or constructed routes have affected the undeveloped quality within the wilderness cumulative effects area. Reasonably foreseeable actions include retiring livestock grazing allotments (in accordance with the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act, P.L. 114-46).

Alternative C would not contribute to cumulative effects to the undeveloped quality, as no new structures or use of motorized equipment or mechanized transport are proposed. Lacking specific exclusions for wilderness (clearing for helicopter landings), livestock grazing management (future irrigation proposals), SAR (motorized emergency response), and management zones (additional signs or system trails) may result in additional motorized use or developments.

Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation

Recreational use, outfitter and guide activities, regulations on group size, campfires, recreational stock use, and trail construction have affected opportunities for primitive and unconfined recreation within the wilderness cumulative effects area. Alternative C would not result in cumulative effects, as no additional regulations nor facilities that degrade self-reliant recreation would be established.

Resource Indicator and Measure 5: Opportunities for Solitude

Recreation; federal projects with personnel on the ground (e.g., trail maintenance, monitoring, invasive species treatments); and permittees managing their livestock and developments (e.g., recreation facilities, livestock developments) have affected opportunities for solitude within the wilderness cumulative effects area. Alternative C may result in cumulative minor-to-moderate, negative effects as continued management would allow large groups, and recreational impacts (e.g. proliferating fire rings, unmanaged stock use) would continue or increase with increasing visitor use.

Summary

The wilderness resource is the primary driver of the Purpose and Need for the project. The purpose of the WMP is to provide management direction for preserving wilderness character. Each alternative meets this Purpose to a varying degree. The Need for the action is also intimately related to the wilderness resource: the need for the resource stems from the signing of P.L. 114-46, which designated these wilderness areas and changed the management direction of these areas (from recommended wilderness or WSA status to congressionally designated wildernesses).

Further, effect to wilderness character was identified as a key issue through scoping. The above analysis attempts to explicitly identify the trade-offs in wilderness stewardship, in relation to losses and gains under each alternative. Identifying the effects of the various management alternatives is presented to inform the decision-making process. Under each alternative, the qualities of wilderness character may be improved, preserved, or degraded. Protecting one quality may degrade another quality, or actions may affect one quality both positively and

negatively. The following table summarizes how the alternatives address the Purpose and Need and key issues (Table 5).

Table 5. Summary comparison of how the alternatives address the Purpose and Need and key issues of wilderness character

Indicator/ Measure	Alternative A: Proposed Action	Alternative B: Natural-Focus	Alternative C: Minimum Management
Untrammeled	Direction would ensure preservation of the untrammeled quality.	Same as A.	Future actions allowable under this alternative may degrade this quality.
Natural	Direction would preserve the natural quality, and the recreational use restrictions would moderately improve the natural quality.	Preservation, and potential for substantial improvement to the natural quality.	Continued and increasing impacts to naturalness with recreational use.
Undeveloped	Direction would ensure preservation of the undeveloped quality.	Same as Alternative A.	No immediate impacts, however, ongoing degradation of the quality may occur.
Opportunities for Primitive and Unconfined Recreation	A mix of direction that would both improve and degrade opportunities for primitive and unconfined recreation. Overall, moderate degradation to this quality from the recreational use restrictions.	Substantial impacts to primitive and unconfined recreation opportunities, particularly for equine stock, pack goat users, and outfitted groups.	No immediate impacts on the FS-managed portion. New visitor use restrictions (e.g., group size) would be implemented on the BLM-managed portion but impacts are considered to be low.
Opportunities for Solitude	Moderate improvement to opportunities for solitude.	Benefits to opportunities for solitude based on improvements to naturalness; and limited improvements from visitor management actions.	Continuing impacts to solitude from large groups and recreational impacts. Less management direction overall may lead to additional impacts, or developments, which increase sights and sounds of other people.

3.4. Wildlife

3.4.1. Introduction

This section addresses the effects of the WMP on wildlife-related concerns. The proposed management of recreational activities (e.g., pack goat use, campfire use, large groups, recreational stock use in sensitive areas, dogs, human waste management, zones) in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness may affect wildlife. The following measurement indicators were used to analyze effects to wildlife:

- Risk of contact between bighorn sheep and pack goats
- Disturbance to wildlife and adequacy of management actions to protect wildlife

This analysis is based on the following assumptions:

- The WMP and actions identified in the alternatives would be fully implemented, adhered to by the public, and enforced by the Forest Service. Some amount of noncompliance would likely occur. Regardless, this analysis is based on full implementation of the alternatives.
- Increased visitation in the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wildernesses can be anticipated over the life of the WMP based on estimates that Forest Service wilderness visitation increased roughly 3.2% per year between 2005 and 2012 (Holmes et al. 2015); the Idaho Department of Labor projection that Idaho's population will grow 15.3% from 2015 to 2025, an annual growth rate of 1.4%; and that 64% of use in the Hemingway-Boulder Wilderness and Cecil D. Andrus-White Clouds Wilderness areas is people from Idaho.

The spatial boundaries for analyzing the direct and indirect effects to wildlife are the wilderness area boundaries because management of recreational activities described in the alternatives that affect wildlife would occur within these boundaries. The temporal boundaries for analyzing the direct and indirect effects are long-term (greater than 15 years as stated in the Forest Plan) because the recreational activities that influence the wildlife issues would be ongoing indefinitely.

The north end of the Forest and the BLM Challis Field Office area is considered the cumulative effects boundary for Canada lynx and wolverine based on the home range size and wide-ranging nature of these species (Aubry et al. 2000; Copeland 1996). The north end of the Forest and the BLM Challis Field Office area is also considered the cumulative effects boundary for gray wolf and fisher based on home range size of these species (USFWS 2003; Powell and Zielinski 1994). The Sawtooth NRA and Challis BLM Field Office area is considered the cumulative effects boundary for all other species of concern due to the scale of their population sizes. The temporal boundaries for analyzing the cumulative effects are long-term (greater than 15 years as defined in the Forest Plan) because the recreational activities that influence the wildlife issues would be ongoing indefinitely.

3.4.2. Affected Environment

Resource Indicator and Measure 1: Risk of Contact between Bighorn Sheep and Pack Goats

Prior to 1850, bighorn sheep were the most abundant game animal in Idaho. Declines began as human settlement and their associated activities increased in Idaho. Overhunting, mining, domestic livestock grazing, and diseases have all contributed to bighorn sheep declines. The subspecies Rocky Mountain bighorn sheep (*Ovis canadensis canadensis*) have continued to decline in the state with numbers dropping from approximately 3,800 in 1990 to 1,700 in 1998 (Toweill and Geist 1999).

Within the Sawtooth NRA, Rocky Mountain bighorn sheep historically occurred in the Sawtooth Mountains and throughout the White Cloud and Boulder Mountains (Toweill and Geist 1999). Currently, one population (East Fork Salmon Population) remains in the White Cloud Mountains. A portion of this population uses the White Cloud Mountains from spring through fall. They move to high elevation areas, generally above 8,000 feet, in the north end of the White Cloud Mountains in the spring, summer, and fall and spend winters along the East Fork of the Salmon

River at lower elevations. The range of this population historically extended throughout the White Cloud and Boulder Mountains (Lindquist 1977). The population experienced a large decline between 1990 and 2007 (IDFG 2010) though it has shown a slight increase since then (Miyaski et al. 2014). The population is thought to be disease-limited based on persistently low lamb-to-ewe ratios since the die-off, from an average of 57 lambs to 100 ewes between 1977 and 1990 to an average of less than 9 to 100 since 1991 (Miyaski et al. 2014). An ongoing study by the IDFG of this herd has documented bighorn sheep use of the north side of the Boulder Mountains (Jessie Shallow, IDFG, pers. comm., 2017) within the Hemingway-Boulder Wilderness.

Wild sheep are very susceptible to respiratory infections that result in pneumonia. Bacteria of the family Pasteurellaceae (*Pasteurella multocida, Mannheimia haemolytica*, and *Bibersteinia trehalosi*), and *Mycoplasma ovipneumoniae* are the most frequently identified pathogens from wild sheep with pneumonia. Pneumonia caused by these organisms often results in the mortality of a large proportion of the population (TWS 2014) across all age classes and is typically followed by multiple years of lamb mortality from pneumonia (WAFWA WHC 2014). This pattern of pneumonia in wild sheep has been documented in more than 70 peer-reviewed scientific publications.

Incidences of pneumonia-related die-offs are frequently associated with the presence of pathogens commonly carried by domestic sheep and goats (George et al. 2008, Wehausen et al. 2011, Heinse et al. 2016). Controlled research studies have confirmed that both *Mannheimia hemolytica* and *Mycoplasma ovipneumoniae* are transmitted to wild sheep upon contact with, or proximity to, domestic sheep (Besser et al. 2014, Lawrence et al. 2010, Wehausen et al. 2011) and *Mycoplasma ovipneumoniae* are transmitted to wild sheep from domestic goats (Rudolph et al. 2003, Besser et al. 2017). Domestic sheep and goats carry these disease-causing organisms which typically cause few deaths and little illness in domesticated adults and lambs (Martin 1996, Drew 2017). Contact can and does occur between animals from range use overlap on public land and forays of wild sheep to nearby domestic herds on private in-holdings and vice versa (Jansen et al. 2006). While not all outbreaks of pneumonia in wild sheep have confirmed contact with domestic sheep or goats, the preponderance of scientific evidence shows that association with domestic sheep and goats poses a threat to the continued conservation and restoration of wild sheep populations. For a recent review of the literature and summary of this issue see Pils and Wilder 2017.

Management alternatives to reduce the impacts of respiratory disease on wild sheep are limited. No effective vaccine or treatment for pneumonia in bighorn sheep exists (Wehausen et al. 2011). Maintaining appropriate and reasonable spatial and temporal separation between wild sheep and domestic sheep and goats is the most effective tool available for minimizing risk of disease transmission between species (WAFWA WSWG 2012). The Forest does not manage pack goat use or require practices to reduce the risk of contact with bighorn sheep.

Resource Indicator and Measure 2: Disturbance to Wildlife and Adequacy of Management Actions to Protect Wildlife

Listed Species

Canada Lynx (Lynx canadensis)

The wilderness areas contain parts of 9 Lynx Analysis Units (LAUs) (Table 6 and Table 7). Watershed biological assessments of the effects of ongoing projects to Canada lynx were completed in February 2003. As part of these analyses, baseline conditions for each LAU were described and evaluated as to their ability to conserve lynx (available in the project record). The LAUs within the project area contain approximately 57,532 acres of lynx habitat, including approximately 9,946 acres of denning habitat.

No lynx populations have been documented recently within the Sawtooth NRA. From 1999 to 2001, the Forest Service conducted the National Lynx Detection Protocol within the Sawtooth NRA in the Sawtooth Valley and Stanley Basin. All hair samples collected from this survey were determined to be negative for lynx hair. One Idaho Natural Heritage database record of lynx within the Cecil D. Andrus-White Clouds Wilderness area was observed in the 1960s and 3 records within 1 mile of the wilderness areas was reported in 1960s. The most recently confirmed sightings of lynx tracks in the Sawtooth NRA occurred during winter 1997 near the Fishhook Creek drainage, approximately 8 air miles from the wilderness areas. Trapping records from the 1960s and 1970s show that lynx occurred throughout the Salmon River watershed on the Sawtooth NRA (IDFG 2017).

Behaviorally, lynx are generally tolerant of humans but also exhibit a wide variety of behavioral responses to human presence (Ruediger et al. 2000). Lynx can be sensitive to human activities around den sites in late May and June, and the presence of human activity may lead to abandonment of the site, possibly affecting kitten survival (Claar et al. 1999). When foraging, lynx may be able to adapt to regular and concentrated recreational use if adequate security habitat is available, since most human activity occurs during the day and lynx are known to be active at night (Ruediger et al. 2000). However, lynx may be less tolerant of human activity in habitats that are fragmented and restricted in extent as in central Idaho (Koehler and Aubrey 1994).

Table 6. Lynx Analysis Units and acres of lynx habitat within the Hemingway-Boulders Wilderness area (denning habitat is a subset of foraging habitat)

Lynx Analysis Unit	Lynx Habitat within Hemingway-Boulder Wilderness Area									
	Zone 1		Zone 2		Zone 3		Zone 4		Total	
	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)
Baker-Fox-Leroux	504	64	0	0	0	0	0	0	504	64
Upper North Fork Big Wood-Easley	6,119	987	142	1	62	5	1	0	6,324	993
Upper Big Wood	893	13	0	0			0	0	893	13
Upper East Fork Salmon	12,111	2,299	53	13	28	3	0	0	12,192	2,315
Slate-Sullivan-Big Lake-Boulder	76	1	0	0	0	0	0	0	76	1
Total	19,703	3,364	195	14	90	8	1	0	19,989	3,386

Table 7. Lynx Analysis Units and acres of lynx habitat within the Cecil D. Andrus-White Clouds Wilderness area (denning habitat is a subset of foraging habitat)

Lynx Analysis Unit	Lynx Habitat within Cecil D. Andrus-White Clouds Wilderness Area									
	Zone 1		Zone 2		Zone 3		Zone 4		Total	
	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)	Foraging (acres)	Denning (acres)
Pole-Germania	2,011	148	24	8	6	0	51	1	2,092	157
Upper Warm Springs-Swimm-Martin	9,493	1,413	152	12	0	0	0	0	9,645	1,425
Casino-Rough	6,232	1,093	0	0	0	0	0	0	6,232	1,093
Robinson Bar-Beaver	11,444	2,282	65	6	0	0	0	0	11,509	2,288
Slate-Sullivan-Big Lake-Boulder	7,620	1,530	284	40	103	16	58	11	8,065	1,597
Total	36,800	6,466	525	66	109	16	109	12	37,543	6,560

Wolverine (Gulo gulo)

The entire Cecil D. Andrus-White Clouds Wilderness and Hemingway-Boulder Wilderness provide habitat for wolverines, and approximately 86,150 acres, where snow persists into late May, provide reproductive denning habitat. The population trend for wolverine is unknown within the Sawtooth NRA and wilderness areas. A recent study in central Idaho investigating the influence of backcountry winter recreation on wolverine movements and reproductive denning included the wilderness areas. Data from this study, which involved live-trapping and instrumenting animals with GPS-collars, documented 5 individuals within the wilderness areas, 3 of which had large portions of their home ranges in the wilderness areas. One reproductive den site was located in the Cecil D. Andrus-White Clouds Wilderness (Heinemeyer and Squires 2012).

During winter, wolverines may avoid areas where recreation or other human activity occurs (Krebs et al. 2007). Additionally, female wolverines are sensitive to disturbance during mid-February through May while they are searching for, establishing, and occupying their reproductive dens. During this time, females are lactating, and disturbance, which leads to increased energy expenditure, can be very detrimental. It is a critical time for females because they must maintain energy levels to properly nourish their kits. During studies in Alaska and Idaho, females were documented moving kits after encounters with researchers (Magoun and Copeland 1998). During summer in central Idaho, Copeland and others (2007) found that wolverines avoided roads, although it is not certain whether this is a cause-effect relationship or due to wolverines' tendency to occupy areas that are not conducive to road-building.

Species of Concern

Table 8 lists the wildlife species of concern that may occur in the wilderness areas. Species of concern designations include Forest Service Sensitive Species, Forest Service MIS, BLM Sensitive Species, and Idaho State Species of Greatest Conservation Need (SGCN). Forest Service Sensitive Species are designated by the Regional Forester whose population viability may be a concern as evidenced by a current or predicted downward trend in population numbers or density, or a current or predicted downward trend in habitat capability that would reduce a species' existing distribution. BLM Sensitive Species are native species found on BLM-administered lands for which the BLM has the capability to significantly affect the conservation status of the species through management and either there is information that a species has recently undergone, is undergoing, or is predicted to undergo a downward trend such that the viability of the species or a distinct population segment of the species is at risk across all or a significant portion of the species range, or the species depends on ecological refugia or specialized or unique habitats on BLM-administered lands, and evidence exists that such areas are threatened with alteration such that the continued viability of the species in that area would be at risk. SGCN were taken from Idaho's State Wildlife Action Plan (IDFG 2016). Their status is determined using an objective rule–based process to evaluate all animals thought by experts to be a candidate for SGCN. This process was designed specifically to reduce subjectivity and to obtain an objective State rank for species considered for inclusion as SGCN. Factors included, but were not limited to, information about population size, trend, viability, environmental specificity, threats, and protection status.

Table 8 includes species with known occurrences and species not documented but with habitat in the wilderness areas.

Table 8. Species of concern (vertebrates) within the Cecil D. Andrus-White Clouds and Hemingway-Boulder Wilderness Management Plan project area

Species	Status	Habitat in the Project Area
Spotted Bat (*Euderma maculatum*)	USFS Sensitive	All vegetation types
Townsend's Big-eared Bat (*Corynorhinus townsendii*)	USFS Sensitive, BLM Sensitive, Idaho SGCN	All vegetation types
Big Brown Bat (*Eptesicus fuscus*)	BLM Sensitive	All vegetation types
Hoary Bat (*Lasiurus cinereus*)	BLM Sensitive, Idaho SGCN	All vegetation types
Silver-haired Bat (*Lasionycteris noctivagans*)	BLM Sensitive, Idaho SGCN	All vegetation types
Pallid Bat (*Antrozous pallidus*)	BLM Sensitive	All shrub, deciduous forest, and riparian vegetation types
Fringed Myotis (*Myotis thysanodes*)	BLM Sensitive	All vegetation types
Little Brown Myotis (*Myotis lucifugus*)	BLM Sensitive, Idaho SGCN	All vegetation types
Long-eared Myotis (*Myotis evotis*)	BLM Sensitive	All vegetation types
Long-legged Myotis (*Myotis volans*)	BLM Sensitive	All vegetation types
Western Small-footed Myotis (*Myotis ciliolabrum*)	BLM Sensitive, Idaho SGCN	All vegetation types
Yuma Myotis (*Myotis yumanensis*)	BLM Sensitive	All vegetation types
Pygmy Rabbit (*Brachylagus idahoensis*)	USFS Sensitive, BLM Sensitive, Idaho SGCN	Sagebrush
Gray Wolf (*Canis lupus*)	USFS Sensitive, BLM Sensitive	All vegetation types
Fisher (*Pekania pennanti*)	USFS Sensitive, BLM Sensitive, Idaho SGCN	All forest and riparian vegetation types

Species	Status	Habitat in the Project Area
Mountain Goat (*Oreamnos americanus*)	Idaho SGCN	Alpine, High elevation mountain shrub
Bighorn Sheep (*Ovis canadensis*)	USFS Sensitive, BLM Sensitive, Idaho SGCN	All vegetation types
Bald Eagle (*Haliaeetus leucocephalus*)	USFS Sensitive, BLM Sensitive	Lakes and riparian vegetation types
Golden Eagle (*Aquila chrysaetos*)	BLM Sensitive, Idaho SGCN	All vegetation types
Northern Goshawk (*Accipter gentilis*)	USFS Sensitive, BLM Sensitive, Sawtooth National Forest Management Indicator	All forest vegetation types
Ferruginous Hawk (*Buteo regalis*)	BLM Sensitive	Sagebrush and Mountain Shrub
Peregrine Falcon (*Falco peregrinus*)	USFS Sensitive	All vegetation types
Greater Sage-grouse (*Centrocercus urophasianus*)	USFS Sensitive, Sawtooth National Forest Management Indicator, BLM Sensitive, Idaho SGCN	All shrub and non-forest riparian vegetation types
Great Gray Owl (*Strix nebulosi*)	USFS Sensitive, Idaho SGCN	All forest and riparian vegetation types
Flammulated Owl (*Psiloscops flammeolus*)	USFS Sensitive, BLM Sensitive	All forest and riparian vegetation types
Boreal Owl (*Aegolius funereus*)	USFS Sensitive	All forest and riparian vegetation types
Short-eared Owl (*Asio flammeus*)	BLM Sensitive, Idaho SGCN	All shrub and riparian vegetation types
Common Nighthawk (*Chordeiles minor*)	Idaho SGCN	All vegetation types
Northern Three-toed Woodpecker (*Picoides dorsalis*)	USFS Sensitive	All forest and riparian vegetation types
Pileated Woodpecker (*Dryocopus pileatus*)	Sawtooth National Forest Management Indicator	All forest and riparian vegetation types
Lewis' Woodpecker (*Melanerpes lewis*)	BLM Sensitive, Idaho SGCN	Conifer and deciduous forest types
Olive-sided Flycatcher (*Contopus cooperi*)	BLM Sensitive, Idaho SGCN	Conifer forest types
Clark's Nutcracker (*Nucifraga columbiana*)	Idaho SGCN	Conifer forest types
Willow Flycatcher (*Empidonax traillii*)	BLM Sensitive	Non-forest riparian vegetation types
Loggerhead Shrike (*Lanius ludovicianus*)	BLM Sensitive	Sagebrush and Mountain Shrub
Sage Thrasher (*Oreoscoptes montanus*)	BLM Sensitive, Idaho SGCN	Sagebrush
Green-tailed Towhee (*Pipilo chlorurus*)	BLM Sensitive	Sagebrush and Mountain Shrub
Brewer's Sparrow (*Spizella breweri*)	BLM Sensitive	Sagebrush
Sagebrush Sparrow (*Artimisiospiza nevadensis*)	BLM Sensitive, Idaho SGCN	Sagebrush
Black Rosy-finch (*Leucosticte atrata*)	Idaho SGCN	Conifer forest types
Western/Boreal Toad (*Anaxyrus boreas*)	BLM Sensitive, Idaho SGCN	Lakes, wetlands, and riparian vegetation types
Columbia Spotted Frog (*Rana luteiventris*)	USFS Sensitive	Lakes, wetlands, and riparian vegetation types

Migratory Birds

The MBTA prohibits taking of migratory birds, their parts, nests, eggs, and nestlings. EO 13186, signed January 10, 2001, directs federal agencies to protect migratory birds by integrating bird conservation principles, measures, and practices into agency activities and to avoid or minimize, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions.

Additional direction comes from the MOU between USDA Forest Service and USDI Fish and Wildlife Service, signed December 2008 and extended to 2017, which identifies specific activities for bird conservation pursuant to EO 13186 including analysis of effects on migratory birds.

As described in Chapter 2, vegetation and structure in the area are diverse, which provides habitat for several species of birds. Species of birds of concern that breed or migrate through the area are listed in Table 9.

Trends from the Breeding Bird Survey for either Idaho or the Northern Rockies Bird Conservation Region (depending on what data was available) are listed in Table 9 also. Some information is available on species occurrence on the Forest from point count surveys conducted Forest-wide over 8 years between 2000 and 2015, though sample sizes from these surveys are too small for determining local trends on the Sawtooth NRA. The species in this list require varying types of forest structure, sagebrush, and/or riparian/wetland areas for all or part of their habitat needs during the year (Table 10).

Table 9. Bird species of concern that occur or have habitat in the project area and their status

Species	Partners in Flight Status[a]	Idaho State Species of Greatest Conservation Need[b]	US Fish and Wildlife Service Birds of Conservation Concern[c]	Forest Service Intermountain Region Sensitive Species/BLM Challis Field Office Sensitive Species	Breeding Bird Survey Trend[d] %/year (bold indicates significant trend)
Bald Eagle			X	USFS, BLM	**3.9 (WR)**
Golden Eagle		Tier 2		BLM	NA
Northern Goshawk				USFS, BLM	–1.07 (NR)
Ferruginous Hawk		Tier 2	X	BLM	1.78 (ID)
Swainson's Hawk			X		**2.11 (ID**)
Peregrine Falcon			X	USFS	NA
Greater Sage-grouse	Yellow Watch, Reverse Decline	Tier 1		USFS, BLM	**–1.55 (WR)**
Great Gray Owl		Tier 3		USFS, BLM	NA
Flammulated Owl	Yellow Watch, Prevent Decline		X	USFS, BLM	NA
Long-eared Owl	Yellow Watch, Reverse Decline				NA
Short-eared Owl		Tier 3	X	BLM	–0.95 (WR)
Boreal Owl				USFS	NA
Common Nighthawk		Tier 3			**–1.76** (ID)
Calliope Hummingbird			X		–1.74 (ID)
Rufous Hummingbird	Yellow Watch, Reverse Decline		X		**–1.98 (WR)**
Lewis' Woodpecker	Yellow Watch, Reverse Decline	Tier 2	X	BLM	**–2.86 (WR)**
Williamson's Sapsucker			X		–1.18 (NR)
Three-toed Woodpecker				USFS	NA
Olive-sided Flycatcher	Yellow Watch, Reverse Decline	Tier 3	X	BLM	**–3.62 (ID)**
Willow Flycatcher			X	BLM	**–1.15 (ID)**

Species	Partners in Flight Status[a]	Idaho State Species of Greatest Conservation Need[b]	US Fish and Wildlife Service Birds of Conservation Concern[c]	Forest Service Intermountain Region Sensitive Species/BLM Challis Field Office Sensitive Species	Breeding Bird Survey Trend[d] %/year (bold indicates significant trend)
Loggerhead Shrike	Common, Steep Decline		X	BLM	**–1.04 (WR)**
Clark's Nutcracker		Tier 3			1.55 (ID)
Horned Lark	Common, Steep Decline				**–1.8 (ID)**
Sage Thrasher		Tier 2	X	BLM	**–1.67 (ID)**
Green-tailed Towhee			X	BLM	**–3.0 (ID)**
Brewer's Sparrow			X	BLM	**–1.31 (ID)**
Fox Sparrow			X		**–2.25 (ID)**
Brewer's Blackbird	Common, Steep Decline				**–2.35 (ID)**
Black Rosy-finch	Red Watch	Tier 3	X		NA
Cassin's Finch	Yellow Watch, Reverse Decline		X		–1.3 (ID)
Pine Siskin	Common, Steep Decline				**–2.76 (ID)**
Evening Grosbeak	Yellow Watch, Reverse Decline				**–3.3 (ID)**

[a]Species of Continental Importance in the Intermountain West Avifaunal Biome based on Partners in Flight American Landbird Conservation Plan (Rosenberg et al. 2016).

Watch Species—species determined to be vulnerable based on the combination of the six following factors – population size, breeding distribution, nonbreeding distribution, threats to breeding, threats to nonbreeding, population trend

Red—species with relatively high scores for all vulnerability factors

Yellow, Prevent Decline—species with high vulnerability scores for restricted ranges and small populations with moderate threats and stable or increasing trends.

Yellow, Reverse Decline—species with high population trend scores and moderate to high threats as well as moderate population sizes but low vulnerability scores for range.

Common, Steep Decline—species that are still too numerous or widely distributed to warrant Watch List status, but that are experiencing troubling long-term declines.

[b]Tier 1—species with the most critical conservation needs, taxa that may be heading toward the need for ESA listing; Tier 2—species with longer-term vulnerabilities or patterns suggesting management intervention is needed but not necessarily facing imminent extinction or having the highest management profile; Tier 3—species that are relatively more common and have either declining trends rangewide or are lacking in information

[c]USFWS Birds of Conservation Concern in the Northern Rockies Bird Conservation Region—Designated by USFWS (2008) and determined using assessment scores from threes sources including Partners in Flight North American Landbird Conservation Plan, US Shorebird Conservation Plan, and the North American Water Bird Conservation Plan. List was generated from the USFWS Information for Planning and Conservation application for Hemingway-Boulders White Clouds Wilderness Plan Project and reviewed by R. Garwood for occurrences in the project area. Two species from the Information for Planning and Conservation list (western grebe and long-billed curlew) do not occur in the project area and are not included in this analysis.

[d]From Breeding Bird Survey data (Sauer et al 2017). S=Survey-wide, NR=Northern Rockies, WR=Western Region (US and Canada west of Rocky Mountains), ID= Idaho, NA=no or insufficient data available. Trend estimates are shown for the smallest region with the most sufficient data available.

Table 10. Bird species of concern that occur or have habitat in the wilderness areas

Species	Habitat	Nest Substrate	Season of Use in Project Area
Bald Eagle	Conifer and riparian forest	tree	year round
Golden Eagle	Forest, sagebrush, and meadows near cliffs	cliff	year round
Northern Goshawk	Conifer Forest	tree	year round
Ferruginous Hawk	Sagebrush	tree	spring, fall migration
Swainson's Hawk	Forest adjacent to sagebrush and meadows	tree	spring, summer, fall
Peregrine Falcon	Forest, sagebrush, and meadows near cliffs	cliff	spring, summer, fall
Greater Sage-grouse	Sagebrush	ground	spring, summer, fall
Great Gray Owl	Conifer forest near wet meadows	tree	year round
Flammulated Owl	Forest, mixed conifer, snags	tree cavity	spring, summer, fall
Long-eared Owl	Forest, shrub riparian	tree	spring, summer, fall
Short-eared Owl	Sagebrush, wet meadows	ground	spring, summer, fall
Boreal Owl	Forest, mixed conifer, snags	tree cavity	year round
Common Nighthawk	Open forest, sagebrush, meadow	ground	spring, summer, fall
Calliope Hummingbird	Riparian areas	tree, shrub	spring, summer, fall
Rufous Hummingbird	Riparian areas	tree, shrub	spring, summer, fall
Lewis' Woodpecker	Forest, snags	tree cavity	spring, summer, fall
Williamson's Sapsucker	Aspen and conifer forests, snags	tree cavity	spring, summer, fall
Three-toed Woodpecker	Conifer forest, snags	tree cavity	year round
Olive-sided Flycatcher	Conifer forest	tree	spring, summer, fall
Willow Flycatcher	Riparian areas	shrub	spring, summer, fall
Loggerhead Shrike	Sagebrush	tree, shrub	spring, summer, fall
Clark's Nutcracker	Conifer forest	tree	year round
Horned Lark	Meadow, sagebrush	ground	spring, summer, fall
Sage Thrasher	Sagebrush	shrub, ground	spring, summer, fall
Green-tailed Towhee	Mountain shrub, sagebrush	shrub, ground	spring, summer, fall
Brewer's Sparrow	Sagebrush	shrub, ground	spring, summer, fall
Fox Sparrow	Riparian	tree, shrub, ground	spring, summer, fall
Brewer's Blackbird	Sagebrush, meadow	tree, shrub, ground	spring, summer, fall
Black Rosy-finch	Alpine meadow	cliff, talus	spring, summer, fall
Cassin's Finch	Conifer forest	tree	year round
Pine Siskin	Conifer forest	tree	year round
Evening Grosbeak	Conifer forest	tree, shrub	spring, summer, fall

3.4.3. Environmental Consequences

Resource Indicator and Measure 1: Risk of Contact between Bighorn Sheep and Pack Goats

Direct and Indirect Effects

Alternative A—Proposed Action

Alternative A would prohibit pack goat use within the approximately 26,774-acre core use area of the East Fork bighorn sheep herd from spring through fall within the Cecil D. Andrus-White Clouds Wilderness. Additionally, 8 management practices to minimize the risk of contact between pack goats and bighorn sheep would be enforced within both wilderness areas where pack goats are allowed. These standards would reduce the risk of contact compared to the existing condition, which has no management practices in place to reduce risk of contact. Outside of the pack goat prohibited areas of the wildernesses, some risk of contact would still exist.

Alternative B—Natural-Focus

Alternative B would prohibit pack goat use within the boundaries of both wilderness areas. Successful implementation of this management action would reduce risk of contact to almost zero within the wilderness areas because pack goats would not be present to potentially transmit diseases.

Alternative C—Minimum Management

Alternative C would not provide direction or standards for managing pack goats. Risk of contact would remain unchanged from the existing condition.

Cumulative Effects

Neither the Forest Service nor the BLM have direction or standards for managing pack goats. Risk of contact between bighorn sheep and pack goats outside of the wilderness areas would remain the same as the existing condition. However, due to the reduced risk within the wilderness areas from the closure area and implementation of the management practices, overall risk within the cumulative effects area would be reduced under Alternative A. Under Alternative B, due to the reduced risk within the wilderness areas from the prohibition of pack goats, overall risk within the cumulative effects area would be reduced and at a level lower than Alternative A. Under Alternative C, overall cumulative risk of contact would remain unchanged from the existing condition.

Resource Indicator and Measure 2: Disturbance to Wildlife and Adequacy of Management Actions to Protect Wildlife

Potential Effects Common to All Alternatives

Wildlife can be affected by human recreational activities in a variety of ways, including direct and indirect mortality, reduced use of habitat, behavior alteration resulting in reduced reproductive or survival rates, and habitat alteration resulting in reduced habitat quality. The type

of impact depends on the frequency, intensity, location, timing, predictability, and type of use, as well as the type of animal including its size, group size, sex, age, and niche (Knight and Cole 1995). A wide variety of impacts from recreation on the species of interest addressed in this analysis are identified in literature. In most cases, these impacts are negative, with only a few positive accounts reported. Impacts on species from recreational trails and camping within the wilderness areas can be categorized as follows (Wisdom et al. 1999, Wisdom et al. 2000, Gaines et al. 2003, Snetsinger and White 2009):

- ***Breeding/Rearing Disturbance***—Species that are considered generally tolerant of human activity may experience higher levels of disturbance at breeding and rearing sites. This disturbance may result in reduced attentiveness to young, disruption of feeding patterns, abandonment of nests and dens, and/or cause adults to undertake additional risks to move their young to a new location. Several studies have investigated impacts of human presence on songbirds and found negative responses. Gutzwiller and others (1997) detected curtailments of singing activity in some species in the presence of hikers and thought this response may reduce breeding activity and quality of those sites for young. Gutzwiller and Anderson (1999) found lower numbers of individuals of some common species in sites with human intrusions compared to sites without disturbance. Bighorn sheep have been reported to respond negatively to human disturbance (elevated heart rate and avoidance of routes and/or traditional lambing areas) including hikers, hikers with dogs, mountain bikers, and roads (MacArthur et al. 1979, MacArthur et al. 1982, Papouchis et al 2001, Pelletier 2006, Weidmann and Bleich 2014). Because wild canids are the major predator of wild sheep, dogs are perceived as threats to sheep and several human disturbance studies have shown that wild sheep show increased alarm responses, including increased heart rate, toward dogs (MacArthur et al. 1979, MacArthur et al. 1982, Pelletier 2006). The cumulative effects of these responses may affect metabolic rates and energy balance. Additionally, if sheep perceive an area as high predation risk, it could lead to habitat abandonment.
- ***Displacement/Avoidance***—Many species often move away from human activity or intentionally avoid areas of human activity. Taylor and Knight (2003) investigated the interactions of wildlife and trail users (hikers and mountain bikers). Their observations showed that 70% of animals located within 330 feet of a trail were likely to flee when a trail user passed. Areas may also be avoided due to habitat changes, such as soil compaction or vegetation change, associated with the area. Animals displaced by recreation are less likely to survive and reproduce where habitat is unfamiliar or inferior (Gutzwiller 1995). Recreation intensity has been shown to be negatively correlated with bird densities of some species (van der Zande et al. 1984). Repeated human disturbance can result in displacement or abandonment of a territory, leading to reproductive failure if no unoccupied territory is nearby that is free from disturbance (Riffell et al. 1996). Kangas and others (2010) found a strong negative effect from trail use on ground nesting species that nested along trails. Gutzwiller and others (1998) and Mallord and others (2007) also found a lower tolerance of humans by birds that were active nearer the ground.

- ***Habitat Fragmentation and Alteration***—Recreational trails, campsites, and stock grazing can result in habitat alteration and fragmentation through vegetation removal and trampling, invasive species spread, and change in species composition (Leung and Marion 2000, Barros and Pickering 2017). Forest fragmentation is a concern for some bird species. Hickman (1990) found nest predators and cowbirds attracted to trail corridors 4 to 6 feet wide. Miller and Hobbs (2000) also note that predation of songbird nests was greater closer to forested hiking trails. Miller and others (1998) found generalist species more common near trails with specialist species less common, and nest predation greater near trails. In addition to increased fragmentation, trail construction sometimes results in the loss of important habitat structural components.
- ***Stress/Physiological Response***—Studies of heart rates and fecal glucocorticoid levels have shown stress responses to human activity. Chronic stress can make species susceptible to illness and reduce individual fitness (Gabrielsen and Smith 1995).
- ***Snag/Downed Wood Reduction***—Snags and downed wood are used for cover, nesting, and denning and are key habitat components for some species. Snags are used for foraging and nesting by many priority bird species that occur in the project area (Table 10). These components may be lost through trail development, removal of hazard trees, and campfires at camp sites (Hall and Farrell 2001).

Table 11 summarizes these effects to species of concern in the project area.

Direction in each alternative for managing recreational activities that would likely influence wildlife and wildlife habitat and potentially mitigate effects to wildlife can be grouped into the following categories: group size, campfires, recreational stock grazing, recreational stock use, commercial services, and education (Table 12).

Table 11. Potential effects to species of concern from recreational activities

Species	Breeding and Rearing Disturbance	Displacement and Avoidance	Habitat Alteration	Stress/ Physiological Response	Snag and Downed Wood Reduction
Canada Lynx	x	x	x		x
Wolverine (*Gulo gulo*)	x	x	x	x	x
Spotted Bat	x	x	x		
Townsend's Big-eared Bat	x	x	x		
Big Brown Bat	x	x	x		
Hoary Bat	x	x	x		x
Silver-haired Bat		x	x		x
Pallid Bat	x	x	x		x
Fringed Myotis	x	x	x		
Little Brown Myotis	x	x	x		x
Long-eared Myotis	x	x	x		x
Long-legged Myotis		x	x		x
Western Small-footed Myotis	x	x	x		x
Yuma Myotis	x	x	x		
Pygmy Rabbit	x	x	x		
Gray Wolf	x		x		

Species	Breeding and Rearing Disturbance	Displacement and Avoidance	Habitat Alteration	Stress/ Physiological Response	Snag and Downed Wood Reduction
Fisher		x	x		x
Mountain Goat		x	x		
Bighorn Sheep	x	x	x	x	
Bald Eagle		x	x	x	
Golden Eagle	x	x	x	x	
Northern Goshawk	x	x	x		x
Ferruginous Hawk		x	x		
Peregrine Falcon	x	x	x		
Greater Sage-grouse		x	x		
Great Gray Owl	x	x	x		x
Flammulated Owl	x	x	x		x
Boreal Owl	x	x	x		x
Short-eared Owl	x	x	x		
Common Nighthawk	x	x	x		
Northern Three-toed Woodpecker			x		x
Pileated Woodpecker			x		x
Lewis' Woodpecker			x		x
Olive-sided Flycatcher	x	x	x		
Clark's Nutcracker	x	x	x		x
Willow Flycatcher	x	x	x		
Loggerhead Shrike	x	x	x		
Sage Thrasher	x	x	x		
Green-tailed Towhee	x	x	x		
Brewer's Sparrow	x	x	x		
Sagebrush Sparrow	x	x	x		
Black Rosy-finch	x	x	x		
Western/Boreal Toad	x	x	x		x
Columbia Spotted Frog	x	x	x		x
Migratory birds	x	x	x	x	x

Table 12. Proposed direction by alternative that may affect disturbance to wildlife and wildlife habitat

Category	Direction	Alternative A Proposed Action	Alternative B Natural-Focus	Alternative C Minimum Management
Group Size	Standard	Limit group size to a maximum of 12 people	Limit group size to a maximum of 8 persons in Zone 1 and 12 persons in Zones 2, 3, and 4	Limit group size to a maximum of 20 persons

Category	Direction	Alternative A Proposed Action	Alternative B Natural-Focus	Alternative C Minimum Management
	Standard	Limit the combined number of recreational stock in one group to 14 head of stock	Limit the combined number of pack in saddle stock in one group to a maximum of 10 animals in Zone 1 and 14 animals in Zones 2, 3, and 4	The following is prohibited: being in the area with a combined number of recreational stock in excess of 25 animals.
Campfires	Standard	Campfires are allowed below 8,800 feet elevation, and within 200 yards of Walker, Island, Upper and Lower Chamberlain (9,477 feet and 9,197 feet) and Boorn Lakes	Campfires are only allowed in Zones 3 and 4	Building, maintaining, attending, or using campfires within 200 yards of the following lakes: Cirque, Cove, Sapphire, Sheep, Slide, Tin Cup, Gunsight, Four Lakes Basin, Scree, Shallow, Castle, and Chamberlain 9849 is prohibited
Recreational Stock Grazing	Standard	Grazing by recreational stock within 200 feet of lakes, streams or springs is prohibited	Same as A	No direction
Recreational Stock Use	Standard	Tethering recreational stock is not allowed within 200 feet of lakes, streams and springs, with the exception of agency provided tie-up sites where topography does not allow for tethering more than the 200 feet from lakes, streams, and springs.	Same as A	Tethering recreational stock within 100 feet of springs, lakes, or streams is prohibited.
	Standard	Recreational stock use, with the exception of pack goats and llamas, is prohibited within the following drainages: Slickenslide Creek above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes	Recreational stock use, except for pack goats and llamas, is prohibited within the following drainages: Slickenslide Creek, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes	No direction

Category	Direction	Alternative A Proposed Action	Alternative B Natural-Focus	Alternative C Minimum Management
Commercial Services	Standard	Assigned campsites for outfitters and guides will only be authorized in Zones 3 and 4 and will be located to reduce conflicts with non-outfitted users and to protect sensitive areas. Allow spike and drop camps away from high-use areas and authorize on a case-by-case basis. Progressive camping would be allowed as per Outfitter Operating Plan and annual itinerary.	Same as A	No direction
	Standard	Ensure operating plans for priority use and temporary use outfitting and guiding permits direct outfitters to model appropriate wilderness practices and incorporate awareness of wilderness values in their interaction with clients and others	Same as A	No direction
Education	Guideline	Prevent human/wildlife encounters by emphasizing proper camping techniques and food storage and containment	Same as A	No direction
	Guideline	Discourage off-trail route marking and remove user-created route markers, such as stacked rocks, flagging.	Same as A	No direction
	Guideline	Encourage use of no trace fires (i.e. use of fire pans or fire blankets)	Same as A	No direction

Category	Direction	Alternative A Proposed Action	Alternative B Natural-Focus	Alternative C Minimum Management
	Guideline	Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations.	Same as A	No direction

Direct and Indirect Effects

Alternative A—Proposed Action

Listed Species

Canada Lynx

Disturbances caused by human and stock presence would continue to exist within lynx habitat. The reduction in group size from the existing condition would not likely be substantial enough to positively or negatively affect lynx occurrence in the wilderness areas.

Snowshoe hare, dusky grouse, and red squirrels all occur within the wilderness areas. Foraging habitat quality would increase with the stock grazing and use changes.

No change in habitat access would occur under Alternative A.

The reduction in stock grazing and use areas would likely improve foraging habitat for lynx. Approximately 83 acres of foraging habitat occur within the equine stock use closure areas and approximately 5,690 acres occur within the pack goat closure area with 83 acres of overlap. Where campfires are prohibited within lynx habitat, both foraging and denning habitat would likely improve (approximately 4,256 acres of foraging habitat and 737 acres of denning habitat) from dead and downed wood retention.

Alternative A would not result in greater than 30% of predicted lynx habitat in unsuitable condition within the LAUs as directed by Forest Plan TEST15 (USDA Forest Service 2012).

No change in habitat disturbance from fires or large-scale vegetation projects would occur under this alternative.

Implementing Alternative A would benefit lynx habitat by improving lynx foraging habitat by reducing stock grazing and use. It would benefit lynx denning habitat where campfire restrictions exist by retaining downed wood.

Wolverine

Disturbances caused by human and stock presence would continue to exist within wolverine habitat. The reduction in group size from the existing condition would not likely be substantial enough to change wolverine distribution and movements from the existing condition. Recreation Resources Standard 2176 to "Manage winter recreation to minimize conflict with high elevation wildlife species including mountain goats and wolverine." would remain, continuing to provide some protection to reproductive denning areas.

Campfires would not be allowed above 8,800 feet, which would result in more snag and downed wood retention in these fragile areas (not including the exceptions), benefitting prey species of wolverine and improving wolverine denning habitat (approximately 60,110 acres in both wilderness areas combined).

Recreational stock grazing would not be allowed within 200 feet of lakes, streams, and springs. Additionally, equine stock use would not be allowed within approximately 7,290 acres in the Boulder Chain Lakes area above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Island and Walker Lakes and pack goats would not be allowed in approximately 26,774 acres of bighorn sheep range (approximately 5,084 acres overlap with the equine stock closure area). This area is wolverine habitat and approximately 80% of this area is potential wolverine denning habitat. This direction would improve riparian vegetation and soil compaction over existing conditions, benefitting wolverine prey species.

Direction for commercial use of the wilderness areas and direction for education of wilderness visitors would help prevent expansion of impacts to wolverine habitat from the existing condition.

<u>Species of Concern and Migratory Birds</u>

Group size of both people and recreational stock would be smaller than currently allowed in the wilderness areas (Table 12). Though disturbances caused by human and stock presence would continue to exist, with smaller group sizes, an increase in negative effects from the existing condition would not be expected.

Campfires would generally not be allowed above 8,800 feet, which would result in more snag and downed wood retention in these fragile areas, thus benefitting many species of concern (Table 12).

Recreational stock grazing would not be allowed within 200 feet of lakes, streams, and springs. Additionally, equine stock use would not be allowed within approximately 7,290 in the Boulder Chain Lakes area above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Island and Walker Lakes, and pack goats would not be allowed in approximately 26,774 acres of bighorn sheep range (approximately 5,084 acres overlap with the equine stock closure area). This direction would improve riparian vegetation and soil compaction over existing conditions benefitting multiple species of concern.

Direction for commercial use of the wilderness areas and direction for education of wilderness visitors would help prevent expansion of impacts to wildlife and wildlife habitat from the existing condition.

Alternative B—Natural-Focus

Listed Species

Canada Lynx

Disturbances caused by human and recreational stock presence would continue to exist within lynx habitat and effects from Alternative B would be the same as Alternative A. Effects to snowshoe hare, dusky grouse, and red squirrels foraging habitat quality would be the same as described under Alternative A. No change in habitat access under this alternative either.

The reduction in recreational stock grazing and use areas would likely improve foraging habitat for lynx. Approximately 83 acres of foraging habitat are within the equine stock use closure areas (same as Alternative A) and pack goats would not be allowed within the boundaries of the wilderness areas. Very little lynx habitat is located within Zones 3 and 4 (Table 12 6 and 7) where campfires would be allowed under this alternative. However, where it occurs, both foraging and denning habitat would improve from dead and downed wood retention.

Alternative B would not result in greater than 30% of predicted lynx habitat in unsuitable condition within the LAUs as directed by Forest Plan TEST15 (USDA Forest Service 2012).

No change in habitat disturbance from fires or large-scale vegetation projects would occur under this alternative.

Implementing this alternative would benefit lynx habitat by improving lynx foraging habitat by reducing stock grazing and use. It would benefit lynx denning habitat where campfire restrictions exist by retaining dead and downed wood more than under Alternative A.

Wolverine

As in Alternative A, disturbances caused by human and stock presence would continue to exist within wolverine habitat. Group size restrictions would affect wolverine distribution and movements as described under Alternative A. Recreation Resources Standard 2176 would also remain and continue to provide some protection to reproductive denning areas.

Campfires would only be allowed in Zones 3 and 4 (approximately 1,145 acres), which would result in greater snag and downed wood retention than under Alternative A, benefitting prey species of wolverine and improving wolverine denning habitat (approximately 85,160 acres in both wilderness areas combined).

Recreational stock grazing would not be allowed within 200 feet of lakes, streams, and springs. Additionally, equine stock use would not be allowed within approximately 7,290 acres in the Boulder Chain Lakes area above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Island and Walker Lakes, and pack goats would not be allowed within the boundaries of the wilderness areas. This direction would improve riparian vegetation and soil compaction over existing conditions and Alternative A, benefitting prey species of wolverine.

Direction for commercial use of the wilderness areas and direction for education of wilderness visitors would improve wolverine habitat as described under Alternative A.

Species of Concern and Migratory Birds

Group size of people and recreational stock would be smaller than currently allowed in the wilderness areas and smaller than allowed under Alternative A. As described in Alternative A,

disturbances caused by human and stock presence would continue to exist; however, with smaller group size, effects would not increase from the existing condition.

Campfires would only be allowed in Zones 3 and 4 (approximately 1,145 acres), which would result in more snag and downed wood retention in these fragile areas than under Alternative A, benefitting many species of concern (Table 12).

Recreational stock grazing would not be allowed within 200 feet of lakes, streams, and springs. Additionally, equine stock use would not be allowed within approximately 7,290 acres in the Boulder Chain Lakes area above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Island and Walker Lakes, and pack goats would not be allowed within the boundaries of the wilderness areas. This direction would improve riparian vegetation and soil compaction over existing conditions and Alternative A, benefitting multiple species of concern.

Direction for commercial use of the wilderness areas and direction for education of wilderness visitors would help improve wildlife habitat from the existing condition as in Alternative A.

Alternative C—Minimum Management

This alternative would provide little direction or standards for reducing disturbance to wildlife, including species of concern, migratory birds, Canada lynx, and wolverine, from the existing condition.

Group size of both people and recreational stock would remain the same as existing condition. Disturbances caused by human and stock presence would continue to exist and likely expand.

Campfires would not be allowed within 200 yards of the 12 lakes currently closed to campfires (approximately 800 acres). Impacts to species that require dead and downed wood would continue or worsen outside of these areas.

Impacts to habitat from recreational stock grazing and use would likely maintain or worsen from existing condition.

Because no direction for commercial use of the wilderness areas or direction for education of wilderness visitors exists, these uses would likely maintain or worsen existing impacts to wildlife and wildlife habitat.

Cumulative Effects

The primary federal activities that have impacted terrestrial species of concern and their habitats on the Sawtooth NRA as well as within the north end of the Forest include construction and use of system and non-system roads, construction and use of motorized and non-motorized trails, past and present livestock grazing, pesticide and herbicide application, recreation and non-recreation special use permitted activities, developed recreation, water diversion structures and their operation, current and past timber harvest, current and past mining activity, personal use firewood cutting, and dispersed recreation. The cumulative effects area contains many potential human-caused sources of mortality for birds such as window strikes, power line collisions, fence collisions, vehicle collisions, house cat predation, and pesticide exposure.

Of these activities, livestock grazing, ongoing hazard tree removal, road and trail construction and maintenance (both permitted and unpermitted), and dispersed recreation have altered habitat

for species of concern in the area by removing or degrading potential foraging, denning, and nesting habitat. Herbicide application likely has had some negative effect for birds, amphibians, and small mammal prey species that may consume contaminated vegetation or contaminated insects, as well as amphibians, which may experience direct effects from herbicide exposure.

Foreseeable future actions within the area with potential effects to wildlife species of concern include travel management planning within the Big Wood River watershed. Part of this planning effort will involve reducing route density and restoring some existing unauthorized routes. Implementation of these actions is anticipated to begin in 2019. A prescribed burning and timber harvest project in the Stanley Lake Creek and Elk Creek watersheds of Stanley Basin is planned for implementation in 2018. This project would simultaneously remove and improve habitat for several species of concern.

Alternatives A and B are anticipated to slightly improve conditions for wildlife species of concern so would contribute positively toward cumulative effects. Alternative C would have no contribution to cumulative effects.

3.4.4. Summary

Table 13 summarizes the environmental effects of each alternative to wildlife resources.

Table 13. Summary comparison of environmental effects to wildlife resources

Indicator/Measure		Alternative A	Alternative B	Alternative C
Risk of contact between bighorn sheep and pack goats		Intermediate risk of contact among alternatives	Lowest risk of contact among alternatives	Highest risk of contact among alternatives
Disturbance to wildlife and adequacy of management actions to protect wildlife	Group Size	Impacts to wildlife and wildlife habitat would likely not increase from existing condition	Same as Alt A	Impacts to wildlife and wildlife habitat would be maintained or increase from existing condition
	Campfires	Habitat would improve from dead and downed wood retention in areas where campfires are prohibited	Habitat would improve from dead and downed wood retention in areas where campfires are prohibited. More area would be expected to improve than under Alt A	Impacts to wildlife and wildlife habitat would be maintained or increase from existing condition
	Recreational Stock Grazing and Use	Approximately 6,058 acres would be closed to recreational equine stock use and approximately 26,774 acres would be closed to pack goat use resulting in improved habitat conditions	Approximately 7,290 acres would be closed to recreational equine stock use and both wilderness areas would be closed to pack goat use resulting in improved habitat conditions	Impacts to wildlife and wildlife habitat would be maintained or increase from existing condition
	Commercial Use	Direction would help slow expansion of impacts to wildlife habitat	Same as Alt A	Impacts to wildlife and wildlife habitat would be maintained or increase from existing condition
	Education	Direction would help slow expansion of impacts to wildlife habitat	Same as Alt A	Impacts to wildlife and wildlife habitat would maintain or increase from existing condition

3.5. Botanical Resources, Vegetation, and Nonnative Plants

3.5.1. Introduction

This section addresses the effects of the proposed action and alternatives of the Hemingway-Boulders and Cecil D. Andrus-White Clouds Wilderness WMP proposed by the Forest and BLM on ESA threatened, endangered, candidate, and proposed species, Forest Service Sensitive Species, BLM Special Status plant species, alpine and riparian vegetation, and invasive non-native plant species. These analyses are required by law, regulation or policy.

3.5.2. Resource Indicators and Measures

Concerns regarding plant species arise from recreational use in the wilderness. The following were chosen as analysis indicators and measures for this section as identified during scoping.

- Whitebark pine
  - Change in recreation site area and number, tree damage, campfire rings, or stock use impacts
- Alpine and riparian vegetation
  - Change in recreation site area and number, tree damage, campfire rings, or stock use impacts
- Invasive non-native plant populations
  - Increase in known invasive non-native species
- ESA candidate, Forest Service Sensitive, Forest Watch, or BLM Special Status plant species
  - Loss of occurrences and decrease in habitat quality from recreation activities

Direct and indirect effects are analyzed at the geographic scope of the areas encompassed by the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. Cumulative effects are analyzed at the geographic scope of the entire north end of the Forest (Fairfield Ranger District, Ketchum Ranger District, Sawtooth NRA). Temporal scope is defined as temporary (0–3 years), short term (3–15 years), and long term (+15 years).

The Sawtooth NRA is considered the cumulative effects boundary for whitebark pine, alpine and riparian vegetation, Forest Service Sensitive Species, Forest Watch Plant Species, and BLM Special Status plant species. The timeframe for cumulative effects from the alternatives would be long term.

3.5.3. Affected Environment

Resource Indicator and Measures 1 and 2: Whitebark Pine and Alpine and Riparian Vegetation

The landscape in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas and is diverse, rugged, and isolated. The elevational gradient spans 6,000 feet in elevation to 11,815 feet and supports wide vegetation diversity. Lower elevations in the wilderness include sagebrush steppe, interspersed with grassland and aspens. Coniferous forests of subalpine fir, Douglasfir, and lodgepole pine occur at mid-elevations on steep slopes. High-elevation glaciated mountainous terrain includes lateral moraine; glacial cirques; sharp ridgelines; talus; and broad, level-crested ridges. The alpine area represents several plant communities including subalpine and alpine dwarf-shrub, cushion plant, alpine dry turf meadow, grassland, snowfield, fell-field, and whitebark woodland.

Whitebark occurs at elevations above 8,000 feet in pure whitebark or subalpine fir–whitebark co-dominate stands. Below this elevation, individual whitebark pines occur in the understory of Douglas-fir and lodgepole. These individuals are small saplings/trees less than 4 feet. Whitebark pine stands on the Forest and adjacent lands have substantial mortality caused by mountain pine beetle. White pine blister rust disease occurs frequently in stands on the Forest, and large tree mortality is becoming more frequent in infected stands. On the Forest, decades of fire suppression have led to both progressive loss of whitebark pine basal area and successional replacement by more shade-tolerant trees, such as subalpine fir. Whitebark stands near recreation

sites are affected by firewood gathering, structure building, and stock tethering. Whitebark pine snags and dead branches are often used for fuelwood or to build campsite structures.

Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas contain portions of 5 watersheds in the Upper Salmon River subbasin and 3 watersheds in the Big Wood River subbasin. The major streams in the area are the East Fork Salmon River, Warm Springs Creek, Slate Creek, Big Boulder Creek, Little Boulder Creek, Germania Creek, West Pass Creek, and the North Fork of the Big Wood River. Approximately 158 lakes occur within Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. The Cecil D. Andrus-White Clouds Wilderness includes 46 named lakes of the 133 lakes, and the Hemingway-Boulders Wilderness includes 25 lakes, of which 4 are named. Alpine lakes are popular visitor destinations; some of these include Big Boulder and Little Boulder Chain Lakes, Chamberlain Basin Lakes, and Boorn and Amber Lakes.

Trampling of vegetation along trail corridors and recreation sites by human and recreational stock use occurs in the wilderness areas. While these impacts can be locally severe, they are currently insignificant at the ecosystem or landscape scale.

Recreational use at Boorn Lakes, Chamberlain Lakes, Boulder Chain Lakes and Big Boulder Lakes has resulted in fire scarred rock, unauthorized user created routes in sensitive vegetation, loss of and damaged ground cover, soil compaction and increased erosion. Some recreation sites are lacking dead and downed wood, and living trees have been damaged by firewood gathering, structure building, and stock tethering.

The current group size limit of 20 persons and 25 head of recreational stock (Special Order 0414-04-034) has affected vegetation resources from development of unauthorized user-developed routes, campsite expansion and sanitation concerns. Trailhead registration and wilderness ranger contacts indicate groups have occasionally exceeded the group size limit.

In areas where historic permitted livestock grazing occurred, vegetation communities are less resilient due to reduced species diversity and soil compaction. Soil compaction and erosion in riparian vegetation has resulted in mesic/hydric plant communities transitioning to species found in drier habitats. Fire exclusion has reduced wet meadows through conifer encroachment, and created stands of dense, small-diameter trees in areas that used to be dominated by widely spaced large trees.

Wilderness character monitoring conducted in 2016 indicates 238 recreation sites (campsite and stock areas) occur within the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. The Hemingway-Boulders Wilderness contains 14 of these sites with 9 (64%) of the recreation sites less than 500 square feet in size. The Cecil D. Andrus-White Clouds Wilderness area contains the remaining 224 sites, of which 114 sites (51%) are less than 500 square feet, and 39 sites (17%) are greater than 1,500 square feet. Stock use evidence (manure, feed or tree damage) occurs at 48 (20%) of the 238 recreation sites: 2 in the Hemingway-Boulders Wilderness and 46 in the Cecil D. Andrus-White Clouds Wilderness. Tree damage was found on 238 trees in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas: 14 trees in the Hemingway-Boulders Wilderness and 224 trees in the Cecil D. Andrus-White Clouds Wilderness. Of the sites recorded, 163 (68%) had 0% to 25% tree damage. Campfire evidence occurs in 213 (89%) recreation sites in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas: 11 (79%) in the

Hemingway-Boulders Wilderness and 202 (90%) in the Cecil D. Andrus-White Clouds Wilderness.

Resource Indicator and Measure 3: Invasive, Nonnative Plant Species

Spotted and diffuse knapweed, scotch, musk, bull and Canadian thistle, yellow and Dalmatian toadflax, rush skeletonweed, leafy spurge, black henbane, hounds tongue, common tansy, and field bindweed are known to occur in or adjacent to the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness boundaries along roads and trails on private and public lands. Spotted knapweed occurs along Big and Little Boulder Trail; 4th of July Creek Road; Slate Creek Road; Salmon River Canyon; State Highway 75 along the Boulder front; and extensively along roads, trails, and recreation sites in the North Fork Big Wood River drainage. Dalmatian toadflax occurs in a large infestation in the Big Boulder drainage, at the trailhead, and along access roads and trails into the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. The Fourth of July drainage, including a reclaimed route (still in use by foot and wildlife); Martin Creek; Warm Springs Creek Trail; Big Casino Trail; Germania Trail; Little Redfish Lake; Slate Creek Road; Lower West Pass; East Fork Salmon River Trailhead and Trail; Bower Guard Station; Grandprize Trail; Pole Creek drainage; and North Fork Big Wood River drainage have yellow toadflax infestations directly adjacent to and leading into the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness. Invasive non-native annual grasses are becoming established along trails and stock use areas. The sites are typically south or west aspects and have continual disturbance.

Resource Indicator and Measure 4: ESA Candidate, Forest Service Sensitive, Forest Watch, and BLM Special Status Plant Species

The Forest has known occurrences and provides habitat for 45 Forest Service Sensitive plant species and Forest Watch plant species. Idaho Heritage Database records indicate known occurrences in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas of White Cloud milkvetch, whitebark pine, slender moonwort, Marsh's bluegrass, northern sagewort, wedge-leaf saxifrage, Mt. Shasta sedge, and pointed draba/rockcress draba. Northern sagewort, slender moonwort, silvery primrose, and Engelmann's/Brewer's sedge have known occurrences directly adjacent to the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas, and potential habitat for these species occurs within the wildernesses. BLM Special Status species known to occur within or near the wilderness include wavy-leaf thelypody, Challis milkvetch, Challis crazyweed, Lemhi milkvetch, and marsh felwort. Whitebark pine, currently a federal candidate for listing, occurs at high-elevations throughout the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas.

3.5.4. Environmental Consequences

Direct and Indirect Effects

Summary of Effects that Occur on Vegetation Resources

Activities resulting from implementing each alternative which affect vegetation, such as direct removal, trampling, grazing, and invasive, non-native plant species introductions, could

contribute to effects to botanical resources, depending on the type of impact, frequency, intensity, location, and timing. The potential for impacts exists primarily in high-elevation alpine vegetation, riparian vegetation, and at known occurrences of ESA Candidate, Forest Service Sensitive, Forest Watch, and BLM Special Status plant species. The degree of effect to these species and vegetation communities are discussed by alternative below. Effects to other species and vegetation groups are not addressed.

Direct Removal

The intentional removal of living vegetation is generally prohibited by the public with two exceptions: harvesting of specific edible plants and collection of firewood for campfires. Vegetation removal for administrative purposes may occur during trail maintenance and construction, for fire management, for scientific study, and for the removal of invasive plants. Removal of vegetation by grazing animals is addressed separately. Fire management, scientific study, vegetation removal for trail maintenance and construction, and invasive plant removal are addressed through program-specific.

The most common form of direct vegetation removal is the collection of firewood for campfires. Firewood collection that takes the form of felling trees and cutting limbs can create wounds, leaving trees more susceptible to insect and fungal attacks that can lead to tree mortality (Reid et al 2005). Campfires can impact vegetation by removing firewood and associated trampling that greatly enlarge the area affected by camping activities (Cole 1989a). A study in the Sierra Nevada region found that campers travel up to approximately 200 feet from the campsite to scavenge for firewood, resulting in effects to vegetation and soils (Davilla 1979).

Though small woody materials comprise a small fraction of the mass of the total downed wood in a forest, they contain most of the nitrogen, phosphorus, and potassium contributing to soil productivity (Hall and Farrell 2001). Medium-sized woody materials are important for providing conditions necessary for seed germination and establishment and survival and are also the preferred substrate for seedling establishment and subsequent growth of certain species (Cole and Monz 2002). Removing woody material larger than about 2–4 inches in diameter may alter soil conditions and establishment and survival of vegetation, lichens, mosses, and fungi. Eliminating large woody debris reduces site productivity, particularly on droughty and infertile soils (Cole and Monz 2002) and can result in a variety of negative ecological effects. Woody material increases the physical, structural, and chemical heterogeneity of the forest floor; contributes to soil organic matter and water holding capacity; and helps maintain soil stability. Decaying wood has an unusually high water holding capacity; accumulates nitrogen, phosphorus, and sometimes calcium and magnesium; and is an important site for nitrogen-fixing microorganisms. Of particular importance, ectomycorrhizal fungi (organisms that develop a symbiotic association with the roots of many plants) that improve a plant's ability to extract water, nitrogen, and phosphate from less fertile soils, are concentrated in decayed wood. Shifts in understory species have also been documented and attributed to disturbance by firewood collection (Saunders 1979). Collecting downed wood has been shown to affect nutrient cycling for a 50–70 years (Reid et al 2005).

Direct impacts occur from the campfire itself, which alters organic matter and sterilizes soils in the fire-ring. Campfires can decrease organic matter content in soils to depths greater than about 4 inches. The severity of the impacts is related to the intensity of the fire (Fenn et al. 1976).

In some low-productivity, high-elevation forest types, fuelwood regeneration does not keep pace with its utilization for campfires resulting in various types of impacts (Davilla 1979). In general, firewood consumption exceeds productivity in high-elevation whitebark pine forests in the western United States popular as destinations for visitors (Cole 1989b). Additional impacts may occur at these campsites when available dead and downed wood is limited, and visitors resort to removing lower limbs from standing trees or snags for firewood (Cole 1989b).

Whitebark pine is an ESA Candidate species and a Forest Service Sensitive species. It is also a component of high-elevation forests—valuable aesthetically and as a paleo resource—both as living individuals and as remnant snags and down wood from dead trees. Whitebark pine exist under adverse growing conditions at high elevations and low productivity sites and typically accumulate remnant dead wood on the ground that can be much older than any living tree (frequently two or three times older). Remnant dead wood in these subalpine areas can be many thousands of years old, and a valuable resource for dendrochronologists as sources of information on past ecological or climatic dynamics. These resources can be negatively affected by localized site degradation through the consumption of very old remnant wood for campfires as well as by direct damage to the old living trees.

Remnant wood from whitebark pine can survive for millennia due to a combination of a dry cool environment, rot resistant wood, and low forest turnover rates (Stephenson and van Mantgem 2005).

Besides being on low productivity sites, these old trees and remnant wood are found at these high elevation sites because the probability of natural fire is low (a combination of infrequent fire [Caprio and Swetnam 1995; Swetnam et al. 1998] and small average area burned annually [Caprio 2004]). As a result, the probability of a tree being killed or dead wood being consumed by natural fire is much smaller than at the lower elevations.

Because this remnant wood can survive for such long periods of time, even extremely small effects, such as burning as firewood or removal, compounded over long periods, would have negative effects. Additionally, specific sites across the elevational gradient over which a species lives may have different scientific value, so effects would vary depending on location. For example, trees at the lower elevational limits of a species distribution are generally more sensitive to precipitation and so are valuable for extracting a record of past rainfall and temperature variation. At elevations above the current tree line, “ghost forests” of dead trees provide information on long-term changes in the tree line due to changing climate over many thousands of years.

Actions that decrease the amount of firewood collection would decrease effects to high elevation whitebark pine and alpine vegetation.

The death of mature cone-producing whitebark pine would result in indirect impacts by reducing the potential for future regeneration of whitebark pine stands.

Stock Use Evidence

Grazing by stock affects vegetation both through trampling and defoliation. Grazing has both direct effects on individual plants and indirect effects on vegetation composition, structure, and ecosystem processes (McClaran and Cole 1993).

Trampling effects are mechanical damage to above or below ground plant parts. Trampling can be caused by human foot or stock hoof, stock rolling and pawing, and camp activities. Trampling can reduce leaf area, plant height, and reproductive output. These effects can result in decreased vigor or death of individual plants, changes in species composition, and loss of vegetation.

The relationship between trampling intensity and vegetation impact is curvilinear: the greatest total effects on vegetation occur at low trampling intensities; additional trampling can continue to impact vegetation but at a lower rate (Cole 1987; Kuss and Hall 1991; Cole 1995a; Marion and Cole 1996; Cole and Spildie 1998). Enlargement is the most common, detrimental, ongoing change to established recreation sites (Cole 1989a). Newly used recreation sites in forested vegetation lose more than half their vegetation cover and more than 60% plant height after one night of camping. A Yellowstone National Park study found that tree-sampling density on campsites was only one-eighth of that on natural areas with no camping activity (Leung and Marion 2000). As few as 25 passes over sensitive plant types in alpine vegetation caused dramatic trampling effects and reduced plant heights in a study by Cole (1993).

In contrast, recovery rates from trampling are very low, and effects on vegetation from trampling can persist for decades in mountain environments (e.g., Hartley 1999; Willard et al. 2007). The restoration of affected recreation sites to natural conditions can require 10–30 years (Cole and Monz 2003).

Further, trampling impacts from an individual horse or mule are 6 to 10 times greater than an individual hiker, largely due to the greater force applied (Weaver and Dale 1978; Cole and Spildie 1998). Slopes are more susceptible to trampling impacts than flat ground (Weaver and Dale 1978). Vegetation types differ in their ability to resist and recover from trampling. Structural characteristics are important in determining which plant species are most resistant to trampling and how quickly they recover (Cole 1995b). The characteristics of grass-like plants make them more resistant to trampling impacts than forbs and woody plants such as shrubs and young trees (Cole 1993, Cole 1995b) and grassland and meadow vegetation may tolerate trampling better than the understory of wooded areas (Cole 1987; Cole and Monz 2002). However, meadow and riparian vegetation is especially susceptible to damage to above and below ground structures early in the growing season when soils are wet, and plants are undeveloped (Trimble and Mendel 1995).

Effects on soils from trampling can have the most severe effect on vegetation. Soils may be compacted, which decreases water infiltration, gas exchange, and rooting of plants (Trimble and Mendel 1995) that can decrease plant cover and vigor. In meadows and riparian areas, erosion and channel incision can change the hydrological characteristics that determine local vegetation patterns (Allen-Diaz 1991). Lower water tables can cause the local loss of species that depend on high water tables, resulting in a change from wetland vegetation to upland vegetation.

Trampling of vegetation by human traffic largely occurs along trails that pass through or along riparian corridors and lakeshores where visitors pass through for water or to fish or to access recreation sites and popular scenic vistas.

Actions that concentrate foot and recreational stock travel to existing trails, or concentrate campers in existing recreation sites, can decrease total impacts. Actions that affect stock users' behavior and numbers can change trampling impacts more than those that affect hiker behavior on a per-capita basis.

Defoliation of individual plants results in a reduction of photosynthetic tissues. The loss of foliage to stock grazing can decrease plant productivity (Stohlgren et al. 1989; Cole et al. 2004) and plant cover (Olson-Rutz 1996a; Cole et al. 2004).

Horses, mules, burros, and llamas are selective grazers. Under the low intensity typical of recreational grazing areas, forage availability within a meadow area generally exceeds demand, giving stock a choice in where they graze (patch grazing; McClaran and Cole 1993). The horses and mules that comprise most of the stock use strongly select for tender grass-like species (Olson-Rutz 1996a), even when these have already been grazed extensively (Fleurance et al. 2001). Selective grazing alters the balance of other species interactions, such as competition. Depending on the duration and intensity of grazing, selective grazing can lead to declines in the abundance of grass-like species and increases in the abundance of aggressive forb species. The establishment of shrubs or trees in meadows (e.g., Dull 1999; Berlow et al. 2002) and invasion of non-native species (discussed separately) are special cases of compositional changes that can be exacerbated by grazing. Grazing animals redistribute biomass and nutrients (Blank et al. 2006) that may also have an indirect effect on vegetation by favoring some species over others. The magnitude of effects depends largely on grazing intensity measured by how much herbage is removed. Utilization, the proportion of plant production grazed by stock, is a measure of intensity that is a good predictor of vegetation impacts (Cole et al. 2004). The total amount of grazing required to reach a given utilization increases with productivity. In alpine areas, productivity generally decreases with elevation, decreases at extremes of soil moisture, and decreases with a greater proportion of early seral plant species (Ratliff 1985). All else being equal, the total amount of grazing that an alpine meadow can tolerate before effects occur is higher in larger meadows, at lower elevations, at intermediate moisture levels, and where there is a greater proportion of late seral species.

Decreases in productivity and plant cover have been reported to have a curvilinear relationship with grazing intensity (Olson-Rutz 1996b, McClaran 2000) but may be approximately linear within a limited range of intensity (Cole et al. 2004). Hopkinson and others (2013) and Lee (2013) found low-intensity grazing may have no detectable impact on species composition and bare ground in Sierra Nevada meadows. As grazing intensity increases, bare ground and productivity impacts may develop before changes to species composition (McClaran 2000, Cole et al. 2004). Inter-annual variation in snowpack may also interact with grazing intensity to influence effects (Lee 2013). Grazing impacts occur within a growing season but may persist after grazing ends (Olson-Rutz 1996b, Cole et al. 2004).

Different kinds of vegetation may be sensitive to different grazing impacts. Dry meadows may be more susceptible to decreased productivity and losses of vegetation cover than wetter meadows (Cole et al. 2004, Lee 2013; but see Stohlgren et al. 1989). Moist meadows may be more susceptible to changes in species composition than wet or dry meadows (Cole et al. 2004).

Actions that decrease the number of grazing stock would decrease total grazing impacts. Actions that increase grazing intensity on a site increase the potential for productivity losses, loss of total vegetation cover, and compositional changes.

Invasive Non-native Plant Species

Invasive non-native plant invasions are relatively limited in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas. Where they do occur, they

could reduce the competitive and reproductive capacities of native species, alter available resources, displace less vigorous native species, shift native plant communities' composition, and result in reduced species diversity or monoculture communities.

The probability and success of invasive non-native plant establishment within the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas depends on two factors: disturbance and propagule pressure. Disturbances that reduce native plant cover and create bare soil allow non-native plant species to take advantage of the newly available light, moisture, and nutrients and become established (Richardson and Pysek 2006). Non-native plant establishment is most successful in areas of current and past natural and human-caused disturbance such as roads, trails, developed areas, stock corrals, recent fires, recreation sites, and riparian sites (Gerlach et al. 2003, Tu et al. 2013).

To establish in a disturbed site, non-native plant seeds or propagative root or stem fragments (propagules) need to be introduced to the site, and the more seeds or propagative root or stem fragments that arrive, the more likely non-native plants will establish, even in undisturbed vegetation (Von Holle and Simberloff 2005). Seeds or propagative root or stem fragments can be moved by humans on boots, recreation gear, and clothing; on vehicles and equipment; by stock; and in imported materials such as stock feeds and gravel.

Domestic and wild animals spread invasive plants through three main processes: the transport of seeds within the animal (i.e., digestive tract); the dispersal of seeds by transporting them on the outside of animals (i.e., seeds adhered to coat or hooves); and by mouth while consuming for food or caching (Gower 2008). A variety of seeds have been found to germinate from horse manure (Quinn et al. 2008) with peak passage of viable seed 2–4 days after ingestion (Vander Noot et al. 1967).

Human mediated seed dispersal can occur over longer distances than natural mechanisms. People's clothing, equipment, vehicles, and animal companions can carry seeds for great distances. A study on the dispersal of seed found seeds still attached to shoes after 16,404 feet (Pickering et al 2010).

While all recreational and administrative activities can increase the spread of invasive non-native species, those that create the most disturbance and carry the most propagules have the highest risk. Stock create more severe and extensive soil disturbance than hikers (Weaver and Dale 1978). Equestrian trails and camps have been found to have more non-native plants than those that do not allow horses (Campbell and Gibson 2001, Cole and Hall 1992; but see Marcus et al. 1998).

Alternatives that have smaller group sizes would decrease both propagule pressure and the severity of localized disturbance. Alternatives that restrict areas open to stock travel and/or reduce grazing area would have lower severity disturbance, less extensive disturbance, and lower propagule pressure, and would decrease the probability invasive non-native plant species become established.

Measures to reduce disturbance and prevent the introduction of non-native plant propagules would never be 100% successful. The chance of detecting and eradicating new introductions of invasive, nonnative plants early is higher in alternatives that restrict stock travel or reduce grazing area. To protect native ecosystems, new introductions need to be detected early and eradicated before they establish a large seed bank and develop into large infestations. The

probability of detection is higher along trail corridors and at established recreation sites than in off-trail areas. The Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas have approximately 94 miles of system trail.

Potential indirect impacts associated with invasive non-native plant species infestations may include loss of wildlife habitat and loss of rangeland for grazing due to the diminished native vegetation communities, soil erosion due to shorter-lived annual species invasions, and consequent increased fire susceptibility due to dry dead stands of annual invasive non-native plant species (e.g., cheatgrass stands). Left untreated, infestations could increase, eventually eliminating the native vegetation and replacing the plant regime with an undesirable plant community.

The management of invasive non-native plant species management is further addressed in the Boise and Sawtooth Forest-wide Invasive Plant Species Treatments Draft Environmental Impact Statement (USDA Forest Service 2016).

Direct and Indirect Effects

Alternative A—Proposed Action

The types of impacts associated with vegetation that relate to recreational use and administrative activities in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas include direct removal, trampling, and grazing and the indirect impacts associated with the introduction of invasive non-native plant species, as described above. All proposed WMP goals, objectives, standards and guidelines related to the protection of soils and water would protect vegetation, as those measures would work to reduce or eliminate impacts on vegetation. Alternative A includes the following standards and guidelines that would influence the effects to vegetation:

- Limit group size to a maximum of 12 people
- Limit the combined number of recreational stock in one group to 14 head of stock
- Only allow campfires below 8,800 feet elevation and within 200 yards of Walker, Island, Upper and Lower Chamberlain (9,477 feet and 9,197 feet), and Boorn Lakes (recreational campfires would be restricted in 78,709 acres of the wilderness area [40,124 acres in Hemingway-Boulders Wilderness and 38,585 acres in Cecil D. Andrus-White Clouds Wilderness])
- Prohibit tethering recreational stock within 200 feet of lakes, streams, and springs, with the exception of agency provided tie-up sites where topography does not allow for tethering more than the 200 feet from lakes, streams, and springs.
- Prohibit grazing by recreational stock within 200 feet of lakes, streams, or springs
- Prohibit recreational stock use, with the exception of pack goats and llamas, within the following drainages: Slickenslide Creek above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes

Alternative A would limit group size to 12 and recreational stock to 14. Based on these reductions, an increase in the area of existing recreation sites is not expected. The recreation sites

that currently exist would continue to be used, except for areas where stock use and campfire restrictions occurred in the past, that use would continue to impact existing recreation sites, but would not enlarge the sites or create new sites. The group size and stock reductions would not result in a decrease in recreation sites.

Resource Indicator and Measure 1: Whitebark Pine

Campfire restrictions in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas would eliminate the collection of downed wood and vegetation trampling from the collection of firewood. Eliminating firewood collection could decrease impacts to whitebark pine, increase down and dead wood that could increase overall soil productivity supporting the habitat for whitebark pine regeneration.

Alternative A would restrict equine stock use within Slickenslide Creek drainage above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Island and Walker Lakes, and tethering and grazing within 200 feet of lakes, streams, and springs. This action would decrease equine stock use impacts and, in conjunction with group size reduction, reduce the impacts to whitebark pine and its habitat because the recreation site area is not expected to increase in stock restricted areas. However, effects from pack goats and llamas would continue to occur.

Impacts to whitebark pine in areas outside of the proposed group and stock reductions are expected to continue. The increase in area and new development of recreation sites particularly above 8,000 feet; tree damage; and fire and stock evidence could directly affect existing whitebark pine and create disturbance in habitat suitable for whitebark pine regeneration. The death of mature cone-producing whitebark pine could result in indirect affects to future regeneration of whitebark pine stands.

Resource Indicator and Measure 2: Alpine and Riparian Vegetation

Due to the short growing season and harsh conditions that characterize the high-elevation environment, and the slow-growing, perennial-dominated communities that comprise alpine vegetation, recovery from even minor disturbances can take a long time and signs of impacts can persist. Most of the alpine vegetation occurs in remote and inaccessible portions of the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas and is relatively free from human disturbance. Alpine lakes, passes, and vistas popular with visitors are where most trampling impacts to alpine vegetation occur.

Riparian vegetation effects could occur wherever visitor and stock use are concentrated. Most trampling effects to riparian vegetation would continue to occur in popular destinations where visitor use is concentrated. While effects along trails that pass through or along riparian corridors and lakeshores and near recreation sites can be locally severe, they are currently insignificant at the ecosystem or landscape scale and this is expected to remain the case.

Campfire restrictions in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas could reduce some trampling effects to alpine and riparian vegetation resulting from the firewood collection. The increase in down and dead wood may increase overall soil productivity, supporting diverse and resilient vegetation communities. In areas without restrictions, the potential for impacts to vegetation from firewood collection would continue.

Actions that decrease the number of grazing stock would decrease total grazing impacts. Alternative A would restrict equine stock use within Slickenslide Creek drainage above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Island and Walker Lakes, and tethering and grazing within 200 feet of lakes, streams, and springs. This action would decrease equine stock use impacts to alpine and riparian vegetation in these areas and, in conjunction with group size reduction, contribute to recovery of existing alpine and riparian vegetation. However, pack goat and llama impacts would continue to occur.

Actions that affect stock users' behavior and numbers could change trampling impacts more than those that affect hiker behavior on a per-capita basis.

The development of unauthorized user routes may continue to pose potential risks to adjacent riparian vegetation. However, under Alternative A, visitor education would be implemented to mitigate these impacts.

Impacts to alpine and riparian vegetation in areas outside of the proposed group and stock restrictions would continue. The increase in area and new development of recreation sites particularly above 8,000 feet; tree damage; and fire and stock evidence could directly affect alpine and riparian vegetation.

Resource Indicator and Measure 3: Invasive Non-Native Plant Species

A reduction in group size to 12 and recreational stock to 14 would decrease recreation use–related disturbance and propagule pressure, decreasing the risk of introduction and establishment of invasive non-native plant populations.

Alternative A restricts stock tethering and grazing within 200 feet of lakes, streams, and springs, and equine stock use within Slickenslide Creek drainage above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Island and Walker Lakes. These actions could decrease equine stock use–related disturbance and propagule pressure, decreasing the risk of introduction and establishment of invasive non-native plant populations. However, pack goat and llama disturbance and propagule pressure would remain the same.

Resource Indicator and Measure 4: ESA Candidate, Regional Foresters Sensitive, Forest Watch, BLM Special Status Plant Species

Recreation use at special plant species occurrences could affect resiliency of, or eliminate, species or reduce habitat quality. Direct removal of most Forest Service Sensitive, Forest Watch, or BLM Special Status plant species would be expected to occur only under very limited circumstances, such as collections made during research, inventory, or monitoring activities. Because these species are by definition rare, the likelihood that they would be encountered by visitors and illegally collected is considered quite low. While the potential for illegal collection would be low under all alternatives, the collection of whitebark pine for firewood is expected to occur in areas where campfire is allowed.

Similarly, trampling of these plant species would be expected to be infrequent. Although species in the riparian area may suffer incidental trampling by visitors accessing water, this incidental trampling would not result in population level impacts.

Alternative B—Natural-Focus

The types of impacts associated with vegetation that relate to recreational use and administrative activities in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas include direct removal, trampling, and stock use, and the indirect impacts associated with the introduction of invasive non-native plant species, as described above. All proposed WMP goals, objectives, standards and guidelines related to the protection of soils and water would also protect vegetation, as those measures would work to reduce or eliminate impacts on vegetation.

Alternative B includes the following standards and guidelines that would influence impacts to vegetation:

- Limit group size to a maximum of 8 persons in Zone 1 and a maximum of 12 persons in Zones 2, 3, and 4
- Limit the combined number of pack in saddle stock in one group to a maximum of 10 animals in Zone 1 and a maximum of 14 animals in Zones 2, 3, and 4
- Only allow campfires in Zones 3 and 4
- Prohibit tethering recreational stock within 200 feet of lakes, streams, and springs, with the exception of agency provided tie-up sites where topography does not allow for tethering more than the 200 feet from lakes, streams, and springs.
- Prohibit grazing by recreational stock within 200 feet of lakes, streams, or springs
- Prohibit recreational stock use within the following drainages: Slickenslide Creek, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes, excluding Walker and Island Lakes

Alternative B is the Natural-Focus Alternative and generally proposes greater vegetation resource protection than the other alternatives. Recreational campfires would be restricted in 157,639 acres of the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas (67,867 acres in Hemingway-Boulder Wilderness and 89,772 acres in the Cecil D. Andrus-White Clouds Wilderness). Alternative B campfires restriction in Zones 1 and 2 would increase the acreage of campfire restrictions by 78,930 acres in comparison with Alternative A. Furthermore, Alternative B proposes to restrict all stock use within Slickenslide Creek drainage, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes above Island and Walker Lakes.

Resource Indicator and Measure 1: Whitebark Pine

Actions that decrease the amount of firewood collection would decrease impacts to high-elevation whitebark pine. The additional 78,930 acres of campfire restrictions for Alternative B compared to Alternative A would result in a greater reduction of impacts to whitebark pine and an increase of down and dead wood that could increase overall soil productivity supporting the habitat for whitebark pine regeneration.

The additional stock use, tethering, and grazing restrictions proposed under Alternative B would decrease all stock use impacts, and in conjunction with group size reduction, reduce the impacts to whitebark pine and its habitat. This alternative differs from Alternative A by the inclusion of Quiet Lake, and pack goat and llamas in stock restriction. The Quiet Lake area has large stands

of whitebark pine, and the landscape above the lake is alpine. Eliminating pack goat and llama use could reduce impacts to alpine vegetation and increase overall soil productivity supporting the habitat for whitebark pine regeneration.

Impacts to whitebark pine in areas outside Alternative B group and stock reductions are expected to continue. The increase in area and new development of recreation sites particularly above 2438 meters (8,000 feet), tree damage, fire and stock evidence could directly affect existing whitebark pine and create disturbance in habitat suitable for whitebark pine regeneration. The death of mature cone-producing whitebark pine could result in indirect affects to future regeneration of whitebark pine stands.

Resource Indicator and Measure 2: Alpine and Riparian Vegetation

Based on reduced group size and stock numbers and increased campfire restrictions, Alternative B would result in a larger decrease in effects to alpine and riparian vegetation than Alternatives A or C.

Effects to alpine and riparian vegetation under Alternative B would be similar to the effects discussed under Alternative A but would occur to a lesser extent because group size and pack animal reductions would reduce visitor and stock pressure over a larger area. These reductions could decrease the area and number of existing recreation sites in less popular areas. The recreation sites that currently exist may continue to be used, excluding areas where stock use and campfire restrictions would occur; that use may continue to affect the recreation site, but the reduced level of users would not enlarge the sites or create new sites. In areas less popular with visitors, vegetation recovery in existing recreation sites could occur.

Campfire restrictions on an additional 78,930 acres (i.e., 78,930 acres more than under Alternative A) could reduce effects to alpine and riparian vegetation and increase down and dead wood that could increase overall soil productivity, supporting resilient native vegetation communities compared to Alternative A.

Alternative B stock use restrictions, with the inclusion of Quiet Lake and the restriction of pack goat and llamas where the landscape quickly transitions to alpine vegetation, could provide a greater decrease in vegetation effects compared to Alternatives A and C. Group size reductions would contribute to recovery of existing effects to alpine and riparian vegetation in these areas. Eliminating pack goat browse of leaves from woody species and pointed hoof action and llama grazing could reduce effects to alpine and riparian vegetation and increase overall soil productivity.

The development of unauthorized user routes would continue to pose potential risks to adjacent riparian vegetation, which would be mitigated through visitor education. Alternatives A and B propose to restrict stock tethering and grazing within 200 feet of lakes, streams, and springs. Trampling and grazing of riparian vegetation could decrease with these restrictions.

Resource Indicator and Measure 3: Invasive Non-Native Plant Species

The group size and stock restrictions and additional restrictions on areas open to stock travel and reduced grazing area under Alternative B compared to Alternatives A and C would decrease the severity and extent of recreation use–related disturbance and lower propagule pressure and may decrease the probability invasive non-native plant species would become established.

Resource Indicator and Measure 4: ESA Candidate, Regional Foresters Sensitive, Forest Watch, BLM Special Status Plant Species

Effects to special status plant species would be similar to Alternative A, but to a lesser extent. The reduced group size and stock reductions and additional restrictions on areas open to stock travel and reduced grazing area of Alternative B compared to Alternatives A and C would decrease recreation use at occurrences of ESA Candidate, Forest Service Sensitive, Forest Watch, and BLM Special Status plant species, decreasing potential effects to resiliency or occurrences of species or reductions in habitat quality.

Alternative C—Minimum Management

Alternative C proposes no changes to the existing management prescriptions to the wilderness areas, and current group size and allowable recreational stock numbers would remain the same as the existing condition. The types of effects associated with vegetation that relate to recreational use and administrative activities in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas include direct removal, trampling, grazing, and the indirect impacts associated with the introduction of invasive non-native plant species, as described above. All direct and indirect effects currently occurring to whitebark pine, alpine, and riparian vegetation and ESA Candidate, Forest Service Sensitive, Forest Watch, BLM Special Status, and native vegetation in the wilderness areas would continue. Alternative C lacks the proactive direction presented under the other two alternatives and may lead to additional direct and indirect effects to the botanical resources, based on the larger group sizes, allowable recreational stock numbers and lack of restrictions on areas open to stock travel and grazing.

Forest Service wilderness visitation increased roughly 3.2% per year between 2005 and 2012 (Holmes et al. 2015). The Idaho Department of Labor projects Idaho's population will grow 15.3% from 2015 to 2025, an annual growth rate of 1.4%, and 64% of use in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas is from Idaho. Any substantial increase in levels of use or change in patterns of visitor use could potentially increase effects associated with vegetation that relate to recreational use and administrative activities in the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas, including direct removal, trampling, grazing, and the indirect impacts associated with the introduction of invasive non-native plant species.

Cumulative Effects

Alternative A—Proposed Action

The primary cumulative activities that have affected botanical species and their habitats on the Sawtooth NRA as well as within the north end of the Forest include permitted domestic livestock grazing and its related impacts; wildfire suppression; mining operations; treatment of non-native plants; wildlife management actions (predator control); research projects (vegetation sampling/collection, bighorn sheep research); recreation activities (dispersed and developed camping, system/non-system route construction/development, hiking, biking, motorcycle, snow machine, hunting, fishing, trapping, commercial outfitting and guiding); SAR; water diversion structures and their operation; timber harvest and fuels treatments; and personal firewood cutting.

Stock use within the Hemingway-Boulders Wilderness and Cecil D. Andrus-White Clouds Wilderness areas is a foreseeable future action that could increase cumulative effects to native vegetation and ESA Candidate, Forest Service Sensitive species, Forest Watch species, and BLM Special Status species.

Invasive non-native plant invasions could cumulatively reduce the competitive and reproductive capacities of native species; alter available resources; displace less vigorous native species, shift native plant communities' composition (including whitebark pine, alpine and riparian vegetation, and ESA Candidate, Forest Service Sensitive, Forest Watch, and BLM Special Status plant species); and reduce species diversity or create monoculture communities. Alternative A proposes smaller group sizes, which would decrease both propagule pressure and the severity of localized disturbance. Alternatives that restrict areas open to stock travel and or reduce grazing area, such as Alternative A, could have lower severity disturbance, less extensive disturbance, and lower propagule pressure, and would cumulatively decrease the probability invasive non-native plant species would become established and affect native species.

Alternative B

Cumulative effects for Alternative B would be similar to Alternative A, except would occur to a lesser extent based on the reduced group size and stock reductions and additional restrictions on areas open to stock travel and reduced grazing area of Alternative B compared to Alternative A.

Alternative C—Minimum Management

All cumulative effects currently occurring to whitebark pine, alpine, and riparian vegetation and ESA Candidate, Forest Service Sensitive, Forest Watch, BLM Special Status, and native vegetation in the wilderness areas would continue. Alternative C lacks the proactive direction presented under the other two alternatives and may lead to additional cumulative effects to the botanical resources, based on the larger group sizes, allowable recreational stock numbers and lack of restrictions on areas open to stock travel and grazing.

3.5.5. Summary

Table 14 summarizes the environmental effects of each alternative for botanical resources, vegetation and non-native plants.

Table 14. Management Summary comparison of environmental effects of each alternative for botanical resources, vegetation and non-native plants

Resource Element	Indicator/ Measure	Alternative A: Proposed Action	Alternative B: Natural-Focus	Alternative C: Minimum Management
Whitebark pine	Change in recreation site area and number, tree damage, campfire rings, or stock use evidence from existing condition	Smaller group size (12) and stock numbers (14), restrict campfires in 78,709 acres limit equine stock use area could decrease impacts to high elevation whitebark pine	Smaller group size (8 - Zone 1, 12 - Zone 2,3,4) and stock numbers (10 - zone 1, 14 - Zone 2,3,4), restrict campfires in 157,639 acres limit all stock use area could decrease impacts to high elevation whitebark pine and may allow recovery of lesser used areas	Continued current impacts to high elevation whitebark pine
Alpine and riparian vegetation	Change in recreation site area and number, tree damage, campfire rings, or stock use evidence from existing condition	Smaller group size (12) and stock numbers (14), restrict campfires in 78,709 acres limit equine stock use area could decrease impacts to high elevation whitebark pine	Smaller group size (8 Zone 1, 12 Zone 2,3,4) and stock numbers (10 zone 1, 14 Zone 2,3,4), restrict campfires in 157,639 acres limit all stock use area could decrease impacts to high elevation alpine and riparian vegetation and may allow recovery of lesser used areas	Continued current impacts to high elevation whitebark pine
Invasive non-native plant species	Increase in known invasive non-native species	Smaller group sizes could decrease both potential to introduce invasive non-native species and the severity of localized disturbance. Restricted stock travel and or reduce equine grazing area could have lower severity disturbance, less extensive disturbance, and lower potential to introduce invasive non-native species decreasing probability invasive non-native plant species would become established.	Smaller group sizes could decrease both potential to introduce invasive non-native species and the severity of localized disturbance. Restricted stock travel and or reduce grazing area could have lower severity disturbance, less extensive disturbance, and lower potential to introduce invasive non-native species decreasing probability invasive non-native plant species would become established.	Continued risk of introduction of invasive and non-native plant species and probability to become established.

Resource Element	Indicator/ Measure	Alternative A: Proposed Action	Alternative B: Natural-Focus	Alternative C: Minimum Management
ESA Candidate, Regional Foresters' Sensitive, Forest Watch, BLM Special Status plant species	Loss of occurrences and decrease in habitat quality from recreation activities	Smaller group size (12) and stock numbers (14), restrict campfires in 78,709 acres limit equine stock use area could decrease impacts to ESA Candidate, Regional Foresters' Sensitive, Forest Watch, BLM Special Status plant species	Smaller group size (8 Zone 1, 12 Zone 2,3,4) and stock numbers (10 zone 1, 14 Zone 2,3,4), restrict campfires in 157,639 acres limit all stock use area could decrease impacts to ESA Candidate, Regional Foresters' Sensitive, Forest Watch, BLM Special Status plant species	Continued current impacts to ESA Candidate, Regional Foresters' Sensitive, Forest Watch, BLM Special Status plant species

4. Consultation and Coordination

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Appendix 1—Trails within Closure Areas

Trails included in recreational equine stock and pack goat closure areas

	Trail Name/Number	Miles	Trail Class	Prohibition Area
Alternative A	Boulder Chain Lakes #683	1.95	2	Equine Stock
	Crater Lake #673	1.2	1	Pack Goat
	Walker Lake Trail #601	1.16	3	Pack Goat
	Big Boulder Trail #680	3.77	3	Pack Goat
	Slate Creek Trail #674	3.45	1	Pack Goat
Alternative B	Boulder Chain Lakes #683	2.69	2	Equine Stock

Appendix 2—Forest Plan Amendments

The general relationship between land management plans (forest plans) and plans for designated areas (such as this WMP) is described in FSH 1909.12, section 24.3. This section indicates that planning for designated areas may be met through the forest plans. Any parts of a WMP that meet the requirements of plan components must be included in the forest plan. The entire area plan does not need to be included in the forest plan. The forest plan must also be compatible with the designated area plan; if not, amendments may be needed.

Terms used in this section are consistent with the 2012 Planning Rule, and definitions may be reviewed at 36 CFR § 219.7.

As shown below, the following proposed changes would be made to the common management prescription category management direction, p. III-89, in Chapter III, Management Direction, of the Land and Resource Management Plan (revised) for the Sawtooth National Forest.

Corrections:

- Would be modified to correct reference errors.
- Would be modified to reflect current terminology.

Deleted direction: None

Other direction in this section would remain as presented in the Forest Plan and consequently, is not included below.

Management Prescription Category

Management Direction

Existing Wilderness

MPC 1.1 Standards	
Modified Standard	Management actions shall be designed and implemented in manner that protects wilderness character.
Modified Standard	Road construction or reconstruction may only occur where needed and determined to be the minimum necessary: To provide access related to reserved or outstanding rights, or To respond to statute or treaty.
Modified Standard	The full range of fire management strategies may be used to manage wildfires. When suppression actions are necessary, emphasize strategies and tactics that minimize impacts to wilderness character.

Management Area 21—Hemingway-Boulders & Cecil D. Andrus-White Clouds Wilderness

As shown below, the following proposed new direction would be established for Management Area Direction for Management Area 21, Hemingway-Boulders & Cecil D. Andrus-White Clouds Wilderness, in Chapter III, Management Direction, of the Land and Resource Management Plan (revised) for the Sawtooth National Forest.

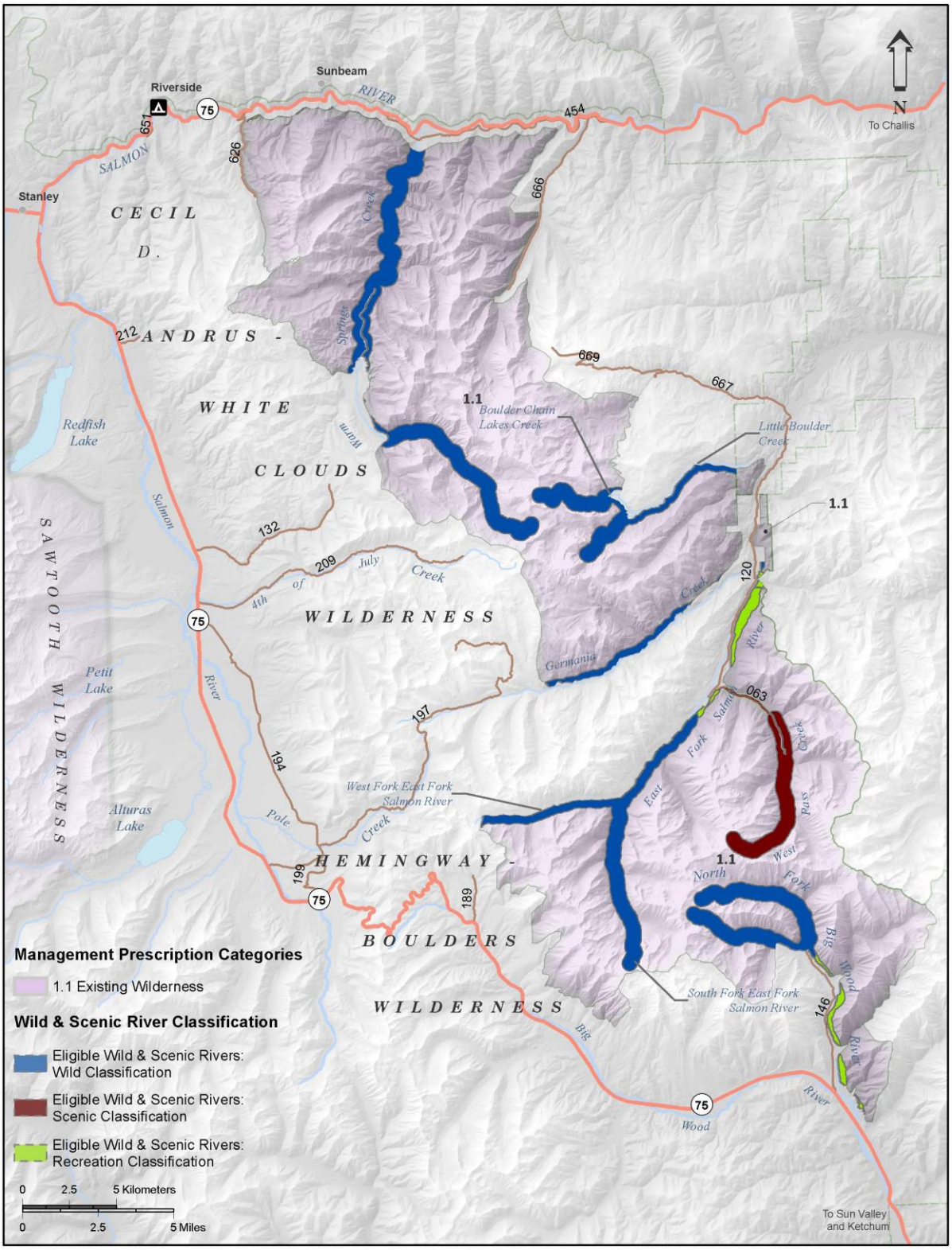
Location Map:

- The Management Area location map would be added to reflect the addition of the wildernesses

New Direction:

- Please see table below.

Deleted Direction: None



Map of Management Area 21

Management Area Description

MA 21 includes only lands designated as the Hemingway-Boulders Wilderness and the Cecil D. Andrus-White Clouds Wilderness areas.

The management approach for MA 21 is to manage the wilderness area per the approved Hemingway-Boulders and Cecil D. Andrus-White Clouds Wilderness Management Plan (DN date of decision: August 21, 2018).

Management Prescriptions—MA 21 has the following management prescription.

Management Prescription Categories for Management Area 21

Management Prescription Category	Percent of Management Area
1.1 – Designated Wilderness	100

Management Direction

Direction for Management Area 21

MPC/ Resource Area	Direction	Number	Management Direction Description – Wilderness (To be Modified by WMP amendment)
Sawtooth NRA General Management	Standards	2101	Manage lands to ensure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the associated recreational values in accordance with Public Law 92-400.
Sawtooth NRA General Management	Standards	2102	Management, utilization, and disposal of natural resources on federally owned lands (such as timber, grazing, and mineral resources) shall be allowed only insofar as their utilization does not substantially impair achievement of the purposes for which the recreation area was established. (As a management approach, "Substantial Impairment" is defined as that level of disturbance of the values of the Sawtooth NRA that is incompatible with the standards and guidelines of the Forest Plan. The proposed activities shall be evaluated as to: 1) the period of impact; 2) the area affected; and 3) the importance of the impact on the Sawtooth NRA values. Use process guidance in Appendix I of the Forest Plan to assist in determining compliance with this standard.)

Management Area 03—East Fork Salmon River/White Cloud

As shown below, the following proposed changes would be made to the Management Area Direction for Management Area 03, East Fork Salmon River, p. III-141, in Chapter III, Management Direction, of the Land and Resource Management Plan (revised) for the Sawtooth National Forest.

Location Map:

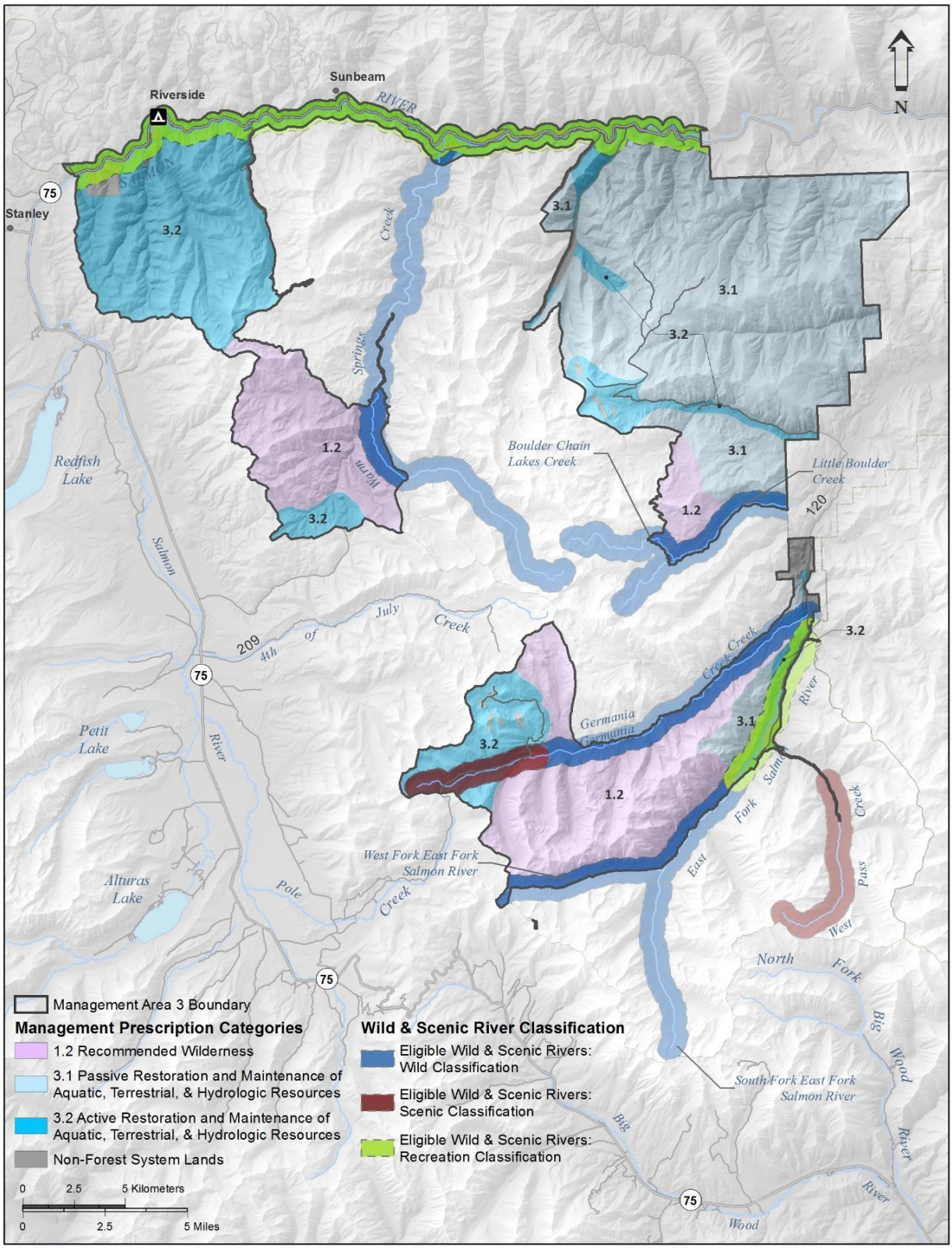
- The Management Area location map has been modified to reflect the removal of the designated wilderness areas from the unit.

Modified direction:

- Objective regarding ROS classes within the Management Area was changed to a goal, and has been revised with new percentages.
- Recreation direction was modified to remove the campfire prohibition regarding lakes that are no longer in the Management Area.

Deleted direction: None

Other direction in Management Area Description and Management Area Direction for Management Area 03 would remain as presented in the Forest Plan, and consequently, it is not included below.



Map of Management Area 03

Management Area Description

Management Prescriptions - MA 03 has the following management prescriptions.

Management Prescription Categories for Management Area 03

Management Prescription Category	Percent of Management Area
1.2 – Recommended Wilderness	29
3.1 – Passive Restoration and Maintenance of Aquatic, Terrestrial, & Hydrologic Resources	39
3.2 – Active Restoration and Maintenance of Aquatic, Terrestrial, & Hydrologic Resources	30
Non-FS	2

Management Direction

Direction for Management Area 03

<table>
<tr><th>MPC/Resource Area</th><th>Direction</th><th>Number</th><th>Management Direction Description</th></tr>
<tr><td>Recreation Resources</td><td>Goal</td><td>0373</td><td>Achieve or maintain the following ROS strategy:
<table>
<tr><th rowspan="2">ROS Class</th><th colspan="2">Percent of Mgt. Area</th></tr>
<tr><th>Summer</th><th>Winter</th></tr>
<tr><td>Primitive</td><td>0%</td><td>30%</td></tr>
<tr><td>Semi-Primitive Non-Motorized</td><td>46%</td><td>3%</td></tr>
<tr><td>Semi-Primitive Motorized</td><td>24%</td><td>56%</td></tr>
<tr><td>Roaded Natural</td><td>15%</td><td>10%</td></tr>
<tr><td>Roaded Modified</td><td>15%</td><td>1%</td></tr>
</table></td></tr>
<tr><td>Recreation Resources</td><td>Standard</td><td>0305 Modified</td><td>Within recommended wilderness, the following are prohibited:
a) Having greater than 20 persons in a group.
b) Being in the area with a combined number of recreational stock in excess of 25 animals.
c) Shortcutting trail switchbacks on foot or with recreational stock.
d) Tethering recreational stock within 100 feet of springs, lakes, or streams.
e) Tying recreational stock to live trees for period longer than one hour.</td></tr>
</table>

Management Area 04–Big Wood River

As shown below, the following proposed changes would be made to the Management Area Direction for Management Area 04, Big Wood River, p. III-154, in Chapter III, Management Direction, of the 2003 Land and Resource Management Plan (revised) for the Sawtooth National Forest.

Location Map:

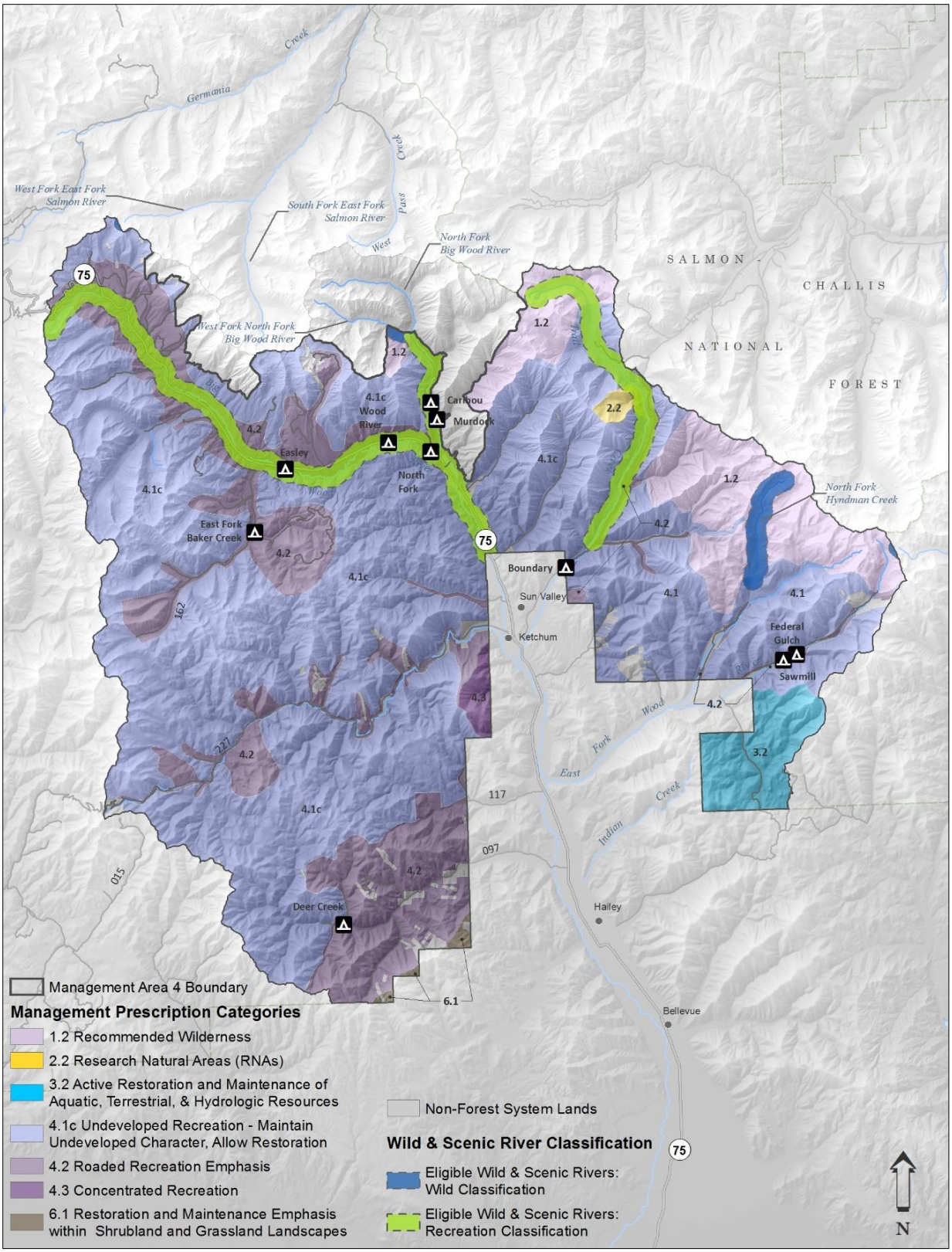
- The Management Area location map was modified to reflect the removal of the designated wilderness areas from the unit.

Modified direction:

- Objective regarding ROS classes within the Management Area was changed to a goal, and has been revised with new percentages.

Deleted direction: None

Other direction in Management Area Description and Management Area Direction for Management Area 03 would remain as presented in the Forest Plan, and consequently, it is not included below.



Map of Management Area 04

Management Area Description

Management Prescriptions - MA 04 has the following management Prescriptions.

Management Prescription Categories for Management Area 04

Management Prescription Category	Percent of Management Area
1.2 – Recommended Wilderness	10
2.2. – Research Natural Areas	<1
3.2 – Active Restoration and Maintenance of Aquatic, Terrestrial & Hydrologic Resources	3
4.1c – Maintain Unroaded Character with Allowance for Restoration Activities	64
4.2 – Roaded Recreation Emphasis	20
4.3 – Concentrated Recreation	<1
6.1 – Restoration and Maintenance Emphasis within Shrubland & Grassland Landscapes	<1
Non-FS Lands	2

Management Direction

Direction for Management Area 04

<table>
<tr><th>MPC/Resource Area</th><th>Direction</th><th>Number</th><th>Management Direction Description</th></tr>
<tr><td>Recreation Resources</td><td>Goal</td><td>0470</td><td>Achieve or maintain the following ROS strategy:
<table>
<tr><th rowspan="2">ROS Class</th><th colspan="2">Percent of Mgt. Area</th></tr>
<tr><th>Summer</th><th>Winter</th></tr>
<tr><td>Primitive</td><td>0%</td><td>2%</td></tr>
<tr><td>Semi-Primitive Non-Motorized</td><td>9%</td><td>5%</td></tr>
<tr><td>Semi-Primitive Motorized</td><td>53%</td><td>87%</td></tr>
<tr><td>Roaded Natural</td><td>20%</td><td>6%</td></tr>
<tr><td>Roaded Modified</td><td>18%</td><td>0%</td></tr>
</table></td></tr>
</table>

Appendix 3—Response to Comments, HBWC Wilderness Plan

Notes:

Non-substantive comments are not included in this table, but all comments and responses are retained in the project record.

Page numbers and direction numbers (e.g. 2189) referenced in this document are based on the Plan and EA documents provided during the comment period (October 2017) and are available on the FS project site, under "Analysis."

Table 15. List of People, Organizations and Agencies Responding and Associated Comment Number Identifier

Comment Number Identifier	People, Organizations and Agencies Responding
KW	Kris Wirth
JR	Jim Rehmeyer-Boise, Idaho
CC	Clancy Clark
KG	Kathy Grotto-Hailey, Idaho
GG	Gary Gadwa-Retired Conservation Officer IDFG, Stanley, Idaho
AR	Alan Reynolds-Former Blaine County Commissioner
PB	Perry Burkhart-Mount Vernon, WA
BCHI	Back Country Horsemen of Idaho-Bill Conger, State Chairman
COC	Christopher O. Cook, DPM FACFAS
IDPR	Idaho Department of Parks and Recreation-Jeff Cook, Outdoor Recreation Analyst
IWSF	Idaho Wild Sheep Foundation-Jim Jeffress, Conservation Committee
TU	Trout Unlimited-Ed Morthen, Council Chair and Michael Gibson, Idaho Field Coordinator
BWCC	Boulder-White Clouds Council-Lynne Stone, Director
JK	John Kelley-Ketchum, ID
NAPgA	North American Packgoat Association-Larry Robinson, Land Use Manager

Comment Number Identifier	People, Organizations and Agencies Responding
SS	Sawtooth Society-Gary O'Malley, Executive Director
NC	Nancy Clough, North American Packgoat Association Member-Dalton Gardens, Idaho
CCC	Custer County Commissioners-Randy Corgatelli, Custer County Board of County Commissioners
CD	Carl Dammann-New Meadows, Idaho
LK	Linn Kincannon-Hailey, Idaho
IS	Irene Saphra
KD	Kent Daniels
NPH	Nan and Phil Hassey-Rye, CO
ICLWS	Idaho Conservation League-Betsy Mizell, Central Idaho Community Engagement Associate and The Wilderness Society-Rob Mason, Central Idaho Representative
ICA	Idaho Cattle Association-Tucker Shaw, President
ISDA	Idaho State Department of Agriculture-Brooke Jacobson, Range Program Manager
IDFG	Idaho Department of Fish and Game-Sharon Kiefer, Deputy Director, Programs and Policy
IOGA	Idaho Outfitters and Guide Association-Grant Simonds, Government Affairs Liaison/Executive Director, Middle Fork Outfitters Association
JM1	Jon Marvel-Hailey, Idaho (First Letter)
JM2	Jon Marvel-Hailey, Idaho (Second Letter)
WCO	White Cloud Outfitters- Mike Scott & Louise Stark
WSF	Wild Sheep Foundation-Gray Thornton, President & CEO, Clay Brewer, Conservation Director, and Kevin Hurley, Senior Conservation Officer
WW/WWP	Wilderness Watch-Gary Macfarlane, Board Member & Western Watersheds Project-Melissa Cain, Bighorn Habitat Campaign Coordinator
JM3	Jon Marvel (Third letter)
SB	Shoshone-Bannock Tribes
SP	Shoshone-Paiute Tribes

Table 16. Response to public comments

Number	Comment	Forest Service Response
AR-01	The Wilderness Act, FS Manual, FS Handbook, Planning Rule 2012 and WMP all point to the purpose and objective of the plan to protect the wilderness resource and characteristics (untrammeled, solitude, primitive recreation, etc.) with the most restrictive management that will protect these features. I submit that Alternative C is disqualified under these parameters by the EA analysis just finished that points out the degrading results of that proposal. The Alternative A EA analysis to a lesser extent also indicates degrading effects (see below). I believe Alternative B represents the only proposed plan that satisfies the requirements of Forest Service Management directives.	All three alternatives comply with law (e.g. Wilderness Act, Sawtooth NRA and Jerry Peak Additions Act, among others), agency policy, and existing land use plan direction. Alternative C would lean on existing law, policy and current regulations, rather than incorporate the additional management actions (e.g. smaller group sizes, or additional campfire restrictions) described under Alternatives A and B.
AR-02	Specific areas of concern: Overflights (Obj. 2114) As a designated noise sensitive area, 2000AGL is the defined minimum altitude under VFR rules. 500 AGL is also unsafe and could be deadly in case of emergency.	FAA regulates overflight restrictions. Objective 2114 (p. 25) is specific to administrative flights. This includes routine administrative flights, such as for fire reconnaissance or search and rescue, should fly at the highest levels possible. The direction also acknowledges some reconnaissance will need lower levels to be effective. As an example, it can be possible to see smoke from a new, emerging fire at 2000’ AGL yet seeing people in proximity to the fire is not. This one of many circumstances that could occur where a flight below 2000’ may be needed. Any point to point (cross country) mission over the wilderness will follow the FAR's recommendation of 2000' AGL.
AR-03	Party and stock size (Stds. 2150-3,2165-6, & 2172) The EA indicates degradation to camps with larger party sizes. Present use indicates typical party sizes to be 4-6 people and/or 4 horses. The maximum party size should be set at 8 people and 8 horses to preclude degradation to the resource. Larger party sizes have millions of acres of public land to access. Size should be set by resource requirements, not selfish people desires.	The agencies took a hard look at several factors when considering establishing group size limits, including current group sizes (average, and maximum) by general recreation visitors, visitors with stock, and use by outfitters and guides. Additionally, the agencies looked at current group size limits, current recreational impacts, wilderness ranger reports, and research on recreation use, impacts and group size limits.

Number	Comment	Forest Service Response
		From scoping period comments, and in combination with the above, the IDT consider a variety of number combination for group sizes (both people and stock). As a result, Alternative B was developed, which includes smaller group size limits for Zone 1 (i.e. the off-trail, more pristine portions of the wildernesses) than those proposed under Alternatives A and C.
AR-04	This goes for outfitter groups also. If they don't appreciate the value of the resource they don't belong there. A commercial use is to be the minimum needed to function in a Wilderness. Larger groups should be directed to non-wilderness camps.	The wilderness plan proposes a group size limits that would apply to all visitors, including the general public and outfitted/guided groups (see standards 2165 and 2166 in section 7.10).
AR-05	14 days (2169) is also degrading to any camp occupancy-6 days is plenty and then move if more time is needed. (Std. 2169) says outfitter days and size should be capped at actual existing use loads. The EA indicates trammeling and camp sprawl is degrading and opportunities for solitude and primitive recreation will be lost. Plan ahead! At 3.6% growth rate/year for the area, get ahead of the threat.	The current stay limit is 14 days for all users. The Plan does not propose to change this regulation. The October 2017 version of the Plan only addresses stay limits in terms of the exception for Native American Tribes.
AR-06	Air quality (Guideline2104). Adjacent Wilderness areas are classified Class 1. The present air quality is Class 1. The Idaho Class 2 designation is wrong. Fix it.	The SNRA+ Act is silent on airshed, so we must manage the wildernesses as Class II. FSM 2320.1 – The Clean Air Act, as amended…, directs the Forest Service to protect class I air quality standards in certain wilderness areas and class II standards on the remaining wilderness areas. These areas are not designated as Class I.
AR-08	Vacant grazing allotments (Goal 2124) should be terminated.	It isn't clear what the commenter is referencing by "Goal 2124." Direction number 2124 is a guideline about helicopter landings. It is assumed the commenter intended to reference Rangeland Resource Goal (21106): Provide for continued livestock grazing in wilderness in a manner that minimizes impacts to wilderness character. In reference to vacant grazing allotments, the decision as to whether or not to issue a grazing permit on an allotment is an

Number	Comment	Forest Service Response
		administrative decision and is determined by the Line Officer in accordance with FSM & FSH direction and Forest Plan direction.
AR-09	Fish stocking (Std. 2154). Stocking of native species does not constitute 'trammeling' and should be allowed to provide great recreation opportunity and does not degrade the resource. Fish and Game should be the deciding entity here.	Established by agency policy and guidance. Forest Service Policy **2323.34:** Recognize that States have jurisdiction and responsibilities for the protection and management of wildlife and fish populations in wilderness. Cooperate and work closely with State wildlife and fish authorities in all aspects of wildlife and fish management. Base any Forest Service recommendation to State wildlife and fish agencies on the need for protection and maintenance of the wilderness resource. Appendix 6 of Keeping It Wild 2 (Landres, et al, 2015) describes trammeling actions, including "Actions taken inside the wilderness on a biological resource to intentionally affect "the earth and its community of life." Examples are… b. Adding or restoring indigenous or non-indigenous vegetation or fish and wildlife."
AR-10	Std. 2172. Horses should not be allowed at Island lake and above due to topographic limitations-no level areas, 200 feet setback impossible, sparse vegetation (Google Earth it and see).	Standard 2173 would prohibit equine stock use above Island Lake per the comment; however this alternative would allow equine stock use at Island Lake. Stock use is prevalent and popular at Island Lake.
AR-11	21147. No-fire signs should be placed on trails at the edge of no-fire areas.	As noted on p.5 of the WMP, the Plan "does not describe the methods, the "how to," or the schedule of implementing the direction, nor does it describe the day-to-day or operational actions to be carried out in the management of the wildernesses. The rate of implementation and potential management activities depend on the annual budgeting process."

Number	Comment	Forest Service Response
		Signage strategy would need to comply with the Management Zones, if included in the final decision, as well as Education and Interpretation direction.
AR-12	MRAs should be required for all potentially degrading activities (grazing,stock use, goat use,etc.).	The requirement to use an MRA is included in the WMP, Standard 2115 (p. 25). Also see response to comment IDFG-02.
AR-13	VERs should be monitored yearly and retired when not kept up to date.	VERs are monitored annually via Dept. of Interior in the form of annual maintenance of locations (claims). If maintenance fees are not paid per operation of law, locations are dropped (retired) and abandoned forever.
BCHI-02	Back Country Horsemen of Idaho submitted written comments dated January 23, 2017 in response to the initial management plan for the Hemingway-Boulders and White Cloud Wildernesses which we do not see addressed in the revised plan dated October 25, 2017.	All comments submitted during the scoping period were considered in the revision of the wilderness plan, and in the development of the EA, including alternatives.
BCHI-03	Our areas of concern still include: Item a: Having greater than 12 persons in a group with the current management direction is 20 persons.	The agencies took a hard look at many factors when considering establishing group size limits, including historic group sizes (average, and maximum) by general recreation visitors, visitors with stock, and use by outfitters and guides. Additionally, the agencies looked at current group size limits, current recreational impacts, wilderness ranger reports, input during the scoping period, and research on recreation use, impacts and group size limits. Refer to the EA (p. 43-46) for historic data that supports the proposed group size limits.
BCHI-04	Item b: Being in the area with a combined number of pack and saddle stock in excess of 14 animals when the current management direction is 25 head of stock. When I asked about this issue at the Nov. 14th meeting in Stanley I was told the total number of animals was derived from input from the BCHI-	The agencies took a hard look at many factors when considering establishing group size limits, including historic group sizes (average, and maximum) by general recreation visitors, visitors with stock, and use by outfitters and guides. Additionally, the agencies looked at current group size limits, current recreational impacts, wilderness ranger reports, input during the scoping

Number	Comment	Forest Service Response
	outfitters which does not answer our original questions of how this number was determined.	period, and research on recreation use, impacts and group size limits. Refer to the EA for historic data that supports the proposed number of pack and saddle stock allowed per group.
BCHI-05	Item e: Using campfires within 200 yards of Swimm Lake. I don't see that Swimm Lake is mentioned now but instead the campfire use has been lowered from 9,000' to 8,800' of elevation with no campfires within 200 yards of Walker, Island, Upper and Lower Chamberlain and [Boorn] Lakes. The restriction of campfire over a certain elevation seems reasonable however the 200 yards is not reasonable. Again we must ask where is the empirical data that supports this conclusion?	Current prohibitions (per the Forest Plan) include building, maintaining, attending, or using campfires within 200 yards of the following lakes: Cirque, Cove, Sapphire, Sheep, Slide, Tin Cup, Gunsight, Four Lakes Basin, Scree, Shallow, Castle, and Chamberlain. The change to prohibit campfires above 8800' is consistent with research that shows campfires can result in aesthetic and ecological impacts particularly in sensitive areas near tree line and higher elevation areas where trees are scarce and slow-growing. Walker, Island, lower and upper Chamberlain, and Boorn lakes are some of the most popular destinations within the White Clouds. This regulation is designed to protect water quality and fragile wet areas, provide for solitude, allow heavily used areas to recover, and to protect areas where use is only beginning to impact resources. The standard is misinterpreted in the comment. The direction would allow campfires within 200 yards of the indicated lakes. Exemptions at these lakes reflect the team's effort to balance the impacts of heavy use with the desire for campfires in popular destinations. The 200 yard buffer allows for the use of campfires at the Chamberlain lakes above the 8800' elevation band while limiting lake-side impacts. At Walker, Island, and Boorn lakes, all below 8800', the 200 yard buffer would manage camping and campfire impacts as a result of high use. Swimm Lake is at 8,866 feet, and is therefore included in the 8,800 feet campfire prohibition, whereas when the elevation band was 9,000 feet, it was called out to be included in the prohibition area.

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BCHI-07	Item h: Recreational grazing within 200 yards of lakes. It appears that this was possibly a typo because it has been updated to 200 feet. The term "Recreational" refers to any stock other than stock grazing per an allotment for grazing, correct?	Yes, this standard was revised from the scoping version of the Plan to the current version of the plan. The 200 feet threshold is established in this standard (2170) for consistency with Leave No Trace practices, and the tethering standard in the plan (2169). The term Recreational Stock is defined in the glossary of the EA as: Recreational Stock—Includes all stock used for recreation, including horses, mules, goats and llamas.
BCHI-08	Item j: Recreational stock use above Lodgepole Lake, above Quit Lake, within Gunsight Creek, and within the Big Boulder drainage excluding Walker and Island Lakes. Again this is a new direction and we ask for the supportive data that would suggest this is a valid direction.	Through the scoping process, issues regarding sensitive alpine and riparian vegetation, and whitebark pine habitat were identified. The recreational stock use restrictions are designed to protect fragile alpine and riparian areas, and whitebark pine. Additionally, some of the trails and terrain are inherently limiting to stock because of the steep and rocky landscape. WMP EA 75, 119 - 120 Above Lodgepole and Quite Lake, within Gunsight Creek, and the Big Boulder drainage excluding Walker and Island Lakes are high elevation alpine areas. This regulation is designed to protect fragile alpine and riparian areas, and whitebark pine. Stock restriction exemptions reflect the IDT's effort to balance stock users access to high elevation areas where existing impacts of heavy use currently exist in popular destinations.
BCHI-09	Trails Proposed to Remove from System Map, Trail 7674, Trail 7684, Trail 7113: Has a separate scoping effort been conducted outside of the management plan on these trails and if so could you please forward a copy.	No additional scoping has occurred regarding the removal of these trails from the designated trail system. The opportunities for public involvement, environmental analysis, and decision associated with this plan meets the necessary requirements. Additional scoping is not required. The court case Back Country Horsemen of America v. Johanns, 424 F.Supp.2d 89 (D.D.C., 2006) 424 F.Supp.2d 89 concerned the requirement for notice on comment on standards, criteria, and guidelines under 16 U.S.C. 1612. It does not apply to trail

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		closures. A trail closure is a site-specific federal action that would require compliance with NEPA, either with a CE if it fits or with notice, comment, and objection if a higher level of NEPA is required. NFS trail 674, Slate Creek above O'Caulkins Lake to Creek: this trail was downgraded to trail class (TC) 1 and as a result it is no longer maintained per the East Fork Salmon River Bighorn Sheep Management Plan (April 1977). This was to "discourage backcountry recreational use in key summer range areas for bighorn sheep." Monitoring for this trail in summer 2016 found that much of the trail tread was overgrown and indistinguishable; however, portions (e.g. over the pass from Iron Basin) were identifiable. Note: For Trail 674, the mileage stated incorrectly referenced the full length of the trail from Slate Creek road to Warm Springs Trail (671). Correct mileage above O'Caulkins Lake to Warm Springs is 3.9 miles. NFS trail 684—Wickiup Creek: this trail begins on private land where the landowner has placed "No trespassing" signs, and going around the property is difficult given the terrain. The trail has not been maintained in 30 years, and is indiscernible over most of its length. The Trail Management Objective (TMO) for this trail is currently TC 1. NFS trail 113—South Fork of the East Fork of the Salmon River: Monitoring for this trail in summer 2016 found that much of the trail tread was indistinguishable (e.g. over the pass out of Boulder Basin to Lake 10,198 at the headwaters of the South Fork and down toward the East Fork); however, sparse tree blazes were occasionally located although the tread was not present. The TMO for this trail is currently TC 1.

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BCHI-10	Trail signage was mentioned at the meeting I attended in Stanley which BCHI feels is important to maintain for the safety of the visitors.	Trail signing standards in wilderness are different than general forest areas and may be used less frequently as a means to preserve primitive recreation opportunities and opportunities for self-reliance not always found outside wilderness. The degree to which trail signs are used vary depending upon the zone or ROS setting. FSM 2324.33f - Signs 1. Use a minimum of signing in wilderness. 2. Do not provide wilderness signs for the convenience of the visitor. Along with accurate maps, and wilderness education materials, provide a minimum number of signs for either the routing or location of the traveler or the protection of the wilderness resource. Further, BLM Manual 6340 1.6.C.13.c. states, in part: iii. Signs. Only a minimum of signs should be installed within wilderness areas. Instead, emphasis should be on making accurate maps, route descriptions, or brochures available to visitors.
BCHI-11	BCHI also believes that it is important to leave all historical structures and artifacts. Most of these items date back to the mountain man and/or mining days of our State's history which are enjoyable and educational to see.	The variability in management proposed in the three alternatives of the Hemingway-Boulders & White Clouds Wildernesses will not have an adverse effect on cultural resources. All proposed undertakings within either wilderness boundary will follow 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108). Due to the fact that any future proposed federal undertaking within either Wilderness' boundaries will undergo proper National Historic Preservation Act (NHPA) cultural resource protection analysis, there will be no adverse effect to cultural resources within either Wilderness boundaries. Indeed, the importance of cultural resource protection is written into this management plan as, features of historical value "must be protected as rigorously

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		as any of the other four required qualities" (untrammeled, natural, undeveloped, and outstanding opportunities for solitude or a primitive and unconfined type of recreation).
BCHI-12	21168-Z2 The highest trail standard in this zone is Class 2. Per our per comments all current trail standards are Trail Class 3 other than Trail #674 & #115 which are Class 2, 21168-Z2 needs to be changed to Class 3.	The Upper North Fork trail #128 and the western end of the West Fork- North Fork trail #129 in the Hemingway- Boulders Wilderness are Class 3 trails, and occur within Zone 2. Zone 2 direction was updated to allow for existing Class 3. Within the White Clouds Wilderness, the Slate Creek Trail #674 is proposed for removal from the trail inventory and was previously downgraded to a Class 1 trail per the East Fork Salmon River Bighorn Sheep Management Plan (April 1977) to "discourage backcountry recreational use in key summer range areas for bighorn sheep." Note: For Trail 674, the mileage stated incorrectly referenced the full length of the trail from Slate Creek road to Warm Springs Trail (671). Correct mileage above O'Caulkins Lake to Warm Springs is 3.9 miles. Correct, the North Fork West Pass Trail #115 is a class 2 trail and passes through Zones 2 and 3.
BCHI-13	As to human waste I would suggest this same wording as use in the Jim McClure - Jerry Peak: Require human waste to be covered 8" deep in a cat hole at least 200 feet from water, and, where the terrain allows, 200 feet from campsites and trails. Alternatively, waste may be packed out.	We determined to not include the caveat for terrain in this plan to protect the environment.
BWCC-01	**2.5.1. Wildlife Resources** Packgoats and Bighorn Sheep – We agree that contact between packgoats and Rocky Mountain bighorn sheep must be avoided. We see as a larger problem, the fact that there are sheep allotments in the Big Wood River watershed and the Sawtooth Valley. Also, bighorn sheep were seen near Stanley last summer. It's hard for us to urge banning the use of packgoats as	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture."

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	some would do, when there are thousands of domestic sheep summering in and near the Boulder-White Clouds.	Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Additionally, livestock grazing is not the "action" but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary.
BWCC-02	**2.5.2 Recreation Resources** We support limiting group size to 12 and number of packstock to 14. This is a big change from the SNRAs current White Cloud management allowing 20/25. As a side note and beyond the scope of this plan, the SNRA should make their numbers consistent through the Boulder-White Clouds, wilderness or not.	P. 86 of the EA addresses the complexity of the proposed group size limits, specifically for Alternative B.
BWCC-03	We are concerned about pack stock use at Island Lake and urge that this beautiful place be closely monitored, and if necessary, pack stock use be eliminated, or at the least, allowed by limited permit only.	See response to AR-10.
BWCC-04	**2.6.2 Alternative B – Natural Focus** While we would like to see a maximum of 8 persons in Zone 1, the most unspoiled areas, we question how is this going to be enforced? A group could start out at the trailhead with 12 people and then decide to hike farther to Zone 1. Four people have to drop out? At the same time, the group size at a nearby non-wilderness lake (such as 4th of July or Washington Lake) is 20 people and 25 packstock. Confusion. Frustration. The SNRA must pick a use number and stick with it.	Also see response to BWCC-02.
BWCC-10	**3.3.2 Affected Environment** Plants. With regards to whitebark pines, there should be no cutting down of dead of dying trees, or using any part of	Objective 2144 address management actions occurring within the Wilderness as they may impact whitebark pine.

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	whitebarks for firewood. The recent mountain pine beetle infestation has killed off many stands of whitebarks. But, the trees still provide habitat for birds. Dead branches provide nutrients to high alpine soils. And whitebarks are magnificent sentinels of high places, living or not.	
BWCC-11	CAMPFIRES – we support restricting campfire use, but how is the SNRA going to enforce it at Island Lake, Walker, Born Lakes, etc – where new rules say campfires must be 200 yards away. That's two football fields.	See response to BCHI-05.
BWCC-13	GROUP SIZE AND PACKSTOCK MANAGEMENT AND CAMPFIRES Currently, the SNRA allows groups of 25 packstock and 20 humans without restriction in the Boulder-White Clouds. On P. 82 of the EA, it states that "more recent research has found inconclusive results regarding the impact of large groups on the wilderness experience" (Monz et al, 2000). We do not agree at all with Monz et al, 2000, and you need to do more research. We do not know anyone who would not be dismayed or not feel that their wilderness experience has been diminished by encountering such an army in the backcountry. We certainly have been and moved on to get away from so many people and stock.	The Monz et al. (2000) article does acknowledge the impact of large groups on the wilderness experience: > From the standpoint of impact on experiences, we believe that the current group size limits in place in most areas do have some benefits for protecting wilderness experiences. Seeing very large groups, for example, more than 20 people in a group, does bother many wilderness visitors. Such groups once existed in wilderness, although they were always a minority. Now, in part because of group size limits, they are very rare. But research also shows that encountering many other use, user, and impact variables in wilderness is more bothersome that group size issues. Also, we are not at all sure that seeing people in one large group has a more negative impact on experiences than seeing the same number of people in several small parties. (p. 267). See the full article for more detail.
BWCC-14	**5. Issues Resolved by Policy** Hunting, fishing and trapping. There is a dispute with the wording stated here. While the State of Idaho claims jurisdiction over wildlife, in fact, the federal government has ultimate authority over fish and wildlife on federal lands including	Trapping and hunting are generally allowed on FS and BLM administered land, absent specific statutory language to restrict or limit. As noted on p. 7 of the WMP, P.L. 114-46 Section 1029(g) states: "Nothing in this title affects the jurisdiction of the State of Idaho with respect to the management of fish and

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	wilderness. For example: FSM 2300 – RECREATION, WILDERNESS, AND RELATED RESOURCE MANAGEMENT, CHAPTER 2320 – WILDERNESS MANAGEMENT. Pertaining to predators, FSM states: 2323.33c – Predator control. The Forest Service is responsible for determining the need for control, the methods to be used, and approving all proposed predator damage control programs in wilderness. White Clouds/H-B management plan: 2174 – states that trapping is ok as long as fur, hides and other parts are not sold. Please enlighten us as to how trapping and snaring is compatible with wilderness? Also, how will the SNRA enforce the ban on sale of trapped/snared animal parts? If you cannot enforce it, don't allow it. Wildlife trapped/snared for their fur would include but not be limited to wolves, bobcat, black bear, fox, beaver, otter, pine marten, mink and muskrat. 2116 – This says that Wildlife Damage Control will use the minimum necessary tool. Comment: Having dealt with USDA Wildlife Services for decades, it's essential that the SNRA does not rubber stamp actions of this predator killing agency. Wildlife Services exists to protect livestock and kill predators. Also, to kill predators if some hunters or outfitters complain to IDFG, that they are killing too many deer and elk. When a Memorandum of Understanding (MOU) and Minimum Requirements Analysis (MRA) are developed between this wildlife killing agency and the SNRA/BLM, citizens must be involved.	wildlife on public land in the State, including the regulation of hunting, fishing, and trapping within the wilderness areas." Wildlife damage control, or predator control, is allowable on a case-by-case basis per policy: FSM 2323.33c; BLM Manual 6340 1.6C 21.c.viii(8). Law and policy prohibit commercial enterprises within wilderness (Wilderness Act Section 4c; BLM Manual 6340 1.6.C.4. and FSM 2320.1). MOUs and Agreements may be shared if they are requested under the Freedom of Information Act (FOIA). They are public records, but there is no standard by which the agencies are required to post them, nor are they subject to public review and input prior to finalizing. See response to IDFG-23.
BWCC-15	7.11 – Commercial Services – this section details the role of outfitters in the wilderness areas (see Goal 2083 below). We find the wording here in conflict with what some big game	2183 describes an overall goal for commercial services in the Wilderness. It is not intended to make a list of potential animals that may be hunted or how they can be hunted. This type of

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	outfitters actually do in the White Clouds according to the activities listed on their websites and IDFGs. Activities include big game hunting of mountain goat, bighorn, wolf, mountain lion, black bear, trophy elk and deer, as well as unprotected species such as coyote. Outfitters may also use hounds to chase and corner mountain lions and black bears. Bear baiting is allowed. Wolves near bear bait may be shot. Goal 2083 states: Ensure outfitters provide quality services that enable the public to use, access, enjoy and understand the recreational and other values of wilderness, emphasizing opportunities for primitive or unconfined types of recreation, physical and mental challenge, inspiration and solitude. Goal 2185 states: Ensure outfitters play a role in providing opportunities for the public to develop awareness, appreciation and understand of the wilderness resource and its nature and cultural history. Note: There is no mention here of the role of wildlife in wilderness, which is the one place animals should be allowed to live in peace without being persecuted by man. If not, wilderness, then where? An outfitted trip led to a wolf being killed in Ibex Creek in the East Fork Salmon. Ibex Creek is now in the H-B Wilderness.	specific language is appropriate in the terms and conditions of a commercial use permit.
BWCC-16	Allowing trapping in the White Clouds and Boulders, also threatens wolverines, a species that is attracted to bait. The wolverine at the SNRA headquarters was killed by a trapper up Beaver Creek in the Sawtooth Valley. Another rare species is the fisher, which is sometimes incidentally trapped. We have a photo of an IDFG employee who trapped a fisher, when he was trapping pine marten. It was not in the White Clouds, but could have been. Fishers have been documented in the range.	See response to comment IDFG-23.

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	The earlier draft WMP in January 2017, eloquently stated on Page 6: This wilderness provides a valuable refuge for wildlife as climate change becomes an increasing concern for our planet. The range in elevation provides habitat that supports species like mountain goats, bighorn sheep, moose, elk, mule deer, black bear, pronghorn, gray wolves, mountain lions and elusive wolverines.	
CC-01	I wish to express concern over some of the statements/conclusions in the draft. The statement, "Contact between Pack Goats and Bighorn Sheep can result in disease transmission", is not proven by any existing scientific, replicated research. Although there is an anecdotal situation involving the Hells Canyon feral goat, the final analysis concluded that this goat did not carry the same pathogen that caused the die off of the Bighorn Sheep.	According Besser and others 2017 who conducted experiments to test disease transmission potential from domestic goats to bighorn sheep: "*Mycoplasma*. *ovipneumoniae* strains carried by domestic goats were transmitted to comingled bighorn sheep, triggering development of pneumonia. However, the severity of the disease was markedly milder than that seen in similar experiments with domestic sheep strains of the bacterium." According to Cassirer and others 2017: "Domestic sheep and domestic goat *Mycoplasma ovipneumoniae* lineages were both detected in bighorn sheep populations" These studies show that transmission can occur. See response to comment NAPgA-14, regarding edits that have been made to correct inaccurate statements in the EA.
CC-02	The statement "*Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats, can be transmitted to bighorn sheep when the species interact". There is again no scientific evidence that this pathogen is commonly carried by domestic goats, and is therefore mere speculation.	See response to comment CC-01 and wildlife report See response to comment NAPgA-14, regarding edits that have been made to correct inaccurate statements in the EA.
CC-03	The statement which references the Besser research, "This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017)", is erroneous, as this was in fact not the	Testing does not eliminate the risk of disease transmission. Additionally, how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.

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	conclusion of that research. Dr. Besser stated in his article to the Wyoming Wild Sheep Foundation that, "If the low prevalence of 'the carriage of *M. ovipneumoniae* by Pack Goats is confirmed by testing, I believe that *M. ovipneumoniae* test-negative Pack Goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies." The definition of negligible is "so small or unimportant as to be not worth considering; insignificant".	See response to comment NAPgA-14, regarding edits that have been made to correct inaccurate statements in the EA.
CCC-01	As duly elected representatives of Custer County, Idaho, we, as the Board of County Commissioners, present the following comments in regard to the Hemingway-Boulders and White Clouds Wilderness Management Plan Environmental Assessment (WMP) on behalf of the citizens of Custer County. Just the designation of this area as wilderness represents an immediate burden on Custer County and its residents. We notice glaring omissions from this document. First, coordination with local government as required by statute (NEPA regulations found in 40CFR 1500 sections 1501.2, 1501.7, 1502.16 and 1506.2 among others) both in the pre-planning phase and in the ongoing management phase. Coordination is a process mandated by federal law that requires federal agencies to coordinate their plans, programs and management activities with local government. Congress originally defined coordination in the Federal Land Management and Policy Act (FLMPA) at 43 USC 1712. This is the main federal statute specifically setting forth the criteria as to the duties an agency must carry out under coordination. It is also required in other natural resource laws and many regulatory laws where Congress wanted to ensure local priorities were to be considered when federal agencies prepare plans, policies and management actions. One of our residents was appointed as	The BLM, Challis Field Office and Sawtooth National Forest met early, regularly, and in an on-going process with the Custer County Commissioners. • Project kick-off meetings were held May 19, 2016 in Ketchum and Stanley, and June 2, 2016 in Challis. • Scoping Period, including public meetings in Challis, Stanley and Ketchum, occurred November 21, 2016 – January 5, 2017, and was extended upon request until January 31, 2017. The County Commissioners provided input during this time. • Comment Period, including public meetings in Mackay, Challis, Stanley, and Ketchum, occurred October 27-November 27, 2017 during which time the County Commissioners provided input. Agency representatives from the BLM and the FS regularly provided updates at the monthly County Commissioners meetings, and at the Natural Resource Advisory Committee (NRAC) meetings. The agencies provided a monthly newsletter via email to stakeholders, including the county, to provide regular planning updates. The County Commissioners requested several meetings during the planning process, including briefings prior to the initiation of

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	Wilderness Liaison to fulfill part of the requirement for coordination, but sadly went unused in that capacity, serving more as a messenger than a representative of the County Commissioners. COORDINATION Congress originally defined coordination in the Federal Land Management and Policy Act (FLMPA) at 43 USC 1712, as a process that requires Federal and State government to resolve and achieve consistency with local land use plans. The working definition of the word "coordination" has been found in Webster's New International Dictionary. We further define coordination, collaboration and cooperation here because there is a tendency to use them interchangeably and they are not and cannot be used interchangeably. **From Webster's Dictionary; Coordination** (noun) the state of being coordinate, or of equal rank, dignity, power, etc. The act of coordinating; the act of putting in the same order, class, rank, dignity, etc.; as, the coordination of the executive, the legislative, and the judicial authority in forming a government; the act of regulating and managing so as to produce harmonious results; harmonious adjustment; as, a coordination of functions. As opposed to: **Collaboration** is the process of two or more people or organizations working together to realize or achieve something successfully, the action of working with someone to produce or create something or to cooperate with or willingly assist an enemy of one's country; or **Cooperation** is your assistance in the process, the process of groups working or acting together for common or mutual benefit, as opposed to working in competition for selfish benefit.	the scoping and comment periods. The agencies meet with the commissioners November 18, 2016 prior to the start of the scoping period, August 8, 2017 to discuss the wilderness plan process, and October 17, 2017 prior to the start of the comment period. The agencies will continue to coordinate with Custer County regarding the management of wilderness.

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	Thus your statement that "coordination with Custer County Commissioners and the Custer County Natural Resource Advisory Committee occurred throughout the planning process. Representatives from each agency attended the monthly Custer County Commissioners meeting, with discussions regarding the planning process initiating shortly after the designation of the wildernesses. The Forest Service and BLM provided the Commissioners with a briefing on the WMP on November 18, 2016, prior to the scoping period" does not meet the definition of coordination. Had you coordinated, many of the areas we find disagreeable would already have been discussed and a possible mutual outcome could have been reached.	
CCC-02	The second glaring omission deals with socio-economic data or rather the lack thereof. The wisdom of Congress, in times past and in the present, has seen the need to diligently avoid government actions and policies that would be detrimental - - even devastating - - to the local economies. There is a danger of thinking that the area covered in the WMP just "appeared" when it was designated as a wilderness. We have worked and played in this area for six plus generations. We have a close knit community based on agriculture, boom and bust periods of mining, and recreation of which outfitters are an integral piece. With three percent private land in a county the size of Connecticut, ranching is the stable foundation of our rural economy and any actions that curtail ranching activities within the county affects our economy as a whole. NEPA calls for the inclusion of a socioeconomic study to determine the affects of proposed actions by federal agencies.	p. 26 of the EA (Section 2.8.5) provides a discussion of Environmental Justice and Socioeconomics in accordance with Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The E.O. directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. The IDT determined that “Given the nature of the proposed action and demographics of the area, disproportionate human health and environmental effects on minority or low-income communities are not projected.” Further, p. 5 of the EA states that an examination of the socioeconomics of the wilderness designation is out of the scope of this plan and EA because the areas were designated by congress and this plan does not and cannot affect the designation. Significant social or economic issues were not identified for the proposed plan (i.e., proposed action) to protect the wilderness character already established under the existing designation;

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		additional socio-economic analysis, beyond Environmental Justice, is not included in the EA.
CCC-03	Another such act, and perhaps more germane here, is the Regulatory Flexibility Act 5 U.S.C.A. 601 as amended. Any rule making by a federal agency is to address the impact of such rule making on "small governmental jurisdictions" of a population ofless than 50,000. There are about 4200 people in Custer County and if we include Blaine County with a population of about 21,400 we are still below the benchmark where an economic analysis of any proposed action would not be required. Past socioeconomic studies have been on a scale that showed no impact as a result of proposed actions; it is time to evaluate your actions at a local economic scale - - not at a regional or intermountain scale.	p. 26 of the EA (Section 2.8.5) provides a discussion of Environmental Justice and Socioeconomics in accordance with Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The E.O. directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. The IDT determined that "Given the nature of the proposed action and demographics of the area, disproportionate human health and environmental effects on minority or low-income communities are not projected." Significant issues were not identified linking the proposed wilderness management plan (proposed action) to significant impacts to substantial numbers of small entities, including counties.
CCC-04	The WMP could be strengthened if the data sources were revealed, especially as it relates to existing resource conditions. Many rigid statements are made throughout the document about some less-than-satisfactory conditions that are attributed to certain factors in a rather hasty manner. To what extent are these conclusions, especially those regarding causes for damage, based on specific scientific data? If indeed these observations are based upon data they should be supported either in text or footnote. To what extent do they rely on longer-term (but non-specific) observation, for example by FS or BLM personnel? Where the conclusions result from this kind of accrual of experience or more impressionistic observation, they should be acknowledge and described. The Data Quality Act (H.R.5658)	Data collected within wilderness, in addition to research performed in the vicinity, and peer-reviewed research completed elsewhere has been incorporated throughout the EA for each resource analyzed in detail under "Environmental Consequences." For example, the Wilderness analysis includes data on visitor use, outfitter and guide use, campsite condition inventories, as well as supporting recreational research (p. 46-84). The Effected Environment conditions in the EA utilized campsite condition inventory data, and the trends and results of research performed in the vicinity (e.g. unpublished monitoring data and photo points). The Environmental Consequences analysis incorporates data on visitor use, outfitter and guide use, campsite condition inventories, research performed in the

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	of 2001 requires the use of scientific data, not an accrual of experience or more impressionistic observation.	vicinity, and peer-reviewed supporting research undertaken elsewhere. See EA pg. 118 - 135.
CCC-05	1) We, as County Commissioners, are charged with the responsibility for the health, safety and welfare of the County's citizens. No other agency, state or federal, has that charge. In reviewing this plan, we see that there is almost no recognition that there has been an existing and hereditable use of the area for more than 140 years. Because of this historic ethnographic cultural use, we would like to see a greater respect and emphasis on the existing uses of the land. Our responsibility for the welfare of the County helps explain our understanding and concern for the social and economic impacts on the county residents of eliminating these uses, either quickly or slowly. 2) In addition to this observation, we also notice a remarkable absence of a provision for coordination with the County in the management of the area as required in NEPA, FLMPA, the Forest Planning Act, the Regulatory Flexibility Act and others.	1) The EA contains a description of the existing and affected environment, including historic uses of the area. Section 6.11 of the WMP (p. 19) describes the cultural themes of the area. Section 6.10 (p. 17-19) describe the recreational uses of the area, including outfitter and guide use. Section 6.12 (p. 19-20) describes the current livestock grazing activities within the wildernesses, and Section 6.13 (p. 20) describes historic mining and prospecting, and the current status of mineral exploration. 2) On-going coordination with the county is described in response to comment CCC-01.
CCC-06	A third omission deals with the lines on the map delineating the wilderness boundaries. These lines are arbitrary and may look good on paper but make no sense on the ground. The lines should be along ridge tops or other distinctive nature geographic feature. A boundary line halfway down the mountain only adds to the confusion and the possibility of violations. Boundary lines can be moved up to one mile and through coordination a more suitable location could be agreed upon with no loss of acreage. In 2.3. Scope of the Wilderness Management Plan, it states that "(t)he boundaries of the wilderness were set through passage of the Act and are not open to review through this planning process (see 36 CFR Part 261.18, National Forest Wilderness, and 43 CFR Part 6300, Management of Designated Wilderness Areas)." Further on in 6.15. Lands and Special Uses it states "The number and type of facilities in wilderness will depend upon the	As noted in the comment, the final boundary surveys are out of scope of this planning effort (p. 7 of the WMP; and p. 4 of the EA). This also includes minor errors described in P.L. 114-46, Section 101(d)(2), which states “Each map and legal description submitted under paragraph (1) shall have the same force and effect as if included in this Act, except that the Secretary may correct minor errors in the map or legal description.” Add to the plan (p. 7 - Issues not analyzed in detail – wilderness boundary topic): The direction in the plan would apply within the final surveyed boundaries.

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	final boundary survey. So what is it? A survey is required in the Act creating these wildernesses as the boundaries are approximate. Specific reference can be found at: SEC. 101. Additions to National Wilderness Preservation System in the State of Idaho. (a) Hemingway-Boulders wilderness.-In accordance with the Wilderness Act (16 U.S.C. 1131 et seq.), certain Federal lands in the Sawtooth and Challis National Forests in the State ofIdaho, comprising approximately 67,998 acres, as generally depicted on the map entitled "Hemingway/Boulders Wilderness AreaProposed" and dated February 25, 2015, are designated as wilderness and as a component of the National Wilderness Preservation System, which shall be known as the "Hemingway-Boulders Wilderness". (emphasis added) (b) White clouds wilderness.- In accordance with the Wilderness Act (16 U.S.C. 1131 et seq.), certain Federal lands in the Sawtooth and Challis National Forests in the State ofIdaho, comprising approximately 90,769 acres, as generally depicted on the map entitled "White Clouds Wilderness Area-Proposed" and dated March 13, 2014, are designated as wilderness and as a component of the National Wilderness Preservation System, which shall be known as the "White Clouds Wilderness". (emphasis added) (c) Jim McClure-Jerry peak wilderness.- In accordance with the Wilderness Act (16 U.S.C. 1131 et seq.), certain Federal lands in the Challis National Forest and Challis District of the Bureau of Land Management in the State of Idaho, comprising approximately 116,898 acres, as generally depicted on the map entitled "Jim McClure-Jerry Peak Wilderness" and dated February 21,	

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	2015, are designated as wilderness and as a component of the National Wilderness Preservation System, which shall be known as the "Jim McClure-Jerry Peak Wilderness". (emphasis added) Even the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act Fact Sheet dated August 21 , 2015 calls the acreages approximate. A survey of these areas in required in the Act and is needed on the ground before any management changes should be made and must be an integral part of this EA.	
CCC-07	Specific comments directed toward the Hemingway-Boulders and White Clouds Wilderness Management Plan Environmental Assessment can be found below. 1) As we reviewed this document and that for the Draft Environmental Assessment for Jim McClure-Jerry Peak (JMJP) Wilderness Management Plan we find it very hard to believe that the same wilderness planner authored them. They are as different as night and day. 2) This is supposed to be a wilderness management plan, not a reiteration of the Sawtooth Forest Management Plan nor is it the Sawtooth National Recreational Area any more. It is a wilderness area and as such calls for its own management plan. While some of the management points sighted maybe germane to this WMP they should at least look original!	There are organizational differences between the two wilderness plans given that the Hemingway-Boulders and White Clouds Wilderness Plan will amend the Sawtooth Forest Plan, and therefore must conform to the organizational structure established therein. While the BLM, Challis Field Office is involved in both planning efforts, two separate ID Teams worked to development plans. All of the FS-administered lands within the Hemingway-Boulders Wilderness and the White Clouds Wilderness remain in the Sawtooth National Recreation Area. The Wilderness designation did not change the SNRA designation. Therefore, the SNRA direction from the previous management areas (MA 03 and 04) are carried forward into the new management area (21).
CCC-08	3) The statement "based on the analysis herein, the Forest Service and BLM will decide whether to manage the wilderness area strictly according to legislative and regulatory requirements, or whether to implement a WMP that provides additional direction to manage approved uses while ensuring adequate protection and preservation of resources and values, as well as providing mitigation for potential impacts to those resources and values." found in Decisions to Be Made sets the	This description was updated using the term solely, rather than strictly. The intent of this statement is to describe the range of alternatives.

<table>
<tr><th>Number</th><th>Comment</th><th>Forest Service Response</th></tr>
<tr><td></td><td>tone for the entire document. You have gone against legislative and regulatory requirements by not developing a WMP to manage the wilderness area strictly "according to legislative and regulatory requirements."</td><td></td></tr>
<tr><td>CCC-09</td><td>4) Public Law 92-400 which created the SNRA is sited at least eight times. While referring to Public Law 92-400 as it relates to the creation of the recreation area is appropriate, using its direction for management is not. For example:

Appendix 2-Direction Crosswalk

The following table summarizes the direction brought forward from the pre-existing management areas (MA 03 and MA 04) into the new MA (21). The direction listed under the Proposed Action indicated with an asterisk (*) has been carried forward, generally with modifications, to be in compliance with the Wilderness Act.
<table>
<tr><th>Direction Crosswalk
MPC/
Resource Area</th><th>Direction</th><th>Management Direction Description – Wilderness</th><th>Management Direction Description – 03</th><th>Manag
Descrip</th></tr>
<tr><td>Sawtooth NRA</td><td>Standard</td><td>Manage both federal and private lands to ensure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the associated recreational values in accordance with Public Law 92-400.</td><td>0301: Manage both federal and private lands to ensure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the associated recreational values in accordance with Public Law 92-400.</td><td>0401: W
NRA, m
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</table></td><td>The purpose of the crosswalk is to present the direction from the previous management areas (MA 03 and 04) that is being carried forward into the new management area (21) that would be created upon approval of this plan. The direction in the crosswalk table included wording changes to be in accordance with the Wilderness Act, and related policy, or to be more current to the needs of the area. The wording changes are reflected in this table.

New management area 21 occurs within the Sawtooth National Recreation Area, therefore the direction for the Sawtooth NRA is brought forward into this new management area.</td></tr>
<tr><td>CCC-10</td><td>5) Appearing at least six times, the phrase "substantially impair" is defined as "that level of disturbance of the values of the Sawtooth National Recreation Area (NRA) that is incompatible with the standards and guidelines of the Forest Plan (contained in this document). The proposed activities shall be evaluated as</td><td>The FS portions of the two wilderness areas occur within the Sawtooth National Recreation Area (p. 8 and p. 26 of the WMP). The wilderness designation did not affect the SNRA designation. The SNRA direction established in the previous management areas (see p. 26-27 of the WMP; Section 7.2, and</td></tr>
</table>

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	to: 1) the period of impact; 2) the area affected; and 3) the importance of the impact on the Sawtooth NRA values." Again, this WMP is to guide management in two new wildernesses, not the SNRA.	Appendix 1 of the WMP) is carried forward into the new management area (21) that would be established per the Forest Plan amendment.
CCC-11	6) One further example of your seeming reluctance to develop an environmental assessment specifically for the Hemingway-Boulders and White Clouds Wildernesses can be found on page 117. "A prescribed burning and timber harvest project in the Stanley Lake Creek and Elk Creek watersheds of Stanley Basin is planned for implementation in 2018. This project would simultaneously remove and improve habitat for several species of concern." This project has nothing to do with the WMP.	This section is describing cumulative effects for wildlife and the Sawtooth NRA is considered the cumulative effects boundary for most species addressed in the EA. Therefore describing future projects that may affect these species is appropriate.
CCC-12	7) The word "enhance" appears in the document approximately fifteen times. We can find no direction in the Wilderness Act that indicates that you are to "enhance" wilderness and for that matter the word enhance does not appear in the Act. We believe this to be beyond your preview and should not be a part of the WMP.	The purpose and need for the plan quotes the Wilderness Act (Section 4), which requires that "… each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area." As described in agency policy (BLM Manual 6340 1.6. A.7 and FSM 2320.6), including the diagram relating wilderness character (purity) to human influence, the agency mandate is to preserve or improve wilderness character. BLM Manual 6340 states "While managers may make decisions that temporarily impair one or more qualities of wilderness character, wilderness character as a whole must be sustained or improved." The Glossary was revised to include the wilderness character diagram. Additionally, several edits were made to the language in the plan to replace enhance with the terms preserve or protect. Management activities, such as reclamation, may be implemented to enhance wilderness character over time.

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CD-02	A recent study was completed by Dr. Margaret Higland, Research Veterinarian with the Animal Disease Research Unit-ARS-USDA Washington Animal Disease. Dr. Highland sampled occurrence of *Mycoplasma ovipneumoniae* (MOVI), in pack goats. MOVI is the chief pathogen suspected of causing pneumonia in bighorn sheep, Results show the occurrence of MOVI in pack goats is extremely low. Of 576 pack goats tested, 94.8% of the goats had no *M. ovipneumoniae* detected at any of the sample collection time points. (Highland 2016, results available upon request). Please complete a new risk analysis that takes these results into account when making your decision to close areas of the Wilderness to Pack Goats.	The Wildlife Specialist Report reviewed literature related to domestic goat and bighorn sheep disease transmission. Highland's research was not published, which is why it was not used in the wildlife analysis.
CD-04	Pack Goat users are willing to sit down with Land Use Managers additional Mitigation Measures that will even further reduce risk.	We plan to encourage any new best management practices through education as science regarding disease transmission continues to improve.
COC-01	I understand the purpose to restrict pack goats to wilderness areas is to preserve the Bighorn Sheep populations. I implore you as individuals and committees authorized to govern wilderness areas that you will not allow political influence or financial pressures to create policy. From the proposals there is a concern that pack goats will transmit *Mycoplasma ovipneumoniae* to Bighorn Sheep which then would cause mass die off of herds exposed. This concern is not based on known history or scientific study. Well informed and reasonable individuals do not make policies and regulations based on theoretical risks. We assess our risks and determine the best way to reduce them or decide when to work with the risks and when not to. I argue that the risks are yet to be stratified as the studies have not shown that contact with goats purposefully infected with Movi, have been transmitted to bighorn sheep. There has been no historical or controlled study that demonstrates that goats	See response to comment CC-01 and wildlife report

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	have been the cause of bighorn sheep die offs. Conclusions have been made without a direct link and most fear is based on possibilities not on actual events or studies. As inadequate as the studies have been so far, they have only demonstrated minimal risk of goat to sheep transmission and death.	
COC-02	Pack goats by the nature of how they are trained as stock animals used for packing further reduce the risk compared to the typical herd goat. The greatest argument against risk is that very few pack goats carry the concerned pathogens and can be tested to assure they are not carriers. The Second argument is that pack goats are easily managed and when with people with whom they are bonded will not leave even when not on a lead to join with other species. When separated from people is the only chance of an encounter, which can be well controlled as it is for any stock animal or pet through leads and ropes.	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing. The measures to reduce the risk of disease transmission (Alternative A) include management techniques to control for encounters.
COC-03	In regards to the number of pack goats that can be managed by one person I am unaware of a defined quantity for best management. As one who has worked for a few years with pack goats my experience tells me that two is easier than 6 but not by much and that my risk of losing a goat is not any greater with 6 when tied together in a string. I've seen bighorn sheep in the wilderness and although they are more docile or less frightened than most wild animals they did not find my goats any more interesting than deer do. They stare for a while and then go back to feeding. More importantly my goats did not seem any more attracted to the sheep than they do deer. In fact they have little interest in sheep. I exercise them past a sheep herd that during certain seasons live nearby my home and my goats seem as interested about the sheep as they do the horses, not even curious. I keep them away from sheep and other goats for the very reason of disease transmission of any kind. Pack goats consider people their species of choice, for when I encounter	The group size limitation proposed for pack goats is taken from the NAPgA website (http://www.napga.org/best-management-practices-psr/), as a best management practice to limit "potential number of pack goats in bighorn source habitat." The website states: "Within bighorn source habitat, pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group. These numbers represent a maximum."

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	people they want to visit and will bleat at them even when they are at a distance, not so around animals.	
COC-04	I do not oppose rules that are reasonable to help manage the risk of disease transmission such as keeping animals tied and to avoid contact with bighorn sheep, precautions I already take. I will fight with financial resources to my disposal for right to use public land occupied by bighorn sheep until there is an actual nonbiased risk identified that is substantial. There should be a reasonable acceptable risk that outweighs the benefits that these pack animals provide. They have much less impact to the environment than other stock animals yet can help individuals young and old access wilderness areas other animals cannot. They are more easily controlled much less likely to "escape" and much easier to "catch" than other animals. Extra feed contaminated by weeds is not necessary and when a group of pack goats move through an area even when muddy you'll be hard pressed to identify that it wasn't a bunch of deer on the trail usually even obscuring the human tracks. The pack goat issue is not going to be pushed aside with here say scenarios or misinterpreted data, the risk of disease transmission with the information we do have is shown to be low to very low and this without any regulation on pack goat usage. With simple precautions the risk can be lowered yet further to sensible levels. My vote is to go with equitable and practical.	See response to ICA-12 on goat impacts to vegetation. Goats impact vegetation from browsing and trampling.
GG-04	Group sizes requiring a Mandatory Permit must be enforceable and closely monitored. Boy Scouts of America have often been blatant violators of Group Size requirements and this should not be allowed to continue. Groups such as these must be monitored closely for Resource Damage issues.	Agreed. Upon approval of the plan, enforcement of the regulations is imperative. The Forest Service and BLM will work with wilderness rangers, volunteers and partner organizations to implement the plan, as well as agency law enforcement.
GG-05	I noted that Dogs in the wilderness management is listed in the McClure/ Jerry Peak Draft but is apparently missing in the BWC	Dogs are addressed in the following places in the Plan.

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	Draft. This may be understood knowledge to some people but I feel this should be addressed in both Plans.	Objective 21145: Provide educational information regarding proper management of dogs to minimize social conflicts or effects to wildlife (e.g., under voice or physical control, horse or hiker encounter etiquette). Guideline 2152: Minimize contact between domestic animals (e.g., pack goats, dogs) and bighorn sheep. p. 4 of the EA – Issues Not Analyzed in Detail: Dogs on Leash—Scoping comments suggested requiring dogs on leash within the wildernesses to minimize disturbance to wildlife, specifically big game. However, Idaho Statute (Section 36 1101) protects big game from harassment by dogs.
GG-06	**Paragraph 2.3.2 Wildlife Resources** I feel explanation of Bighorn Sheep diseases and Domestic Animals should be spelled out further herein. Yes to cooperation but the issue should be spelled out in particular.	Section 3.4 Wildlife Resources (p. 88-111 of the EA) includes discussion of bighorn sheep and pack goats. In particular, see section 3.4.2 Resource Indicator and Measure 1: Risk of Contact between Bighorn Sheep and Pack Goats for discussion.
GG-07	**Paragraph 2.3.3** Manage winter Recreation to minimize conflict with high elevation species. The future of Winter Sports is uncertain however Back Country Skiing and Snow Boarding can conflict with high elevation species such as Mtn. Goats and Wolverines…..I believe this paragraph should be spelled out more fully.	Standard 2175 brings forward direction from the current Forest Plan (Management Areas 03 and 04): "Manage winter recreation to minimize conflict with high elevation wildlife species including mountain goats and wolverine." and is consistent across all three alternatives. The EA, pages 100, and 114-116 includes analysis of winter recreation on wolverine.
GG-08	Prohibit Tethering Recreational Stock within 200 feet of lakes, streams and springs ADD: where terrain allows.	Standard 2169 is established to protect sensitive riparian areas from stock use, and adding this exception would not provide the same level of protection. See discussion in EA (p. 77, 122).
GG-09	ADD: Require Tether Straps or padding for highline ties.	While standards 2169 and 2171 are designed to minimize tree damage. The IDT agrees with this suggestion and proposes to add a guideline: Encourage use of temporary stock containment systems and require tree-saver devices to minimize tree damage.

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GG-10	I also think the requirement of tying to trees for a maximum of one hour is ridiculously impossible to enforce as stated.	While this standard may be challenging to enforce, it is enforceable. Standard 2171 was carried forward into Alternatives A and B from the existing Sawtooth Forest Plan direction developed for Management Area 03. The Forest has been enforcing this special order is it was established for this area in 1996.
GG-11	Commercial Services What is meant by "allow Progressive Camping"? This should be spelled out in the plan.	As defined in the Glossary (EA), progressive camps are "A series of camps used during trips through an area. Duration of use is usually 1-2 nights per location. These camps are not set up in advance of arrival and are removed as the party moves on." (p. 145)
GG-12	**Paragraph 2.3.9** Wilderness Education and Interpretation Encourage funding of large Wilderness Gateway informational signs and coordinate with Sawtooth Interpretive and Historical Association to offer Wilderness Education, Leave No Trace and Wilderness Gateway programs.	In the WMP (p. 25), objective 2113 states "Incorporate partners and volunteers to accomplish work in these wilderness areas." Further, under the Wilderness Education and Interpretation section (section 7.19) guideline 21148 states: "Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations."
GG-13	**Alternative A Paragraph 2.5.1** Wildlife Resources The American Pack Goat Association guidelines for minimizing contact between Pack Goats and Bighorn Sheep may well be wholly inadequate. I feel a much greater effort to analyze the impacts should be considered. I feel IDFG Trophy Species Biologists such as Holly Miyasaki or the Staff at the Idaho Wildlife Health Laboratory in Caldwell Idaho should be consulted regarding the dire effects of exposing Idaho's Bighorn Sheep to Domestic Goats and or Sheep. I am not satisfied with the USFS or the	Alternative B includes prohibiting all pack goat use within the two wildernesses, which is analyzed in the EA.

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	BLM using the Pack Goat Association Guidelines when the White Clouds Big Horn Sheep population could be at risk.	
GG-14	Please just for starters review these documents. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5462392/ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5345818/ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5385708.pdf	These documents were reviewed in preparing the wildlife report and two are cited in that report.
ICA-01	The Idaho Cattle Association submits the following comments on behalf of the cattle industry in Idaho and particularly those ranchers who own private land or graze livestock within or near the proposed Hemingway-Boulders and White Clouds Wilderness. **General Comments Regarding Livestock Grazing:** It is important that the plan recognizes that grazing "plays an important role in the heritage and economies of rural Idaho and Custer County". This line was included within the Jerry Peak wilderness plan's pre-scoping documentation and at that time, we requested that similar language be included within this plan. We again urge you to recognize the role of continued grazing. In addition to these significant values, the continued presence of livestock grazing also ensures continued conservation of the ecosystem in and surrounding the proposed wilderness area. Not only do ranchers make up the backbone of the area's economy, but it is also their presence that has preserved the area's pristine characteristics that have qualified it to be designated as wilderness.	In addition, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Because there is no proposed changes to current livestock grazing within the wilderness boundaries, no lengthy discussion on livestock grazing was needed.
ICA-02	It is important that grazing is continued to be utilized as a sustainable tool for managing the landscape and that it is	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where

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	recognized as such in the wilderness plan. Particularly in regards to fuels management and invasive species control, flexibility in managing livestock numbers can, and should, be utilized as an invaluable tool. Authorized grazing on public lands has decreased steadily over the past several years, which has also coincided with increased fire prevalence in Idaho. Livestock grazing is a key tool to reducing the threat of catastrophic wildfires and should be recognized in the draft for the benefits it provides. Peer-reviewed studies have clearly demonstrated that grazing livestock reduces the threat of catastrophic wildfire by controlling the fuel load and increasing productivity of grasses that are less fire prone.	established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICA-03	An additional benefit of livestock grazing on federal lands is the constant presence of ranchers on the public lands to partner with the agencies in managing the range. With their presence comes the development and maintenance of range improvements which allow for more effective land management and provide benefits to both livestock and wildlife, sage grouse included.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICA-04	Although the wilderness's creating legislation allows for the retirement of permits, this should be done on a completely voluntary basis. It has been a longstanding concern of ours that grazing permittees would be pressured by agency personnel and by outside activist groups to permanently retire their permits through overly restrictive management measures and by other means. This must not be the case. Rather than encouraging the elimination of cattle, the managing agencies should work to facilitate their continued presence for the reasons outlined in these comments.	If a rancher decides to retire his/her permit, that is a voluntary action that does not involve the Agency until the end of the process. Additionally, p. 4 of the EA identifies that the process for voluntary donation of grazing permits and leases in accordance with P.L. 114-46 and is out of the scope of the Plan and EA.

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ICA-05	**Specific Comments on the EA:** **2.2.4. Rangeland Resources** ***• For FS-administered allotments, livestock fences must provide for big-game passage.*** Further clarification would assist on this requirement. Existing livestock fences, as constructed, already provide for big-game passage. Is it the intent that additional fence construction must be undertaken within the wilderness? We believe that this would be unnecessary. This language should be removed.	This direction was established in Management Area 03, as indicated in Appendix 1 of the WMP (p. 63) referenced as Standard 03110, which is also included the in the term grazing permit.. This direction was determined by the IDT to be appropriate to be carried forward into the new management area (21) that would be established upon approval of this Plan. If new fence construction is proposed, the Agency would first need to complete an MRA to determine whether or not it would be the minimum necessary for administration of the area as wilderness.
ICA-06	***• For FS-administered allotments, forage utilization for riparian areas would not exceed 30% use of most palatable forage species, or must retain a minimum 6" stubble height of hydric greenline species.*** This language should be removed. The standards for 30% utilization and 6-inch stubble height would prove to be unnecessarily restrictive. This type of specificity should not be used in a plan but rather would be more appropriate at the level of allotment and site-specific resource objectives, grazing management plans, and long term monitoring. The agency's own guidance documents recommend that these types of decisions are conducted on a more site specific level. For example, the multi-agency TR 1737-20 "Grazing Management Processes and Strategies for Riparian-Wetland Areas" recommends on page 22 that "a range of utilization or stubble heights should be used to accommodate for favorable and unfavorable production years." Page 68 of the same reference states that "To establish utilization guidelines, knowledge of the growth habits and characteristics of the key plant species; of their response to grazing and browsing; and of the	This direction was established in Management Area 03, as indicated in Appendix 1 of the WMP (p. 63) referenced as Standard 03109, which is also included the in the term grazing permit. In addition, this direction was determined by the IDT to be appropriate to carry forward into the new management area (21) that would be established upon approval of this Plan.

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	characteristics, preferences, and requirements of the grazing and browsing animals is needed. When using utilization information to make management changes, consideration should be given to the timing of utilization of key species with respect to plant phenology, which often affects subsequent growth and reproduction more than the amount of utilization does." We recommend that these specific numbers are dropped from this plan and re-evaluated on an allotment site-specific level as recommended in TR 1737-20.	
ICA-07	**2.3.6. Rangeland Resources** ***• Use irrigation or water spreading only to maintain livestock grazing operations and only where practiced prior to the designation of wilderness.*** This language is repeated throughout the plan and we are concerned about the implications to existing water rights of the permittees and adjacent private ranch owners who use this water. This plan should not attempt to supersede, trump, or diminish existing water rights nor alter the ability of private landowners to use the water that flows through the wilderness onto their land.	The IDT supports revising Standard 21113: Water use for irrigation to maintain livestock grazing operations will be in accordance with existing water rights issued by the State of Idaho with priority dates predating the wilderness designation. We recognize water rights issued by the State of Idaho by the Idaho Department of Water Resources and the Idaho Adjudication Court. Our research and review of historical documents did not reveal water spreading and/or irrigation occurring within the wilderness prior to the wilderness designation. This plan is not intended to "supersede, trump or diminish existing water rights" or private landowners rights. This statement refers to water spreading and/or irrigation practices that were taking place on NFS or BLM lands and not referring to water rights held by private landowners for use on their private lands.
ICA-08	**2.3.7. Fire Management, 3.1.4. Fire Management** ***• Determine actions for each wildland fire that are consistent with protecting wilderness character while providing for firefighter and public safety and considering the impacts to private property and developed facilities in surrounding areas.***	The management direction in bold text refers to site specific actions that may occur in the management of a wildfire (ie cutting trees to create a helicopter landing area or setting up sprinklers around a cabin). Grazing is a permitted use, and analyzing grazing as a fuels management tool is outside the scope of this plan.

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	Because fire suppression tools and capabilities will be limited within the wilderness, it is important that the plan recognizes the role that grazing can play in reducing fine fuel loads and that it is one of the only management options available within wilderness to reduce fire risk. The plan should acknowledge that continued livestock grazing is a valuable tool for managing fuel loads.	
ICA-09	**2.8.5. Environmental Justice and Socioeconomics** The plan's socioeconomic impacts discussion is very brief and only focuses on its impacts on minorities. The plan is entirely lacking in any review of its impacts on the ranching community who largely sustain the economy of the entire geographic region. We request a more in-depth analysis of the socioeconomic impacts to the area when/if grazing is reduced or eliminated from the wilderness area. If the ranchers, who have grazed livestock within the wilderness boundaries prior to its designation for years, either retire permits for the permit buyout or are left with an infeasible business due to wilderness grazing management restrictions, there will be significant impacts to the local area. This should not be so easily overlooked by the plan and must be analyzed.	The wilderness management plan does not establish any new or additional requirements or restrictions on grazing in the wilderness areas. Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. In addition, if a rancher decides to retire his/her permit, that is a voluntary action that does not involve the Agency until the end of the process. Since the Agencies have little to no idea who might be entertaining the retirement option, it would be pure speculation if we attempted to analyze the socioeconomics impacts to the local community. P. 4 of the EA identifies that the process for voluntary donation of grazing permits and leases in accordance with P.L. 114-46 is out of the scope of the Plan and EA. Further, administration of grazing permits within is guided by Section 4(d)(4) of the Wilderness Act; Section 102(e) of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act; the grazing guidelines in House Report 96-617; and Appendix A of House Report 101-405, which is also out of scope of this plan and EA.
ICA-10	**3.4.3 Habitat Fragmentation and Alteration** ***Recreational trails, campsites, and stock grazing can result in habitat alteration and fragmentation through vegetation***	The statement referenced is directed at recreational stock grazing, not permitted livestock grazing. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed

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	removal and trampling, invasive species spread, and change in species composition. In addition to the above language, it is common in this plan to discuss potential negative impacts of grazing. Nowhere does it discuss the positive effects, as identified in our introduction. If language such as this is left in, we again request that a review of the benefits of grazing are also considered. For example, in this specific section regarding habitat fragmentation, it is only because of the decades-long ranching history of the area and the continued ranching that have the habitat and open spaces in the wider area have not been sold off and fragmented further for subdivision.	necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICA-11	**Page 109 - Cumulative Effects** ***The primary federal activities that have impacted terrestrial species of concern and their habitats on the Sawtooth NRA as well as within the north end of the Forest include construction and use of system and non-system roads, construction and use of motorized and non-motorized trails, past and present livestock grazing. Of these activities, livestock grazing, ongoing hazard tree removal, road and trail construction and maintenance (both permitted and unpermitted), and dispersed recreation have altered habitat for species of concern in the area by removing or degrading potential foraging, denning, and nesting habitat.*** Livestock grazing will be managed according to standards and guidelines which are designed to conserve species' habitat. The language in this section will only serve to further subject the agency and the permittee to frivolous litigation. Page 113 – 3.5.3.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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	In areas where historic permitted livestock grazing occurred, vegetation communities are less resilient due to reduced species diversity and soil compaction. Soil compaction and erosion in riparian vegetation has resulted in mesic/hydric plant communities transitioning to species found in drier habitats. As stated above, livestock grazing will be managed according to standards and guidelines which safeguard the land and habitat. The language in this section will only serve to further subject the agency and the permittee to frivolous litigation.	
ICA-12	Page 116 & 117- 3.5.4 Stock Use Evidence ***Grazing by stock affects vegetation both through trampling and defoliation. Grazing has both direct effects on individual plants and indirect effects on vegetation composition, structure, and ecosystem processes (McClaran and Cole 1993). Trampling effects are mechanical damage to above or below ground plant parts. Trampling can be caused by human foot or stock hoof, stock rolling and pawing, and camp activities. Trampling can reduce leaf area, plant height, and reproductive output. These effects can result in decreased vigor or death of individual plants, changes in species composition, and loss of vegetation….Actions that decrease the number of grazing stock would decrease total grazing impacts. Actions that increase grazing intensity on a site increase the potential for productivity losses, loss of total vegetation cover, and compositional changes*** The paragraph should be removed from the plan. It appears as though the agency is setting the stage for anti-grazing activists to eliminate grazing. As stated above, livestock grazing will be managed according to standards and guidelines which safeguard the land and habitat. The language in this section will only serve	The paragraph is describing the effects that occur to vegetation with the presence of pack stock grazing and is based on the research cited. Comment refers to pack stock grazing; additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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	to further subject the agency and the permittee to frivolous litigation.	
ICA-13	**Page 125 - Cumulative Effects Alternative A** ***Proposed Action The primary cumulative activities that have affected botanical species and their habitats on the Sawtooth NRA as well as within the north end of the Forest include permitted domestic livestock grazing and its related impacts.*** ***Stock use within the Hemingway-Boulders Wilderness and White Cloud Wilderness areas is a foreseeable future action that could increase cumulative effects to native vegetation and ESA Candidate, Forest Service Sensitive species, Forest Watch species, and BLM Special Status species.*** Livestock grazing will be managed according to standards and guidelines which are designed to conserve species' habitat. The language in this section will only serve to further subject the agency and the permittee to frivolous litigation. In all of the examples above, the cited language would only serve to ensure that livestock grazing is forced out of these allotments. Grazing is protected as a viable use within wilderness and the plan should not seek for ways to force grazing permittees out.	Cumulative effects are described in the EA on pg. 40 -41. Cumulative effects are defined as the impact on the environment that results from the incremental impact of an action when added to other relevant past, present (ongoing), and reasonably foreseeable actions (those for which there are existing decisions, funding or identified proposals, but that have not yet been implemented), regardless of what agency or person undertakes such actions (40 CFR 1508.7). Cumulative effects analyses are carried out in accordance with 40 CFR 1508.7 and *The Council on Environmental Quality Guidance Memorandum on Consideration of Past Actions in Cumulative Effects Analysis*, dated June 24, 2005. Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICA-14	**Conclusion:** In comparing this plan to the Jim McClure-Jerry Peak wilderness plan, there are stark differences in tone towards grazing. This plan seems to seek to portray grazing use as only a negative impact while the other plan acknowledges it as a valid existing use that is already in harmony with wilderness	Section 5 of the WMP (p. 7-8) acknowledges law (Wilderness Act, Section 4(d)(4), and Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act), which states "Within the wilderness areas, the grazing of livestock in which grazing is established before the date of enactment of this Act shall be allowed to continue, subject to such reasonable regulations,

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	characteristics. We encourage you to revise this plan to be more closely in line with the Jim McClure-Jerry Peak language.	policies, and practices as the Secretary determines to be necessary…" Further, Section 6.12 (p. 19-20) of the WMP describe current rangeland resources. Both plans acknowledge the above law, and the Congressional Grazing Guidlelines, and agency policy for administration of commerical livestock grazing within wilderness.
ICA-15	The ranchers in this area are the stewards of both the private land they own and the public land they use. Without ranchers, who provide an effective line of defense against fire and noxious weeds, who manage forage for optimum production, and who are the primary protectors of open space in the private lands of the west, large areas of public land would be in jeopardy. The benefits provided by ranching, including reduced wildfire risk, treatment and prevention of expansion of invasive plants, and prevention of urbanization and development, answer the concerns of those who want to see the area protected as wilderness. Ranchers can be invaluable partners in preserving the wilderness characteristics of the area and in promoting and carrying out sustainable conservation practices. As you move forward in developing the wilderness plan, we encourage you to facilitate their continued presence in the area.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICLWS-01	**Wilderness** <u>Administrative flights</u> (Objective 2114) A minimum of 500 AGL is too low for flying above a wilderness area. The minimum should be set at 2000 AGL. The Aeronautical Information Manual recommends the following: 7-	The FAA has authority to formulate policy regarding use of navigable airspace (see AC No: 91-36D). The Advisory Circular is voluntary, including "pilots operating noise producing aircraft over noise-sensitive areas should … fly not less than 2,000 feet above ground level, weather permitting… to reduce potential interference with wildlife and complaints of noise disturbances …"

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	4-6. Flights Over Charted U.S. Wildlife Refuges, Parks, and Forest Service Areas: The landing of aircraft is prohibited on lands or waters administered by the National Park Service, U.S. Fish and Wildlife Service, or U.S. Forest Service without authorization from the respective agency. Exceptions include: a. When forced to land due to an emergency beyond the control of the operator; b. At officially designated landing sites; or c. An approved official business of the Federal Government. Pilots are requested to maintain a minimum altitude of 2,000 feet above the surface of the following: National Parks, Monuments, Seashores, Lakeshores, Recreation Areas and Scenic Riverways administered by the National Park Service, National Wildlife Refuges, Big Game Refuges, Game Ranges and Wildlife Ranges administered by the U.S. Fish and Wildlife Service, and Wilderness and Primitive areas administered by the U.S. Forest Service. *NOTE- FAA Advisory Circular AC 91-36D, Visual Flight Rules (VFR) Flight Near Noise---- Sensitive Areas, defines the surface of a national park area (including parks, forests, primitive areas, wilderness areas, recreational areas, national seashores, national monuments, national lakeshores, and national wildlife refuge and range areas) as: the highest terrain within 2,000 feet laterally of the route of flight, or the upper----most rim of a canyon or valley.* The BLM 6340 Manual acknowledges that low flight may disrupt wildlife and encourages low flight to be discouraged in wilderness areas: *"Low flight should be discouraged except in emergencies (such as search and rescue), essential military missions, and wildlife operations. Where low over flight is a*	https://www.faa.gov/documentlibrary/media/advisory_circular/ac91-36d.pdf

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	problem, or expected to become a problem, wilderness management plans should include outreach to military authorities, State agencies, the Federal Aviation Administration, and pilots in the general area in an effort to reduce low flight."	
ICLWS-02	Baseline Conditions for Wilderness Character (Standards 2121, 2122, 2123) Initial monitoring reports for baseline conditions including campsite condition, travel encounters, recreation site condition, and user developed routes should be included as an appendix to the final Wilderness Management Plan or included in the final Wilderness Monitoring section of the plan.	Acquiring the baseline monitoring is incomplete and for that reason will not be included as an appendix in the wilderness plan. Monitoring will be on-going. The intent of these baseline reports is to provide the data to assess change over time. In the wilderness plan, (p. 53) states "Baseline data will be established in the *Recreation Site Plan* and *Solitude Monitoring Plan* developed for these two areas."
ICLWS-04	**Wildlife Resources** Angling, hunting and trapping (JMJP027) We support the inclusion of Standard 2174 which prohibits hunting and trapping using motorized or mechanized means as well as the sale of fur, hide, or any other part of an animal trapped in the Wilderness. However, the Forest Service and BLM need to amend this standard to read as follows: "allow angling, hunting and trapping subject to State and federal regulations as long as associated access is limited to non-motorized, non-mechanized means and as long as there is not commercial sales associated with furs, hides or other parts of a trapped animal."	See response to IDFG-23.
ICLWS-05	It is not sufficient for the Forest Service and BLM to simply state a standard, but the agencies also need to take steps to be sure this standard is met. The Idaho Department of Fish and Game (IDFG) is the only entity to issue trapping permits and take end of season trapping reports. Current IDFG end of season trapping reports require only the county that an animal was	See response to IDFG-23.

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	trapped in, meaning there is currently no means by which to determine if Standard 2174 has been violated. Therefore, to strengthen the prohibition on commercial trapping activities in the Wilderness the Forest Service should work with IDFG to update trapping reports to state whether the animal was trapped in wilderness or not. Following this update, the Forest Service and IDFG should review the end of season trapping data to determine if Standard 2174 has been met.	

ICLWS-06	The final WMP should also include the following language:
	Wildlife management proposals will be evaluated through a MRA to determine if they are necessary for the administration of the area(s) for the purpose of the Wilderness Act. The following activities will be permitted:
	1) when they cannot be completed outside of wilderness,
	2) When they are needed to correct unnatural conditions resulting from human influence, and
	3) When they contribute to the preservation of wilderness character.
	• *Facility maintenance or repairs*
	• *Habitat mitigation or enhancement*
	• *Research on fish and wildlife populations and habitats*
	• *Wildlife population surveys*
	• *Wildlife transplants (i.e., removal, augmentation, or reintroduction)*
	• *Wildlife damage control needed to address:*
	  ○ *Impacts to Federally-listed endangered, threatened, or candidate species,*
	  ○ *Transmission of diseases or parasites that affect wildlife and humans, or*
	  ○ *Unacceptable livestock losses*
		We agree the policy stated in the comment would apply within the two wilderness areas.
		The WMP states on p.5 that "This WMP does not repeat guidance already contained in existing laws and policies (e.g., the Wilderness Act, Endangered Species Act, or Clean Water Act and existing Federal Regulations)." Further this section states, "All actions are supplemental to and consistent with wilderness laws, regulations, and policies, which must be further consulted in the event of unforeseen issues."
		All points in this comments are incorporated by reference to the AFWA guidelines, BLM Manuals 6340, 6830 and FSM 2320.

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	According to BLM Policy Manual 6830 (Wildlife Damage Management), control activities should be directed at individual animals causing damage, and only the minimum amount of control necessary should be used to resolve the problem. • Authorized activities should only be conducted on foot or with riding and pack stock, unless BLM determines through a MRA that the use of motorized or mechanized vehicles and equipment is the minimum tool necessary for the preservation of wilderness character. An environmental analysis and associated decision document is needed for proposals involving potential soil or vegetation disturbance or the temporary use of a structure.	
ICLWS-07	<u>Fish Stocking (objective 2151, standard 2154)</u> Fish stocking in the wilderness should be discouraged in all lakes regardless of stocking history. Exotic species of fish should never be stocked in wilderness. If stocking is considered by the State of Idaho, the Forest Service should require a MRA.	Fish stocking is governed by Forest Service policy **2323.34** and AFWA **AFWA- POLICIES AND GUIDELINES FOR FISH AND WILDLIFE MANAGEMENT IN NATIONAL FOREST AND BUREAU OF LAND MANAGEMENT WILDERNESS (as amended June 2006)** **Fish Stocking** Fish stocking may be conducted by the State agency in coordination with the Federal administering agency to perpetuate or recover a threatened or endangered species, or to reestablish or maintain indigenous fish species. Any species of fish introduced for management purposes prior to wilderness designation may be managed as indigenous fish species if the species is likely to survive. State agencies may continue to stock those waters traditionally stocked prior to wilderness designation. State and Federal agencies should carefully

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		evaluate stocking those waters that consistently require supplementation for reasons other than angler-induced mortality. Selected species for stocking will be determined by the State agency in close cooperation and coordination with the Federal land management agency. In order of preference for stocking fish species is (a) Federal threatened or endangered species, and (b) indigenous species. Numbers and size of fish and time of stocking will be determined by the State in coordination with Federal agencies. Lakes and streams currently **without fish** may be considered for stocking, if there is mutual agreement that no appreciable loss of scientific values or adverse effects on wilderness resources will occur. **It is generally undesirable to stock previously unstocked waters. Because these areas generally reflect natural ecosystem processes, they may possess high scientific values. Proposals for fish stocking that would involve uses generally prohibited under Section 4 (c) of the Wilderness Act w**ill be considered and may be authorized by the Federal administering agency through application of the MRDP as outlined in Section E., General Policy.
ICLWS-08	Mountain Goat and Big Horn Sheep Habitat (objectives 2150, 2153 & standards 2155, 2156, 2157) 1) We fully support these standards and objectives. We believe these to be crucial management actions that can result in the reduction of risk of disease transmission and stressors between bighorn sheep and domestic animals. We encourage the Forest Service and BLM to continue to identify areas where existing populations of big horn sheep or mountain goat exist. 2) The Forest Service and the BLM should eliminate all domestic sheep grazing in occupied and potential big horn sheep	1) Comments in support of the proposed action. 2) Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would typically be analyzed during grazing permit NEPA and the subsequent decision process.

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	and mountain goat habitat by phasing out and/or transferring permits. Simply reducing summer and fall forage completion is not sufficient to protect big horn and mountain goat.	In the case of domestic sheep grazing and big horn sheep interaction, the analysis may result from further direction based upon additional studies, Agency direction, litigation, etc.
ICLWS-11	**Recreational Resources** We support the recreational goals, objectives and standards outlined in the proposed action for the WMP with the addition of the following: • We continue to suggest that the Forest Service and BLM adopt a free, self issue permit system as outlined in Alternative B, rather than relying on a trail registration system. While both monitoring methods are subject to visitor compliance, research suggests that a self issue permit system can serve as a means to educating users of regulations, LNT practices and wilderness ethics in addition to supporting the Forest Service and BLM in determining use levels and visitation patterns. Combining the opportunity to watch a short video on regulations with the pick-up of a wilderness permit prior to entering the wilderness has also shown to increase overall visitor compliance[1]. This could be achieved by having a video-kiosk style permit pick-up available at visitor centers. Permits should also be available for pick up at trailhead locations. [1]James and Gilbert. 1974. Mandatory Wilderness Permits: Some Indications of Success. Journal of Forestry, Volume 72, 12, pp. 753-756	The self-issue permit system was considered and evaluated in alternative B. The 1974 reference is not the best available science for us to be using in 2018. Wilderness land managers have learned much since 1974 about types of users, user preferences, user impacts, interpretation and application of the Wilderness Act through decades of research. In the early 1970s visitors to Wilderness and Backcountry areas also were required to perform skills and ability tests and show the type of equipment they had before being given a wilderness/backcountry permit. This practice has not been used for over 35 years for many reasons some of which may include: restriction on freedom for the wilderness user, new equipment and permitting technologies, new education techniques such as the Leave No Trace skills and ethics program, federal budget cuts, time constraints, etc.
ICLWS-12	• The Forest Service and BLM should prioritize monitoring human waste impacts as part of a standard campsite monitoring program throughout the wilderness areas. If human waste becomes a public health concern, a water quality issue, or otherwise becomes a problem within the wilderness areas, consider implementing a policy requiring	As noted in the EA (p. 51): Alternative A could have a slightly positive effect on water quality by requiring human waste to be buried at least 200 feet from water (Recreation Resources Standard 2172), which would reduce the possibility of waste entering water systems. Disposing of human waste in cat-holes

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	visitors (both the general public and outfitter clients) to pack out human waste from areas where it is an issue.	is the most common method of human waste disposal and is preferred because it avoids or reduces the negative impact of visitors encountering feces or toilet paper, animal and insect transmission of pathogens, and water contamination after rainfall (Monz et al. 2000). Also see response to comment BCHI-13 regarding human waste management.
ICLWS-13	• We suggest language in the Wilderness Plan that addresses recreational rock climbing. We suggest the following language: *"Hand drilled bolting in wilderness is permitted when it is the minimum tool necessary to facilitate primitive rock climbing safety in wilderness. Bolting should be infrequent any should only be used to facilitate primitive climbing opportunities in wilderness. Additionally, the installation of any bolts within wilderness must be approved by the managing agency prior to installation."*	The BLM has existing policy regarding climbing anchors (BLM Manual 6340 P. 1-42). The USFS does not currently have policy regarding fixed anchors. The FS can currently consider fixed anchors on a case-by-case basis when it is determined to be the minimum requirement for management of wilderness. Additional language was not added to the plan.
ICLWS-14	Tying of Stock (standards 2170, 2171, 2172, 2174) We fully support these standards and feel these are necessary for limiting resource impacts. We suggest an additional requirement of the use of tree-saver devices or other knot techniques that further prevent tree girdling.	See response to GG-09 (for tree-saver device).
ICLWS-16	**Rangeland Resources** Grazing should be permitted and administered in a way that prevents degradation of wilderness character, does not adversely impact wildlife species, and is compatible with maintaining and improving natural resource health. Sheep and cattle grazing should be defined as permitted livestock grazing to distinguish desired future conditions from other goals for large game and wildlife. In general, the BLM and FS should attempt to ensure that ranching permittees are able to maintain viable allotments, in a manner that also supports wilderness character. The USFS	The management direction for livestock grazing management highlight the importance of preserving wilderness character while continuing to allow commercial livestock grazing (WMP p. 40-41). As noted on p. 8 of the WMP, administration of livestock grazing is conducted in accordance with various other laws, regulations and policy. Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as

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	and BLM should ensure that grazing conforms to the "Standards and Guidelines for Grazing Administration" by placing a priority on assessing areas to see if they are in compliance. If the areas are not in compliance, immediate action should be taken to rectify the grazing management so the areas are brought into compliance.	are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICLWS-17	The USFS and BLM should actively pursue ways in which to better manage livestock in functioning at risk and non-functioning areas. Options may include adjusting on and off dates, reducing the numbers of livestock, reducing grazing pressure on riparian areas, and improved herding. Grazing should also be eliminated from all riparian pastures where water quality standards are not met within a reasonable amount of time such as two years, for factors affected by livestock grazing (fecal coliform, turbidity, temperature, etc). Stocking rates must include consideration of topography, distance to water, forage availability, etc. to determine realistic stocking rates. Stocking rates must also consider long-term weather/moisture history and not overstock lands based upon optimistic single-year events. Public Law 114-46 provides a mechanism for the voluntary permanent retirement of grazing allotments. USFS and BLM should work with permittees to identify those who are interested in retiring their permits or being relocated to prevent resource damage and conflicts with native wildlife. Should grazing allotments be retired, the USFS and BLM should assess the need for any remaining range improvements (such as fencing) and prioritize the removal of unneeded fencing to reduce conflicts with wildlife and improve wilderness characteristics. For any grazing areas that are retired, the USFS and BLM should also clarify which party has the maintenance responsibilities for any remaining fences that are needed.	As described on p. 8 of the WMP (Section 5): The wilderness designation does not affect grazing preference, nor does it preclude the development of Allotment Management Plans. These items are administered according to the regulations in 36 CFR 222 and 43 CFR 4100. In accordance with existing Forest Service and BLM policy, periodic interdisciplinary allotment evaluations assess grazing use by domestic cattle, sheep, and other animals on vegetation and a determination of ecological health is made. Waiver and donation of grazing permits and leases, as identified in the designating legislation, is considered outside of this planning process. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Consequently, adjusting stocking rates and retirement of grazing permits are out of scope of this plan. Removal of unneeded developments is covered under goal 2109 and standard 2116.

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ICLWS-18	Wilderness Resource and Priority Watersheds (Objective 21106) The following should be added to this objective: "Consider the wilderness resource [and priority watersheds] when preparing or modifying range permits, annual operating instructions or allotment management plan or when conducting NEPA analysis"	Livestock management and monitoring is already covered under laws, regulation and policy. The Allotments within the wilderness have current Allotment Management Plans (AMPs) and Annual Operating Instructions (AOIs) that provide direction for this land use. The following special provision in the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act allows for the continuation of livestock grazing and management that was established before the date of enactment. SEC. 102 (e)LIVESTOCK.-(1) IN GENERAL.- Within the wilderness areas, the grazing of livestock in which grazing is established before the date of enactment of this Act shall be allowed to continue, subject to such reasonable regulations, policies, and practices as the Secretary determines to be necessary, in accordance with- (A) section 4(d)(4) of the Wilderness Act (16 U.S.C. 1131(d)(4)); (B) with respect to wilderness areas administered by the Secretary of Agriculture, the guidelines described in House Report 96-617 of the 96th Congress; and (C) with respect to wilderness areas administered by the Secretary of the Interior, the guidelines described in appendix A of House Report 101-405 of the 101st Congress. Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
ICLWS-19	Wildlife Passage (Standard 21113) This standard should be expanded to not only address big game species but address wildlife permeability overall. This standard should also be applied to all BLM administered allotments. Where fencing is no longer needed, the Forest Service and BLM should require removal. Volunteer groups may be interested in assisting such efforts.	Removal of unneeded developments is covered under goal 2109 and standard 2116.

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ICLWS-20	Maintenance of Range Improvements (Standard 21109) This standard should be elaborated upon to include a requirement that necessitates that any resulting resource damage must be mitigated or rehabilitated by the individual requesting access. All non-conforming use access should be subject to a MRA.	The comment is confusing because of the Standard reference. Standard 21109 states: Prohibit the use of motor vehicles for routine livestock monitoring, herding, and gathering. Whereas, 21110 addresses maintenance of range improvements. Standard 2115 indicates that all actions that include a prohibited use per 4(c) of the Wilderness Act would require an MRA. Additionally, any activities authorized within a wilderness area are authorized in a manner that minimizes impacts to wilderness character. Any requirements for mitigation and/or rehabilitation would be addressed within the MRA on a site/project specific basis.
ICLWS-21	**Mineral and Geologic Resources** The USFS and BLM should implement the strictest interpretation of the Wilderness Act, choosing law over lenient policy with regard to mineral resources and valid existing rights (VERs). The USFS and BLM should seek alternative (non-wilderness) routes where possible to existing claimed vehicular access through wilderness in-holdings and edge-holdings when necessary. Where possible, rights of way and other VERS in the Wilderness should be eliminated when acquisitions or other means are made possible. The USFS and BLM should not renew leases where the renewal is not legally required and should not write leases that imply or legally require renewal. All claims for mineral entry should be verified as valid prior to assessment of any kind.	The Forest Service agrees that valid existing rights will be confirmed prior to the evaluation of a plan of operation for mineral activity in wilderness. When evaluating a plan of operations, reasonable access will be evaluated pursuant to the requirements of the Wilderness Act. No previous leases that would require reconsideration or renewal occur within the Wilderness area.
ICLWS-22	Reference to Plans of Operations (Objective 21118) This objective should be expanded. Operating plans that are associated with valid existing rights should utilize equipment consistent with the wilderness objectives (picks, shovels, buckets, etc.) The plan of operations must include reasonable	Operating plans for mineral activities performed commensurate with valid existing rights will be reviewed by a Certified Mineral Examiner to ensure the proposal is consistent with wilderness objectives and commensurate with the appropriate phase of logical and sequential mineral development.

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	stipulations to protect wilderness character to the extent consistent with the rights associated with the valid mining claim.	The Forest Service agrees prior to authorization of a plan, reasonable stipulations for the protection of wilderness character should be included.
ICLWS-23	<u>Reclamation and Bonding (Objective 21119, Standard 21120)</u> We support this objective and standard with the following addition: *any resulting resource damaging must be mitigated or rehabilitated at the cost of the responsible party. In order for the approval of a plan of operations by either the USFS or the BLM, the operator must post a financial guarantee that completely covers and guarantees completion of reclamation.*	While operating plans approved under 36 CFR 228A already stipulate the recommended additional language, he Forest Service will consider amending and expanding the language to more clearly address the reclamation and rehabilitation responsibilities of the responsible party. These terms and conditions would be stipulated within the approved plan of operation. The IDT supports this revision to 21120: "*Ensure lands disturbed during mineral exploration and development activities are restored as nearly as practicable promptly upon completion or abandonment of operations. Plans of operations will stipulate reclamation and bonding requirements of the authorized operator.*"
ICLWS-24	The Forest Service and BLM should re-include the following standards into the final WMP (these appeared in the last version we reviewed) o BLM will not issue mineral or geothermal leases, licenses or permits under the mineral or geothermal leasing laws (43 CFR 6304.23), o BLM will not issue sales contracts or free use permits under the Material Act (30 U.S.C. 601 et seq.) in the JMJP Wilderness with the exception of those for scientific research. o Personal collection of petrified wood is prohibited (BLM Manual 6340 1.6.C.11.d; 43 CFR 6302.15).	While these prohibitions are expressly addressed within the language of Special Provisions of Wilderness Act, The USFS will review these and consider them for re-inclusion into the final document.
ICLWS-25	<u>Rockhounding</u> We recommend that the Forest Service and BLM review the protocols for rock collecting in other wilderness areas and assess	Leave No Trace Skills and Ethics are encouraged, posted, and taught on US Forest and BLM lands (one of the four main

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	an appropriate limit here. We are concerned that allowing removal of 25 lbs/per person/per year may result in removal of unique specimens best left on site for others to enjoy. We recommend that the Forest Service and BLM recommend a "leave only footprints" ethic and allow the removal of a lesser quantity of specimens, if at all.	founding partners with the Leave No Trace Center for Outdoor Ethics). "Gathering (removing or disturbing) of a reasonable amount of a common resource for non-commercial personal use, either by hand or with the use of non-motorized hand tools resulting in only minimal surface and in a manner that preserves wilderness character, may be allowed." (BLM Manual 6340 - Wilderness Management, pg. 19; 3. Collection for Personal Use.)
ICLWS-26	**Fire Management** Generally speaking, we support the goals, objectives, and guidelines as outlined for fire management under the proposed action for the WMP. We encourage the Forest Service and BLM to develop a comprehensive fire management plan that corresponds with the WMP and includes the identification of the threats imposed by hazardous fuel situations within the Wilderness and surrounding BLM and USFS managed lands. The USFS and BLM should define the appropriate management response to fires taking into account protection of wilderness values including objects and resources. Emergency fire rehabilitation protocols should also be developed and must be consistent with the Wilderness Act and protection of the area's objects, resources and objectives. The USFS and BLM should establish the goal of mimicking the historical fire regimes of affected plant communities in these considerations. Protocols should include post-fire rest from livestock grazing. Post-fire rest must be at least 3 years to ensure the adequate establishment of shrub and forb species. We encourage the USFS and BLM to rely on the interagency tools and resources available at through the wilderness fire management toolbox available at www.wilderness.net/fire.	The Forest Service and BLM already work collaboratively in fire management planning and will continue to do so. There is national level policy that was jointly developed by all of the DOI land management agencies and the Forest Service that is intended to promote consistency, interagency cooperation, and efficiency in all facets of fire management. https://www.nifc.gov/policies/pol_ref_redbook.html The goals, objectives, standards, and guidelines within the WMP will be utilized as the foundational direction in fire management plans and related applications as per agency policy.

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ICLWS-29	**Management Zones** We fully support the use of zoning as laid out in the proposed action as means to differentiate the heterogeneous nature (and higher used areas) within the wilderness. All zones should be maintained using a non-degradation policy. Monitoring strategy and recreation management should ultimately complement the goals and objectives for each management zone so that wilderness character of each area is maintained or improved.	Non-degradation is highlighted in the Zone section (p. 47 states: Zones were developed based on current conditions (trails, campsites), current visitor use levels and patterns, and desired conditions to ensure non-degradation of wilderness.), and 21174-Z4 specifically emphasizes this topic.
ICLWS-30	**Wilderness Monitoring** The Wilderness Act requires agencies to preserve the wilderness character of designated wilderness areas. 16 U.S.C. § 1133(b). The Forest Service Manual 2320.2 directs the agency to "protect and perpetuate wilderness character" from the time of wilderness designation. The central importance of preserving wilderness character is underscored by several recent District Court and Court of Appeals cases showing that the courts are increasingly holding the agency accountable for fulfilling this legal and policy mandate to preserve wilderness character. The BLM Instruction Memorandum (IM) 2010-190 directs the agency to implement strategies for monitoring and measuring wilderness character. While we appreciate the reference to a Wilderness Monitoring program based off of the wilderness character monitoring framework identified in *Keeping It Wild 2*, the Forest and BLM should expand this section to provide specific goals, objectives, standards and guidelines associated with a monitoring program.	The WMP includes monitoring thresholds for three indicators associated with wilderness character monitoring. See standards 2120, 2121, 2122. These were identified by the IDT as three of the most valuable indicators for responding to changes in the two wildernesses. Also, see response to comment IDFG-1.
ICLWS-31	Baseline data should also be included as an appendix to the WMP as a means for comparing future monitoring and management effectiveness. Baseline data is the only sure way the BLM and Forest Service can track the overall resource	See response to ICLWS-02. Further, Guideline 2125 (p. 26 of the WMP) states that the agencies will implement the FS Wilderness Character Monitoring Technical Guide (Landres et

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	health and wilderness quality and make adjustments to management actions as necessary. Values such as night sky quality and impact from climate change should be included as part of a monitoring strategy.	al., in press), or most current agency direction, which includes specific monitoring measures and protocols.
ICLWS-32	**Plan Implementation and Evaluation** We appreciate the Forest Service and BLM including a plan implementation section into the WMP. We encourage the prioritization of future activities including identification of locations within the Wilderness that would receive the most benefit if future activities were implemented. Doing so could help prioritize use of limited funds while also identifying areas of greatest need where funding sources could be sought out.	As noted on p. 5 of the WMP, the Plan "does not describe the methods, the "how to," or the schedule of implementing the direction, nor does it describe the day-to-day or operational actions to be carried out in the management of the wildernesses. The rate of implementation and potential management activities depend on the annual budgeting process."
ICLWS-33	**Boundaries** The boundaries of the wilderness were established with the passage of the Act, however, final ground surveys may give the Forest Service and BLM some discretion as to whether or not to include small features such as range improvements, dispersed campsites, borrow pits, refuse dumps, vehicle pull outs or other smaller scale features. We recommend that the Forest Service and BLM make site-specific decisions to exclude non-natural features, places in need of active restoration, or range improvements needing motorized access and include sensitive areas vulnerable to disturbances such as rare plant occurrences and springs. Where possible, the actual boundary should follow identifiable features on the ground. We note that the BLM was able to conduct similar fine-tuning on a fine-scale during the final boundary delineations for the Owyhee River, Little Jacks Creek, Big Jacks Creek, Bruneau-Jarbidge, Pole Creek and North Fork Owyhee Wilderness.	See response to CCC-06.

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ICLWS-34	**Naming protocols** To the extent practicable, we recommend using historical landscape, trail and road names as many people are already familiar with these and using historic place names captures a sense of the history of these places.	Agreed, traditional, historic place names provide the reader with the most familiar names for orientation on maps or in text. The in-text reference to trails (Standard 2178) includes both the traditional name, and the FS trail number. Maps in the Plan and EA are not at a scale to allow for many place names or trail names to be included. Within the online storymap for this project, the attributes for trails include both the traditional name and the FS trail number.
ICLWS-35	**Weed control** We support an integrated weed management program but have some concerns about any aerial spraying of herbicides, particularly with regard to the potential for disturbing wildlife and the affecting listed fish species should herbicides drift into waterways. It is unclear if the BLM Integrated Weed Management Program Environmental Assessment allows for the aerial spraying within the Hemingway-Boulders Wilderness. Any aerial spraying program should be accompanied by a monitoring program to assess implementation and effectiveness. While we recommend a judicious approach for aerial spraying, we fully support efforts to prevent the spread of noxious weeds and control or eradicate infestations. Where infestations already exist, we recommend a rapid response utilizing ground-based weed control measures that meet MRA requirements, including manual pulling, backpack sprayers, horses and mules. Efforts should be focused at trailheads, staging areas, interpretive sites, trails and at patches along trails. We also recommend utilizing volunteer efforts to assist with noxious weed surveys and treatments.	Invasive species treatments are not within the scope of the Wilderness Management Plant and are analyzed in the Boise and Sawtooth Forest-wide Invasive Plant Species Treatments Draft Environmental Impact Statement (USDA Forest Service 2016). WMP EA pg. 127 Invasive species treatments within the Wilderness would undergo Minimum Requirement Analysis to determine the minimum necessary treatment of invasive species. WMP EA pg. 9 Impacts to wildlife, fisheries and water resources from herbicide treatments are analyzed in each agency's respective NEPA documents related to invasive species control (see Objective 2146).
IDFG-01	**Incorporation of Non-binding/Vague Guidance Documents** A fundamental concern with the draft WMP is its incorporation of several non-binding, often vague, and some not-yet-in	Several of these documents are discretionary. The agencies are proposing to establish their use under standard as a requirement.

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	existence documents in the WMP standards, guidelines, and management actions. For example, Forest Plan regulations (36 CFR 219.7), define a standard as a mandatory constraint on project and activity decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. Sweeping previously non-binding policy documents, internal procedures, or technical guidance into standards mandating federal agency action poses a range of unintended and unhelpful consequences to effective management. Of specific concern to IDFG is the draft WMP's application of such documents to matters where the state of Idaho has independent jurisdiction and responsibilities, such as the state's primary jurisdiction over fish and wildlife management resources. USFS and BLM handbooks and manuals, along with U.S. Fish and Wildlife Service and NOAA Fisheries recovery plans, do not have independent force and effect of law and are not binding on even the federal agencies themselves, much less other entities (*see, e. g., Forest Guardians v. APHIS,* (9th Cir. 2002); *Cascadia Wildlands v. Thrailkill,* 806 F.3d 1234, 9th Cir. 2015). The draft WMP refers to the various agency handbooks and manuals, along with documents such as: • *Policies and Guidelines for Fish and Wildlife Management in National Forest and BLM Wilderness* (USFS, BLM, and Association of Fish and Wildlife Agencies [AFWA] 2006) (WMP p. 17) • *Framework for Evaluating Ecological Intervention in Wilderness* (Standard 2117, WMP p. 26) • *Framework to Evaluate Proposals for Scientific Activities in Wilderness* (Standard 21152, WMP p. 45) • *Keeping It Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the*	• AFWA: The FS and BLM are participants to AFWA. This document is noted in the Management Area Description (p. 17), and is established in a Forest-wide goal per the Sawtooth Forest Plan (WROB02). • Framework for Evaluating Ecological Intervention in Wilderness and Framework to Evaluate Proposals for Scientific Activities in Wilderness: These two documents are discretionary. The IDT includes their use as standards in the Plan, as they are valuable tools to explicitly state rationale for allowing or disallowing these activities. The IDT edited these standards (21152 and 2117) to allow for flexibility in their use. • Keeping It Wild 2 and USFS Wilderness Character Monitoring Technical Guide: The Interagency Wilderness Steering Committee endorsed KIW2, and required each agency to develop its own implementation strategy, which for the FS is the Technical Guide. Three monitoring indicators are established under the standards (2120, 2121, 2122). • The Interagency Visitor Use Management Framework is included as a goal, and includes a broad framework for various visitor management methods.

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	National Wilderness Preservation System (Guideline 2125, WMP p. 26) • *Interagency Visitor Use Management Framework* (Goal 2158, WMP p. 33) • *USFW Wilderness Character Monitoring Technical Guide* (in press) (WMP p. 53) IDFG objects to any language in the WMP that purports to require that USFS or BLM apply new procedural or substantive requirements in a way that may be detrimental to IDFG's exercise of independent state jurisdiction and responsibilities for fish and wildlife resources, or to effective management for the benefit of those resources. Where such requirements are not contained in statutes, implementing regulations or other rulemaking, it is inappropriate to seek to apply them unilaterally through a wilderness management plan.	
IDFG-02	Standards 2115 and 2117 (WMP pp. 25-26) are inappropriate standards. These standards refer to "Minimum Requirements Analysis," as if this term is a document or process defined by statute or implementing regulations. The Glossary in the EA (EA at 144) recognizes an MRA is "not required by law" but "may be conducted whenever an administrative action may adversely affect wilderness character whether a prohibited use is considered or not." IDFG located a reference to MRA in an Appendix to the BLM Policy Manual 6340, but this term is not used in the USFS manual. Other USFS and BLM documents recommend use of MRAs, Minimum Requirements Decision Guide, (MRDG), or Minimum Requirements Decision Process (MRDP) in some fashion, but are not prescriptive as to their use, and these documents recognize various circumstances in which MRDG use is not appropriate (*e.g.,* public health and safety for fire, wildlife control, law enforcement, and search and rescue). The 2006 AFWA-BLM-USFS MOU has an appendix with an	The IDT includes Standard 2115 as the best available method for meeting the requirements of the Wilderness Act. The Wilderness Act (Section 4c) prohibits certain uses "…except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act…" To determine if an action meets this legal requirement, agencies undertake a Minimum Requirements Analysis (MRA). The MRDG was developed by the Arthur Carhart National Wilderness Training Center as a tool for completing an MRA. It provides a structured, rigorous process for arriving at defensible determinations of the minimum necessary. The MRDG is the primary means of completing an MRA approved for use by the Forest Service, and Bureau of Land Management. BLM Manual 6340 (Appendix B) requires the use of the Minimum Requirements Decision Guide developed by the Arthur Carhart Wilderness Training Center.

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	MRDP outline as guidance when appropriate, but it is not presented as a prescription.	
IDFG-03	Standard 2117 also refers to the *Framework for Evaluating Ecological Intervention in Wilderness.* The list of references in the EA and WMP did not include such a document, and a search of online information did not produce a specific document appropriate for use as a standard.	The Framework was added to the References section.
IDFG-04	The WMP (p. 17) incorrectly characterizes Section V.B. of the 2010 Memorandum of Understanding (MOU) between USFS and IDFG. This Section identifies the creation of a separate MOU for management of fish and wildlife in wilderness as a subject potentially needing attention for establishing or improving cooperation, but USFS and IDFG have not developed such an MOU, nor has IDFG, to date, agreed to developing one.	Correct, the indicated paragraph references the MOU (2010-MU-11062754-027), which identified the need for creation of a separate MOU of management of fish and wildlife in wilderness areas in Idaho. The EA states "until such an Idaho-specific wilderness MOU is developed," but does not indicate an MOU is in development or a timeline for such. The agencies acknowledge and support the development of a wilderness-specific wildlife and fish MOU with Idaho.
IDFG-05	The WMP (p.17) states that it will use AWFA/BLM/USFS 2006 guidelines to BLM and USFS until an Idaho-specific wilderness MOU is developed. Use of the AFWA guidelines is not appropriate in Idaho; the state of Idaho and IDFG have not endorsed the AFWA guidelines, and IDFG notes that the AFWA MOU specifically "encourages" that USFS, BLM and individual states enter into individual agreements to make the guidelines relevant to individual states…." The correct legal references to include in the WMP for BLM and USFS' responsibilities for cooperation with IDFG are federal laws and regulations directing them to coordinate/cooperate with States regarding wildlife management on lands that they administer. *E.G.,* 43 CFR, Part 24 (Department of the Interior Fish and Wildlife Policy: State-Federal Relationship) and 36 CFR, Part 241 Subpart A.	The federal agencies follow regulations (e.g. BLM Manual 6340, FSM 2320) which are issued by the agency to carry out the intent of legislation enacted by Congress and ensure uniform application of the law. The "Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness" serve as a framework for cooperation among the FS, BLM and the States in the coordination of fish and wildlife management and in the development of cooperative agreements or other management plans. FSM 2323.32(5) specifically directs the FS to apply the AFWA guidelines in all NF wilderness and use as a foundation for State wilderness cooperative agreements.

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	Additional comments on appropriate coordination between USFS, BLM and IDFG are below.	
IDFG-06	21152 (WMP p. 45) is an inappropriate standard. As stated, it requires evaluation of proposals "through the Framework to Evaluate Proposals for Scientific Activities in Wilderness." It appears this Framework (referenced at http://www.wilderness.net/science) is an internal document intended to be discretionary and evolve over time.	Yes, this is a discretionary document and we are establishing it under this standard as a requirement. The IDT believes this Framework is a valuable tool to explicitly provide the rationale for allowing or disallowing a scientific activity within wilderness. Revise Standard: Require prior authorization for all parties interested in conducting research activities in wilderness. Proposals for scientific research may be evaluated through the Framework to Evaluate Proposals for Scientific Activities in Wilderness (Landres 2010, or most current), in conjunction with an MRA, as needed.
IDFG-07	**Consistency with State Jurisdiction and Responsibilities** The draft HBWC WMP includes general statements that properly identify state jurisdiction over fish and wildlife, including regulation of hunting, fishing and trapping, in the wilderness. Page 7 properly recognizes that regulation of hunting, fishing and trapping is the purview of the state, and quotes relevant language in the *Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act,* Section 102 (g): > Nothing in this title affects the jurisdiction of the state of Idaho with respect to the management of fish and wildlife on public land in the state, including the regulation of hunting, fishing, and trapping within the wilderness areas. Where an action may be within the scope of both federal and state/local jurisdiction, the HBWC WMP should allow for flexible approaches to the exercise of jurisdiction, rather than impose procedural standards/guidelines not required by law (e.g., prescription of use of particular flow charts, forms of	Wilderness area management is guided by federal laws, notably the Wilderness Act of 1964. The federal agencies follow regulations (e.g. BLM Manual 6340, FSM 2320) which are issued by the agencies to carry out the intent of legislation enacted by Congress and ensure uniform application of the law. Management jurisdiction is identified in the regulations and are reflected in the WMP. The Wilderness Act (Section 4c) prohibits certain uses "…except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act…" To determine if an action meets this legal requirement, agencies undertake a Minimum Requirements Analysis (MRA). The Minimum Requirements Decision Guide (MRDG) was developed by the Arthur Carhart National Wilderness Training Center as a tool for completing an MRA. It provides a structured, rigorous process for arriving at defensible determinations of the minimum necessary. The MRDG is the

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	agreement or permit, MRA/MRDG/MRDP or decision "frameworks" where they are not required by statute or regulation). Standards that may create duties to act, where statute/ regulation did not otherwise impose them, may have unintended, detrimental consequences to resolving inconsistencies in federal statutory directives and further, may actually impede preservation of wilderness character for the use and enjoyment of the American people. Standards imposing pre-emptive procedural requirements for wildlife management, law enforcement, and search and rescue should be deleted entirely or restated (e.g., as goals per 36 CFR 219.7(e)(2)).	primary means of completing an MRA approved for use by the Forest Service, and Bureau of Land Management. BLM Manual 6340 (Appendix B) requires the use of the Minimum Requirements Decision Guide developed by the Arthur Carhart Wilderness Training Center.
IDFG-08	This flexibility is especially important in light of long-standing, scientifically based existing uses at the time of wilderness designation for state wildlife management activities (monitoring/ research/law enforcement) that include occasional and temporary use of aircraft and other mechanized/motorized uses, as well as remote devices/equipment. For example, there is general agreement among the scientific community as to the use of aerial supported radio-collaring as necessary for monitoring/research of ungulate populations. Fish and wildlife management, research, and enforcement activities such as redd surveys, big game population estimates, harvest monitoring, bighorn sheep research, and carnivore surveys within and adjacent to the HBWC Wilderness are on-going and will continue.	Minimum Requirements Analysis is the interagency process for determining if a use prohibited under Section 4(c) of the Wilderness Act is "…necessary to meet minimum requirements for the administration of the area for the purpose of this Act…" (Section 4(c) of the Wilderness Act).
IDFG-09	In its scoping comments for HBWC wilderness management planning, IDFG identified its various species management plans and its Statewide Wildlife Action Plan, and it would be informative to reference the relationship of these plans to wildlife resources under independent state jurisdiction in the HBWC. IDFG provides these plans again at the end of our comments.	The agencies acknowledge and use these plans. Listing all of these plans individually in the WMP is not necessary, as specialists reference them as needed. Further, referencing a specific plan would result in using an outdated plan as these documents are revised. Paragraph in Section 6.9 was revised to reference these plans in a general manner. See IDFG-32 for list of species management plans.

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IDFG-10	The WMP acknowledges that the Wilderness Act and SNRA recognize conduct of state-regulated hunting, fishing and trapping. As such, the WMP should also reflect that these activities are encompassed within the baseline of "natural processes and natural selection" for objectives and goals for the HBWC (*e.g.,* WMP Goal 2105 p. 24; WMP Standard 2117 p. 26, WMP Goal 2147, p. 29). State seasons, harvest limits, and laws and statutes for possession and transfer of harvested wildlife and fish regulate within-wilderness harvest and related off-wilderness use of harvested animals. IDFG management of fish and wildlife within wilderness, pre-wilderness designation, should also be considered within the baseline of "natural processes and natural selection"; these managed resources were a contributing factor to wilderness designation.	Hunting, fishing and trapping are allowable uses within wilderness. This direction is established by law and policy. The Wilderness Act, Section 2a - Purpose of Wilderness, states " …lands designated for preservation and protection in their natural condition, …" Section 2c – Definition of Wilderness "…an area of undeveloped federal land retaining its primeval character and influence, …which is protected and managed to preserve its natural conditions…and which generally appears to have been affected primarily by the forces of nature, …" FSM 2323.31 Objectives stipulate that the Forest Service will "provide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist." (Also see BLM Manual 6340 1.6.C.21) P.L. 114-46 Section 102(g) acknowledges state jurisdiction of management of fish and wildlife; however, baseline natural processes are not determined by human influences, such as seasons, harvest limits, etc.
IDFG-11	**Miscellaneous Comments** **<u>Endemic Species:</u>** The WMP (p. 3) uses the word endemic to refer to Wood River Sculpin. It also refers to "rare endemic species" on p. 4. IDFG is unaware of any wildlife species endemic to the wilderness boundaries. Where endemic species are referenced, it would help to define the scale of endemism (e.g., endemic to Idaho, endemic to a watershed, etc.).	There are sensitive plant species that are endemic to the White Clouds (*Astragalus vexilliflexus* var. *nubilus* - White Cloud milkvetch) and Wood River sculpin is endemic to the Big Wood River watershed. Wood river sculpin are endemic to the Big Wood river drainage.
IDFG-12	**<u>Soil, Water, Riparian and Aquatic Resources (WMP p. 14):</u>** The WMP should identify wildfire as a source of localized, accelerated soil, sediment, riparian and aquatic resource impact. The WMP should recognize that post-fire management actions may be needed for protection of fish and wildlife resources,	In accordance with the Wilderness Act, which states in Section 2(c), "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man,…"

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	particularly protection and recovery of ESA-listed fish, within the Wilderness.	This direction is also in accordance with agency wilderness policy. For example, BLM Manual 6340 1.6.C.15 states " When possible, management activities should emphasize enhancement of wilderness character over time. Natural processes should always be favored to restore disturbed areas in order to maintain the Untrammeled, Natural, and Undeveloped qualities of wilderness character, as well as outstanding opportunities for Solitude or Primitive and Unconfined Recreation. However, in some cases, restoration management activities may be needed to restore streams, watersheds, vegetation and to preserve or enhance the area's wilderness character, despite the impacts of such activities on the Untrammeled quality of wilderness character." (also see FSM 2320.2, 2320.3, 2323.26b, 2320.5) The Wilderness Act also states that wilderness is to be "… protected and managed so as to preserve its natural conditions…"
IDFG-13	**Bull Trout (WMP p. 15):** Replace "A strong local population of bull trout exists within the upper Warm Springs Creek watershed." with "Migratory and resident bull trout use Warm Springs Creek, the East Fork Salmon River, and their tributaries for spawning and rearing."	The IDT agrees and has revised the Plan accordingly.
IDFG-14	**Alpine Lakes (WMP p. 15):** The assertion that native fish and amphibian population are at risk from the presence of non-native fish species should either be validated with definitive information or removed. Amphibians, native fish, and natural fauna are all considered as part of IDFG's alpine lakes management plan.	Many of the lakes which have been stocked prior to the HBWC wilderness designation were likely fishless. Several studies have found that that the presence of fish stocked in high mountain lakes can have effects on certain life histories of amphibians depending the lakes habitat characteristics. *Refer to:* Bradford, David. 1989 *Allotopic Distribution of Native Frogs and Introduced Fishes in High Sierra Nevada Lakes of California: Implication of the Negative Effect of Fish Introductions*

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		and Pilliod, David and Peterson, Charles 2000. *Local and Landscape Effects of Introduced Trout on Amphibians in Historically Fishless Watersheds*
IDFG-15	**Lynx (WMP p.16):** Based on IDFG's information, the HBWC does not support lynx.	The Sawtooth Forest mapped lynx habitat shortly after ESA-listing and consulted with US Fish and Wildlife Service on the map. Therefore portions of the wilderness areas are considered lynx habitat by the Forest Service and US Fish and Wildlife Service. Additionally See EA, page 98: "There is one Idaho Natural Heritage database record of lynx within the White Clouds Wilderness area observed in the 1960's and three records within a mile of the wilderness areas also reported from the 1960's. The most recently confirmed sightings of lynx tracks in the Sawtooth NRA occurred during the winter of 1997 near the Fishhook Creek drainage, approximately eight air miles from the wilderness areas."
IDFG-16	**State Wildlife Action Plan (WMP p. 17):** The WMP cited information from an outdated document. The 2017 State Wildlife Action Plan reflects that the HBWC contains nine (9) habitat targets and four (4) taxa targets identified in the Challis Volcanics/Idaho Batholith sections of SWAP. Habitat targets are: • Dry Lower Montane–Foothill Forest • Subalpine–High Montane Conifer Forest • Aspen Forest & Woodland • Lower Montane–Foothill Grassland & Shrubland • Sagebrush Steppe • Alpine & High Montane Scrub, Grassland & Barrens • Riverine–Riparian Forest & Shrubland	This paragraph in the WMP cites the 2017 document. It also highlights the target habitats and species with the most acreage in the wilderness areas. The list provided is not intended to be an exhaustive list of all habitats or species.

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	• Springs & Groundwater- Dependent Wetlands • Lakes, Ponds & Reservoirs Taxa are: • Bat assemblage • Wolverine • Bighorn Sheep • Pollinators • Mountain Goat	
IDFG-18	**Goal 2145, Objective 2146, WMP p. 29:** This objective references documents that IDFG believes are sufficient and appropriate for addressing invasive/noxious plant species. IDFG offers that control of noxious weeds and invasive species is a key aspect of USFS and BLM's management of wildlife and fish habitat vital to fish and wildlife resources and wilderness character. However, we are concerned that the goal is not sufficiently focused on minimizing the impacts of invasive/noxious plant species. To significantly slow extensive degradation of the landscape and habitat by invasive plants, we emphasize that a prescription for non-motorized, non-mechanized mans should not be cast as the primary method of control unless the prescription is limited to a small area. Given the significance of degradation from this source, the goal should allow flexibility for treatment methods involving otherwise prohibited uses if they are necessary.	Invasive species treatments are not within the scope of the Wilderness Management Plant and are analyzed in the Boise and Sawtooth Forest-wide Invasive Plant Species Treatments Draft Environmental Impact Statement (USDA Forest Service 2016). WMP EA pg. 127 Invasive species treatments within the Wilderness would undergo Minimum Requirement Analysis to determine the minimum necessary treatment of invasive species. WMP EA pg. 9
IDFG-19	**Objectives WROB02 (WMP p. 23 Table 3), 2150 (WMP p. 29) and 2151 and Standard 2153 (WMP p. 30):** These items should be revised to be consistent with the IDFG Fisheries Management Plan regarding fish stocking. Because IDFG's 2013-2018 Fish Management Plan specifically states: "Management of alpine lakes in wilderness and national recreation areas will be coordinated closely with the appropriate land management agencies", we see no need for any reference to	AFWA policy does not refer to recreational opportunity. Fish stocking may be conducted by the State agency in coordination with the Federal administering agency to perpetuate or recover a threatened or endangered species, or to reestablish or maintain indigenous fish species. Any species of fish introduced for management purposes prior to wilderness designation may be managed as indigenous fish species if the species is likely to survive. State agencies may continue to

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	jointly developing management agreements with IDFG in Objective WROB02. Regarding Objective 2150, IDFG unequivocally expects any species of fish introduced for management purposes prior to wilderness designation may be managed as an indigenous fish species if the species is likely to survive. We suggest revision of Objective 2150 to be consistent with IDFG's Plan, as the lead agency for fish population management in alpine lakes, to read: *Fish stocking may be conducted by the IDFG in coordination with federal land management agencies to provide recreational opportunity, to perpetuate or recover a threatened or endangered species, to reestablish or maintain indigenous fish species, or to remove unwanted species. IDFG may continue to stock lakes traditionally stocked prior to wilderness designation. IDFG will manage for suitable fishless habitat to ensure the long-term persistence of native aquatic fauna; lakes and streams currently without fish may be considered for stocking if there is agreement with the land management agency that no appreciable loss of scientific values or adverse effect to wilderness resources will occur*. Regarding Objective 2151 and Standard 2153, IDFG often uses non-native fish species to control other non-natives and will continue to use this as a management tool to control, manage, and /or enhance native or desirable fish populations, pursuant to our previously noted management coordination with the federal land managers for alpine lakes in wilderness. We previously addressed the reference to MRA.	stock those waters traditionally stocked prior to wilderness designation. State and Federal agencies should carefully evaluate stocking those waters that consistently require supplementation for reasons other than angler-induced mortality. Selected species for stocking will be determined by the State agency in close cooperation and coordination with the Federal land management agency**.** In order of preference for stocking fish species is (a) Federal threatened or endangered species, and (b) indigenous species**.** Numbers and size of fish and time of stocking will be determined by the State in coordination with Federal agencies.
IDFG-20	**Objective 2152 (WMP p. 30):** Our interpretation is that this standard does not encompass use of dogs for hunting, which is covered by IDFG regulation.	This standard applies to anyone with dogs near bighorn sheep. The intent is to minimize contact so if hunting dogs are harassing bighorn sheep this standard would apply and is consistent with state code on domestic animals (i.e. pets) harassing wildlife. Also see response to GG-05.

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IDFG-21	**General discussion of Bighorn Sheep, Section 7.9:** It is unclear from the WMP and accompanying environmental analysis how the herd home range was developed and whether the most current data was incorporated into the analysis. IDFG requests opportunity to work with the USFS on the bighorn sheep analysis. Further, it is unclear why this section does not include a discussion of measures to maintain domestic sheep/goat and bighorn sheep separation.	Sawtooth NRA received 2016 telemetry locations and the home range area from Salmon Region IDFG (telemetry data from Shallow and home range from Painter) which were used to develop the pack goat exclusion area. This section does include separation measures – standard 2155 on page 30.
IDFG-22	**Standard 2155 (WMP p. 30)**: If this remains a standard, it should be revised from "enforce" to "require" to protect enforcement discretion. Guidelines for pack goats and other pack animals should be refined based on recommendation of the wild sheep working group (2012) and the British Colombia risk assessment (2017) to reduce bighorn sheep disease risks.	In Standard 2155 language was change from enforce to require. These sources were used in developing the guidelines along with recommendations from the North American Packgoat Association.
IDFG-23	**Standard 2174 (WMP p. 34)**: This standard should be deleted; hunting, trapping, and angling are allowed subject to regulations of federal and state wildlife management agencies. Federal wilderness motorized and mechanized restrictions apply to all recreational users, not just hunters and trappers.	In short, law and policy require activities in wilderness to be of a non-commercial nature, and access may only be through non-mechanized and non-motorized means, including hunting, trapping and collecting. The Wilderness Act (Section 4c) prohibits certain uses: "…there shall be no commercial enterprise" and "…no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport…" Trapping and hunting are generally allowed on FS and BLM administered land, absent specific statutory language to restrict or limit. As noted on p. 7 of the WMP, P.L. 114-46 Section 1029(g) states: "Nothing in this title affects the jurisdiction of the State of Idaho with respect to the management of fish and wildlife on public land in the State, including the regulation of hunting, fishing, and trapping within the wilderness areas."

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		Given that this is already covered by law and policy, this language will be removed from the standard (2174) but retained in the plan.
IDFG-24	**Standard 2178 (WMP p. 34)**: IDFG objects to the removal of trails from inventory without analysis as to the impacts of the recreational and administrative access that these trails provide. This analysis is particularly important in light of concerns of needs for aircraft and motorized use for management purposes and in light of proposed standard 2122 (WMP p. 26) to consider management action if "user-developed" routes exceed 3%. Our view is that sufficient trail maintenance and utilizing existing inventory are measures to substantially forestall new user-developed routes. The desired Condition for trails and maintenance should include management of trails and routes to provide administrative access and for use and enjoyment of the wilderness *(emphasis added)*. In addition, there should be a clearer objective, including a schedule, for trail maintenance. Trails are important for both recreation and administrative use.	The federal agencies are mandated to preserve wilderness character in Section 2(a) of the Wilderness Act. Every wilderness is unique in terms of the resources and has conditions that prevail at the time of designation. The combination of the qualities of wilderness character that exist at the time of designation are also unique to each wilderness; however it is this benchmark – the status at the time of designation – against which the mandate to preserve wilderness character is typically measured. Updating the trail inventory to be consistent with the on-the-ground conditions that were present at the time of designation is a component of ensuring preservation moving forward. The trails proposed to be dropped are minimally developed and currently unmaintained. Their presence on the ground is intermittent if they exist at all. Trail #7684 connects to #7047 but has no outlet as it terminates at private land. No physical changes would occur on the ground. Visitor would not be prevented from using these areas. However, the trails would not be presented on maps, nor would they be maintained by the FS. These administrative changes to the trail inventory would reflect on the ground conditions. Statement in the comment "…in light of concerns of needs for aircraft and motorized use for management purposes…" is unclear. Ground-truthing existing travel routes is on-going, and will be part of the baseline inventory of trails to inform standard 2122. NFS trail 674—Above O'Caulkins Lake to Warm Springs Creek was no longer maintained per the East Fork Salmon River Bighorn Sheep Management Plan (April 1977) to "discourage backcountry recreational use in key summer range areas for

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		bighorn sheep." Revision to the inventory for this trail is to align with the previous recommendation in the bighorn sheep management plan. Note: For Trail 674, the mileage stated incorrectly referenced the full length of the trail from Slate Creek road to Warm Springs Trail (671). Correct mileage above O'Caulkins Lake to Warm Springs is 3.9 miles.
IDFG-25	**Standard 21114 (WMP p. 41):** IDFG recommends consideration of Paige, C. (2012) A Landowner's Guide to Wildlife Friendly Fences for examples. Second Edition. Private Land Technical Assistance Program, Montana Fish, Wildlife & Parks, Helena, MT.	The Sawtooth NRA has that document along with many other sources for wildlife passable fence design standards.
IDFG-27	**Objectives 21119, 21120, and Standard 21121(WMP pp. 41-42):** Objective 21119 – Add "and would minimize impacts to bats and other wildlife which may occur at mine sites" to the end of the 2nd sentence. Objective 21120 – Add "while ensuring the protection of bats and other wildlife which may occur at the site" to the end of the sentence. Standard 21121 – Add to the end of the first sentence: "while minimizing impacts such as disturbance, injury, mortality, or entombment of bats potentially occupying mines."	The ID Team proposes to expand objective 21118 to encompass state and federal wildlife requirements without being overly specific to one species. The IDT supports revision of Objective 21118 – *"Where valid existing rights occur, provide direction for managing mineral activities in wilderness in accordance with agency directives and regulations and with consideration of all applicable state and federal requirements."*
IDFG-28	**Glossary Definitions (as incorporated by reference from the EA)** Commercial Enterprise: The definition of these terms should be deleted as unduly expanding the traditional, common sense use of the term. Such expansion should not occur by virtue of a glossary definition given its legal consequence. For example, defining "commercial enterprise" to include any use or activity undertaken for promotion of an individual regardless of whether the use or activity is intended to produce a profit could foreclose many common forms of social media. The definition should also	The definition for commercial enterprise is taken from BLM Manual 6340 1.6.B. and the Glossary of Terms. The following definition will be added to the glossary from FSH 2709.14, section 53.1e - Commercial Use or Activity. Any use or activity on National Forest System lands: 1. Where an entry or participation fee is charged, or 2. Where the primary purpose is the sale of a good or service and, in either case, regardless of whether the use or activity is

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	delete the reference to "any use or activity where an entry or participation fee is charged."	intended to produce a profit (36 CFR 251.51).
IDFG-29	Developments, Structures, or Installations: The definition of these terms should be deleted as unduly expanding the traditional, common sense use of the term. Expanding common sense interpretation (e.g., the Glossary's inclusion of trail as an "installation") should not occur by virtue of a glossary definition given its legal consequence.	The definition for developments, structures, and installations is taken from BLM Manual 6340 definitions for Installations, and Structures. FSM 2320.5, provides definitions for the terms permanent improvement and temporary improvement. The glossary will be clarified for the definition of Developments (FSM defines permanent improvement, temporary structure). Also see response to comment IOGA-44.
IDFG-30	Dispersed Campsites: The definition includes a statement that "campers are generally directed or permitted to camp only" in designated campsites. This reference should be deleted given the rest of the WMP's direction to restrict designated campsites.	No reference in the WMP or EA to designated campsites. The last sentence of the definition has been deleted.
IDFG-31	IDFG has appreciated the opportunity to attend meetings associated with the HBWC wilderness planning. Please contact Gary Vecellio (gary.vecellio@idfg.idaho.gov, 208-535-8021) or Mike McDonald (mike.mcdonald@idfg.idaho.gov, 208-324-4359) with questions or requests for information related to this correspondence.	Mr. Vecellio is included on our list of interested parties and will continue to receive the communications that all interested parties receive.
IDFG-32	**Existing Species Management Plans for Idaho** Idaho manages fish and wildlife consistent with Fish and Game Commission-approved species management plans, including the HBWC WMP-referenced Idaho State Wildlife Action Plan. Each of the following provides direction for species management within the new wildernesses, just as prior to wilderness designation. The HWBC WMP should recognize species management objectives detailed in the following Commission-approved plans: • Fisheries Management Plan 2013-2018	The agencies acknowledge and use these plans. Listing all of these plans individually in the WMP is not necessary, as specialists reference them as needed. Further, referencing a specific plan would result in using an outdated plan as these documents are revised. Paragraph in Section 6.9 was revised to reference these plans in a general manner.

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	https://idfg.idaho.gov/old-web/docs/fish/planFisheries.pdf • Conservation Plan for the Greater Sage-grouse in Idaho 2006 https://idfg.idaho.gov/old-web/docs/wildlife/sageGrouse/conservPlan.pdf • Executive Order No. 2015-04, Idaho's Sage-grouse Management Plan 2015 https://gov.idaho.gov/mediacenter/execorders/eo15/EO%202015-04%20Sage-Grouse%20pdf.pdf • Idaho Governor's Greater Sage-Grouse Conservation Strategy 2015 https://species.idaho.gov/pdf/Idaho%20Sage%20Grouse%20Conservation%20Planning%20Update%20-May%202015.pdf • Mule Deer Management Plan 2008-2017 https://idfg.idaho.gov/old-web/docs/wildlife/planMuleDeer.pdf • White-tailed Deer Management Plan 2005-2014 https://idfg.idaho.gov/old-web/docs/wildlife/planWhiteTailDeer.pdf • Elk Management Plan 2014-2024 https://idfg.idaho.gov/old-web/docs/wildlife/planElk.pdf • Pronghorn Management Plan 1991-1995 Copy available on request • Bighorn Sheep Management Plan 2010	

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	https://idfg.idaho.gov/old-web/docs/wildlife/planBighorn.pdf • Mountain Goat Management Plan 1991-1995 Copy available on request • Management Plan for the Conservation of Wolverines in Idaho 2014-2018 https://idfg.idaho.gov/old-web/docs/wildlife/planWolverine.pdf • Black Bear Management Plan 1999-2010 https://idfg.idaho.gov/old-web/docs/wildlife/planBlackBear.pdf • Mountain Lion Management Plan 2002-2010 https://idfg.idaho.gov/old-web/docs/wildlife/planMtnLion.pdf • Idaho Wolf Conservation and Management Plan 2002 https://idfg.idaho.gov/old-web/docs/wolves/plan02.pdf	
IOGA-01	IOGA is concerned that the BLM and the USFS take the appropriate amount of time needed to finalize Wilderness Management Plans (WMP) going forward. No place in these draft WMP's or within the Public Law 114-46 is there identified any direct or indirect consequences, penalties or repercussions to the responsible Federal Agencies (USFS and BLM) should these wilderness plans take more than three years to reach the approval stage. There are no penalties or punishments for taking longer than three years to fully vet these plans and EA's so that the needs of all users and the conditions of the resource are considered properly. The Forest Service and the BLM should take ample and sufficient time in which to prepare and finalize	See response to WCO-04.

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	these Wilderness Management Plans so that all affected parties and involved publics can live with them it for years to come. These Plans, once approved, will not likely see significant changes for many years and the introduction confirms this point.	
IOGA-02	The Forest Service and the BLM are trying to accomplish these important tasks without allowing adequate for the public to digest what has been prepared by your specialists over the past six-plus months. The federal agencies need to publicly recognize that August of 2018 is unrealistic. Contact with Congressman Simpson needs to be made in order express your commitment to "do this right" and let him know that the process will require additional time. This is a valid request since the agencies have not offered to "re-open" the comment period for the HB-WC or the JPJM draft WMPs and EAs as per a number of formal requests you have received including IOGAs.	See response to WCO-04.
IOGA-03	Of particular concern to IOGA is the depiction, and apparently attendant agency lack of understanding of outfitter operations in designated wilderness as expressed on page 41of HB and WC EA, *Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation*, which reads as follows: The Wilderness Act states in Section 2(c) that wilderness has, "outstanding opportunities for solitude or a primitive and unconfined type of recreation." *Keeping it Wild 2* describes primitive recreation as follows (Landres et al. 2015, pp. 55–56): *Primitive recreation requires self-reliance, as well as travel that is unassisted by mechanical or motorized equipment. Many different types of structures, installations, and developments are constructed to facilitate access or use of the*	The reference to "comfort" facilities is only one example of what impairs opportunities for self-reliant recreation as presented in this quoted portion of Keeping it Wild 2. It was quoted in the plan as a method for organizing information on the effects of proposed actions. This portion of the quote was deleted from the EA.

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	wilderness, to improve visitor safety, or to protect other wilderness resources from visitors. Facilities designed for these reasons are categorized as recreational in this monitoring strategy and occur in many wildernesses. Examples are: system trails, trail signs, bridges, stock tie facilities…and the "comfort" facilities provided by outfitters and guides for their clients. Wilderness protection provides the visitor an opportunity to experience unconfined recreation in undeveloped, primeval, and natural conditions. In an ideal world, these conditions would coalesce. Unfortunately, recreation leaves a footprint, or impact, on wilderness lands. IOGA submits that this depiction of outfitter operations in wilderness as "comfort" facilities is an inaccurate value judgment by the authors of Landres et al. This depiction demonstrates a lack of understanding of the role outfitters and guides as identified by Idaho statute, Idaho Code, Title 36, Chapter 21, 36-2101, Declaration of Policy, which in part reads, "…..explicit purpose of safeguarding the health, safety, welfare and freedom from injury or danger of such persons…." that utilize outfitter and guide services. Why is this "comfort" citation focused on only outfitted users of wilderness? For instance, why would not a tent or manmade shelter of any kind or a down sleeping bag by any wilderness user be considered a "comfort" facility? The fact is that these so-called "comfort" facilities such as tents and sleeping bags are utilized by nearly all wilderness recreation users. Get rid of	

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	"…and the "comfort" facilities provided by outfitters and guides for their clients."	
IOGA-04	Another example of the mischaracterization of outfitter services in wilderness that is cited in Landres et al, Keeping it Wild 2, can be found on page 54 of that document under the section entitled, *Indicator: Remoteness from sights and sounds of human activity inside wilderness*, which reads in part, "Similarly, trash and debris from hunting and outfitting camps can negate the feeling of being remote." Why are trash from hunting and outfitting camps singled out and not other user's trash? IOGA's overall point is that Landres Keeping it Wild 2 is biased toward uses such as hunting, outfitter camps and operations. This depiction by Landres does not reflect current wilderness management of the HB-WC Wilderness, or current administration of outfitter special use permits. Outfitters operating in these areas both before and after designation have been blessed with agency management and permit administration that has been fair and have demonstrated a good understanding of outfitter operations that care for the resource and outfitted clients. IOGA recommends that this description of primitive recreation attributed to Landres et al on page 41 in the draft WMP be stricken and replaced with something more generic that describes "outstanding opportunities for solitude or a primitive and unconfined type of recreation" that does not attempt to describe "comfort" facilities.	The quoted portion provides example of what impairs opportunities for solitude. Neither the Wilderness Plan nor the EA identify trash at outfitter camps as an issue. Wilderness character monitoring does not determine the significance of effects or replace agency decision processes. See response to IOGA-03, IOGA-19, regarding the "comfort" quote.
IOGA-05	It is particularly evident in the HB and WC Wilderness Management Plan and Environmental Assessment a certain tone that does not accurately represent outfitter and guide operations in wilderness. Specific terminology and citations in these documents send the clear message that there is conjecture,	Subsequent comments provide more detail. See responses to remaining IOGA comments.

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	strong convictions, sentiments and inferences that do not reflect the outfitter and guide role in maintaining wilderness character, which is not defined in The Wilderness Act of 1964.	
IOGA-06	IOGA comment continues with the HB-WC Wilderness Management Plan and Environmental Assessment. **Page 7, Section 5 (of the HB and WC WMP). Issues Resolved by Policy** **Include outfitting and guiding** – Statute, Policy and Rules regarding Outfitters and Guides are created and enforced by the Idaho Outfitters and Guides Licensing Board (IOGLB). Please see the recently renewed MOU between Regions 1, 4, and 6 of the USFS, the Idaho State BLM office and the IOGLB that specifies in outline form how the federal agencies and IOGLB work together to coordinate federal agency outfitter and guide special use permitting and state licensure. <u>Add</u> IOGLB to **References and Acronyms and Abbreviations** in the HB and WC WMP on page i and refer to IOGLB elsewhere for continuity in the EA and the JMJP WMP and EA. Neither WMP includes reference to Idaho Statute Title 36, Chapter 31, Section 2101 Declaration of Policy and IDAPA 25 – Rules of the Idaho Outfitters and Guides Licensing Board. 001.03. Under Adequate Protection and Enhancement is the role of the State of Idaho and its requirement for all licensed outfitters to "protect the health, safety and welfare of the public." Neither EA mention the role of the IOGLB as the State entity with the responsibility for licensure of qualified outfitters and guides on public lands and waters in Idaho. Such requirements and obligations associated with outfitter and guide licensure are set forth in Idaho Statute and Rule.	This text was added into the MA Description section (Section 6.10): The agencies acknowledge the MOU between Regions 1, 4, and 6 of the USFS, the Idaho State BLM office and the IOGLB. Agencies will work with the Licensing Board to manage commercial services within the wilderness, such as when undertaking the needs assessment through the land use plans. IOGLB was added to Acronyms. The MOU was added to the References section. The MOU and State Statues are used for administering outfitter and guide permits. They are not specific to the management of the wilderness.

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IOGA-07	**Page 8. Special Uses (of the HB and WC WMP)** reads: Section 4(d)(6) of the Wilderness Act states that commercial services, such as outfitter and guides and/or pack stock rentals, are allowed "to the extent necessary for activities which are proper for realizing the recreational or other purposes of the areas." This restriction is reiterated in the enabling legislation, Section 102(f). Commercial services are further guided by the Federal Lands Recreation Enhancement Act and agency-specific policy and guidance (FSM 2709.14, BLM Manual 2930, H-2930-1) in addition to direction specific to wilderness. 1) Replace the word "restriction" with "recognition". It is not a "restriction" which allows commercial outfitting services in Wilderness, it is *recognition* of activities allowed in Wilderness which meet the public purpose and are proper. 2) Also, the specific law which authorizes Outfitter/Guide Special Use Permits on public lands and waters, in wilderness and non-wilderness for any activity, may be changing while these WMP's and EA's are being finalized. Please include language which allows for future or other Acts of Congress as they are approved relative to outfitter authorization (current example is the Guide and Outfitter, "GO" Act, which has passed the House of Representatives and is likely to be included through a bipartisan reconciliation efforts by the end of 2017 or early 2018). Thus, it is likely that a new federal will become the new "authority" under which outfitter and guide commercial services will be authorized. Thus, the Federal Lands Recreation Enhancement Act will be amended regarding the authorization authority by which BLM	1) Agreed, p. 8 of the Plan is revised to replace "restriction" with recognition. 2) The agencies will follow current laws.

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	and the USFS permit outfitters. For more information, contact America Outdoors Association or the WO of the FS.	
IOGA-08	**Pages 9 and 10, 6.2. Wilderness Character (of the HB and WC WMP)** reads in part: **Outstanding opportunities for solitude or a primitive and unconfined recreation**—These wilderness areas provide outstanding opportunities for solitude and primitive, unconfined recreation. The varying topography of the wildernesses and relatively few trails provide excellent opportunities for solitude. In addition, a range of recreational experiences can be found within the wildernesses, including short day hikes, plentiful backpacking options, multi-day pack trips, or off-trail scrambles allowing for exploration and discovery. Visitor use restrictions have been in place within these two areas since 1996, reducing the perception of unconfined recreation. Also, within the wildernesses are recreation-related facilities, such as bridges, trails, tent base logs, meat poles, and stock tie facilities. This paragraph needs serious revision. IOGA recommends the following: <u>Outstanding opportunities for solitude or a primitive and unconfined recreation</u>—These wilderness areas provide ~~outstanding~~ opportunities for solitude and primitive, unconfined recreation. The varying topography of the wildernesses and relatively few trails provide ~~excellent~~ opportunities for solitude. ~~In addition,~~ A range of recreational *opportunities within the wildernesses* include *but are not limited to* ~~found within the wildernesses, including~~ short day hikes, ~~plentiful~~ backpacking *trips* ~~options~~, multi-day *hunting and* pack	The structure for organizing the affected environment for the wilderness resource is taken from Landres et al., 2015 as noted in the comment. This is the most current guidance for the agencies to follow to describe wilderness character, and to provide consistency in doing so across the National Wilderness Preservation System. Visitor use restrictions impact unconfined recreational opportunities. Recreational facilities are organized under this quality as facilities that decrease self-reliant recreation, therefore impacting opportunities for primitive and unconfined recreation.

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	trips, or off-trail scrambles. ~~allowing for exploration and discovery. Visitor use restrictions have been in place within these two areas since 1996, reducing the perception of unconfined recreation. Also, within the wildernesses are recreation-related facilities, such as bridges, trails, tent base logs, meat poles, and stock tie facilities.~~ The last sentence in this paragraph has absolutely nothing to do with "reducing opportunities for solitude." The authors are making assumptions that the reader or visitor would not have a wilderness experience by encountering historic facilities thereby affecting their personal opportunities for solitude. Signs of past human occupation are part of the HB-WC Wilderness landscape. Congressman Simpson found them insufficient to deter his legislation creating this new Wilderness. How does Landres et al know how a visitor feels when they encounter so-called recreation related facilities? The monitoring listed in Keeping It Wild 2 are not the only sources of opinions to be included. Apparently, some agency persons feel these features degrade their wilderness experience to a higher percentage than that of the general public. However, this is not a widely held perception by the general public. Just because Landres et al believes the visitor experience is reduced, that is only their perception based on personal biases, convictions and emotion, and is not a view commonly held by HB-WC wilderness visitors. The Landres authors should embrace Wilderness as the public's land and the public's right to use it. Yes, stewardship should be encouraged and promoted, but people's use of Wilderness is considered in The Wilderness Act and human presence is an obvious part of the history of the Hemmingway-Boulders and White Clouds Wilderness. (See removal of the word "ENHANCE" as this term further enables future managers to expand management	

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	strategies all in the name of enhancement of opportunities for solitude.)	
IOGA-09	**Page 16, 6.9. Wildlife Resources (of the HB and WC WMP)** WMP fails to reference all important wildlife species present in both shrub and forest lands found in these Wildernesses. The presence of the state's largest ungulate species is not mentioned or analyzed. Shiras Moose is entirely ignored in the opening statements. Mountain lion and black bear are only casually mentioned under the discussion of birds. IOGA encourages the Plan's authors consult with the IDFG. Contact the Department for information on population distribution of ungulates, fur bearers, small game and predators found in Central Idaho including the BH-WC Wilderness. This discussion falls short of what currently inhabits this landscape and managed by the IDFG based on approved unit/zone management objectives.	The EA does not address many wildlife species that occur in the wilderness areas. That list is very long, so only species with special status including ESA-listed species, BLM or Forest Service sensitive species, state species of greatest conservation need, or species brought up associated with an issue (bighorn sheep) are addressed.
IOGA-10	**Page 18, 6.10 Recreational Resources (of the HB and WC WMP)** in part reads: > Due to landscape and topographic features, most recreational use is funneled toward lake basins in sensitive, high-elevation zones. As a result, certain areas receive relatively high and concentrated recreational use; predominantly at Boorn Lakes, Chamberlain Lakes, Boulder Chain Lakes, and Big Boulder basin in the White Clouds Wilderness. This use has resulted in soil compaction, fire-scarred rock, loss of and damage to vegetation and ground cover, and increased erosion. The WMP needs to point out that these areas listed are also very popular and heavily used by large non-commercial, non-profit, organized groups during the months of July and August. A	The EA considers both the social and physical effects of large groups on wilderness in numerous places throughout the document, including the interpretive and educational benefit of permitting groups. The EA does not however differentiate between commercial, non-commercial, non-profit, or organized groups. It also does not describe impacts of groups by season of use. These were not considered to be factors in how group size affects ecological resources. Supports the Alt A and B guideline for education and interpretation specific to groups: *Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations*.

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	discussion of large organized group use and impacts primarily in the summer months is inadequate. There needs to be a mandatory permit system specific to large group users and Wilderness ethic education by agency personnel in advance of trips. Large organized groups are a formidable user of this Wilderness and they have not been adequately addressed in this Plan or the EA.	Supports the Alt. B, standard that would require a permit for groups of 8 or more people or with recreational stock that will remain overnight.
IOGA-11	**Page 18, 6.10 Recreational Resources, paragraph 5, last sentence (of the HB and WC WMP)** reads: Signs are placed at trail junctions and to identify stock tie areas. The authors should also identify in the EA that cameras or electronic counters have also been attached to signage at trail junctions which are not readily noticeable, apparently for the purpose of monitoring current compliance or activity. Please explain what these devices are used for and how this information is currently being used and into the future regarding Wilderness management.	Infrared counters were installed near the boundary in some locations following designation. All of which were located outside wilderness. Counters are occasionally used to collect use data at trails and recreation sites. This occurs at a minimum every 5 years on NFS lands in conjunction with the National Visitor Use Monitoring protocol. The agencies will continue to use vehicle counters and break-beam or infrared counters on trails, at trailheads and other areas outside wilderness to gain information about visitor use. The information collected is helpful in understanding the amount of use on a trail and/or in the general area. Other forms of data collection may be used to track user data so long as it complies with agency policy.
IOGA-12	**Page 19, 6.10 Recreational Resources, the paragraph that begins with "Seven Outfitters…" (of the HB and WC WMP)** reads: Seven outfitters operate under special use permits in the White Clouds Wilderness that provide a diversity of recreation opportunities that include hiking, mountain climbing, backcountry skiing, summer pack trips, hunting, and fishing opportunities. Of these, three also operate in the Hemingway-Boulders Wilderness. Two assigned outfitter campsites are located in the White Clouds Wilderness and one is in the Hemingway-	The term temporary in reference to outfitting and guiding, comes from policy, FSH 2709.14, section 53.1e. The following terminology was added to the Glossary. Temporary Use. Short-term, non-renewable outfitting and guiding use that is authorized in increments of 50 service days, up to a maximum of 200 service days in a 180-day period. Temporary Use Pool. A pool of service days or quotas in a use area that are reserved for short-term, non-recurring, seasonal distribution during an open season to qualified applicants who do not hold a priority use permit in that use area, and thereafter

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	Boulders Wilderness. These sites have some development, including tent and stock structures. Temporary outfitting and guiding occurs in these areas with types and amount of use varying from year to year. The word "Temporary" should be replaced with "Seasonal". The word "Temporary" insinuates these businesses operate on a temporary authorization and that is not the case. There are 5 outfitters (This number needs correction as it is 5 outfitters) who need to be referred to as holders of "Term Permits" or "Priority Use Authorizations". The word temporary sends a wrong message to any future manager of this resource. If the season of use is what the authors are referring to, then use the word "seasonal" instead. The specific season of use depends on each individual outfitting business's authorization/operating plan.	may be distributed to all qualified applicants on a first-come, first-served basis. Priority Use. Authorization of use for up to 10-years, based on the holder's past use and performance and applicable programmatic or project decisions to allocate use. Except as provided in 36 CFR Part 251, Subpart E, authorizations providing for priority use are subject to renewal (sec. 53.1m). Change the paragraph in both the EA and WMP to read: Six outfitters hold priority use permits for operations in the wilderness areas. Five are administered by the Sawtooth NRA, and one by the Challis Field Office. Of these six, five are authorized use in the White Clouds Wilderness, and three in the Hemingway-Boulders Wilderness. They offer guided hiking, mountain climbing, skiing, horse packing, hunting, and fishing opportunities. Two assigned outfitter campsites are authorized in the White Clouds Wilderness and one in the Hemingway-Boulders Wilderness. These sites have some development, including tent and stock structures. Temporary use outfitting and guiding also occurs within the wilderness areas. The type and amount of temporary outfitter and guide use has varied from year to year.
IOGA-13	**Page 22, 6.16.3 Desired Condition (of the HB and WC WMP)** The mandate from the Wilderness Act for each agency is to preserve wilderness character. The Act does not include direction to "Create" specific Wilderness characteristics where they did not exist upon designation by Congress. See that you include in your discourse not only what The Wilderness Act does and speaks to but, also what The Wilderness Act does NOT do or require. To preserve	The proposed management actions and alternatives are analyzed relative to the planning area, i.e. wilderness, and the responsibility the agencies have to protect and preserve wilderness character as required by the Wilderness Act, the enabling legislation, and policy. Evaluation of the Wilderness Act and what it "does not do or require", is outside the scope of this analysis. Also see response to comment CCC-12.

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	existing Wilderness attributes is clearly required by the Act but, to create and develop Wilderness attributes which did not exist upon Congressional approval is manipulation of existing conditions.	
IOGA-14	**Page 24, 7.0 Proposed Action** 1st paragraph, last sentence. The intent of the management direction is to protect, perpetuate and ~~enhance~~ maintain wilderness character. These are maintenance responsibilities. Nowhere in the Act are managers required to "ENHANCE" wilderness' character. To enhance existing characteristics is an over-reach of Wilderness intent and management objectives. This was not a requirement of Congressional designation and insinuates the agency's desire to manipulate and change the existing qualifying lands and waters from their current and accepted conditions into something which represents someone's opinion, personal impression, belief or conviction.	See response to comment CCC-12.
IOGA-15	**Page 25, 7.1 Wilderness (of the HB and WC WMP) Goal 2103** reads: 2103 Protect and enhance wilderness character. Change Wilderness Management Goal 2103 to read "Protect and Preserve Wilderness Character". Delete reference to "enhance or enhancement" whenever and wherever used in this Plan. There is an enormous difference between the words "enhance" and "preserve or maintain." Enhancement of this Wilderness was never addressed, included or emphasized in the Legislation. To "enhance" the Wilderness gives undo power and authority to the Authorizing officer. The federal agencies would have the ability	See response to comment CCC-12.

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	to do and approve just about anything they wanted, all in the name of "enhancement" of the resource. This is an error and an over reach of power which the public may be unaware. Also, to "enhance" the Wilderness would indicate purposeful change which runs counter to the essence of the 1964 Wilderness Act. Merriam - Webster's Dictionary definitions are as follows: ***Enhance*** *– To make greater, as in cost, value, attractiveness, etc. To heighten, improve, augment, etc. To increase as in value.* ***Preserve*** *– To keep from harm, damage, danger, evil, etc.; protect or save. To keep up, carry on or maintain.* ***Maintain*** *– To keep or keep up with, carry on. To continue in or with. To keep in a certain condition or position. To keep in existence or continuance; preserve. To uphold or defend. To support by aid, influence or protection* Realizing that this statement is the very first goal for this draft WMP, this overall "umbrella goal" needs to be an accurate and plausible goal which all stakeholders can agree to be true, accurate and correct based on law. To "enhance" what has already been recognized to qualify as Wilderness by Congress certainly suggests a level of change or manipulation which the agencies and the authorizing offficer could initiate, if they so choose.	
IOGA-16	**Page 25, 7.1 Wilderness (of the HB and WC WMP) Goal 2105** reads: 2105 Preserve the untrammeled quality of wilderness character by refraining from the deliberate manipulation or management of the biophysical environment except as necessary to protect or enhance overall wilderness character, to preserve human life, or to accommodate other activities in compliance with applicable laws.	See response to comment CCC-12.

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	Change Wilderness Management Goal 2105 to read as follows: Preserve the untrammeled quality of wilderness character overall to preserve human life or to accommodate other activities in compliance with applicable laws. The use of "enhancement or enhance" allows for all kinds of liberties granted to current and future managers to manipulate current environments, features and special attributes and current authorizations in the HB-WC Wilderness.	
IOGA-17	**Page 25, 7.1 Wilderness (of the HB and WC WMP) Goal 2109** reads: 2109 Preserve and enhance the undeveloped quality of wilderness character by removing nonconforming and/or unnecessary facilities and installations and minimizing human-caused surface disturbances. Change Wilderness Management Goal 2109 to read as follows: Preserve and ~~enhance~~ protect the undeveloped quality of wilderness character. ~~by removing~~ Removal of nonconforming and/or unnecessary facilities and installations will be determined on a case by case basis therefore ~~and~~ minimizing any additional human-caused surface disturbances by conducting a publicly vetted MRA. National Historic Preservation Act protocols will be followed for structures and facilities 50 years and older. Please explain where and what exactly are "non-conforming" and/or "unnecessary facilities and installations". If this is a subjective judgement call and cannot be quantified, then require	For the "enhancement" part of the comment, see response to comment CCC-12. MRA: MRAs with signed decisions/approvals are FOIA-able, and interested parties may request copies through that process. MRAs are considered administrative decisions that are not subject to public engagement or public review. The MRA process is described in the Glossary, and includes a link to the worksheet. The special provisions definition in the glossary states: Legislated exceptions to the 1964 Wilderness Act Section 4(c) prohibitions against commercial enterprise, permanent roads, motor vehicles, motorized equipment, aircraft landing, mechanical transport, structures and installations. Occasionally referred to as "non-conforming uses." As proposed 2019 is consistent with FSM 2323.13g Outfitter and Guide Operations… *Approve only temporary structures and facilities for outfitter and guide operations necessary to properly meet their public service in a manner compatible with the wilderness environment*

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	a site specific analysis of why a feature qualifies as the above and what the qualifiers exactly are by requiring an MRA at the very least. (Are you referring to the historic mining cabin above Baker Lake in the White Clouds or the SNF fence material in the South Fork of the East Fork?) Again replace the word "enhance" with protect as above for the same reasons. Care and consideration including an MRA (Minimum Requirements Analysis) needs to be provided to the public when the Forest or BLM considers removal of non-confirming structures or facilities. What qualifies such a structure to be removed? Who deems them unnecessary? What is the criteria? What is involved in an MRA? Include in such an analysis the exact amount of disturbance which may be caused by demolition and/or removal or destruction. The action of removal needs to be evaluated compared to just letting natural processes occur on their own (which is a primary theme of The Wilderness Act.) A separate and individual analysis should occur prior to the federal government's removal of any site specific structures, features or facilities which existed before designation by Congress. Address why this needs to happen, how this will be done, when it would occur, funded by what means and conducted by whom.	Added the wording "National Historic Preservation Act protocols will be followed." to Wilderness Goal 2109.
IOGA-18	**Page 25, 7.1 Wilderness (of the HB and WC WMP) Standard 2116** reads: 2016 Remove existing structures, developments, and installations unless they are determined to be the minimum necessary for the administration of the area as wilderness, or are: a) Associated with existing rights, b) Authorized range developments; or	The Wilderness Act (Section 4c) prohibits certain uses "…except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act…" To determine if an action meets this legal requirement, agencies undertake a Minimum Requirements Analysis (MRA). MRAs are the accepted methodology for determining if existing structures, developments, and installations are the minimum necessary for the administration of the area as wilderness. An MRA is required by law when a project may involve uses that are prohibited under Section 4(c) of the Wilderness Act. This

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	c) Of significant historical or cultural value as identified by the Forest Archaeologist in consultation with the Idaho State Historic Preservation Officer, following National Historic Preservation Act protocols. Since no methodology is described in this draft WMP to make this determination, we recommend the following: Change Standard 2016 to read: Do not remove existing structures, developments, and installations except when completion of an MRA provides sufficient evidence that they ~~are~~ exceed the minimum necessary for the administration of the area as wilderness, … Change a) to read: Associated with existing rights and permits,… The reason for these corrections is found in Standard 2117 on page 26. In the author's own words, "Use natural processes to maintain ecosystem functions, whenever possible, for restoration activities in the wilderness. Where human activities have altered conditions, active management may be considered if an MRA in conjunction with the Framework for Evaluating Ecological Intervention in Wilderness determines active management to be the minimum necessary for the administration of the area for the purposes of the Wilderness Act."	section specifically prohibits temporary roads, motor vehicles, motorized equipment or motorboats, landing of aircraft, other forms of mechanical transport, and structures or installations. An MRA would be necessary if a project to remove existing structures, developments, and installations were to involve motorized mechanical means, or if the agencies were to consider allowing them to remain. Standard 2115 regarding the use of an MRA would apply to any actions as described above, including those listed in 2116. As proposed 2116 is also consistent with FS policy below: FSM 2320.3 (4). Cease uses and activities and remove existing structures not essential to the administration, protection, or management of wilderness for wilderness purposes or not provided for in the establishing legislation. FSH 2709.14, 53.1c (3), Not authorize any development, improvements, or installations in wilderness areas for the purpose of convenience to the holder or the holder's clients; caches in wilderness areas; and permanent structures, improvements, or installations in wilderness areas unless they are necessary to meet minimum requirements for administration of the area for the purposes of the Wilderness Act (16 U.S.C. 1133c). FSM 2320.5 (7) Temporary Structure. Any structure that is easy to dismantle, that could be removed completely from a site between periods of actual use, and that must be removed at the end of each season of use if the non-use period is greater than 30 days. Portion (a) of 2116 was not revised to include the term permits, as outfitter and guide permitted activities are captured under the portion of the standard that states "…unless they are determined to be the minimum necessary for the administration of the area as wilderness…"

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		Standard 2116 refers to structures, developments and installations. Standard 2117 refers to ecological systems and manipulation of the natural environment.
IOGA-19	As mentioned previously, Landres takes many liberties in providing armchair judgment having to do with wilderness character, which is not defined in The Wilderness Act, relative to outfitter operations without so much as seeking outfitter industry input. The characterizations of hunting camps in relation to "trash" accumulation and "comforts" being provided to outfitted clients is an inappropriate depiction. Where are the sentiments of commercial service providers referenced in the EA; they are not included. How do you intend to monitor the attitudes of outfitters and the outfitted public?	The reference to "comfort" facilities is only one example of what impairs opportunities for self-reliant recreation. Neither the Wilderness Plan nor the EA identify trash at outfitter camps as an identified issue. Wilderness character monitoring does not determine the significance of effects or replace agency decision processes.
IOGA-20	We recommend mention in the EA the J. Copeland Nagle statement from December 2015 article in the International Journal of Wilderness that "in 51 years, not even the Courts have answered that question as to "What is the character of Wilderness?"	The cited article was reviewed and consists of an analysis of the federal agencies' Keeping It Wild 2 (Landres et al. 2015), and the position of wilderness advocates as to proper interpretation of wilderness character. The article concludes by stating "…there are strong arguments for the understandings offered by both the federal agencies and the wilderness advocates, but the judicial deference to an agency's interpretation of a statute suggests that the courts will uphold the understanding of wilderness character that the agencies propose." Which is to say that the strategy encompassed by Keeping It Wild 2 would likely receive judicial deference.
IOGA-21	Where in the EA is any reference to Roderick Nash's 1973 Wilderness and the American Mind who confirms in his final analysis that "Wilderness is a state of mind. It is a resource that is defined by human perception". Since the EA frequently quotes Landres et al. 2015 on monitoring of changing conditions, provide in the EA an analysis to consider the following:	We recognize that not all available sources of information have been reviewed for this analysis. The agencies strive to use the most current information available along with agency endorsed guidance, such as Keeping it Wild 2. This suggested level of in depth analysis of existing outfitter and guide operations was not necessary for the purposes of the EA or the WMP. There are no proposed changes to the number of

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	1 What change has taken place at the HB and WC outfitter reserved camp sites since their initial approval by the agency's authorizing officer on the SNRA? • These authorized sites have been maintained to a high level of compliance since approved. Same footprint for the assigned camps has been retained over time. This was not mentioned in the EA nor was historically acceptable/high approval rating noted in camp inspections performed by agency personnel. These positive aspects of these three sites were not mentioned in the EA. • The camp layouts and composition of temporary features has not been expanded upon since originally authorized. Sites have not been enlarged or expanded upon to service larger groups or more livestock. Use patterns of the outfitted public at these sites has not changed. Outhouse location (defined as appropriate by Leave No Trace ethics for groups) has been moved many times, but naturalized to the point where it is not evident where the prior position or location existed. Use of a firepan and fire blanket instead of a fire ring/pit has been a summer feature for 28 years in Little Boulder assigned site. The South Fork camp in HB Wilderness does not have a camp fire ring or fire area.	existing outfitters, the number or location of assigned outfitter camps, the amount of use, type of use, or operating areas. Any future changes such as these will be determined by policy and evaluated through a needs assessment, capacity analysis, and a determination of extent necessary, consistent with FSH 2709.14 53.1f. As per policy, service day limits will be based on a 5-year analysis of actual use. Refer to Objective 2186 and 2187 Response to item 1. As is the case with all authorized uses on public land, operational adaptation is inevitable. Those described here reflect adaptations due to policy changes, public demand, and ecological change. We recognize the outfitter's effort to adapt and we appreciate the support IOGA provides for high performing outfitter and guide operations. Response to item 2. (and previous bullets that reference safety). Standard 2189 requires the use of temporary structures. This standard would not prohibit outfitters from providing the amenities described as essential to the safety of their clients. Although structures, developments and installations affect "other visitor" wilderness experiences, the Standard 2189 reflects policy and is not the result of documented complaints and/or concerns expressed by others prior to wilderness designation. See also IOGA-15. Response to item 3. See IOGA-15 for an in depth discussion of agency policy with regard to existing structures, developments, and installations in wilderness. The agencies can not speculate on what information Congress and/or Congressman Simpson considered in establishing these wilderness areas. Documents that govern these uses in wilderness are publicly available. Response to item 4. Correct. No surveys have been conducted that would provide details regarding user experiences within the HB and WC. Thus

	• Natural cover and the landscape have changed though the years of authorized occupancy. Dead and dying Lodge Pole pine, Douglas fir and Engelmann spruce have become a constant challenge in the more recent past. The agency approved site in the Baker Lake Fork of Little Boulder is located on a dry rocky ridgeline which has a considerable dead and dying over story. The South Fork of the East Fork assigned site is located on the edge of a natural opening with a mixed conifer over story on the northeast side of both tent locations. White Cloud Outfitters (WCO) has adjusted the access route to account for this natural occurrence at both sites. WCO continues to remove hazard trees as they have increased in number annually. Both dead standing and green trees have fallen at these locations including incidents of them falling down across tent frames but fortunately not during a time of occupancy-- yet. These historically approved skeleton frames with base logs do provide the occupants a higher level of safety from falling trees compared to an aluminum frame or shock cord internal structures which do not. They are necessary for us to provide for the outfitted public's safety now more than ever due to the increase of bug kill. Also, these camps are used in the fall season when snow accumulation in September and October would crush a conduit frame at an elevations of 8300 and 7400 respectively. These camps are typically DISMANTLED by definition, in early November (see Definitions.)	the data doesn't exist. The EA however sites research by Reid/Marion, Cole, Stankey, and Broom/Hall each of which consider the wilderness experience for different user groups. The monitoring protocols (Landres et al., 2015) are established to provide consistency among agencies and across the National Wilderness Preservation System for collecting data regarding wilderness character. The intent of these protocols is to firstly, comply with law, specifically the mandate per the Wilderness Act "…so as to provide for the protection of these areas, the preservation of their wilderness character" and, among other objectives, to improve communication about wilderness stewardship. They are intended to be representative of all user groups including those utilizing outfitter and guide services. As noted, the FS and BLM use volunteers and partners for various aspect of wilderness management and monitoring. As partners, we welcome participation by outfitters for future monitoring efforts.

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	• The EA does not include or make mention of the thousands of horse camping days which outfitters have purposefully reduced because of overnighting stock at their assigned sites rather than at sensitive high mountain lake destinations. 2 How have those features or necessary improvements which provide for basic human safety needs affected other wilderness visitor's experience pre or post designation? • Are there documented complaints by other visitors who have encountered these features before and after Wilderness designation? If you have done such monitoring over the past 28 to 30 years, where are these reports, and if they exist, how was someone's wilderness experience degraded due to the presence of tent frames and/or their contents? In other words, how do these rustic improvements representative of basic outfitted public safety needs detract from others' wilderness experience? We are unaware of agency outfitter evaluations associated with permit compliance than have documented how non-outfitted public wilderness users have felt their wilderness experience was somehow degraded on encountering tent frames and base logs in outfitter assigned campsites. A wilderness visitor's chance encounter of assigned outfitter camps that are located "out of sight and mind" on purpose is considered good	

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	fortune and personal discovery as these locations cannot be found on a GPS or forest service maps or within the locally available trip guides. Outfitters hear nothing but praise and heart-felt thanks from those who randomly encounter these sites during bad weather, wind storms, freezing sleet, unexpected snows or when physically exhausted from a self-guided experience. 3 Did these assigned campsite features affect Congress's determination for suitability as Wilderness? • If these temporary features had been of significance to Congressman Simpson, the legislation would not have been introduced, supported or signed into law. • There would have been letters of protest on file from the conservation community which the EA would have cited. 4 The EA fails to provide any details of encounters within Wilderness which degrades the experience for outfitters and users whether they are outfitted or not. Have you considered the outfitter perspective in this analysis or that of the outfitted public? Guideline 2125, page 26 directs implementation of the wilderness character monitoring framework of Keeping It Wild 2, but where is reference to gathering monitoring responses from the outfitted public? How does the agency intend to gauge their views on wilderness character; which, as noted, is not defined in The Wilderness Act?	

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IOGA-22	**Page 27, 7.2 Sawtooth NRA General Management (of the HB and WC WMP) Standard 2101** reads: 2101* Manage both federal and private lands to ensure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the associated recreational values in accordance with Public Law 92-400. IOGA recommends that Standard 2101 be rewritten as follows: Manage both federal and private lands in such a manner as to best provide (1) the protection and conservation of the salmon and other fisheries; (2) ~~to ensure the preservation and protection~~ the conservation and development of the ~~natural, scenic,~~ scenic, natural, historic, pastoral, ~~and fish and~~ wildlife, and other values, contributing to and available for public recreation and enjoyment, including the preservation of sites associated with and typifying the economic and social history of the American West~~; and to provide for the enhancement protection of the associated recreational values~~ in accordance with Public Law 92-400. Delete reference to "enhancement" and replace with language in Public Law 92-400. Accurately quote the SNRA Act of 1972. Do not insert language which is not part of the 1972 Act. This language is very important to the Idaho outfitting and guiding industry in so much as outfitting and guiding represent the "economic and social history of the American West". Need to quote the SNRA Act word for word if referencing it in the WMP and EA.	This standard is established in the Forest Plan. We are keeping the language consistent with the Forest Plan.

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IOGA-23	**Page 33 7.10 Recreation Resource(of the HB and WC WMP) Objective 2159** reads: 2159 Use visitor education and indirect management techniques to achieve objectives, preferring indirect methods of reducing visitor impact. Consider direct methods when indirect methods are insufficient to adequately protect wilderness character. Do not wait until wilderness character has been irretrievably degraded to implement management restrictions. IOGA recommends that Objective 2159 be revised as follows: Use visitor education and indirect management techniques to achieve objectives, preferring indirect methods of reducing visitor impact. Consider direct methods <u>such as mandatory self- administered visitor permits for large organized groups camping together</u>, when indirect methods are insufficient to adequately protect wilderness character.	Alternative B in the EA includes an option to permit groups of 8 or more.
IOGA-24	**Page 33, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2165** reads: 2165 Limit group size to a maximum of 12 people. (See exception for Native American tribes in the Tribal Rights and Interests section.) IOGA recommends that Standard 2165 be revised as follows: Limit group size to a maximum of 12 people unless inventoried camp site will accommodate more. Allow for an increase in group size at outfitter reserved or	Group size limits were established to protect wilderness character. Outfitter and guides follow existing policy, special use permit, and annual operating plan.

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	authorized sites as identified in individual operating plans.	
IOGA-25	**Page 33, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2166** reads: 2166 Limit the combined number of recreational stock in one group to 14 head of stock. IOGA recommends that Standard 2166 be revised as follows: Limit the combined number of recreational stock in a group to 14 head of stock unless inventoried camp site will accommodate more. Allow for an increase in number of head of stock at outfitter reserved or authorized sites as identified in individual operating plans.	Group size limits were established to protect wilderness character. Outfitter and guides follow existing policy, special use permit, and annual operating plan.
IOGA-26	**Page 33, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2168** reads: 2168 Only allow campfires below 8,800 feet elevation and within 200 yards of Walker Lake, Island Lake, Upper and Lower Chamberlain Lakes (9,477 and 9,197 feet), and Boorn Lakes (Figure 5 and Figure 6). IOGA recommends that Standard 2168 be revised as follows: Only allow campfires below 8,800 feet in elevation and within 200 yards of Walker Lake, Island Lake, Upper and lower Chamberlain Lakes and Boorn Lakes during the high use months of July 1 through Labor Day.	Following the scoping period, the IDT considered seasonal fire restrictions as suggested in this comment. The concept was not carried forward into an alternative because the risk of fire scaring, soil sterilization, and use of whitebark pine (all reasons for the fire restrictions) is the same after Labor Day as it is on the Fourth of July. Other IDT concerns included enforcement and potential confusion for public, such as if they arrive at a lake during fire restrictions and there is a fire ring. Parties may be likely to have a fire regardless of timing restrictions.

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	Warming fires should be allowed during the late summer and fall hunting months at any elevation.	
IOGA-27	**Page 33, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2169** reads: 2169 Prohibit tethering recreational stock within 200 feet of lakes, streams, and springs. IOGA recommends that Standard 2169 be revised as follows: Prohibit tethering recreational stock within 100 feet of lakes, streams and springs. Utilize the current standard (Alt.C) for the simple reason that the topography of lake basins, stream sides and location of springs may not afford any tie ups at all. Also the agency tie ups at Chamberlain Lakes are non-conforming to the 200 foot minimum of Alt. A.	Agency structures within wilderness would be evaluated similar to all other structures. Some administrative structures may not comply with this plan, and corrections would be necessary following the Decision. Edit 2169: to add language "…with the exception of agency provided tie-ups where topography does not allow it outside the 200'.
IOGA-28	**Page 34, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2173** reads: 2173 Prohibit recreational equine stock use within the following drainages: Slickenslide Creek above Quiet Lake; Boulder Chain Lakes Creek above Lodgepole Lake; Gunsight Creek; Bighorn Creek; and Big Boulder Lakes, excluding Walker and Island Lakes (see Figure 7). IOGA comment: No need to use prohibitive language as these destinations are self- regulating there is no stock use or extremely little due to	Although terrain limitations may be apparent to those familiar with the terrain, it may not be for others. Closing these areas to stock use provides important pre-trip information for users and prevents use in sensitive areas. Supports Alt. A and B See also BCHI-08

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	aspect, slope, access, terrain. Since stock use is prevalent in Walker and Island, allow for such use to continue.	
IOGA-29	**Page 34, 7.10 Recreation Resources (of the HB and WC WMP) Standard 2174** reads: 2174 Allow hunting and trapping subject to State and federal regulations as long as associated access is limited to non-motorized and non-mechanized means and as long as the trapper does not sell the fur, hides, or other parts of the trapped animal. IOGA comment: Delete Standard 2174 as this restriction has no place in the draft WMP. This is not in reference to a commercial enterprise but to personal trapping which is regulated by the IDFG. See IDFG current Rules and Regulations on Trapping.	See response to comment IDFG-23.
IOGA-30	**Page 34, 7.10 Recreation Resources (of the HB and WC WMP) Guideline 2179** reads: 2179 Prevent human/wildlife encounters by emphasizing proper camping techniques and food storage and containment. IOGA comment: Identify where one can find information on proper camping techniques, food storage and containment as none is provided in the draft WMP.	The Leave No Trace Center for Outdoor Ethics teaches people how to enjoy the outdoors responsibly and has Memorandum of Understandings with the Forest Service and BLM. See Guideline 21148 in the plan, which references Leave No Trace: Emphasize a proactive approach to wilderness education. Build partnerships and relationships with organization camps, group organizations, businesses, school and university programs, permittees, permanent and seasonal staff, and other users to integrate Leave No Trace and wilderness ethics into their operations. Information on Leave No Trace is available online, at agency offices, on informational signs, and is often shared by wilderness rangers, and volunteers.

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IOGA-31	**Page 34, 7.10 Recreation Resources (of the HB and WC WMP) Guideline 2182** reads: 2182 Maintain the voluntary registration system. IOGA recommends that Guideline 2182 be revised as follows: Maintain a mandatory visitor permitting system located at trailheads into high use areas such as Big Boulder Creek, Little Boulder Creek, North Fork of the Big Wood and Boorn Lakes during the periods of highest visitation from July 1 thru Labor Day. Maintain mandatory trail registration system during shoulder seasons and at less visited trailheads leading into more remote sections of the Wilderness. This is the only feasible way to obtain good monitoring data for future management decisions.	Partially supports Alt. B. Alternative B provides for a mandatory permit for all users all year long. This would provide the referenced "good monitoring data for future management decisions" without the complexities proposed in the change.
IOGA-32	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Goal 2183** reads: 2183 Ensure outfitters provide quality services that enable the public to use, access, enjoy, and understand the recreational and other values of wilderness, emphasizing opportunities for primitive or unconfined types of recreation, physical and mental challenge, inspiration, and solitude. IOGA comment: Delete word ~~Ensure~~ and mirror Goal #1 in the Sawtooth Wilderness Plan, "Outfitters provide quality services that enable the public to use, access, enjoy and understand the recreational and other values of wilderness, emphasizing opportunities for	The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.

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	primitive or unconfined types of recreation, physical and mental challenge, inspiration and solitude."	
IOGA-33	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Goal 2184** reads: 2184 Ensure outfitters protect the wilderness resource by modeling and helping the public understand how to use wilderness responsibly. IOGA comment: Delete word ~~Ensure~~ and mirror Goal #2 in Sawtooth Wilderness Plan, "Outfitters protect the wilderness resource by ~~modeling~~ assisting public understand and use wilderness responsibly."	The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.
IOGA-34	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Goal 2185** reads: 2185 Ensure outfitters play a role in providing opportunities for the public to develop awareness, appreciation and understanding of the wilderness resource and its natural and cultural history. IOGA comment: Delete word ~~Ensure~~ and mirror Goal #3 in the Sawtooth Wilderness Plan, "Outfitters play a role in educating the public in wilderness values, wildlands interpretation, plant and animal ecology, geology and cultural history". ~~providing opportunities for the public to develop awareness, appreciation and understanding of the wilderness resource and its natural and cultural history~~.	The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction. (Same response to IOGA-32.)

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IOGA-35	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Objective 2186** reads: 2186 Maintain outfitter and guide priority use permit holder service days at existing actual use levels based on a review of actual use consistent with FSH 2709.14 53.1n and BLM H-2930-1, IIIA. Evaluate changes in amount of use, type of use, operating areas, or service day allocation through a needs assessment, capacity analysis, and a determination of extent necessary, consistent with FSH 2709.14 53.1f, to prevent negative impacts on wilderness character. Service day limits will be based on a 5-year analysis of actual use. IOGA recommends that Objective 2186 be revised as follows: Maintain outfitter and guide priority use permit holder service days at existing actual use levels based on a 5-year review of actual use consistent with ~~FSH 2709.14.53.In and GLM H-2930-1, IIIA~~ current Forest Service and BLM Handbook direction. Evaluate changes in amount of use, type of use, operating areas, or service day allocation through a needs assessment, capacity analysis ~~and determination of the extent necessary,~~ consistent with ~~FSH 2709.14 53.1f.~~ Forest Service Handbook direction~~, to prevent negative impacts on wilderness character. Service Day limits will be based on 5-year analysis of actual use~~. Restate to make more concise. Delete last sentence as not necessary to restate as the Wilderness Plan speaks at great lengths to preserving, protecting and maintaining the Wilderness resource. Reduce redundancy.	Objective 2186 was revised: Maintain outfitter and guide priority use permit holder service days at existing actual use levels based on a review of actual use consistent with Forest Service and BLM handbook direction. Evaluate changes in amount of use, type of use, operating areas, or service day allocation using the most current guidance (i.e. needs assessment, capacity analysis), consistent with Forest Service and BLM handbook direction. Current direction is found at FSH 2709.14 53 and BLM H-2930-1, IIIA.

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IOGA-36	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Objective 2187** reads: 2187 Develop temporary outfitter and guide use pools that reflect existing use, including amount, type, and operating areas that existed at the time of designation. Allocate temporary use on a first-come, first-serve basis. Increases in temporary use pool days may only occur after completing a needs assessment, capacity analysis, and a determination of extent necessary. IOGA comment: Delete entire Objective ~~Develop temporary outfitter and guide use pools that reflect existing use, including amount, type, and operating areas the existed at the time of designation. Allocate Temporary use on a first-come, first-serve basis. Increases in temporary use pool days may only occur after completing a needs assessment, capacity analysis, and a determination of the extent necessary.~~ The Authorizing Officer shall consult the Recreation Special Uses Handbook 2709.14 Chapter 53 in order to specifically coordinate with outfitters the development of use pools should at some time in the future the Forest completes a needs assessment and capacity analysis. Furthermore, this is no current direction in the Forest Service Handbook regarding the development of pools. And, in Idaho, outfitter areas are designated by the State and the federal agencies recognize the Idaho area system. Any future development of a pool would need to account for the Idaho area system – Discussed 11/20/17	2187 was revised to read: Develop temporary outfitter and guide use pools based on a review of actual use at the time of designation. Evaluate changes in the amount of use, type of use, or operating areas, using the most current guidance (i.e. needs assessment, capacity analysis, etc.), consistent with Forest Service and BLM handbook direction. Current direction is found at FSH 2790.14 53.11 and BLM H-2930-1, 1-9. FSH 2709.14 53.1l - Management of Temporary Use Pools 1. The authorized officer may establish and manage a temporary use pool, including development of application and operating procedures for the temporary use pool. The Federal agencies recognize operating areas established by the State of Idaho for activities licensed by the State. The agencies also establish operating areas for use of Federal lands, specifically for activities not licensed by the State.

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IOGA-37	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Standard 2188** reads: 2188 Do not authorize permanent structures or installations associated with recreation special uses. A permanent structure is a constructed feature remaining for more than one season. IOGA recommends that Standard 2188 be revised as follows: Do not authorize permanent structures or installations associated with recreation special uses. ~~A permanent structure is a constructed feature remaining for more than one season.~~ See FSM 2323.13g for examples of permanent structures such as cabins, toilet buildings, tent frames with floors and sides. **The WMP should provide a complete and entire worded reference to FSM 2300 – Recreation, Wilderness and Related Resource Management Chapter 2323.13g – Outfitter and Guide Operations** This section the Forest Service Manual specifically identifies what is considered a Permanent Structure and it speaks to "dismantling" the frames and poles at the end of each season. These temporary skeleton structures or features are located at specifically authorized sites and do NOT consist of "cabins, toilet buildings, or tent frames with floors and sides" as cited in this Chapter. Existing sites and associated temporary features are approved in each Outfitter's Operating Plan which are part of the Outfitter's Special Use Authorization.	Standard 2188 was removed, as it is covered by default in 2189, and policy.
IOGA-38	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Standard 2189** reads:	2189 was revised: Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment. (Current direction may be found FSH 2709.14,

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	2189 Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment. A temporary structure is a constructed feature that is erected and dismantled within one season or less. IOGA recommends that Standard 2189 be revised as follows: ~~Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment.~~ The District Ranger may authorize the construction and installation of simple and temporary structures, including corrals, but excluding cabins for outfitter and guide pack stock operations in accordance with the Forest Plan direction. See FSM 2323.04e. A temporary structure is a constructed feature that is erected and dismantled (see Definition) ~~within one season or less.~~ after the period of use which is based on the individual outfitter Operating Plan.	53.1c (3), FSM 2320.13g and BLM H-2930-1, BLM 6340 1-15 (i)). Also see response to comments IOGA-18.
IOGA-39	**Page 38, 7.11 Commercial Services (of the HB and WC WMP) Standard 2190** reads: 2190 Authorize assigned campsites for outfitters and guides in Zones 3 and 4 only and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas. Authorize spike and drop camps away from high-use areas on a case-by-case basis. Allow progressive camping per the Outfitter Operating Plan and annual itinerary. IOGA recommends that Standard 2189 be revised as follows:	Revised as follows: 2190 Authorize assigned campsites for outfitters and guides in Zones 3 and 4 only and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas. Changes to existing assigned campsite locations would be evaluated in a needs assessment, capacity analysis, and/or extent necessary process.

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	Authorize assigned campsites for outfitters and guides in Zones 2, 3, 4 and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas. ~~Authorize spike and drop camps away from high-use areas on a case-by-case basis.~~ Allow progressive camping per the Outfitter Operating Plan and annual itinerary. Provide consistency with the Recreation Opportunity Spectrum used in the Sawtooth Wilderness Plan relative to assigned campsites. Zones 3 and 4 account for <1% of the entire HBWC Wilderness area. How would outfitters with reserved sites have any choice or opportunity to move a camp based on a natural or wildfire, catastrophic or not? IOGA urges the agency to keep your options open with a broader spectrum of choices. Drop camp locations are based on where the client wants their gear dropped and we have no choice of where that destination is. Spike camps would be authorized on an "as needed" basis.	
IOGA-40	**Page 39, 7.11 Commercial Services (of the HB and WC WMP) Standard 2191** reads: 2191 Ensure operating plans for priority use and temporary use outfitting and guiding permits direct outfitters to model appropriate wilderness practices and incorporate awareness of wilderness values in their interaction with clients and others. IOGA recommends that Standard 2191 be revised as follows: Recognize that ~~Ensure~~ operating plans for priority use and temporary use outfitting and guiding permittees ~~direct outfitters to~~ are models of appropriate wilderness	The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.

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	practices and incorporate awareness of wilderness values in their interaction with clients and others. The EA should recognize that Outfitters are models of wilderness ethic and have been for decades. We have self-imposed limits on stock, on the number of clients, on numbers of saddles and equipment to say nothing of agency imposed limits on Priority Use Days. We are all stewards of the land since our first temporary permits were issued; The EA should acknowledge our collective stewardship by picking up others trash, burying others feces, clearing trails for all users, conducting ourselves and our clients in an appropriate manner showing respect to other visitors. We have also retained the same camp footprint over time, continually provided "Leave No Trace" educational materials to drop camp clients, utilized weed free stock feed and continue to practice "leave no trace" stock handling methods.	
IOGA-41	**Page 39, 7.11 Commercial Services (of the HB and WC WMP) Standard 2192** reads: 2192 Prohibit caches (see FSM 2323.13 (g) and BLM Manual 6340 B.2.j for additional direction). IOGA recommends that Standard 2192 be revised as follows: Prohibit <u>permanent</u> caches (See FSM 2323.13 g and BLM Manual 6340 B.2.j for additional direction.) <u>Unattended feed will be allowed at destinations as defined by the operating plan. Feed bundles must be left in such a manner as to blend in with the natural environment.</u> Permanent caches are not allowed in the Sawtooth Wilderness Plan, Page I-40 and this language would provide consistency	FSM 2323.13g states, in part: "Do not permit caches, and phase out existing ones on a planned basis." It does not specify permanent or temporary. The glossary defines "Cache" as: Equipment, personal property or supplies stored and left unattended for 16 consecutive days on National Forest lands or 14 days on BLM lands.

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	and also by creating a distinction between stock feed and equipment or personal property. Place the Glossary definition of a "cache" in the Recreation Resources Section 7.10 for reference to the unguided visitor's practices.	
IOGA-42	**Page 43, 7.17. Fire Management (of the HB and WC WMP) Guideline 21333** reads: 21133 Minimize suppression impacts to wilderness character by using Minimum Impact Suppression Tactics (MIST) and assigning Resource Advisor(s) with knowledge, training, and/or experience in wilderness management. Return disturbance caused by suppression actions to as natural a condition as possible. IOGA recommends that Guideline 21133 be revised as follows: Minimize suppression impacts to wilderness character by using Minimum Impact Suppression Tactics (MIST) and assigning <u>local</u> Resource Advisor(s) with knowledge, training, and/or experience in wilderness management <u>including special use permitted activities</u>. Return disturbance caused by suppression actions to as natural a condition as possible. Too often in this day and age of fire teams assigned to fires from out-of-state or out-of-the area end up with resource advisors that are not knowledgeable of the local conditions and activities associated with the resource.	The IDT does not support revision to this guideline. Local resource advisors are usually the first choice for convenience, and for their local knowledge. The addition of "including special use permitted activities" was not incorporated. A resource advisor's duties are to research and coordinate with the local activities, including outfitter and guide activities during a fire. Further, most commercial service activities take place during the hunting season (e.g. October and November), which is typically outside fire season.
IOGA-43	**Page 53, 8. Wilderness Monitoring, paragraph 3** which reads. *Keeping It Wild 2* (Landres et al. 2015) establishes monitoring questions and indicators for each quality of	P. 5 of the Plan states that "The rate of implementation and potential management activities depend on the annual budgeting process."

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	wilderness character. The Forest Service Technical Guide expands the direction from *Keeping It Wild 2* (Landres et al. 2015), identifying specific measures for each indicator (e.g., index of encounters) and establishing thresholds for those indicators. The thresholds set in the "Wilderness" section above align with the Forest Service Technical Guide direction. When thresholds are exceeded, additional management actions may be necessary. Specifically, the agencies will impose or adjust visitor use restrictions if monitoring shows a substantial increase in visitor use conflicts and/or indicates visitor use is causing unacceptable impacts to resources or wilderness character. Basic recreation management actions are described in the "Glossary". IOGA Comment: The agency is encouraged to recognize the limits of its management presence as described on page 19 *(Management presence typically includes two to four wilderness rangers, a Wildlands Education Coordinator, and two trail maintenance crews that split their time between the Sawtooth, White Clouds, and Hemingway-Boulders Wilderness areas. Several non-profit organizations lead volunteer trail maintenance and reconstruction projects. Volunteers and interns are also used to augment ranger patrols and support the Wildlands Education Program, providing information and education to users prior to their wilderness visit or during their backcountry visit*) in relation to assessing trends in use that will be hamstrung due to insufficient funding and staff resources for wilderness character monitoring. As mentioned previously, IOGA is concerned that user data collected going forward be stepped up to include	The Wilderness Act requires preservation of wilderness character, and the 2012 National Forest Planning Rule requires the FS to conduct monitoring. Forest Service Manual (FSM) chapter 2320 – Wilderness Management, outlines Forest Service policy pursuant to the Wilderness Act. This chapter includes the following policies that directly address the need for preserving wilderness character: *2320.2 – Objectives, 4. Protect and perpetuate wilderness character and public values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences…* *2323.14 – Visitor Management. Plan and manage public use of wilderness in such a manner that preserves the wilderness character of the area.* FSM 1940 establishes the information management framework for all Forest Service inventory, monitoring, and assessment activities. FSM 1940.3 describes the policy: Inventory, monitoring, and assessment activities shall: 1. *Be coordinated through a national integrated program planning process that addresses information needs related to all Agency business requirements;* 2. *Use a standards-based approach and framework for information management and related business operations; and*

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	mandatory sign-ins and education, particularly with the high lakes use during the busy summer season.	3. *Foster and realize opportunities for collaboration, cooperation, and coordination across Forest Service deputy area programs and with agency partners, including the public; local, state, and other Federal agencies; and non-governmental organizations.* FSM 1920 and Forest Service Handbook (FSH) 1909.12 provide policy and detailed guidance for land management planning, including conducting assessments and monitoring.
IOGA-44	The HB and WC EA does not reference the following definitions found in Merriam-Webster's New World Dictionary accurately. Please add as corrected to provide future managers a greater understanding of these terms in the Glossary of the Plan and EA. **Dismantle** – To strip of covering, to strip of furniture, equipment, etc., to take apart, to disconnect the pieces, to destroy the integrity or functioning of. **Protect** – To shield from injury, or danger, or loss; guard or defend. **Preserve** – To keep from harm, damage, danger, evil, etc.; protect or save. To keep up, carry on or maintain. **Untrammeled** – Not confined, not restrained, not impeded; originally used to describe the act of not damming a free flowing river, ie the Colorado River through the Grand Canyon. (This definition in the Plan and EA has been expanded beyond the original intent, by Landres et al. 2015) **Maintain** – To keep or keep up with, carry on. To continue in or with. To keep in a certain condition or position. To keep in existence or continuance; preserve. To uphold or defend. To support by aid, influence or protection	Several of these terms are used in the document in the same manner as would be found in any dictionary definition and therefore are not included in the Glossary. The terms in the Glossary are taken from agency policy. Standard 2188 was removed, as it is covered by default in 2189, and policy. [See response to IOGA-37] FS policy specifies how structures should be addressed specific to O&G operations: FSH 2709.14, 53.1c (3), Not authorize any development, improvements, or installations in wilderness areas for the purpose of convenience to the holder or the holder's clients; caches in wilderness areas; and permanent structures, improvements, or installations in wilderness areas unless they are necessary to meet minimum requirements for administration of the area for the purposes of the Wilderness Act (16 U.S.C. 1133c). FSM 2320.5 (7) Temporary Structure. Any structure that is easy to dismantle, that could be removed completely from a site between periods of actual use, and that must be removed at the

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	Enhance – To make greater as in cost, value, quality, desirability, attractiveness, etc. To heighten improve or augment, etc. (Remove the reference to "Enhance/Enhancement" of Wilderness in all cases within this Plan and EA.) **Structure** – Manner of building, constructing, organizing. Something built or constructed such as a building or dam. **Building** – Anything that is built with walls and a roof, as a house, factory, etc.; structure. General term applied to a fixed structure in which people dwell, work, etc.; edifice **Feature** – The make, shape, form or appearance of a thing. A distinct or outstanding part, quality or characteristic or attraction. **Installation** – A complete mechanical apparatus fixed in position; the act of setting up for use or service **Fixed** – To fasten or attach; to make firm, stable or secure. To fasten or secure firmly. **Skeletal** – Having supporting framework; something reduced to its minimal form or essential parts. **Frame or framework** – A basic structure serving to hold the parts of something together or support something constructed or stretched over or around it; skeletal structure. **Permanent** – Lasting or intended to last indefinitely without change; enduring without fundamental marked change. (This does not represent an outfitter skeleton frame for a wall-tent.) The definition referenced in Standard 2188 is not entirely accurate. The FSM definition in FSM 2320.5 does NOT represent what is stated in FSM 2323.13g – Outfitter and Guide Operations. The definition of a permanent structure or installation is in all likelihood referencing FS Structures, Installations, & Buildings such as outhouses, bridges, kiosks/signage, cattle guards, treated wood and steel fences etc. O&G simple temporary structures and features are just that; rustic, using native materials, temporary & dismantled at the end of the period of use. These may be authorized by the District	end of each season of use if the non-use period is greater than 30 days.

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	Ranger as per 2323.04e – #2 under District Ranger responsibility. **Permanent Improvement** – Improvement to property or land that will remain indefinitely and is now an integral part of the property; fixed, enduring, abiding, not subject to change. **Temporary** – Lasting, enjoyed, effective, serving or used for a limited time only. (Limited time could refer to a season of use…it is not specific in definition.) (Webster's definition states nothing about "remaining in place for more than a specific time of use, when it then is deemed permanent.") **Management** – The act of handling, controlling, directing, etc. The act of having charge of, direction, conduct or administration of.	
IOGA-45	**IOGA Comments on the Jim McClure-Jerry Peak Wilderness Management Plan and Environmental Assessment** Add IOGLB (Idaho Outfitters and Guides Licensing Board) to the list of Acronyms	While specific to the JMJP Plan, comment is responded to under IOGA-06.
IOGA-47	**Page 25, 7.1 Wilderness (of the HB and WC WMP) Objective 2111** reads: 211 Ensure, where possible, management between the Forest Service and BLM, including regulation of visitor uses, appears seamless to the public. Where differences in agency policy occur, and if allowable by law, regulation, or policy, the WMP will endeavor to apply the stricter policy to the adjacent land of the other agency. Change Objective 2111 to read as follows:	The Plan direction would apply only to those lands within wilderness, no buffer zones proposed. Adjacent lands would continue to be managed by each individual agency's policy, be it state, BLM or FS.

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	Ensure, where possible, management between the Forest Service and BLM, including regulation of visitor uses, appears seamless to the public. Where differences in agency policy occur, and if allowable by law, regulation, or policy, the WMP will endeavor to apply the less strict policy to the adjacent land of the other agency. Add the words "less strict" so that bordering and perimeter lands where a wilderness boundary touches, the bordering agency does not manage those lands as "defacto" Wilderness. This concept could be easily misinterpreted as written. There were never intended to be "buffer zones" along borders with other agencies and this Objective states just the opposite. Is it only referring to instances where BLM Wilderness touches USFS Wilderness? What about where it touches State Land sections? This Objective is not clear.	
IS-01	I wish to comment on the Draft Hemingway-Boulders plan (HBWC), and the the Jim McClure-Jerry Peaks plans (JMJP) with respect to Pack Goats. Specifically, I do not see the justification for closing off vast areas of the proposed Wilderness with no substatial proof of actual risk of disease transmission. I understand that the goal is to have low risk of disease transmission between pack goats and Bighorn Sheep. However, a recent study, conducted by Dr. Margaret Highland, veterinary researcher with the USDA, found that there was a much lower level of disease-causing bacteria in pack goats than previously thought. Even Dr. Tom Besser, the Chair for the Wild Sheep Disease Research Unit at Washington State, and who you cite in your references, stated the following: "I believe that *M. ovipneumoniae* test-negative pack goats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and	See response to CD-02 regarding Highland's research.

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	that it would be reasonable to take this into account when setting public lands policies" (Wild Sheep Foundation Newsletter, Summer 2016). I am asking you to take this new research and professional opinion under consideration when choosing the best alternative.	
IS-02	I currently own 4 pack goats. I take excellent care of my animals and I follow many of the Best Management Practices suggested by the North American Packgoat Association, NAPgA. If these practices were required, I would have no problem following them, including a permit system and using other methods to reduce the risk of contact between my goats and Bighorn Sheep. I feel that when these practices are used, the risk of contact would be low to very low, or even as close to zero as possible.	See response to comments IWSF-02, and NAPGA-19.
ISDA-01	**Grazing in Wilderness (specific to the wilderness plan)** ISDA is extremely concerned about the negative portrayal of livestock grazing found repeatedly throughout the WMP that often lists assumed impacts associated from livestock grazing, while refusing to acknowledge or cite other multiple uses and activities as a source of these and other similar impacts or citing causal effects analysis or best science. The WMP states on pages 8 that livestock grazing is administered according to existing regulations and policies. This includes determination of specific causes contributing to negative effects that must be assessed on a case-by-case basis at the site or project level. A specific example of this is Goal 21106 on page 43. The goal should instead cite the Wilderness Act stating grazing is an acceptable use. Or at a minimum, the plan should state as desired conditions the provision of commercial livestock grazing consistent with the Wilderness Act and Congressional Grazing Guidelines. The enacting legislation for the Hemingway-Boulders and White Clouds Wilderness through Public Law 114-46 explicitly directs for continued grazing of livestock	Section 5 of the WMP (p. 7-8) acknowledges law (Wilderness Act, Section 4(d)(4), and Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act), which states "Within the wilderness areas, the grazing of livestock in which grazing is established before the date of enactment of this Act shall be allowed to continue, subject to such reasonable regulations, policies, and practices as the Secretary determines to be necessary…" Further, Section 6.12 (p. 19-20) of the WMP describe current rangeland resources. Both plans acknowledge the above law, and the Congressional Grazing Guidlelines, and agency policy for administration of commerical livestock grazing within wilderness.

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	grazing within the wilderness. The continued permitted grazing of livestock is also consistent with Section 4(d)(4) of the 1964 Wilderness Act. The Wilderness Act is clear in its intent that established livestock grazing and the facilities used to support a livestock grazing program are permitted to continue in federal wilderness areas. It is imperative that the WMP is consistent with House Report 96-617, Appendix A of House Report 101-405, and Public Law 114-46 which state "There shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly "phase out" grazing."	
ISDA-02	To maintain this consistency, the WMP must not discourage grazing in the wilderness or unduly restrict the on-the-ground activities needed for proper grazing management. Proper grazing management must have flexibility and opportunity to schedule and adjust intensity, timing, duration, and frequency of grazing use over time in a manner that maintains rangeland health and habitat quality. It's imperative that livestock grazing-related activities, including access to and maintenance of existing structures such as fences, water wells and lines, stock tanks, line cabins, etc. continue as outlined in Appendix A of House Report 101-405, and Public Law 114-46. For example, ISDA supports the intent of Guideline 21110 on page 41 acknowledging and allowing the continuance of pre-authorized use of motorized vehicles on a case by case basis for the purpose described in the guideline, and as was allowed prior to wilderness designation consistent with the Wilderness Act. Please see the attached detailed comments for requested clarification on Guideline 21110.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would be analyzed during grazing permit NEPA and the subsequent decision process. See ISDA-34 below for response to Guideline 21110.
ISDA-03	The plan and its analysis should include a discussion of the benefits of livestock grazing. Livestock grazing is a useful tool	Agency requirements include the identification and discussion of current conditions, including positive and negative impacts

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	that can be used to meet specific objectives and benefit vegetation communities and wildlife habitat. For example, the benefits of grazing to reduce fine fuels which threaten native communities such as sage-steppe ecosystems should be acknowledged in the plan's analysis (Davies et al. 2010). Davies et al. 2014 also outlined that the loss of forage for livestock grazing permittees can result in the sale of private base property for development and subsequent loss of wildlife habitat. This is crucial when analyzing the cumulative impact area of public lands decisions.	and require specialists to make a reasonable attempt to identify the cause or causes that contribute to those impacts. However, because livestock grazing is not the "action" but rather the management of wilderness, in depth analysis regarding livestock grazing was not necessary. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would be analyzed during grazing permit NEPA and the subsequent decision process.
ISDA-04	Cultural heritage The cultural heritage and history of the wilderness areas is tied to livestock producers in the area. A thorough analysis of the social and economic impacts to livestock production in Custer and Blaine counties as well as the surrounding and affected counties should be taken into consideration in the planning process. The enacting legislation for the Hemingway-Boulders and White Clouds Wilderness explicitly directs for the continued grazing of livestock grazing, and this underscores the fact that historic livestock grazing has maintained the wilderness characteristics present and will continue to be an important use in the area. In fact, Idaho's citizens acknowledge that livestock grazing is an important use of public lands.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would be analyzed during grazing permit NEPA and the subsequent decision process. In this analysis, livestock grazing is not the "action" but rather the management of wilderness, so in depth analysis regarding livestock grazing was not necessary. A study of the social and economic impacts to current livestock production is outside the scope of Heritage Resources. The historic use of the area has been covered in chapter 6.
ISDA-05	ISDA requests the review and incorporation into the plan a 2014 Public Opinion Poll conducted by the University of Idaho. The	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be

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	poll found that 90 percent of Idaho residents approve of grazing on public lands (SSRU 2014).	permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process, which could include the poll you refer to. In addition, a lengthy analysis regarding livestock grazing was not required for the WMP.
ISDA-07	Weed Management Livestock grazing is an effective tool to control noxious and non-native invasive weeds (Launchbaugh & Walker 2006). Targeted grazing should also be included and allowed in the WMP.	Targeted grazing would be considered a vegetation management tool; therefore, is outside of the scope of the WMP. Invasive species treatments are not within the scope of the Wilderness Management Plant and are analyzed in the Boise and Sawtooth Forest-wide Invasive Plant Species Treatments Draft Environmental Impact Statement (USDA Forest Service 2016). WMP EA pg. 127 Invasive species treatments within the Wilderness would undergo Minimum Requirement Analysis to determine the minimum necessary treatment of invasive species. WMP EA pg. 9
ISDA-08	ISDA Involvement on Interdisciplinary Team The alternative and management action selected should be consistent with the State of Idaho's objective to promote the livestock industries, including grazing on public lands. This includes support of grazing on public lands for maintaining the health and productivity of those lands, communities, and the people who rely on Idaho's rangelands I appreciate USFS and BLM's positive consideration of these comments. ISDA requests involvement with the management team in the continued planning process. Tyler Hamilton (tyler.hamilton@isda.idaho.gov) is ISDA's contact for the	Mr. Hamilton is included on our list of interested parties and will continue to receive the communications that all interested parties receive.

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	interdisciplinary team. Please contact Tyler Hamilton or myself with questions regarding these comments.	
ISDA-09	**Specific Comments** *p. 9. More recently, trammeling actions include management of wildland fire and invasive species, fish stocking, and livestock grazing* Trammeling action may also include other influences such as wildlife and recreation, as both these and other actions are intentionally managed or carried out by humans. Also see comment below in regards to multiple actions affecting natural resources.	Section 6 of the WMP includes a brief overview description of the Management Area. More detailed description of the affected environment is provided in the EA (Section 3).
ISDA-10	*p.9. Some changes to the native vegetation composition have occurred in portions of the wilderness, including the introduction of non-native species, such as fish stocked in many of the high mountain lakes; fire exclusion; and livestock grazing impacts.* Fish stocking, fire exclusion, and livestock grazing are not the only factors influencing native vegetation composition. Other influences such as recreation and wildlife also have impacts to native vegetation composition. Remove these references or include all factors that have an effect on native vegetation structure within the wilderness. ISDA suggests the following wording: Changes to the native vegetation composition have occurred in portions of the wilderness, including the introduction of non-native species.	The IDT revised this sentence to read: Some changes to the native vegetation composition have occurred in portions of the wilderness, including the introduction of non-native species; fire exclusion; and livestock grazing impacts. Additionally, fish have been stocked in many of the high mountain lakes, thus altering the natural composition of the area.

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	Also see comments below specific to livestock grazing. Livestock grazing conducted in a manner that meets rangeland health objectives has minimal effects to naturalness, especially due to this and other existing wilderness characteristics present in the area given historic grazing. In a review of grazing management in sagebrush steppe, Davies et al. 2014 found that "Long-term evaluations of well-managed moderate grazing compared with grazing rest have often found few differences in plant community composition and density." Another key point of the Davies et al. 2014 summary is that "Long-term rest causes an accumulation of fine fuels that increases wildfire risk and potential severity and subsequently the cost of fire suppression efforts…" The Wilderness Management Plan and its analysis must also consider the benefit to natural resource management due to livestock producers actively working with federal land management agencies detect and treat weeds. It is not an accurate assumption that discontinuing livestock grazing will reduce weed infestation.	
ISDA-11	*p. 14. Localized impacts are occurring, primarily from livestock grazing, dispersed recreation, and past mining activities.* ISDA recommends removal of sentence. It is unclear what activities related to impacts are ongoing and which have been caused by past actions. There is also a need to understand if and how these causal activities were and are monitored and identified. Federal agencies are required to make allotment evaluations based on of site-specific ecological capabilities and long-term monitoring data coupled with causal determinations. If livestock grazing has been identified as a causal factor for impacts outside of those anticipated for approved and managed livestock grazing and associated infrastructure, the WMP should clarify that improper livestock grazing, not livestock grazing in	Cattle tend to avoid hot, dry areas and congregate in wet areas for water and forage, which is generally more abundant in riparian areas (Belsky, 1999). Effects to water quality from grazing include increases in water temperature from physical effects of grazing and livestock movement to streambanks (Platts 1991). Cattle are notorious users of the riparian areas and many times will cause a large reduction in the streamside vegetation. Riparian vegetation intercepts and reduces the intensity of solar radiation. Platts (1991) included the results from a literature review summarizing grazing effects to streams across the intermountain western United States. Other potential effects are associated with concentration of *E. coli* bacteria, increasing the width/depth ratio through bank trampling, decreasing the percentage of undercut banks and increasing

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	general, is related to localized negative impacts. Watering sites, trailing areas, and supplement sites have been analyzed and approved in anticipation of certain effects in certain localized areas. This distinction between effects of general livestock grazing, beneficial effects of grazing, and negative effects of improperly managed livestock grazing should be made throughout the WMP. For example, proper grazing has the ability to benefit sage-grouse habitat as discussed by Boyd et al. 2014. Grazing and its management, and the exclusion of livestock grazing, has an effect on fuel loads and wildfire behavior. Exclusion of grazing can affect the placement of fuel loading, and may contribute to wildland fire expansion. Davies et al. 2014 also found as a key point in their summary that "Long-term rest causes an accumulation of fine fuels that increases wildfire risk and potential severity and subsequently the cost of fire suppression efforts…" This in turn has effects on resources such as soils due to increase erosion after wildfire.	sediment yield within the streams (turbidity/suspended sediment). Because livestock grazing is not the "action" but rather the management of wilderness, an in-depth analysis regarding livestock grazing was not necessary. However, best available science, as referenced in the paragraph above, indicates that livestock impacts can occur around lakes.
ISDA-12	*p. 14. Localized accelerated sediment impacts have occurred from dispersed recreation, livestock grazing, and historic mining.* Again, the Forest Service and BLM are required to monitor resources and identify causes for impacts to those resources. It should be specified here that improper livestock grazing management is the cause of localized areas being negatively affected if that is the case documented by long term data and a causal factor analysis. Properly managed livestock grazing benefits multiple resources.	Cattle tend to avoid hot, dry areas and congregate in wet areas for water and forage, which is generally more abundant in riparian areas (Belsky, 1999). Effects to water quality from grazing include increases in water temperature from physical effects of grazing and livestock movement to streambanks (Platts 1991). Cattle are notorious users of the riparian areas and many times will cause a large reduction in the streamside vegetation. Riparian vegetation intercepts and reduces the intensity of solar radiation. Platts (1991) included the results from a literature review summarizing grazing effects to streams across the intermountain western United States. Other potential effects are associated with concentration of *E. coli* bacteria, increasing the width/depth ratio through bank trampling, decreasing the percentage of undercut banks and increasing

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		sediment yield within the streams (turbidity/suspended sediment). Because livestock grazing is not the "action" but rather the management of wilderness, an in-depth analysis regarding livestock grazing was not necessary. However, best available science, as referenced in the paragraph above, indicates that livestock impacts can occur around lakes.
ISDA-13	*p. 15. Aquatic habitat around these lakes is functioning at risk in some localized areas due to past and present impacts from trail alignments, dispersed recreation, livestock grazing, and historic mining.* ISDA suggests removal of language assuming livestock grazing has negative impacts without data linking cause and effect. There is a need to understand if and how these causal activities were monitored for or identified. It should be specified here that improper livestock grazing management is the cause of localized areas being negatively affected if that is the case.	Cattle tend to avoid hot, dry areas and congregate in wet areas for water and forage, which is generally more abundant in riparian areas (Belsky, 1999). Effects to water quality from grazing include increases in water temperature from physical effects of grazing and livestock movement to streambanks (Platts, 1991). Cattle are notorious users of the riparian areas and many times will cause a large reduction in the streamside vegetation. Riparian vegetation intercepts and reduces the intensity of solar radiation. (Platts, 1991) included the results from a literature review summarizing grazing effects to streams across the intermountain western United States. Other potential effects are associated with concentration of *E. coli* bacteria, increasing the width/depth ratio through bank trampling, decreasing the percentage of undercut banks and increasing sediment yield within the streams (turbidity/suspended sediment). Because livestock grazing is not the "action" but rather the management of wilderness, in depth analysis regarding livestock grazing was not necessary. However, best available science, as referenced in the paragraph above, indicates that livestock impacts can occur around lakes.
ISDA-14	*pp. 15-16. Section 6.6 Vegetation*	The IDT supports including phrasing that is not limiting such as *factors included, but were not limited to* into the causal factors for negative impacts.

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	Identification of causal factors for negative impacts should be excluded or include all possible factors that may cause localized changes to mesic/hydric plant communities.	
ISDA-15	*p. 15. The Montane Shrub group is near properly functioning condition, although older age classes dominate structure due to livestock grazing impacts, non-native invasive species, and conifer encroachment. The Mountain Big Sagebrush group is functioning at risk in localized areas due to livestock grazing impacts, non-native invasive plant species, and conifer encroachment.* How were upland "functioning at risk" assessments made? Functioning at risk is a term specific to Proper Functioning Condition (PFC) assessments for lotic and lentic areas. The PFC is a qualitative assessment that is not designed to be a long-term monitoring tool. ISDA suggests removing functioning at risk language found on page 15 and 16 and elsewhere for each vegetation group. As noted elsewhere, the WMP needs to reference literature, studies, or data that tie livestock grazing to impacts in the wilderness.	Montane Shrub group conditions are referenced from Chapter III of the Sawtooth Forest Plan pg 111-137 and 111-158
ISDA-16	*p. 16. Aspen is present in pure stands and mixed with Douglas-fir and lodgepole. Many stands are dying out due to environmental reasons, and in localized areas due to past management practices including but not limited to: conifer encroachment, fire exclusion, and livestock grazing impacts.* The WMP needs to reference literature, studies, or data that tie livestock grazing to aspen impacts in the wilderness. ISDA	Aspen conditions are referenced from Chapter III of the Sawtooth Forest Plan pg 111-137 and 111-158

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	recommends removal of language specific to livestock grazing without cause and effect data.	
ISDA-17	*p. 16. Riparian vegetation is functioning at risk in localized areas due to vegetation loss and stream and floodplain alterations from dispersed recreational sites and grazing.* Again, how were "functioning at risk" assessments made? The PFC is a qualitative assessment that is not designed to be long-term motoring tool. Riparian vegetation does not function at risk. Riparian systems are assessed as a whole for proper functioning condition (proper functioning, functioning at risk, or non-functioning), and consider hydrology, vegetation, and geomorphology. Attributes of hydrology, vegetation, and geomorphology determine functioning condition. ISDA suggests clarification and rewording of this sentence, along with a removal of the assumed causal factors from this sentence.	Riparian vegetation group conditions are referenced from Chapter III of the Sawtooth Forest Plan pg 111-137 and 111-158
ISDA-18	*p. 16. Native mesic/hydric plant communities have transitioned to species found in drier habitats in localized areas due to livestock grazing.* Please provide data of cause and effect to warrant this statement. Wildlife and recreation also impact native mesic/hydric plant communities. ISDA recommends removal of this statement. If it remains, include all factors that may cause localized changes to mesic/hydric plant communities. This should including drivers of geomorphologic change such as floods or avalanches that reroute streams or impact water channels.	Native mesic/hydric plant community's conditions are references from Chapter III of the Sawtooth Forest Plan pg 111-158. The IDT supports including phrasing that is not limiting such as *factors included, but were not limited to* into the causal factors for negative impacts.
ISDA-19	*p. 17. Terrestrial habitat is functioning at risk in some areas due primarily to human-caused disturbance; grazing; and long-term fire exclusion, which has altered some habitats.*	Terrestrial habitat conditions are referenced from Chapter III of the Sawtooth Forest Plan pg 111-138 and 111-159

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	Functioning at risk is a term specific to Proper Functioning Condition (PFC) assessments for lotic and lentic areas. The PFC is a qualitative assessment that is not designed to be long-term motoring tools. ISDA suggests removing functioning at risk language from this paragraph and including data to support the causal factors identified for habitat alteration.	
ISDA-20	*p. 17. Current livestock and recreational stock grazing in some areas is preventing localized areas to recover from grazing impacts.* ISDA requests removal of this sentence. There is little information in this statement to discern what "localized areas" referred to here are not recovering. For example, watering sites, trailing areas, and supplement sites have been analyzed and approved in anticipation of certain effects in certain localized areas.	Agency requirements include the identification and discussion of current conditions, including positive and negative impacts and require specialists to make a reasonable attempt to identify the cause or causes that contribute to those impacts. However, because livestock grazing is not the "action" but rather the management of wilderness, in depth analysis regarding livestock grazing was not necessary. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would be analyzed during grazing permit NEPA and the subsequent decision process.
ISDA-21	*p. 19. Permitted livestock grazing may impact recreational experiences in areas where active allotments exist. Impacts from livestock grazing include livestock waste, vegetation trampling and trails, negative interactions with guard dogs, and the presence of developments such as fencing and water troughs.* ISDA requests that this statement be removed. Livestock grazing is an authorized multiple use of federal lands and saying	We partner with IRRC and utilize their publications in an effort to provide education to a variety of NFS land users. In addition, Agency requirements include the identification and discussion of current conditions, including positive and negative impacts and require specialists to make a reasonable attempt to identify the cause or causes that contribute to those impacts. However, because livestock grazing is not the "action" but

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	how it may or may not effect a recreational experience is conjecture and highly subjective from person to person, or group to group. Recreation may negatively affect proper livestock grazing management and may lead to livestock congregating in sensitive areas to avoid human pressure, animal stress, animal performance issues, chasing by domestic canines, or possibly suffer from a medical condition known as hardware disease (bovine traumatic reticuloperitonitis) from trash and other objects left by people in campsites or around trailheads. There is no need to set multiple uses at odds against each other. There is no objective scientific data to support the argument of perceived impacts to recreation from livestock, nor perceived impacts to livestock from recreation. ISDA suggests partnering with the Idaho Rangeland Resource Commission (IRRC) to promote understanding and appreciation of Idaho's rangelands and ranching heritage, and the importance of shared resources and multiple use. IRRC works with public and private partners to provide education and outreach to the public, including trail signage. The IRRC's Care/Share program is an excellent education resource and partnership to accomplish this. ISDA also requests the addition of an objective to Section 7.19. Wilderness Education and Interpretation to enhancement of public awareness and support through education about the living cultural heritage of ranching and the role of livestock management in creating and maintaining wilderness characteristics. Objective 21145 should also include providing information regarding tips for interactions with livestock.	rather the management of wilderness, in depth analysis regarding livestock grazing was not necessary. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would be analyzed during grazing permit NEPA and the subsequent decision process. In response to your request for the additional an objective and addition to 21145 to address livestock, this messaging is not specific to wilderness. As noted we work with IRRC on this forest-wide messaging.
ISDA-22	*p. 28. 2138* Within the Germania Creek subwatershed, protect habitat for the isolated bull trout population above the falls on Germania Creek.*	Protection of a population and/or habitat is a measurable objective. For a population, one could measure whether the population is viable by meeting a certain criteria for juveniles

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	Protection is difficult if not impossible to measure, and is not itself an objective. Maintenance is a more realistic objective. Change to "Maintain the endemic bull trout habitat..." This would also be consistent with the previous management area direction. Site capabilities and ecological thresholds must be taken into account when considering carrying forward this objective, and when drafting and analyzing objectives, goals, and standards throughout the draft WMP and EA.	and/or adult spawners given certain ecological thresholds and habitat capabilities.
ISDA-23	*p. 28. 2139* Reduce effects to fish habitat and water quality from livestock grazing within the tributaries of the East Fork Salmon River, and Slate Creek subwatersheds. The Upper East Fork Salmon subwatershed is the priority.* ISDA insists on the removal of reference to livestock grazing. This is no supporting cause and effect data. This assumes that livestock grazing is the causal factor for poor fish habitat, populations, and water quality, and is exclusionary of other causal factors such as other multiple uses or natural processes. If there is a livestock management issue, it will be addressed in livestock permit administration. Also, not all effects from livestock grazing are detrimental. Remove livestock grazing all together and change to "Maintain riparian areas to benefit fish habitat and water quality within the tributaries…" as appropriate to the ecological site conditions.	Cattle tend to avoid hot, dry areas and congregate in wet areas for water and forage, which is generally more abundant in riparian areas (Belsky, 1999). Effects to water quality from grazing include increases in water temperature from physical effects of grazing and livestock movement to streambanks (Platts 1991). Riparian vegetation intercepts and reduces the intensity of solar radiation. Cattle are notorious users of the riparian areas and many times will cause a large reduction in the streamside vegetation. Platts (1991) included the results from a literature review summarizing grazing effects to streams across the intermountain western United States. Other potential effects are associated with concentration of *E. coli* bacteria, increasing the width/depth ratio through bank trampling, decreasing the percentage of undercut banks and the sediment yield within the streams (turbidity/suspended sediment). Because livestock grazing is not the "action" but rather the management of wilderness, in depth analysis regarding livestock grazing was not necessary. However, best available science, as referenced in the paragraph above, indicates that livestock impacts can occur around lakes. The language referenced is quoted directly from the Sawtooth National Forest Land and Resource Management Plan (Forest

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		Plan) revised in 2003 and amended in 2012. This is management objective 0330 for MA 3 (p. III-143). Compliance with the Forest Plan is required; however, issues regarding livestock grazing and riparian vegetation utilization standards would be addressed through the range administration process, which includes monitoring efforts and communications with permittees.
ISDA-24	*p. 28. 2140* Protect spawning and rearing areas within streams and rivers during critical spawning and incubation periods. The Upper East Fork Salmon subwatershed is the priority.* Reword to "Maintain spawning and rearing habitat" to be consistent with the Sawtooth RMP. Again, the application of this objective for maintenance must take into consideration ecological potential and other factors such as wildfires, floods, avalanches etc.	Use of the term "Protect" is appropriate in this direction. Protection of spawning and rearing habitat from anthropogenic activities is an important aspect of ESA as well as the SNF forest plan. Maintenance would lend itself to accepting these activities as well as not working toward recovery of a species.
ISDA-25	*p. 28. 2141 Allow natural ecological processes to define the composition, abundance, and distribution of native biotic communities.* ISDA suggests removal of this objective: What constitutes a natural ecological process? Wildfire? Beetle infestations? If all vegetation communities are supposed to be defined by natural processes, land managers shouldn't be protecting or maintaining or managing any natural resources. As examples, Objective 2141 is inconsistent with Goal 2143 and Objective 2144. Under 2141's direction, whitebark pine should not be given any management considerations, as it is supposed to occur naturally under the current conditions. Objective 2141 also eliminates the ability to treat invasive and noxious weeds. This Objective is also inconsistent with Standard 2117 on page 25. Managing for the multiple desired states within ecological	Objective 2141 is in accordance with the Wilderness Act, which states in Section 2(c), "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man,…" This direction is also in accordance with agency wilderness policy. For example, BLM Manual 6340 1.6.C.15 states " When possible, management activities should emphasize enhancement of wilderness character over time. Natural processes should always be favored to restore disturbed vegetation in order to maintain the Untrammeled, Natural, and Undeveloped qualities of wilderness character, as well as outstanding opportunities for Solitude or Primitive and Unconfined Recreation. However, in some cases, restoration management activities may be needed to restore vegetation and to preserve or enhance the area's wilderness character, despite the impacts of such activities on the Untrammeled quality of

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	site potential (as reasonable considering overall Forest and BLM goals and responsibilities and ecological thresholds) is a more reasonable goal.	wilderness character." (also see FSM 2320.2, 2320.3, 2323.26b, 2320.5) The Wilderness Act also states that wilderness is to be "… protected and managed so as to preserve its natural conditions…" Agency policy and regulations detail the ability to manage non-native, invasive plant species (FSM 2320.2 (2); 2323.26b (2); 43 CFR Part 6304.22)
ISDA-26	*p. 29. 2144* Manage fire suppression tactics, livestock grazing, mining activities, recreational use, dispersed camping, firewood collection for personal use, or trail construction and maintenance to minimize impacts to whitebark pine.* Livestock grazing, mining, recreation dispersed camping, etc. as have not been identified as threats to whitebark pine. According to Federal Register Vol. 76, No. 138 pg 42631, the primary threats to whitebark pine are habitat loss and mortality from white pine blister rust, mountain pine beetle, catastrophic fire and fire suppression, environmental effects resulting from climate change, and the inadequacy of existing regulatory mechanisms. ISDA suggest removal of "livestock grazing" and other misidentified activities as described impact of whitebark pine. In addition whitebark pine resides in terrain often unsuitable to livestock access, and is also not a part of domestic livestock diets. Also please refer to previous comment regarding Objective 2141.	Objective 2144 address management actions occurring within the Wilderness as they may impact whitebark pine. The Federal Register Vol. 76, No. 138 pg 42631, is listing the primary threats to whitebark pine. These listed actions, including livestock grazing, have been identified as secondary threats, and may have the potential to impact whitebark pine. These are managed under policy, best management practices, and Forest Plan direction. Best Management Practices/Stipulations to avoid white bark pine stands are included in the Annual Operating Instructions (AOIs) for allotments that contain white bark pine; additionally, there are signs (in English and Spanish) posted within the sheep driveway advising permittees/herders to avoid the white bark pines areas.
ISDA-27	*p. 29. 2148* *Ensure healthy, viable, and naturally distributed wildlife populations in an effort to retain the areas' natural quality.*	The Wilderness Act, Section 2a - Purpose of Wilderness, states " …lands designated for preservation and protection in their natural condition, …" Section 2c – Definition of Wilderness "…an area of undeveloped federal land retaining its primeval character and influence, …which is protected and managed to

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	ISDA requests removal or restatement of this objective. It is impossible to ensure these characteristics. Healthy, viable, and naturally distributed are difficult if not impossible terms to define and are not necessarily consistent with State of Idaho objectives and authorities.	preserve its natural conditions…and which generally appears to have been affected primarily by the forces of nature, …" FSM 2323.31 Objectives stipulate that the Forest Service will "provide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist." (Also see BLM Manual 6340 1.6.C.21)
ISDA-28	*p. 29. 2149* Provide for high-quality mountain goat and bighorn sheep habitat by reducing summer and fall forage competition between domestic livestock where allotments overlap mountain goat and bighorn sheep habitat.* This objective is outside the direction of IDFG's management plan for BHS, which focuses on best management practices for separation between domestic sheep and bighorn sheep at the local level. Additionally, this highlights importance of one wildlife species above the next and is unfounded as it lacks cause and affect data that documents forage competition (competition denotes that a species has been documented to be negatively affected). ISDA requests the removal of this objective. It is also inconsistent with the Hemingway-Boulders & White Clouds Wilderness Draft EA that rightly acknowledges on page 31 that "The rangeland resources within the wilderness areas have previously been analyzed for management to maintain wilderness characteristics and, as such, the proposed alternatives would remain within the effects previously analyzed in the 2003 Forest Plan FEIS (USDA Forest Service 2003)" The allotted Animal Unit Months (AUMs) for livestock grazing permits already take into consideration forage for wildlife, watershed health, etc.	This comes from the current Sawtooth Forest Land and Resource Management Plan. It is in 3 management areas that overlapped the HB-WC (Obj. 0270, 0359, 0454).

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ISDA-29	*p. 29. 2145 Minimize impacts to the untrammeled quality of wilderness character while effectively treating non-native, invasive plant species to maintain the natural quality.* See above comments: USFS cannot treat non-native invasive plants and at the same time allow natural processes. Nor can USFS plant vegetation, or impact the environment in any way or it would be in direct contradiction with Goal 2141. ISDA recommends updating of standard 2145 to allow for effective weed management.	See response to ISDA-25.
ISDA-30	*p. 34. 2171 Allow tying of recreational stock to live trees for a maximum of one hour.* ISDA recommends this standard be removed or clarified. This is a vague requirement. Are animals allowed to be tethered overnight or for long periods of time on a highline with both ends being tied to a tree? There is no clear direction or objective with this standard.	See response to comment GG-10.
ISDA-31	*p. 40. 21106 Provide for continued livestock grazing in wilderness in a manner that minimizes impacts to wilderness character.* ISDA recommends removal of the phrase "in a manner that minimizes impacts to wilderness" Instead cite the Wilderness Act stating grazing is an acceptable use. Livestock grazing has maintained the characteristics that qualified the wilderness for designation under the action. Livestock grazing permit administration and the Wilderness Act and Congressional Grazing Guidelines are sufficient to manage livestock grazing in	The Wilderness Act (Section 2(a)) mandates federal land management agencies to “preserve wilderness character” so that why this verbiage is used in Goal #21106.

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	support of wilderness character. Reword to "continue livestock grazing in support of wilderness characteristics."	
ISDA-32	*p. 40. 21107 Consider the wilderness resource when preparing or modifying range permits, annual operating instructions, or allotment management plans or when conducting NEPA analyses.* ISDA recommends this be removed due to its vague context and as it is unneeded. This is also a given under the Wilderness Act. In addition, resource conditions as Wilderness Study Area and Recommended wilderness were already considered in administering of grazing permits, allotment management plans and NEPA evaluations prior to the wilderness designation. See previous comment.	21107 is listed as an objective, which supports goals and helps guide standards. Although it may seem redundant, it further clarifies direction from the Wilderness Act and clearly establishes a path forward during preparation or modification of range (term grazing) permits, annual operating instructions, or allotment management plans or when conducting NEPA analyses. Any permits, allotment management plan and/or NEPA authored prior to the wilderness designation would NOT have required the Agency to consider preservation wilderness character.
ISDA-33	*p. 40. 21109 Prohibit the use of motor vehicles for routine livestock monitoring, herding, and gathering.* ISDA requests removal of this standard. Standards dictating prior-authorized use and future use regarding motorized vehicles are outlined in the Wilderness Act and Congressional Grazing Guidelines for motorized equipment. Emergency situations such as those for emergency livestock removal would likely necessitate the use of motorized equipment for monitoring, herding, or gathering and should be specified in the plan. There may also be previous agreements for the use of motorized equipment that will be analyzed under the Wilderness Act.	Standard 21109 addresses "routine" activities such as monitoring, herding and gathering. There is no language in the Wilderness Act nor the Congressional Grazing Guidelines that "grandfather in" motorized uses within wilderness. However, any requests for the use of motorized/mechanized equipment within wilderness will be evaluated through the MRA process on a case-by-case basis. In the case of an emergency, the Congressional Guidelines state "*"..The use of motorized equipment for emergency purposes such as rescuing sick animals...is also permissible. This privilege is to be exercised only in true emergencies...."* In other words, a permittee may use a motor vehicle to place feed in an emergency, but not for routinely checking on the herd."
ISDA-34	*p. 41. 21110 Maintain range improvements using non-motorized, non-mechanized means. Requests by grazing permittees for occasional use of motorized or mechanized equipment or vehicles will be evaluated on a case-by-case basis*	Revise 21110: Routine livestock management activities in wilderness, including maintenance, would normally be accomplished by non-motorized, non-mechanized means. Requests by grazing permittees for occasional use of motorized

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	through an MRA. Maintenance may be done by the occasional use of motorized equipment where: *a) practical non-motorized alternatives do not exist; and* *b) the motorized use is expressly authorized in the grazing permit and advanced written permission for each maintenance activity is granted by the FS or BLM, as appropriate; and* *c) the motorized use was allowed prior to wilderness designation.* As worded, the first sentence of this standard is not consistent with the rest of the standard, as it disallows maintenance using motorized or mechanized means carte blanche, rather than as a general provision where the provisions in the Wilderness Act do not apply. This sentence should be excluded or re-written in conformance with the Congressional Grazing Guidelines. Section 2 of the Congressional Grazing Guidelines provides the following direction for maintaining livestock grazing-related facilities and the occasional use of motorized equipment in wilderness: "The maintenance of supporting facilities, existing in an area prior to its classification as wilderness (including fences, line cabins, water wells and lines, stock tanks, etc.) is permissible in wilderness. Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment. This may include, for example, the use of backhoes to maintain stockponds, pickup trucks for major fence repairs, or specialized equipment to repair stock watering facilities. Such occasional use of motorized equipment should be expressly authorized in the grazing permits for the area involved. The use of motorized equipment should be based on a rule of practical necessity and reasonableness. For example, motorized equipment need not be allowed for the placement of small quantities of salt or other activities where such activities can reasonably and practically be	or mechanized equipment or vehicles would be evaluated on a case by case basis through a MRA. This statement is more in keeping with the Congressional Grazing Guideline language.

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	accomplished on horseback or foot. On the other hand, it may be appropriate to permit the occasional use of motorized equipment to haul large quantities of salt to distribution points. Moreover, under the rule of reasonableness, occasional use of motorized equipment should be permitted where practical alternatives are not available and such use would not have a significant adverse impact on the natural environment. Such motorized equipment uses will normally only be permitted in those portions of a wilderness area where they had occurred prior to the area's designation as wilderness or are established by prior agreement."	
ISDA-35	*p. 41. 21111 Require the use of natural materials when constructing or replacing existing facilities if their use would not impose unreasonable added cost. An exception may be granted when using other materials would require less frequent motorized or mechanized access to perform maintenance.* ISDA would like to emphasize that while natural materials are an option, they should not be required in the construction or reconstruction of facilities or infrastructure already authorized or in place.	Within the 21111 standard, there is room for exceptions to the type of materials used to be made.
ISDA-36	*p. 41. 21112 Permit new range improvements only for the purpose of enhancing the protection of wilderness character.* ISDA recommends removal of this standard, and replacement with "New range improvements would be permitted consistent with direction in the Wilderness Act and Congressional Grazing Guidelines." The wilderness area is already designated and thereby protected and can only be enhanced to a certain degree. This standard would be impossible to measure and therefore meet. When is "enhance" accomplished? Previous	The Congressional Grazing Guidelines state "The construction of new...facilities...is permissible...." However, this must be done "...primarily for the purpose of resource protection...rather than to accommodate increased numbers of livestock." This is in keeping with the protection of wilderness character, notably the natural and untrammeled qualities, which leads to resource protection. Additionally, permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable

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	improvements met wilderness character prior to wilderness designation with existing conditions. The Congressional Grazing Guidelines for Wilderness state that "Furthermore, wilderness designation should not prevent the maintenance of existing fences or other livestock management improvements, nor the construction and maintenance of new fences or improvements which are consistent with allotment management plans and/or which are necessary for the protection of the range." H.R. Report 96-617, 2323.22 – Exhibit 1.	regulations as are deemed necessary by the Secretary of Agriculture." Maintenance of existing improvements is a term and condition of the term grazing permit and is required to be completed by the permittee. However, this may need to be accomplished with non-mechanized/motorized means unless otherwise authorized consistent with Standard 21110.
ISDA-37	*p. 41. 21114* For FS-administered allotments, livestock fences must provide for big-game passage.* Remove this requirement. Current range infrastructure is grandfathered into the wilderness areas. Due to the characteristics present at the time of wilderness designations, this standard is unnecessary. While big-game passage considerations may be a consideration in certain cases, this standard for existing and future fences to employ certain construction methods is likely to unduly restrict livestock grazing and its management and is inconsistent with the Wilderness Act.	This direction was established in Management Area 03, as indicated in Appendix 1 of the WMP (p. 63) referenced as Standard 03110, which is also included the in the term grazing permit.. This direction was determined by the IDT to be appropriately to be carried forward into the new management area (21) that would be established upon approval of this Plan. All fences on NFS lands are required to meet big game passage standards consistent with the Forest Plan. However, bringing fences up to this standard can occur during ongoing maintenance/reconstruction.
ISDA-38	*p. 41. 21115** *For FS-administered allotments, forage utilization for riparian areas would not exceed 30% use of most palatable forage species, or must retain a minimum 6-inch stubble height of hydric greenline species.* Remove this standard. Grazing authorizations and permits already have terms and conditions. Additionally, there is no way to address annual utilization by wildlife that may utilize forage	This direction was established in Management Area 03, as indicated in Appendix 1 of the WMP (p. 63) referenced as Standard 03109, which is also included the in the term grazing permit. In addition, this direction was determined by the IDT to be appropriately to carried forward into the new management area (21) that would be established upon approval of this Plan.

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	above 30% or below 6-inches where domestic livestock are not present. Annual use indicators are not standards. They may be goals to meet land term objectives for specific site conditions, but this direction must not be carried into the wilderness plan for all allotments. This standard is inconsistent with best science and use of utilization measures. According to Cleary et al. 2008 "…Utilization guidelines may be used with other information to make short-term management adjustments, but they are poor administrative objectives and are inappropriate as performance standards." Please specify as to what the palatable forage species and key riparian species are. According to Interagency Technical Reference TR 1737-16 "...it is important to know the potential of the area before determining whether the species present should or should not be there." Also, Key Species and PFC are not strictly linked to one another. PFC is a qualitative assessment, and USFS and BLM are linking it to a quantitative measure without reason	
ISDA-39	*p. 43. 21133 Minimize suppression impacts to wilderness character by using Minimum Impact Suppression Tactics (MIST) and assigning Resource Advisor(s) with knowledge, training, and/or experience in wilderness management. Return disturbance caused by suppression actions to as natural a condition as possible.* Natural condition is difficult to define. Suggest managing disturbed areas to as close to predisturbance condition as feasible.	The definition for natural is provided on p. 5 of the WMP, and in the Glossary. It states: "Area appears to have been primarily affected by the forces of nature and are substantially free from the effects of modern civilization." In this case, the goal would be reducing the human-caused suppression actions.

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ISDA-40	*p. 46. General Comment to section 7.22. Management Zones* ISDA requests that continued support of commercial livestock grazing and provision of forage consistent with the Wilderness Act and Congressional Guidelines be included in the Hemingway Boulder-White Cloud Wilderness Management Plan Desired Conditions and Goals, Management Direction and Action for all management zones. ISDA does not necessarily support the proposed management zones.	The direction in the wilderness plan for each resource apply across the four zones. As stated in the Plan (p.40), standard 21108 includes the Congressional Grazing Guidelines, among other references. Further, p.8 of the WMP is supportive of commercial grazing in accordance with the wilderness Act and Congressional Grazing Guidelines.
IWSF-01	The primary interest of the Idaho Wild Sheep Foundation (Idaho WSF), within both documents, is to assure there are sufficient temporal and spacial requirements for bighorn sheep as it relates to disease (s) from domestic sheep and pack goats. Our comments will be specific to pack goats relative to the management plans being developed for these areas. As outlined in both documents, diseases being transmitted from pack goats to bighorn sheep is a reality and therefore measures need to be taken to assure contact is eliminated or greatly reduced.	Alternatives A and B address this issue.
IWSF-02	To insure no pathogen transfer occurs, Idaho WSF, makes the following recommendations in order of preference: 1. We recommend that NO pack goats be allowed in any occupied bighorn habitat or documented foray areas.	Alternative B addresses the prohibition on pack goat uses and their environmental consequences (see sections 2.5.1 and 3.4.3).
IWSF-03	2. If pack goats are allowed, with the stipulations identified in the respective documents; then a permit system be developed for pack goats and required prior to any pack trips. Within that permit system, owners will present a certificate indicating the animals are healthy and *Mycoplasma ovipneumoniae* (Movi) free. Pack goats should be certified Movi free on an annual basis.	Alternative B includes "Establish a mandatory permit system obtainable from a FS/BLM office for groups of 8 or more people or with recreational stock that will remain overnight," which would include pack goats. If testing were valid, we may consider permit system. Testing does not eliminate the risk of disease transmission. Additionally, how tests are done and the frequency of tests

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		affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.
IWSF-04	3. If pack goats escape and cannot be readily captured, then the Forest Service or their delegated agent will dispatch the animal. Also, nasal swabs be collected and processed to identify any pathogens.	The agencies have proposed reasonable measures to both protect bighorn sheep, and continue to allow use of pack goats.
IWSF-05	If pack goats are authorized, then a permit and health certification model be developed and adopted by the respective agencies. Washington State University Disease Diagnostic Lab (W ADDL) can test animals for approximately $30.00/sample.	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.
IWSF-07	The importance of collecting escaped or astray animals cannot be emphasized enough to safeguard bighorn. From personal experience, I have seen where domestic goats seek and find bighorns, when left on the range. If bighorn sheep venture near domestic sheep and or goats, they are collected so as to not allow them to travel back to the core herd and possibly infect them with Movi. Idaho WSF is asking for these additional safeguards to protect one of our premier native wildlife species and parody in how escaped or foray animals are managed.	Alternative A includes a standard that includes the guideline of searching for stray pack goats.
JK-01	**Group size and number of stock:** Group size and the number of allowed stock remain too high in the proposed action. Stock represent a major detriment to trail conditions and to areas where they are tied up and graze. Fourteen head per group represent a lot of animals and a lot of impact. A limit of eight head is a more reasonable number. The group size of 12 is also too large. A limit of eight is more appropriate.	Alternative B includes group size limit of 8 people and 10 head of stock in Zone 1, and limits of 12 people and 14 head of stock in Zones 2, 3 and 4.

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JK-02	**Prohibition on fundraising activities:** Standard 21137 in the draft plan would prohibit competitive events, training events and contests. "Fundraising events" needs to be added to this list. Organizations from the Wood River Valley host a variety of fundraising events, which attract numbers of participants far in excess of the group size limits proposed in the wilderness plan. The Sawtooth Wilderness Area has been regularly used for fundraising events (peak climbs, etc.). While fundraising events may not be an issue in other parts of the national wilderness system, this should be addressed in the Hemingway-Boulders and White Clouds wilderness plan as it is a popular activity in nearby areas.	Use restrictions proposed in the WMP would prevent most fundraising activities from occurring. For example, any event that would exceed the group size limit would not be allowed. In addition, any fundraising event that has a competitive component would not be allowed within wilderness in accordance with FSM 2323.13h. FSM 2323.13h - Competitive Events Do not permit competitive events, including competition involving physical or mental endurance of a person or animal, foot races, canoe or boat races, competitive trail rides, survival exercises (including military), or other activities of this nature in wilderness. BLM Manual 6340 1.6.C.13.d Non-wilderness-dependent activities may also impair aspects of wilderness character and, when this is the case, should be prohibited. Such activities may include: A. Contests, such as physical or mental endurance of a person or animal, foot races, canoe or boat races, competitive trail rides or other forms of competition, and survival contests; …
JM1-10	**Proposed Hemingway-Boulders and White Clouds Wilderness Plan Comments:** I recommend party size be limited to 8 people total in all zones.	Acceptability of group size limits varies. Watson (1993) found that a majority of users supported limiting group size, and suggested a group size maximum of 10 people. Further, Martin, et al., (2009) summarize several studies, and find that visitors are acceptable of restrictions, such as group size limits, "especially when such restrictions help improve or preserve social and/or resource conditions." A 2004 study in the Bob Marshall Wilderness complex found a majority (57%) of visitors felt that limiting group size to a maximum of 12 people was desirable, and an additional 6% found the limit desirable only in the more heavily used parts of the wilderness (Whitmore et al., 2004).

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		The existing group size limit for FS managed lands within the wilderness areas is 20 people and 25 pack stock. Alternatives A and B call for a reduction in the group size including the number of pack stock allowed in any one group. • Alternative A considers limiting group size to a maximum of 12 people and 14 head of stock for all zones, consistent with the Sawtooth Wilderness. • Alternative B, considers limiting group size to a maximum of 8 persons in Zone 1, and a maximum of 12 persons in Zones 2, 3, and 4. (See Section 2.6.2 of the EA.) And, limiting the combined number of pack in saddle stock in one group to a maximum of 10 animals in Zone 1, and a maximum of 14 animals in Zones 2, 3, and 4. The proposed group size limits and stock size limits in Alt. A and B coupled with the various other standards and guidelines (locating stock handling areas away from water sources, restricting stock use in certain areas, and minimizing impacts to live trees when tying stock outside of camp), were developed as a means to protect the social and natural components (i.e. water quality, soils, and vegetation) of these wilderness areas.
JM1-11	Pack stock needs to be limited to 8 per party.	See also JM1-10. Studies show that groups with equine stock tend to have more impacts (e.g. soil erosion, tree damage) than hiker only groups. Like groups size, the acceptability of stock size and associated impacts vary in different environments. Alternative A and B call for a reduction in the number of allowable stock for any one group. This coupled with other standards and guidelines were developed as a means to protect the social and natural components (i.e. water quality, soils, and vegetation) of these wilderness areas.

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		• Alternative A considers limiting recreational stock group size to a maximum of 14 animals for all zones, consistent with the Sawtooth Wilderness. • Alternative B considers limiting recreational stock group size to a maximum of 10 animals in Zone 1, and a maximum of 14 animals in Zones 2, 3, and 4. (See Section 2.6.2 of the EA.)
JM1-12	No signs should be permitted in either Wilderness in keeping with the direction and intention of the Wilderness Act. Signs may be placed at portals to the Wilderness.	Wilderness policy allows for limited signage within wilderness (FSM 2324.33f, BLM 6340 1.6.C.13.c.iii). The WMP (p. 23) states under guideline JMJP-042: At designated trail junctions, provide the minimum amount of signs necessary for either the routing or location of the traveler or for the protection of the wilderness resource (2324.33f, BLM 6340 1.6.C.13.c.iii.).
JM1-13	The Plan fails to directly address whether the Forest Service and the BLM will deny or permit the killing of carnivores like wolves, mountain lions and bears in designated Wilderness and under what circumstances. The recent successful legal challenges over illegal radio collaring of wolves and elk by Idaho Fish and Game in the Frank Church River of No Return Wilderness provides a cautionary tale that the agencies have chosen to ignore in the Plan. How will the public know when the Forest Service and BLM may be authorizing under some obscure Memorandum of Understanding with Wildlife Services or Idaho Fish and Game the killing or collaring of native wildlife in Wilderness? The Plan needs to provide for a public process before authorizing the killing or collaring of any carnivores in Wilderness, and the draft Plan finesses any discussion of this activity and how it may or may not happen.	Guideline 21116 (Section 7.15) of the WMP states: Review wildlife damage control measures, including predator control, to determine the need for control pursuant to agency policy and regulation, and the method(s) to be used pursuant to cooperative agreements or memoranda of understanding. Actions that would involve uses generally prohibited under Section 4(c) of the Wilderness Act would may be considered and could be authorized if determined the minimum necessary. The authorized agency implementing control measures would provide post-action reporting to the Forest Service and BLM, as applicable. (FSM 2323.33c, and BLM Manual 6340 1.6C 21.c.viii(8))
JM1-14	The Plan should designate the Hemingway-Boulders and White Clouds Wildernesses as Class 1 Airsheds pursuant to the Clean	The SNRA+ Act is silent on airshed, so we must manage the wildernesses as Class II. FSM 2320.1 – The Clean Air Act, as amended…, directs the Forest Service to protect class I air

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	Air Act. Reducing the protection for newly designated Wilderness Areas to Class 2 is quite likely illegal.	quality standards in certain wilderness areas and class II standards on the remaining wilderness areas. These areas are not designated as Class I.
JM1-15	The use of pack goats in designated Wilderness should not be permitted. Anything less assures that the Hemingway-Boulders and White Clouds Wilderness Areas will never have native bighorn sheep restored to their formerly occupied landscapes. Focusing attention on potential impacts to bighorns only in currently occupied areas is short-sighted and will close off potential expansion of the East Fork of the Salmon River and Lost River bighorn herds into the remainder of these Wilderness Areas.	Alternative B analyzes prohibiting pack goat use across both wildernesses.
JM1-16	Airspace flyovers of the Wilderness Areas should be limited to 2000 feet above ground level.	See response to comments ICLWS-1 and AR-02.
JM1-17	Thank you for the opportunity to provide these comments, and please keep me on your mailing and emailing lists for these two Wilderness plans.	All commenters will remain on the mailing list.
JM2-01	Please incorporate the analysis in the attached paper regarding federal and state authority over wildlife on public lands including designated Wilderness Areas. From statements made at a recent public meeting regarding the Jerry peak and Hemingway- Boulders and White Clouds Wilderness Plans, it appears that the Forest Service and the BLM continue to believe that in Idaho the federal land management agencies manage habitat and the Idaho Department of Fish and Game manages wildlife. The attached paper clarifies and denies that widespread mythology and recreates the actual legal relationship between	The federal agencies follow regulations (e.g. BLM Manual 6340, 1.6(C)21 and FSM 2323.3) which are issued by the agency to carry out the intent of legislation enacted by Congress and ensure uniform application of the law. The "Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness" (p. 17 of WMP) serve as a framework for cooperation among the FS, BLM and the States in the coordination of fish and wildlife management and in the development of cooperative agreements or other management plans. The AFWA guidelines state; "Section 4(d)(7) of the Wilderness Act provides that "nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the

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	the federal government and the states that confirms that the federal government has a distinct and important and legally authorized role to play in the management of wildlife on federal public lands. This fact is especially important for these Wilderness Areas in regard to the protection and expansion of the East Fork bighorn sheep herd and in protecting native carnivores like wolves, coyotes, bears and mountain lions from killing or collaring by other federal or state agencies like Idaho Fish and Game and Wildlife Services (part of APHIS/USDA). Please incorporate the conclusions of the attached paper into your Wilderness Plans by correcting any statements stating or suggesting that the Forest Service and the BLM have no authority over wildlife management on public lands.	national forests." The parties acknowledge that, consistent with applicable Federal and State laws, the States and the Federal government each have management responsibilities affecting fish and wildlife, and will endeavor to work cooperatively in the fulfillment of these responsibilities."
JM2-02	Attachments: M. Nie, C. Barns, J. Haber, J. Joly, K. Pitt & S. Zellmer 2017 (draft). Fish and Wildlife Management on Federal Lands: Debunking State Supremacy. To be published by Environmental Law: 47:4(2017).	A review of the Nie et al. 2017 paper did not find anything, especially in regard to wilderness management, that contradicts the WMP. Also, see response to JM2-1.
JM3-01	On page 21 of the Hemingway-Boulders and White Cloud Wilderness Plan there is this statement: "Substantial lodgepole and whitebark pine community mortality has occurred over the last 10–15years because of mountain pine beetle outbreaks. In many locations within the wildernesses, an abundance of snags and surface fuels now exist, making high-intensity and high-severity fire more likely." This statement is factually incorrect since recent research concludes that the presence of snags and surface fuels from	This statement, as written, is factual. It's also relative in that increasing surface fuel loading is site specific and is not occurring uniformly in either wilderness. The results of the referenced paper state that time since outbreak is an important factor in terms of the effect of insect caused mortality on fuel composition, and thus intensity during a fire and the resultant burn severity. As stated in the referenced study once the dead foliage falls from trees there is a reduction in canopy fuel continuity. The lack of fine fuels in the canopy decreases the likelihood for crown fire, and therefore reduces intensity and severity on the overstory. Typically this is described as the "gray stage" in the literature. Given the MPB outbreak occurred 10-15

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	mountain pine beetle caused mortality reduces fire severity; see the paper referenced below. Will the second sentence of this statement be changed accordingly? Environ. Res. Lett. 11 (2016) doi:10.1088/1748-9326/11/4/045008 Do insect outbreaks reduce the severity of subsequent forest fires? Garrett W Meigs1,2 , Harold S J Zald1 , John L Campbell1 , William S Keeton2 and Robert E Kennedy3 1 College of Forestry, Oregon State University, Corvallis, OR 97331, USA 2 Rubenstein School of Environment and Natural Resources, Gund Institute for Ecological Economics, University of Vermont, Burlington, VT 05405, USA 3 College of Earth, Ocean, and Atmospheric Sciences, Oregon State University, Corvallis, OR 97331, USA E-mail: gmeigs@gmail.com Keywords: bark beetle, defoliator, disturbance interactions, fire ecology, forest health, regime change, remote sensing Abstract **[bold added]** Understanding the causes and consequences of rapid environmental change is an essential scientific frontier, particularly given the threat of climate- and land use-induced changes in disturbance regimes. In western North America, recent widespread insect outbreaks and wildfires have sparked acute concerns about potential insect–fire interactions. Although previous research shows that insect activity typically does not increase wildfire likelihood, key uncertainties remain regarding insect effects on wildfire severity (i.e., ecological impact). Recent assessments indicate that outbreak severity and burn severity are not strongly associated, but these studies have been limited to specific insect or fire events. Here, we present a regional census of large wildfire severity following outbreaks of two prevalent bark beetle and defoliator species, mountain pine beetle (Dendroctonus ponderosae) and western spruce budworm (Choristoneura freemani), **across the US Pacific Northwest.** We first quantify insect effects on burn severity with spatial modeling at the fire event scale and then evaluate how these effects vary across the full population of insect–fire events(n = 81 spanning 1987–2011). **In contrast to common assumptions of positive feedbacks, we find that insects generally reduce the severity of subsequent wildfires.** Specific effects vary with insect type and timing, but both insects **decrease the abundance of live vegetation** susceptible to wildfire at multiple time lags. By dampening subsequent burn severity, native insects could buffer rather than exacerbate fire regime changes expected due to land use and climate change. In light of these findings, we recommend a precautionary approach when designing and implementing forest management policies intended to reduce wildfire hazard and increase resilience to global change.	years ago, the current conditions reflect a transitional period where standing snags are beginning to fall and becoming surface fuel. Parsons et al 2014 state that fire hazards and behavior will change following the "gray stage." Collins et al 2012 state that accumulation of wind thrown snags resulting from MPB caused mortality can ultimately result in up to a five-fold increase in surface fuels compared to the pre-disturbance condition (this is largely dependent on the pre-infestation stand density). Additionally, lodgepole doesn't only exist in pure stands within the HBWC wilderness areas. The mixture of additional surface fuels >10 years following an MPB infestation coupled with other live coniferous species (fir and spruce) that remain in the overstory results in a higher fire hazard compared to the condition of a relatively homogenous lodgepole stand after an MPB infestation (Pelz et al 2014). The wording of quoted statement will be reviewed to ensure it's applied in the appropriate context. Collins, B.J., C.C. Rhoades, M.A. Battaglia, and R.M. Hubbard. 2012. The effects of bark beetle outbreaks in forest development, fuel loads, and potential fire behavior in salvage logged and untreated lodgepole pine forests. Forest Ecology and Management 284:260-268. Pelz, KA., Rhoades, C.C., Hubbard, R.M., Battaglia, M.A., Smith, F.W. Species composition influences management outcomes following mountain pine beetle in lodgepole pine dominated forests. Forest Ecology and Management 336: 11-20. Parsons, R., Jolly, M., Langowski, P., Matonis, M., Miller, S. In: Matonis, M.; Hubbard, R.; Gebert, K.; Hahn, B.; Miller, S.; Regan, C. Future Forests Webinar Series, Webinar Proceedings and Summary: Ongoing Research and Management Responses to the Mountain Pine Beetle Outbreak. Proceedings RMRS-P-

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		70. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. p. 19-28.
JR-01	I keep reading all of this detail on the risk of disease transmission with big horn sheep. It seems like pack goats are being classified as domestic sheep, which they are not. When I go into the back country, my goats are by my side 100% of the time. They don't wander off looking for BHS. Last year I was involved in the MOVI study and had all my goats tested three times and all tested negative. How can my goats transmit a disease they don't carry, let alone when will they come into contact with a BHS?	See response to comment CC-01. Additional information is in the wildlife report in the project file.
JR-02	I am not aware of any proven case where a pack goat transmitted any disease. There was some feral goat in hell canyon that caused some concern, but in the end he was not carrying the same pathogen that killed the BHS. There was much research done by Dr Besser last year and nothing linked pack goats to BHS die off. I support the wilderness and support sound management decisions, but I also want the decisions made to be based on data, not on speculation or based on persuasion of special interest groups. Please consider all of this and keep the wilderness open to me and pack goats.	See response to comment CC-01. Additional information is in the wildlife report in the project file.
KD-01	These page and paragraph numbers referred to the actual actual document. Page 17 paragraph 1 Risk of disease transmission. Are there any documentation or studies that have determined the percentage of chance of disease transmission between a packgoat and a Bighorn sheep or any goat for that matter with a	Sawtooth Forest is not aware of studies that determined risk of disease transmission from domestic goats to bighorn sheep, only that it can occur. Proposed action is an attempt to keep risk low while still allowing pack goat use of most of the HB-WC wildernesses.

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	big horn sheep in the wild. Or are you assuming 100% transmission if any theoretical contact is made such as rubbing noses? Did the bighorns(2) that were killed because they were seen with a goat around Challis or Stanley in 2017 have the same disease as the goat had?	
KD-02	What are the chances of people being with in a couple hundred yards of bighorn sheep when hiking in the summer or fall? I never have been or even seen any in the Big Horn Crags.	The chances of observing bighorn sheep within close range are very good during the spring, summer, fall period within the proposed pack goat prohibition area.
KD-03	The only time I know of a study being done with a feral goat and big sheep was in Hells Canyon. The final study indicated that the disease that the feral goat and the big horn sheep that were with it were not carrying the same pathogen that caused the die off of the Hells Canyon Big Horn Sheep . It would be my guess that a goat in that area that came from a large meat/brush herd.	See response to comment CC-1. Additional information is in the wildlife report in the project file.
KD-04	Page 30 paragraph 4 This is prohibiting goats from the big boulder drainage. This is unnecessary if goats can be tested and free from *Mycoplasma Ovipneumoniae* also known as MOVI which the current research believes is the culprit to causing Big Horn Sheep die offs. How can pathogens be transmitted if neither animal has them as confirmed through testing?. This also applies for the whole document as well as the perceived "Risk of disease transmission"	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.
KD-05	Page 30 paragraph 5. Three Packgoats per person. Was this just a random number or did it start out by asking at the packgoat community what a reasonable number would be?. I would think five would be a more reasonable where 3-4 are	The maximum size limit for pack goats per person and per group was taken from the measures outlined by the North American Packgoat Association; standard 2155.

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	working and one or two that may be in training that are 1 to 3 years old.	
KD-06	**Wildlife Resources** The statements are very general ,subjective, and not very accurate specially the interpretation of Dr. Besser's study. The statement that says "this pathogen can trigger the pneumonia outbreaks and bighorn sheep leading to higher mortality in the bighorn sheep populations"(Besser 2017) is NOT what the results of the study were. After Dr. Besser infected goats with the MOVI virus so that they could transmit the virus to bighorn sheep by having them comingle. He described the Bighorn sheep as they looked like they had pneumonia. He described the severity of the illness as being markedly milder than his been seeing other experiments with the domestic sheep strains of the bacteria. The goats were sick as well but all (Bighorn Sheep as well) were getting better prior to Dr Besser killing the Bighorn Sheep to study their lungs. Dr Besser said that it looked like the bighorn sheep had pneumonia. Not published was the histology or the lab work to verify what he saw to prove that he was correct, that came after the published report. The histology lab work showed that the bighorn sheep **did not have the pneumonia**.	See response to comment CC-1. Additional information is in the wildlife report in the project file.
KD-07	Where a very very extreme chance that a pack goat and a Bighorn Sheep contact is made chances are extremely small that they would be any disease transmission . There have been some studies that show zero transmission when sharing an area for months with a common fence between them. I would assume that by making that statement you would have studies that show disease transmission from a Packgoat to a big horn sheep in the wild exist.The Hells Canyon final study indicated that the disease that the feral goat and the big horn sheep that were with	Sawtooth Forest is not aware of studies that determined risk of disease transmission from domestic goats to bighorn sheep, only that it can occur. Proposed action is an attempt to keep risk low while still allowing pack goat use of most of the HB-WC wildernesses.

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	it were not carrying the same pathogen that caused the die off of the Hells Canyon Big Horn Sheep.	
KD-08	*Mycoplasma ovipneumoniae* is not commonly carried by Packgoats as proven by Dr Maggie Highland in her study of 350+ Packgoats in 2016 I believe. This is where only I think only 4% of the Packgoats carried MOVI and something like 90% of those were under 1 year old and from about 7 different people from the western 1/2 or 2/3rds of the U.S.	See response to CD-02 regarding Highland's research.
KD-09	Dr. Besser stated in a Wild Sheep Foundation article after the study that "*M. Ovipneumoniae* test - negative Packgoats represent a negligible risk for triggering a pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies"	See response to comment CC-03.
KG-01	I hope to see improved educational signage at main trailheads.	Standards 21146 and 21147 encompass this comment; whereas the objectives under the Education and Interpretation section of the WMP include topics that may be emphasized on trailhead signs, and elsewhere. Further, as noted on p. 5 of the WMP, the Plan "does not describe … the schedule of implementing the direction…"
KG-02	I hope that there will be a Ranger presence for enforcement of regulations.	When a plan is adopted, the Forest Service and BLM will work with wilderness rangers, volunteers and partner organizations to implement the plan, as well as agency law enforcement**.**
KG-03	I would like to see the group size of 12 people reduced to 10 people.	Alternative B considers limiting group size to a maximum of 8 persons in Zone 1, and a maximum of 12 persons in Zones 2, 3, and 4. (See Section 2.6.2 of the EA.)
KG-04	I would like to see the number of pack and saddle stock in one group to 10.	Alternative B considers limiting the number of recreational stock in one group to a maximum of 10 in Zone 1, and to a maximum of 14 in Zones 2, 3, and 4. (See Section 2.6.2 of the EA)

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KG-05	Most of all, I hope NEVER to see mountain bikes or any mechanized vehicles (except wheelchairs) allowed in ANY wilderness!	Bikes and other wheeled or motorized vehicles are banned by law (Wilderness Act, Section 4c).
KW-01	Please keep Wildlife Services out of our wilderness areas. No helicopters, traps or snares.	See response to comment BWCC-14.
KW-02	Please restrict outfitters to smaller sizes and have them use fewer horses. Their camps should be moved periodically and cleanup and restoration required.	The wilderness plan proposes a group size limits that would apply to both the general public and outfitted/guided groups (see standards 2165 and 2166 in section 7.10).
KW-03	Cattle,sheep and their associated fences, water tanks, and corrals and quasi permanent herder camps should not be allowed in our wilderness areas.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.
KW-04	All trail work in a wilderness area should be accomplished by trained Forest Service employees.	Staffing and budgets do not always allow for all trail work to be accomplished solely by the FS. While the FS does employ a trail crew, they conduct work on over 850 miles of trails within the Sawtooth NRA. Furthermore, the National Forest System Trails Stewardship Act directs the Department of Agriculture (USDA) to significantly increase the role of volunteers and partners in trail maintenance. Objective 2113 includes working with partners and volunteers “to accomplish work in these wilderness areas.”
KW-05	Hunting in a designated wilderness area should not be allowed.	Section 4.d. (8) of the Wilderness Act states: Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests.

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		Further, agency policy acknowledges hunting, fishing and trapping as legitimate activities in wilderness. 2323.35 - Wildlife and Fish Habitat Achieve a balance of wildlife and fish with their habitat through cooperation with State agencies in management of public hunting, fishing, and trapping. BLM 6340 1.6.C.21.c.ix. Angling, hunting, antler collecting, and trapping are legitimate wilderness activities subject to applicable federal and state laws and regulations. Recreational uses associated with fish and wildlife resources, such as hunting, fishing, and wildlife viewing, are important primitive recreational activities associated with many wilderness areas. Also see response to comment BWCC-14.
KW-06	Regulations should be actively enforced. Bikes should be banned, as well as the unthinkable....ATVs.	Bikes and other wheeled or motorized vehicles are banned by law (Wilderness Act, Section 4c).
LK-01	**Bighorn Sheep protection** Standards for Pack goats. The extensive requirements for pack goat use in the Wilderness are comprehensive and would be helpful in keeping pack goats away from bighorn sheep. My concern is the difficulty of ensuring that recreationists with pack goats will be able and willing to follow all of these instructions. Well-meaning people are often careless about the details of rules, especially if they are not well informed about the necessity of these rules. I've seen many, many people disobeying the rules in National Forests and BLM lands, including Wilderness areas, over the years. I'm not perfect either of course, and I know how easy it is to "skate" around rules.	Proposed action is an attempt to keep risk of disease transmission low while allowing pack goat use. Risk will not be zero.

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LK-02	And the EA states that the reason for putting in place the 9 requirements is that "the risk of disease transmission is so high . . ." that these requirements are necessary. But they won't be enough to protect bighorn sheep. Your responsibility to protect the wildlife of the Wilderness as a Wilderness value will be impacted by the management actions in Alt A. Allowing bighorn sheep to be impacted by human use with pack goats and the accompanying hazing by pack goat users to keep them away from pack goats, does not follow your direction to keep the wilderness "untrammelled" or to protect "other features of value" as described on page 2 of the EA. Bighorn sheep already face challenges and will surely face more in the future. To insure their safety, more areas than just the East Fork Herd Home Range must be set aside with no pack goat use. With livestock removal in the Wilderness, bighorn sheep may expand into areas like Herd Creek. As time goes on, pack goat use may increase and like all user groups, they will fight the need for areas to be closed to protect bighorns. Please take steps now to protect future bighorn sheep habitat.	Alternative B would prohibit pack goats in the HB-WC wilderness areas.
LK-03	**Permits and Group Sizes** I support the requirement of permits for all users, as detailed in the EA, to educate users about regulations, and determine use levels and patterns. This will help people to more often follow the important regulations and standards i.e. where to camp away from water, where and how to tie horses, etc. Because of the impacts of large groups, especially with recreational stock, detailed in the EA, please establish a mandatory permit system for groups of 8 or more people with recreational stock who will remain overnight in the Wilderness, as outlined in Alt B.	The permit system components, as detailed under Alternative B, mirror those established for the Sawtooth Wilderness.

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	These permits are already required for the Sawtooth Wilderness and have not caused problems for visitors, the EA informs us. So there's no reason not to implement this requirement in the WMP.	
LK-06	**Eligible Wild and Scenic Rivers** I support the designation of eligible wild and scenic rivers as detailed in the EA.	The identification of eligible wild and scenic rivers occurred under the Sawtooth Forest Plan. The management area (21) that would be created under this Forest Plan amendment would carry forward the direction for those rivers within the planning area developed under the Forest Plan.
NAPgA-01	All over the west, where Land Use Plans are being re-accomplished, or created, goats and goatpackers are being ushered out of the forest. Are there legitimate concerns? Or does this more realistically follow the logic of, "If you say it loud enough, and long enough most all will believe it." The land managers stated reason for restricting goats from the wilderness where Bighorn sheep (BHS) are located, is the suggested 'risk' of 'disease transmission', specifically disease that is caused or triggered by *Mycoplasma ovipneumoniae*. I will submit to you that this fear of 'disease transmission' by packgoats cannot be substantiated by any current scientific data. In point of fact, the most recent science says exactly the opposite. Furthermore, in the formulation of Land Use plans, NEPA requires that current science be followed, and decisions made, especially where it restricts or eliminates any user, must be based exclusively on what science is directly attributable to that particular user. I will submit that in regards to this potential closure, NEPA dictates have been resoundingly ignored.	See response to comment CC-1. Additional information is in the wildlife report in the project file.
NAPgA-02	First the peripheral issues: 1) As already note in the EA's for this plan, there is an extremely small amount of goat packer traffic in these areas. I have visited the area of potential closure on two occasions, and I	Past use doesn't necessarily predict future use. Proposed action is an attempt to keep risk of disease transmission low while still allowing pack goat use.

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	only know of one other packer that has visited this particular area.	
NAPgA-05	6) Finally, as two recent research projects have indicated, *Mycoplasma ovipneumoniae* is at an exceedingly low prevalence in our packgoats. Additionally, with appropriate testing, we can prove that our packers are NOT carrying it. If we can substantiate that our goats are test-negative, then there is NO legitimate reason for keeping them out of the forest.	Disease transmission is possible even with low prevalence of occurrence. The proposed action (Alternative A) is an attempt to keep risk of disease transmission low while still allowing pack goat use. Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.
NAPgA-06	**** Areas of Concern in the Hemingway-Boulders Wilderness Plan **** Page 17, Para 1; "Risk of Disease Transmission" This statement would imply that there is a considerable risk of disease transmission between packgoats and BHS. A packgoat owner is exceptionally concerned with the health of his goats, and would never take a sick animal into the woods. From a purely practical standpoint, a sick animal would be likely to leave the packer hanging by refusing to carry his equipment back out of the woods. In other words, our packgoats are not "diseased" and the grand majority of our healthy packgoats and domestic goats housed on the same premises as packgoats do NOT even carry *Mycoplasma ovipneumoniae*. But in regards to the primary pathogen of concern, *Mycoplasma ovipneumoniae*, as will be discussed in greater detail in the EA comments, there is very little chance of a packgoat carrying that into the woods as, the majority of our goats don't carry it, and further, can be tested to verify that.	Individual animals can be carriers without showing symptoms.
NAPgA-07	Page 30, Para 2; Objective 2152, ["Minimizing contact with BHS"] What contact? There has never been any documented instance of a packgoat getting away and mingling with a BHS	There is a risk of contact when domestic goats and bighorn sheep are in the same area. Bighorn sheep can approach goats.

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	herd. The one instance that invariably comes up at this point, is the so-called feral Hells Canyon goat (NOT a packgoat) that mingled with a BHS herd that subsequently had a pneumonia die-off. The research that followed this incident, when carried to its conclusion, indicated that the feral animal was not carrying the same pathogen(s) that triggered this unfortunate event. Nor is or was there any evidence to support that this goat was a lost or abandoned packgoat).	
NAPgA-08	Page 30, Para 4; Standard 2154, ["Packgoats will be prohibited in the East For Herd Home Range"] [As described on Page 32, Figure 4] This potential closure is, once again, due to the risk of potential 'disease transmission'. What disease transmission? If you can be tested for the current pathogen of interest that MAY cause disease in bighorn sheep, *Mycoplasma ovipneumoniae*, and your boys don't have it, YOU CAN'T GIVE IT!! This one must be addressed as it prohibits us from the entirety of the Big Boulder drainage, a total of at least 12 quality lakes & fishing. I have done this area before, as it is one of my favorite areas of Idaho. To lose access to it would be a sadness indeed, and especially because the stated reasons for closing this portion of the forest do not have any validity whatsoever.	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing.
NAPgA-10	Page 30, Para 5; Standard 2155, Item 4; ["A limitation of 3 packgoats per person"]. This is impractical and unduly restrictive. See the response below to the EA, Page 11, 2.5.1.	The group size limitation proposed for pack goats is taken from the NAPgA website (http://www.napga.org/best-management-practices-psr/), as a best management practice to limit "potential number of pack goats in bighorn source habitat." The website states: "Within bighorn source habitat, pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group. These numbers represent a maximum."
NAPgA-11	Page 30, Para 5; Standard 2155, Item 5; While these sort of scenarios sound great on paper, in many cases they are wildly impractical in practice due to the limitations of terrain, etc. In	The measures proposed in 2155 are those promoted by the North American Packgoat Association (http://www.napga.org/best-management-practices-psr/) as best management practices to

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	many miles of hiking (for this writer personally, well over 1000, possibly closer to 2000), I have never met or seen any BHS on or close to the trail, let alone in a campspot. My three visuals of BHS have all been in the high environs they prefer, and not near any 'traffic' areas.	enable control of pack goats, and to ensure separation of contact between pack goats and bighorn sheep. See response to KD-02.
NAPgA-12	**** Areas of Concern in the Hemingway-Boulders Environmental Assessment **** Page 11, 2.5.1; The number of allowable packgoats is unnecessarily restrictive, especially when compared with the allowed numbers of other stock. Packgoats can vary widely in size, with some being able to carry no more than 20lbs. Also, they are usable for no more than 6-9 years, and so there are always young ones, 'coming up', and must be taken along for the training experience. If these numbers were set low due to concern about 'control' of one's animals, for reasons stated above, there is far less to be concerned about regarding goats than other packstock. Unlike horses or llamas, packgoats do not have to be restrained, as they are unduly concerned about 1) remaining together; and ultimately, 2) remaining with their handler.	The group size limitation proposed for pack goats is taken from the NAPgA website (http://www.napga.org/best-management-practices-psr/), as a best management practice to limit "potential number of pack goats in bighorn source habitat." The website states: "Within bighorn source habitat, pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group. These numbers represent a maximum."
NAPgA-13	Potential Addition to Pack Goat Guidelines: Although not in the current guidelines, NAPgA believes that the following should be added: "No packgoats under 1 year old be taken into the wilderness." The reason for this suggestion, is that in the research project conducted by Margaret Highland, 90% of the *Mycoplasma ovipneumoniae* 'positives' that were found occurred in goats under 1 year.	Recommending to pack goat users to only use goats over 1 year of age can be included in educational efforts (Alternatives A and C). Reasonable measures were included in Alternative A as promoted by NAPGA (as published on their website). Pack goat users are familiar with these measures.
NAPgA-14	Page 48, (Reader Page #56) Wildlife Resources: Sadly this is the same old, same old. These old standby justifications have been bandied around for a very long time as the purported authority to	"Contact between pack goats and bighorn sheep can result in disease transmission" has been shown to occur. See response to comment CC-01 and wildlife report.

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	keep goats out of the woods. For these we will have to examine them one sentence at a time: Wildlife Resources (My comments are in *Italics* [editor changed]) The actual paragraph in question, followed by my dissection of it. Wildlife Resources Contact between pack goats and bighorn sheep can result in disease transmission. *Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats, can be transmitted to bighorn sheep when the species interact. This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017), affecting the natural quality of the wilderness. 1) Contact between pack goats and bighorn sheep can result in disease transmission *[Possibly, but this is unproven and speculative. No record of that has ever occurred except in controlled research situations; situations that are wildly unlikely to occur in a natural habitat, where these animals are much more likely to want to remain separated. NEPA requires that real science and real instances of stated contacts be cited as a justification for the limitations placed on a wilderness user]*.	The paragraph cited included language that was not clearly interpreted between the specialist report and the environmental assessment. Edits have been made in the JMJP EA (p. 48, 75). The Wildlife Specialist Report reviewed literature related to domestic goat and bighorn sheep disease transmission. Besser et al. 2017 is cited in the wildlife specialist report.
NAPgA-15	2) *Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats *[This sadly, is a patent falsehood as it is not 'commonly' carried at all. In fact, two recent research reports indicate that there is very little occurrence of Mycoplasma ovipneumoniae in the goat community as a whole. Additionally, the recent Besser, et. al, research project quoted below, indicates that even goats purposely infected with Mycoplasma ovipneumoniae, still didn't cause lethal pneumonia in the captive research bighorn sheep],*	See response to NAPgA-14.

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NAPgA-16	3) …can be transmitted to bighorn sheep when the species interact *[Once again, unproven and speculative. When has an interaction like this ever occurred in the real world (ie. outside of a research setting)? Meaning when has a packgoat left his/her handler and gone looking for BHS. Quite simply, it hasn't. Once again, NEPA requires that justifications for limitations placed on a wilderness user must be based on documented science and events. Not on suppositions that it 'probably has happened' or 'could happen'.].*	See response to NAPgA-14.
NAPgA-17	4) This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017) *[This is the most egregious statement of all. Quite simply, That was NOT the conclusion of Besser's research, and indeed is patently false]. His actual conclusion as stated in his research: 'M. ovipneumoniae* strains carried by domestic goats were transmitted to comingled bighorn sheep, triggering development of pneumonia. However, the severity of the disease was markedly milder than that seen in similar experiments with domestic sheep strains of the bacterium'. *Furthermore, although there was reported evidence of respiratory illness while the bighorn sheep were alive, Besser never confirmed that the animals had pneumonia, not even after he had killed them in order to look at their lungs to verify pneumonia actually had occurred. The end result was that they didn't actually have pneumonia. (note: the researcher killed the bighorn sheep, not disease from comingling with domestic goats).* It is also very relevant that Besser's study goats in one of the 2 described studies were ONLY infected with *Mycoplasma ovipneumoniae* because he purposely gave it to them. They were unquestionably not infected until his intervention. The BHS reaction, according to Dr. Besser, was markedly milder AND there was no proof that the bighorn sheep even had pneumonia.	See response to NAPgA-14.

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	The eventual result of the histopathology performed after they were put down did NOT indicate or describe the presence of pneumonia. Now, finally, in addition to the fact that there is no concrete indication that would indicate the need to restrict goats from wilderness areas inhabited by BHS, Dr. Besser also stated in his article to the Wyoming Wild Sheep Foundation: "If the low prevalence of 'the carriage of *M. ovipneumoniae* by packgoats is confirmed by testing" (and it was)… "I believe that *M. ovipneumoniae* test-negative packgoats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies." The final analysis is that the Forest Service, F&G & other land managers, cannot possibly justify restricting goatpackers out of the forest. The many reasons stated above indicate that there is no reasonable suspicion that goats can, or will, cause a disease event in BHS, now or in the foreseeable future.	
NAPgA-19	What NAPgA wants the Land Use Plan to do for All users, especially goat users… NAPgA suggested the limitations and standards and therefore completely supports the Standards in 2155 of the Land Use plan. NAPgA also supports the use of permitting in order to insure that all goatpackers follow the guidelines and testing indicated in this analysis. This cannot place an undue burden on land use agencies due to the paucity of individuals actually taking goats into the wilderness.	Alternative B includes "Establish a mandatory permit system obtainable from a FS/BLM office for groups of 8 or more people or with recreational stock that will remain overnight," which would include any overnight use of pack goats.
NAPgA-20	What NAPgA does NOT support is the closure of the forest to goats on the basis of false and speculative standards that cannot stand the scrutiny of scientific examination.	Exclusion of pack goats was analyzed under one alternative (Alternative B), whereas the other two alternative consider lesser restrictions.

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NC-01	I am a citizen of Idaho and avid archery elk hunter spending much of my hunting time hunting and packing in Southern Idaho. My interest in the Hemingway-Boulders & White Clouds Wilderness Management Plan is the effects it may have on my family and friends to travel this country with our packgoats. Our packgoats are vital to our ability to access the country we hunt. Areas of Concern in the Hemingway-Boulders "Wilderness Plan" Page 17, Para 1; "Risk of Disease Transmission", Page 30, Para 2; Objective 2152, "Minimizing contact with BHS", Page 30, Para 4; Standard 2154, "Packgoats will be prohibited in the East For Herd Home Range", Members of the North American Packgoat Association, in cooperation with M. A. Highland, DVM, PhDc, Dipl. ACVP Animal Disease Research Unit - Agricultural Research Service - USDA have concluded a study in 2016 on the prevalence/surveillance of the pathogens that have fueled the wide belief that packgoats pose a risk to bighorn sheep. There is no other packgoat research on the prevalence of *Mycoplasma ovipneumoniae* (MOVI) the primary bacterial agent associated with bighorn sheep pneumonia, and *Mycoplasma conjunctivae* and *Chlamydia* spp. the bacterial agents that causes pinkeye. Nearly 500 packgoats had serial testing done. The results of this research are available from Dr. Highland. Please make yourself familiar with the results of this study before finalizing the wildness plans. It proves that packgoats are not a threat to Big Horn Sheep and should not be restricted based on best available science. Dr Highland presented her findings to the American Goat Federation in Denver this year her short slide presentation and contact information is attached.	See response to CD-02.
NC-02	Dr. Tom Besser Professor of Veterinary Medicine, WSU College of Veterinary Medicine, WA Animal Disease Diagnostic Laboratory authored an article titled "Do Domestic Goats Pose a Risk to Bighorn Sheep?", Wild Sheep Magazine	See response to CD-02.

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	Summer edition 2016. I have attached a copy of this short article. His work has been funded by the Wild Sheep Foundation and included a convince sample of 3 goats, not packgoats, that were MOVI negative. These goats were inoculated with MOVI for purpose of Dr Besser's BHS pneumonia study. None of the animal in the goat BHS study died of pneumonia. I have videos and emails from Dr Besser detailing this information.	
NC-04	All 3 of my packgoats are have been tested a minimum of 4 times and will continue to be tested annually. They are MOVI negative and pose zero risk to BHS. MOVI negative packgoats cannot given pneumonia to any animal. We do not deserve to be removed from any part of our Public Lands. Your decision to do so will impose a great hardship on my ability to access the back country in this area. Your decision will be viewed by other land managers as responsible and in good judgment. I beg you look at the best available science with a critical eye.	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing. The Wildlife Specialist Report reviewed literature related to domestic goat and bighorn sheep disease transmission.
NPH-01	I am an avid packgoat enthusiast. I have read over the Hemingway-Boulders and White Clouds Wilderness Management Plan Environmental Assessment and I must say I am disappointed that the government still insists on blaming packgoats for the spread of disease, including Mycoplasma ovipneumonia. The following quote comes from the Assessment: "*Contact between pack goats and bighorn sheep can result in disease transmission.* Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats, can be transmitted to bighorn sheep when the species interact. This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017), affecting the natural quality of the wilderness.*" There has been NO study that confirms fatal disease transmission between goats and bighorn sheep. Furthermore,	See response to comment NAPgA-14 for corrections to this statement.

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	extensive tests conducted by Dr. Maggie Highland in 2016 showed that *Mycoplasma ovipneumoniae* is rarely carried by packgoats.	
NPH-02	Environmental assessments MUST be based on real studies, real science, and real evidence--not speculation and hearsay. For your assessment to be accurate, you need to remove this false statement about goats infecting bighorns and "commonly" carrying *Mycoplasma ovipneumoniae*. As you well know, environmental assessments are used to inform both the public and our officials about important issues to keep in mind when drafting wilderness plans. If they contain false information, the resulting wilderness plans will not serve the best interests of the public or the wilderness! Please consider this when drafting environmental assessments, and please use the best and latest science.	Regarding domestic goats carrying *Mycoplasma ovipneumoniae* according to study by Heinse and others 2009: 'The estimated probability of being M. ovipneumoniae positive for a goat taken at random from all goat flocks was 28%; the mean incidence among all flocks (weighted by sample size) was 37%, and among goat flocks testing positive was 58%." See response to comment NAPgA-14 for corrections to this statement.
PB-01	In section 2.5.1 t (sic) includes a list of pack goat management practices to minimize the potential for contact between pack goats and bighorn sheep. It limits the number of pack goats allowed in one group: "Pack goat numbers will be limited to a maximum of three (3) pack goats per person, and a maximum of nine (9) pack goats per group." In section 2.5.2 it limits "…the combined number of recreational stock in one group to 14 head of stock." Pack goats have much less environmental impact than horses or mules. They also carry much less. I would ask that you increase the pack goat limit to the same 14 head and remove the per person limit. Is there a need for a per person limit?	The pack goat size limit would help reduce the risk of contact with bighorn sheep.
PB-02	With the pack goat management practices, the likelihood of contact between pack goats and bighorn sheep in the wilderness	See response to comment CC-1. Additional information is in the wildlife report in the project file.

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	is extremely remote. However, this alternative, in addition to the management practices, excludes pack goats from one area designated as "East Fork Herd Home Range". I'd ask that you look at the current science and consider removing this prohibition. Also, I ask that you consider these same comments with regard to the "Draft Hemingway-Boulders and White Clouds Wilderness Management Plan" itself.	
PB-03	I understand that die-off due to pneumonia are a big concern and that Movi bacteria have been identified as a cause. The resent work of Dr. Maggie Highland, USDA, shows that there was almost no Movi present in the pack goats sampled (much less than previously assumed). Scientific knowledge is continuing to grow. Is current research being fully considered?	Wildlife Specialist Report reviewed literature related to domestic goat and bighorn sheep disease transmission. Besser et al. 2017 is cited in the wildlife specialist report. Highland's research was not published, which is why it was not used in the wildlife analysis.
SB-01	P.24 of EA (2.8.2): include Fort Bridger Treaty	The EA was edited to include the Treaty.
SB-02	2197: Tribe has concerns with "while allowing" Suggests: "to manage"	The Plan was edited to include this wording change.
SB-03	2198: "while minimizing impacts" - change to "to protect WC" or "to eliminate or minimize impacts to WC"	The objective will remain as written. New projects would likely have some type of impact to wilderness character (e.g. development, or untrammeled), and may still be considered the minimum necessary; therefore, "eliminate" unlikely.
SB-04	Add additional language p. 19 (6.11) regarding– illegal collection, looting, consequences for getting caught. ARPA laws/violations – perhaps mention in the educational section. Inform and educate public outside wilderness on cultural resources. Would be happy to get language from the Tribes and post on interpretive signs outside wilderness. (e.g. FS will prosecute to fullest extent of the law) • Emphasize education related to cultural.	Added language in the EA that reads "In the spirit of rigorous protection of historical values and pursuant to the Antiquities Act of 1906 and the Archaeological Resources Protection Act of 1979 (ARPA), violators of these laws will be prosecuted to the fullest extent of the law. Appropriate informational signs regarding cultural resource protection laws will be posted in appropriate places outside of the Wilderness boundaries."

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SP-01	add "gathering" into 21104	The Plan was edited to include this wording change.
SS-01	At a high-level, with few exceptions, the recommended Alternative A, which is the basis of the Management Plan, mirrors the historical management for the areas. That makes sense given our conviction that these two areas are quintessential examples of true Wilderness and have been managed as such for decades. However, we have several suggestions for points that we would like to see further emphasized in the Plan. First, we believe given the heightened regional and national attention that was drawn to this area during the process leading up to this legislation, the new Wilderness designation will bring increased recreational use to this easily impacted, largely high-elevation environment. Hence, there will be a sharply elevated need for "Leave no Trace" and general Wilderness education of the user groups and appropriate signage at trailheads and Wilderness boundaries.	Alternative A, the proposed action, diverges from current management in several ways, including reduced group size limits for both people and recreational stock, additional campfire restrictions, closure areas to equine stock use, and closure areas to pack goat use. These measures are proposed to minimize recreational impacts while continuing to allow for recreational opportunities. See Wilderness Education and Interpretation section of the WMP (p. 44), where Guideline 21148 emphasizes "a proactive approach to wilderness education" including Leave No Trace. Further Standard 21147 addresses trailhead signage.
SS-02	We note that there is only a brief reference to winter recreational uses. Since this sector is rapidly growing we believe a clearer focus on this use is also appropriate in the Plan.	Correct. We have little data specific to winter use in these wilderness areas. We recognize that skiing, snowshoeing, and back country travel is occurring in the wildernesses and that winter recreation has potential to impact high elevation wildlife. The agencies would address issues that stem from winter uses in the same manner as all recreation related issues.
SS-03	Secondly, the Forest Service should commit the requisite resources to adequately enforce the applicable laws and regulations within these two Wilderness areas. The Society has become aware of numerous and annually repeated instances of large groups traveling en masse or congregating at a final destination. Not only does this have the potential to cause significant resource impacts, but in some instances the groups are youth-oriented and may teach the next generation of users to	As noted on p.5 of the WMP, the plan "does not describe the methods, the "how to," or the schedule of implementing the direction, nor does it describe the day-to-day or operational actions to be carried out in the management of the wildernesses. The rate of implementation and potential management activities depend on the annual budgeting process." Enforcement is also an important issue. When a plan is adopted, the Forest Service and BLM will work with wilderness rangers, agency law

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	"look the other way" instead of following long-standing laws and regulations. The aggressive enforcement of these over-sized groups should be a priority.	enforcement, volunteers and partner organizations to implement and enforce the plan.
SS-04	Finally, as the Plan acknowledges, there are areas, such as popular campsites around lakes, which are currently in need of restoration work, and given the likelihood of increased use, there may be other areas needing restoration in the coming years.	Recreational site monitoring as described in Standard 2121 (WMP. p. 26) would inform any small-scale campsite restoration needs.
SS-05	Additionally, with invasive and noxious weeds already established within the boundaries of these new Wilderness areas and fewer agency resources to maintain the trail system within them, there is a sharply growing need for individuals and groups to step forward and accomplish what has historically been "core work" for Forest Service staff. This Plan can more clearly emphasize the growing need for people to step forward and help join in the effort to protect and maintain the resources of this iconic area.	p. 19 of the WMP describes current partner and volunteer involvement. Objective 2113 highlights working with partners and volunteers.
TU-02	**General Comments** The development of the WMP will guide the preservation, management, and use of these two wilderness areas for the next twenty years. In order to make sure that these wilderness areas remain unimpaired and that the natural resources and management direction coincide to protect resources within the Wilderness Areas, the WMP must include management direction for all resources. Currently as written, the draft WMP and the EA fail to account for the important fisheries components within these two unique Wilderness areas and for important backcountry recreational use. The EA and WMP must include direction for managing those endangered, threatened and sensitive fish species currently identified in the EA.	All resources that have the potential to be impacted by the proposed action and alternatives are evaluated. The Wilderness Act and many other laws and policies, management plans and agency guidance are adhered to in the writing of this plan and environmental assessment, including the Endangered Species Act.

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TU-04	**Fisheries** The two Wilderness areas contain critical or designated habitat for one endangered fish species, three threatened species, and two Region 4 Sensitive fish species. They include Snake River sockeye salmon (endangered), spring/summer Chinook salmon, steelhead trout, and bull trout (threatened), and Westslope cutthroat trout and Wood River sculpin (Sensitive). While TU understands the U.S. Fish and Wildlife Service (USFWS) is preparing a Biological Evaluation and Biological Assessment, it is important that the Sawtooth National Forest's WMP protect these waterways for the future stability and recovery of all these fish species. That means providing management direction that meets the objectives identified by the USFWS and the forest to maintain and perpetuate high quality habitat and minimize any activities that may threaten habitat quality, connectivity, and water quality.	The USFWS and NOAA will not prepare a BA/BE, rather the Forest Service specialist will. The aquatic resources within these areas have previously been analyzed for management to maintain wilderness characteristics when the area was managed as recommended wilderness and as such any of the three proposed alternatives would remain within the effects previously analyzed in the Sawtooth Forest Plan (Revised 2012).
TU-05	We believe the EA and WMP is negligent in its efforts to provide a more comprehensive management review of aquatic resources, especially when there are so many high value native fish dependent upon the maintenance of quality watersheds. The EA identifies areas around lakes that have riparian and stream drainages that are functioning at risk, thus putting native fish species at risk as well. Monitoring these watersheds remains a viable management tool and should be encouraged. Partnerships with the FS and BLM to improve fish habitat to maintain and expand connectivity where it is currently stressed or threatened should also be a consideration.	The aquatic resources within these areas have previously been analyzed for management to maintain wilderness characteristics when the area was managed as recommended wilderness and as such any of the three proposed alternatives would remain within the effects previously analyzed in the Sawtooth Forest Plan (Revised 2012). Monitoring within all watersheds of the Sawtooth NRA, including areas within the HBWC Wilderness areas is occurring and will continue into the future
TU-06	Fish stocking in the wilderness should be discouraged in all lakes regardless of stocking history. Exotic species of fish should never be stocked in designated Wilderness. If stocking is considered by the State of Idaho, the Forest Service should require a Management Resource Amendment (MRA).	Governed by Forest service policy **2323.34 - Fisheries Management** as well as **AFWA**

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		Standard 2115 indicates that all actions that include a prohibited use per 4(c) of the Wilderness Act, or for other actions that may impair wilderness character, would require an MRA.
TU-07	**Recreation Use** Trout Unlimited is concerned that recreation use was either briefly touched on or not analyzed at all in the EA. Recreation use of all kinds is increasing and the public's appreciation of backcountry wilderness areas remains strong. While the Alternatives provide guidelines for managing the number of group size, it does not address management direction for individual or non-group recreation access and use. Nor does the Recreation discussion include direction for managing conflicting resource uses. We recommend that the EA and WMP provide more direction for this topic.	The WMP proposes direction specific to recreational activities under section 7.10. Although recreational uses are included under other resource topics as well (e.g. 2106, 2121, 2144, Section 7.11, Section 7.19, Section 7.22, etc.). The WMP also provides a brief description of recreational uses within the wildernesses (Sections 6.2 and 6.10), and the EA provides additional detail (Section 3.3.2). Analysis of the proposed and alternative direction upon recreational uses and experiences is covered under the Wilderness section of the EA (Section 3.3.3), specifically under Resource Indicator and Measure 4: Opportunities for Primitive and Unconfined Recreation and Resource Indicator and Measure 5: Opportunities for Solitude for each of the three alternatives.
TU-08	**Eligible Wild and Scenic Rivers** We commend the Sawtooth National Forest's Wild and Scenic River analysis and plan and fully support the inclusion of these standards in the final Wilderness Management Plan. Proper management of eligible Wild and Scenic River corridors goes hand in hand with the preservation of the overall wilderness character of this area.	See response to comment LK-06.
TU-09	**Rangeland Resources** Trout Unlimited supports grazing by livestock when managed to benefit and maintain the high quality of wilderness character visualized by these two Wilderness areas. Grazing should be permitted and administered in a way that prevents degradation of wilderness character, does not adversely impact wildlife species, and is compatible with maintaining and improving natural resource health, including water quality. Sheep and cattle	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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	grazing should be defined as permitted livestock grazing to distinguish desired future conditions from other goals for large game and wildlife. In general, the BLM and FS should attempt to ensure that ranching permittees are able to maintain viable allotments, in a manner that also supports wilderness character. The FS and BLM should ensure that grazing conforms to the "Standards and Guidelines for Grazing Administration" by placing a priority on assessing areas for compliance. If the areas are not in compliance, immediate action should be taken to rectify the grazing management so the areas are brought into compliance. We recommend the FS and BLM actively pursue ways to better manage livestock in functioning at risk and non-functioning areas. Options may include adjusting on and off dates, reducing the numbers of livestock, reducing grazing pressure on riparian areas, and improved herding. Grazing should also be eliminated from all riparian pastures where water quality standards are not met within a reasonable amount of time (such as two years), for factors affected by livestock grazing (fecal coliform, turbidity, temperature, etc.). Stocking rates must include consideration of topography, distance to water, forage availability, etc. to determine realistic stocking rates. Stocking rates must also consider long-term weather/moisture history and not overstock lands based upon optimistic single-year events.	
TU-11	**Wilderness Resource and Priority Watersheds (Objective 21106)** The following should be added to this objective: "Consider the wilderness resource [and priority watersheds] when preparing or modifying range permits, annual operating instructions or allotment management plan or when conducting NEPA analysis".	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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TU-12	**Maintenance of Range Improvements (Standard 21109)** This standard should be elaborated upon to include a requirement that any resulting resource damage must be mitigated or rehabilitated by the individual requesting access. All non-conforming use access should be subject to a MRA.	The comment is confusing because of the Standard reference. Standard 21109 states: Prohibit the use of motor vehicles for routine livestock monitoring, herding, and gathering. Whereas, 21110 addresses maintenance of range improvements. Standard 2115 indicates that all actions that include a prohibited use per 4(c) of the Wilderness Act would require an MRA. Additionally, any activities authorized within a wilderness area are authorized in a manner that minimizes impacts to wilderness character. Any requirements for mitigation and/or rehabilitation would be addressed within the MRA on a site/project specific basis.
TU-13	**Mineral and Geologic Resources** The FS and BLM should implement the strictest interpretation of the Wilderness Act, choosing law over lenient policy with regard to mineral resources and valid existing rights (VERs) for this WMP. They should seek alternative (non-wilderness) routes where possible to existing claimed vehicular access through wilderness in-holdings and edge-holdings when necessary. Where possible, rights-of-way and other VERs in the Wilderness should be eliminated when acquisitions or other means are made possible. Lease renewal should not occur where the renewal is not legally required and leases should not be written or authorized that imply or legally require renewal. All claims for mineral entry should be verified as valid prior to assessment of any kind.	The Forest Service agrees that valid existing rights will be confirmed prior to the evaluation of a plan of operation for mineral activity in wilderness. When evaluating a plan of operations, reasonable access will be evaluated pursuant to the requirements of the Wilderness Act. No previous leases that would require reconsideration or renewal occur within the Wilderness area.
TU-14	**Reference to Plans of Operations (Objective 21118)** This objective should be expanded. Operating plans that are associated with VERs should utilize equipment consistent with the wilderness objectives (picks, shovels, buckets, etc.) The plan of operations must include reasonable stipulations to protect wilderness character to the extent consistent with the rights	Operating plans for mineral activities performed commensurate with valid existing rights will be reviewed by a Certified Mineral Examiner to ensure the proposal is consistent with wilderness objectives and commensurate with the appropriate phase of logical and sequential mineral development.

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	associated with the valid mining claim. We recommend strong buffer stipulations along streams and rivers containing the identified threatened, endangered and sensitive fish species that effectively protect water quality and quantity and at a minimum should be 500 feet.	The Forest Service agrees prior to authorization of a plan, reasonable stipulations for the protection of wilderness character should be included. Should the Forest Service be in the position to evaluate a plan of operation submitted within VER in Wilderness, the Forest Service and operator are not precluded from complying with all other relevant and required coordination in accordance with state and federal law, ie. Endangered Species Act, Clean Water Act, etc.
TU-15	**Reclamation and Bonding (Objective 21119, Standard 21120)** We support this objective and standard with the following addition: any resulting resource damaging must be mitigated or rehabilitated at the cost of the responsible party. In order for the approval of a plan of operations by either the FS or the BLM, the operator must post a financial guarantee that completely covers and guarantees completion of reclamation. The FS is completely within its jurisdiction to increase any surface bonding amount as it deems necessary to protect the wilderness character of these areas. Reclamation bonding must include the current costs of reclamation and clean-up that returns the landscape to its original pristine character.	While operating plans approved under 36 CFR 228A already stipulate the recommended additional language, he Forest Service will consider amending and expanding the language to more clearly address the reclamation and rehabilitation responsibilities of the responsible party. These terms and conditions would be stipulated within the approved plan of operation. Revise Objective 21120: "*Ensure lands disturbed during mineral exploration and development activities are restored as nearly as practicable promptly upon completion or abandonment of operations. Plans of operations will stipulate reclamation and bonding requirements of the authorized operator.*"
TU-16	**Fire Management** Generally speaking, we support the goals, objectives, and guidelines as outlined for fire management under the Proposed Action for the WMP. We encourage the FS and BLM to develop a comprehensive fire management plan that corresponds with the WMP and includes the identification of the threats imposed	The Forest Service and BLM already work collaboratively in fire management planning and will continue to do so. There is national level policy that was jointly developed by all of the DOI land management agencies and the Forest Service that is intended to promote consistency, interagency cooperation, and efficiency in all facets of fire management (including hazardous fuels). https://www.nifc.gov/policies/pol_ref_redbook.html

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	by hazardous fuel situations within the Wilderness and surrounding BLM and FS managed lands.	The goals, objectives, standards, and guidelines within the WMP will be utilized as the foundational direction in fire management plans and related applications as per agency policy.
TU-17	The FS and BLM should define the appropriate management response to fires, considering protection of wilderness values including objects and resources. Emergency fire rehabilitation protocols should also be developed and must be consistent with the Wilderness Act and protection of the area's objects, resources and objectives. The FS and BLM should establish the goal of mimicking the historical fire regimes of affected plant communities in these considerations. Protocols should include post-fire rest from livestock grazing. Post-fire rest must be at least 3 years to ensure the adequate establishment of shrub and forb species. This is particularly important as we experience more and more climate change impacts that result in drier forests, increased erosion from lack of vegetation, earlier snowmelt, and less water availability.	Appropriate management response to a wildfire is dictated by agency policy. For the Forest Service this is covered in FSM 5130.3. Guiding policy for both the FS and BLM is also listed in the Interagency Standards for Fire and Fire Aviation Operations handbook aka the Red Book. https://www.nifc.gov/policies/pol_ref_redbook.html
TU-19	**Management Zones** We fully support the use of zoning as laid out in the Proposed Action as means to differentiate the heterogeneous nature (and higher used areas) within the Wilderness areas. All zones should be maintained using a non-degradation policy. Monitoring strategy and recreation management should ultimately complement the goals and objectives for each management zone so that wilderness character of each area is maintained or improved.	See response to ICLWS-29.
WCO-02	Please place these comments in the public record and respond to our corrections to the WMP draft. We have also included a new Alternative based on your EA. It is called the "Balanced Common Sense" Alternative which we have developed based on	Comment letters have been posted online for review by the public, and included in the project record. Also see response to comment WCO-42.

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	your information or lack thereof found in the EA associated with draft Plan.	
WCO-03	It is evident in the Plan, a certain tone which is constant throughout this document and the EA which greatly concerns us. The tone, terminology and citations sends the clear message that there is conjecture, strong convictions, and sentiments incorporated into this draft WMP representing a strong personal belief about Wilderness and Outfitters operating in Wilderness. If these personal biases are withstanding, both sides of all issues raised by these documents are not fairly represented. We are very concerned with the direction of this WMP and feel the Agencies have taken certain liberties outside of the scope of the 1964 Wilderness Act, SNRA Act of 1972, Sawtooth Forest Plan, FSM 2323.13(g), Special Order 0414-04-034, and Public Law 114-46 (SNRA & Jerry Peak Wilderness Additions Act.)	See response to WCO's subsequent comments for more detail.
WCO-04	1. As stated in Public Law 114-46, Sec. 102. Administration, (c) Comprehensive Wilderness Management Plan - "Not later than 3 years after the date of enactment of this Act, the Secretary of Agriculture and the Secretary of Interior shall collaboratively develop wilderness management plans for the wilderness areas." No place within the Public Law 114-46, is there identified any direct or indirect consequences, penalties or repercussions to the responsible Federal Agencies (USFS and BLM) should this WMP take more than 3 years to approve by the authorizing officers of both Agencies. There are no penalties or punishments identified for taking longer than 3 years fully vet this Plan and EA in order to address the needs of all users and the conditions of the resource. The Forest Service and the BLM should take ample & sufficient time in which to prepare a Wilderness Management Plan so that all affected and involved	As noted in the comment, Section 102(c) of P.L. 114-46 requires the agencies to complete the plans "Not later than 3 years after the date of enactment of this Act the Secretary of Agriculture and the Secretary of the Interior shall collaboratively develop wilderness management plans for the wilderness areas." Use of "shall" in this directive compels the agencies to act. Further, the agencies do not have the ability to select which portions of law to comply with.

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	publics can live with it for years to come. This Plan, once approved, will not likely see significant changes for many years; in your introduction, you confirm this. The Forest Service and the BLM are trying to accomplish this important task without allowing time for the public to digest what has been prepared by your specialists over the past 6 + months. The Federal Agencies need to publicly recognize that August of 2018 is unrealistic. Contact with Congressman Simpson needs to be made in order express your commitment to "do this right" and let him know that the process will require additional time. This is a valid request since the Agencies have not offered to "re-open" the Comment period on the HB-WC or the JP Plan and EAs as per our Oct. 30, 2017 formal request.	
WCO-05	2. Page 5 (Landres el al. 2015) Definition of **Untrammeled** – Correct to read an area or place which is unrestrained, unconfined and unshackled; example - a free-flowing river which is undammed. Landres takes liberties with reference to Untrammeled which he relates to the Wilderness Act of 1964. The 2015 definition needs to be qualified if it has become the new standard. Note: J. Copeland Nagle "In 51 years, not even the courts have answered the question as to "what is the meaning of Wilderness character." 3. Page 7 Section 5. Issues Resolved by Policy: **Include Outfitting and Guiding** – Statute, Policy and Rules regarding Outfitters and Guides are created and enforced by the Idaho Outfitters and Guides Licensing Bd. (IOGLB) on public lands. Please see the recently renewed MOU between Reg., 1, 4, and 6 USFS and State BLM Office outlining how the Federal Agencies and IOGLB will in coordination with each other relative to O&G permitting and licensure. Add IOGLB to 4.1	BLM Manual 6340 defined untrammeled as: Unhindered and free from modern human control or manipulation. FSM 2320.5 defines untrammeled as: In the context of the Wilderness Act, an untrammeled area is where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem. See IOGA-20 for Nagle comment response. For comment 16. See response to IOGA-06.

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	References, Acronyms and Abbreviations and under 6.10 Recreation Resources of the WMP & in the EA. The WMP needs to include reference to Idaho Statute Title 36, Chapter 31, Section 2101 Declaration of Policy and IDAPA 25 – Rules of the Idaho Outfitters and Guides Licensing Bd. 001.03. Under Title and Scope is stated the role of the State of Idaho and its purpose under Adequate Protection is "To provide for adequate protection and enhancement of public health, safety, welfare and enjoyment from the use of Idaho's fish, wildlife, and recreational resources." Your EA barely makes mention of the IOGLB as the State entity with the responsibility for licensure of qualified Outfitters and Guides on public lands and waters in Idaho. Such requirements and obligations associated with O&G licensure are set forth in Idaho Statute & Rule stated above.	
WCO-06	4. Page 8 Special Uses—Section 4(d)(6) of the Wilderness Act states that commercial services, such as outfitter and guides and/or pack stock rentals, are allowed "to the extent necessary for activities which are proper for realizing the recreational or other purposes of the areas." This ~~restriction~~ recognition is reiterated in the enabling legislation, Section 102(f). Commercial services are further guided by the Federal Lands Recreation Enhancement Act and agency-specific policy and guidance (FSM 2709.14, BLM Manual 2930, H-2930-1) in addition to direction specific to wilderness. It is not a "restriction" which allows commercial outfitting services in Wilderness, it is recognition of activities allowed in Wilderness which meet the public purpose and are proper. Correct statement, please. Also, the specific Act which authorizes Outfitter/Guide Special Use Permits in Wilderness and Non-Wilderness for all activities, may be changing while	See response to IOGA-07.

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	this WMP is being drafted. Please include language which allows for future or other Acts as Congress as they are approved (example: "GO" Act). New Act(s) will become the new "Authority" under which O&G commercial services will be authorized. FLREA may be replaced by the end of the 2017 calendar year. See the report to Congress including aspects and highlights of this new Act.	
WCO-07	5. Page 10 **Outstanding opportunities for solitude or a primitive and unconfined recreation**—These wilderness areas provide outstanding opportunities for solitude and primitive, unconfined recreation. The varying topography of the wildernesses and relatively few trails provide excellent opportunities for solitude. In addition, a range of recreational experiences can be found within the wildernesses, including short day hikes, plentiful backpacking options, multi-day pack trips, or off-trail scrambles allowing for exploration and discovery. Visitor use restrictions have been in place within these two areas since 1996, reducing the perception of unconfined recreation. ~~Also, within the wildernesses are recreation-related facilities, such as bridges, trails, tent base logs, meat poles, and stock tie facilities.~~ The last sentence in this paragraph has absolutely nothing to do with "reducing opportunities for solitude." This list of "recreation facilities" has no place in this descriptive paragraph. Remove statement entirely as the writer got off point in this reference and is relying on the Landres et al 2015 for this misdirected association. The author is making assumptions that the reader or visitor would not have a Wilderness experience by encountering historic facilities thereby affecting their personal opportunities for solitude? Signs of past human occupation are part of the HB-WC Wilderness landscape. Congressman	See response to IOGA-08.

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	Simpson found them insufficient to deter his Legislation creating this new Wilderness. How does Landres know how a visitor feels when they encounter these? The monitoring listed in Keeping It Wild 2 are not the only sources of opinions to be included. ; interesting it states that Agency folks feel these features degrade their experience to a higher % than that of the general public. However, this is not a widely held perception by the general public. Just because Landres believes the visitor experience is reduced, that is only his and his co-author's perception based on personal convictions and emotion, and not a view commonly held by HB-WC Wilderness visitors. The authors of this document should embrace this Wilderness as the public's land and the public's right to use it. Yes, stewardship should be encouraged & promoted, but people's use of this place is considered in the Wilderness Act and human presence is an obvious part of the history of the Hemmingway Boulders and White Cloud Wilderness. (See removal of the word "ENHANCE" as this term further enables future managers to expand management strategies all in the name of enhancement of opportunities for solitude.)	
WCO-08	6. Page 16 6.9. Wildlife Resources WMP fails to reference all important wildlife species present in both shrub and forest lands found in this Wilderness. The presence of the state's largest ungulate species is not mentioned or analyzed. Shiras Moose is entirely ignored in your opening statements. Mt. lion and Black Bear are only casually mentioned under the discussion of birds? I would encourage the Plan's writers to consult with the IDF&G. Contact the Dept. for information on population distribution of ungulates, fir bearers, small game and predators found in Central Idaho including the BH-WC Wilderness. This discussion falls completely short of	See response to IOGA-09.

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	what is currently inhabiting this landscape and managed by the IDF&G based on approved unit/zone management objectives.	
WCO-09	7. Page 18 6.10 Recreational Resources Due to landscape and topographic features, most recreational use is funneled toward lake basins in sensitive, high-elevation zones. As a result, certain areas receive relatively high and concentrated recreational use; predominantly at Boorn Lakes, Chamberlain Lakes, Boulder Chain Lakes, and Big Boulder basin in the White Clouds Wilderness. This use has resulted in soil compaction, fire-scarred rock, loss of and damage to vegetation and ground cover, and increased erosion. EA needs to point out that these areas listed are also very popular & heavily used by large non-commercial organized groups (i.e., Boy Scouts of America) during the months of July & August. A discussion of large organized group use primarily in the summer months is inadequate. There needs to be a mandatory permit system specific to large group users and Wilderness ethic education by Agency personnel in advance of trips. Large organized groups are a formidable user of this Wilderness and they have not been adequately addressed in this Plan or the EA.	See response to IOGA-10.
WCO-10	8. Page 18 6.10 Recreational Resources Signs are placed at trail junctions and to identify stock tie areas. The authors should also identify in the EA that cameras or electronic counters have also been attached to signage at trail junctions which are not readily noticeable, for the purpose of monitoring current compliance or activity. Please explain what	See response to IOGA-11.

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	these devices are used for and how this information is currently being used into the future regarding Wilderness management.	
WCO-11	9. Page 18 6.10 Recreational Resources ~~Temporary~~ Seasonal outfitting and guiding occurs in these areas with types and amount of use varying from year to year. The word "Temporary" insinuates these businesses operate on a temporary authorization and that is not the case. There are 5 outfitters (This number needs correction as it is 5 outfitters) who need to be referred to as holders of "Term Permits" or "Priority Use Authorizations". The word temporary sends to wrong message to any future manager of this resource. If the season of use is what the authors are referring to, then use the word "seasonal" instead. The specific season of use depends on each individual outfitting business's authorization/operating plan.	See response to IOGA-12.
WCO-12	10. Page 22 6.16.3 Desired Condition The mandate from the Wilderness Act for each agency is to preserve wilderness character. The Act does not include direction to "Create" specific Wilderness characteristics where they did not exist upon designation by Congress. See that you include in your discourse not only what the Wilderness Act does and speaks to but, also what the Wilderness Act does NOT do or require. To preserve existing Wilderness attributes is clearly required by the Act but, to create and develop Wilderness attributes which did not exist upon Congressional approval is manipulation of existing conditions.	See response to IOGA-13.
WCO-13	11. Page 24 7.0 Proposed Action	See response to CCC-12.

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	1st paragraph, last sentence. The intent of the management direction is to protect, perpetuate and enhance maintain wilderness character. These are maintenance responsibilities. Nowhere in the Act are managers required to "ENHANCE" this Wilderness' character. *To enhance* existing characteristics is an over-reach of Wilderness intent and management objectives. This was not a requirement of Congressional designation and insinuates the Agency's desire to manipulate and change the existing qualifying lands and waters from their current & accepted conditions into something which represents someone's opinion, personal impression, belief or conviction.	
WCO-14	12. Page 25 7.1 Wilderness Goal 2103 Protect and ~~enhance~~ preserve (or maintain) wilderness character. Correct Wilderness Management Goal 2103 to read "Protect and Preserve Wilderness Character". Delete reference to "enhance or enhancement" whenever and wherever used in this Plan. There is an enormous difference between the words "enhance" and "preserve or maintain." Enhancement of this Wilderness was never addressed, included or emphasized in the Legislation. To "enhance" the Wilderness gives undo power and authority to the Authorizing officer. The Federal Agencies would have the ability to do and approve just about anything they wanted, all in the name of "enhancement" of the resource. This is an error and an over reach of power which the public may be unaware. Also, to "enhance" the Wilderness would indicate purposeful change which runs counter to the essence of the 1964 Wilderness Act. Merriam - Webster's Dictionary definitions are as follows:	See response to comment CCC-12.

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	Enhance *– To make greater, as in cost, value, attractiveness, etc. To heighten, improve, augment, etc. To increase as in value.* ***Preserve*** *– To keep from harm, damage, danger, evil, etc.; protect or save. To keep up, carry on or maintain.* ***Maintain*** *– To keep or keep up with, carry on. To continue in or with. To keep in a certain condition or position. To keep in existence or continuance; preserve. To uphold or defend. To support by aid, influence or protection* Seeing that this statement is your very first goal for this new WMP, this overall "umbrella goal" needs to be an accurate and plausible Goal which all stakeholders can agree to be true, accurate and correct based on law. To "enhance" what has already been recognized to qualify as Wilderness by Congress certainly suggests a level of change or manipulation which the Agencies and the Authorizing Officer could initiate, if they so choose.	
WCO-15	13. Page 25 7.1 Wilderness Goal 2105 Preserve the untrammeled quality of wilderness character by "refraining from the deliberate manipulation or management of the biophysical environment" except as necessary to protect or ~~enhance~~ maintain overall wilderness character, to preserve human life, or to accommodate other activities in compliance with applicable laws. Correct Wilderness Management Goal 2105 to read …as necessary to protect or maintain overall wilderness character, … for the same reasons as above. "Enhancement" allows for all kinds of liberties granted to current and future managers to manipulate current environments, features and special attributes and current authorizations in the HB-WC Wilderness.	Regarding proposed edits to goal 2105, see response to CCC-12. For Untrammeled portion of the comment, see response to IOGA-44.

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	We have placed "deliberate manipulation or management of the biophysical environment" in quotes as this is Landres's interpretation of the word UNTRAMMELED. Untrammeled is used quite freely along with the misleading definition which Landres has made in "Keeping It Wild 2". The history of the word UNTRAMMELED is tied to Congress, prior to and after the 1964 Wilderness Act, where trammeling meant allowing and supporting the damming of the Colorado River thru the Grand Canyon; UNTRAMMELED referrs to undammed, unconfined, uncontrolled such as a free-flowing river. This is where the word originated from and why it was used in connection with the Wilderness Act. The 1970 Edition of Webster's New World Dictionary, 2nd Edition was published only 6 years after the Wilderness Act was passed. It states the meaning of UNTRAMMELED based entirely upon the time in which it was used by society and Government. In Wilderness context, UNTRAMMELED is defined as, "not confined, not restrained, not shackled." Correct in the Glossary of Terms in EA.	
WCO-16	14. Page 25 7.1 Wilderness Goal 2109 Preserve and ~~enhance~~ protect the undeveloped quality of wilderness character. ~~by removing~~ Removal of nonconforming and/or unnecessary facilities and installations will be determined on a case by case basis therefore ~~and~~ minimizing any additional human-caused surface disturbances by conducting a publicly vetted MRA. National Historic Preservation Act protocols will be followed for structures and facilities 50 years and older. Please explain where and what exactly are "non-conforming" and/or "unnecessary facilities and installations". If this is a subjective judgement call and cannot be quantified, then require a site specific analysis of why a feature qualifies and what the	See response to IOGA-17.

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	qualifiers exactly are by requiring an MRA. (Are you referring to the historic mining cabin above Baker Lake in the White Clouds or the Forest's fence material in the South Fork of the East Fork?) Again replace the word "enhance" with protect as above for the same reasons. Care and consideration including an MRA (Minimum Requirements Analysis) needs to be provided to the public when the Forest or BLM considers removal of non-confirming structures or facilities. What qualifies such a structure to be removed? Who deems them unnecessary? What is the criteria? What is involved in an MRA? Include in such an analysis the exact amount of disturbance which may be caused by demolition and/or removal or destruction. The action of removal needs to be evaluated compared to just letting natural processes occur on their own (which is a primary theme of the Wilderness Act.) A Separate and individual analysis should occur prior to the Federal Government's removal of any site specific structures, features or facilities which existed before designation by Congress. Address why this need to happen, how this will be done, when it would occur, funded by what means and conducted by whom.	
WCO-17	15. Page 25 7.1 Wilderness Objectives 2111 Ensure, where possible, management between the Forest Service and BLM, including regulation of visitor uses, appears seamless to the public. Where differences in agency policy occur, and if allowable by law, regulation, or policy, the WMP will endeavor to apply the less strict~~er~~ policy to the adjacent land of the other agency. Add the word "less strict" so that bordering and perimeter lands where a wilderness boundary touches, the bordering agency does not manage those lands as "defacto" Wilderness. This	See response to IOGA-47.

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	concept could be easily misinterpreted as written. There were never intended to be "buffer zones" along borders with other Agencies and this Objective states just the opposite. Is it only referring to instances where BLM Wilderness touches USFS Wilderness? What about where it touches State Land sections? This Objective is not clear.	
WCO-18	16. Page 25 7.1 Wilderness Standards 2116 Remove existing structures, developments, and installations unless they are determined to be the minimum necessary for the administration of the area as wilderness, or are: a) Associated with existing rights, … Since no methodology is described in this Plan to make this determination, do the following: Correct the statement to read: Do not remove existing structures, developments, and installations except when completion of an MRA provides sufficient evidence that they ~~are~~ exceed the minimum necessary for the administration of the area as wilderness; Do not remove if they are … Correct a) to read: Associated with existing rights, permits,… Include this word as it relates to the commercial services section and special use permits. The reason for these corrections is found in clause 2117. In your own words you say, "Use natural processes to maintain ecosystem functions, whenever possible, for restoration activities in the wilderness. Where human activities have altered conditions, active management may be considered if an MRA in conjunction with the Framework for Evaluating Ecological	See response to IOGA-18.

Number	Comment	Forest Service Response
	Intervention in Wilderness determines active management to be the minimum necessary for the administration of the area for the purposes of the Wilderness Act."	
WCO-19	Landres takes many liberties in passing "armchair judgement" having to do with Wilderness character relative to Outfitters without so much as asking Outfitters what it means to them? The characterizations of "hunting camps" in relation to trash and "comforts" being provided to outfitted clients is an inappropriate characterization. Where are the sentiments of Commercial Service providers referenced in the EA; they are not included. How do you intend to monitor the attitudes of Outfitters and the outfitted public? Please mention in the EA J. Copeland Nagle statement from Dec. 2015 in the International Journal of Wilderness that "in 51 years, not even the Courts have answered that question as to "What is the character of Wilderness?" EA needs to include reference to Roderick Nash's 1973, Wilderness and the American Mind, which confirms in his final analysis that "Wilderness is a state of mind. It is a resource that is defined by human perception". Since the EA frequently quotes Landres et al. 2015 on monitoring of changing conditions and his white paper fails to address monitoring of outfitters and the outfitted public's perceptions, let the EA also consider the following: 1.) What change has taken place at the HB and WC at Outfitter reserved camp sites since their initial approval by the Agency's authorizing officer on the SNRA? The EA does not address:	See response to IOGA-19, IOGA-20, and IOGA-21.

Number	Comment	Forest Service Response
	• Outfitter authorized sites have been maintained to a high level of compliance since approved. Same footprint for both camps has been retained over time. This was not mentioned in the EA nor was historically acceptable/high approval rating noted in camp inspections performed by Agency personnel. These positive aspects of these two sites were not mentioned in your EA. • Camp layouts & composition of temporary features has not been expanded upon since originally authorized. Sites have not been enlarged or expanded upon to service larger groups or more livestock. Use patterns of the outfitted public at these sites has not changed. Outhouse location (defined as appropriate by Leave No Trace ethics for Groups) has been moved many times, but naturalized to the pt. where it is not evident where the prior position or location existed. Use of a firepan and fire blanket instead of a fire ring/pit has been a summer feature for 28 years in Little Boulder. The So. Fork camp in HB Wilderness does not have a camp fire ring or fire area.	

Number	Comment	Forest Service Response
	• Natural cover and conifer health HAS changed though the years of authorized occupancy. Dead and dying Lodge Pole pine, Douglas fir and Engelmann spruce have become a constant challenge in the more recent past. The Agency approved site in the Baker Lake fork of Little Boulder is located on a dry rocky ridgeline which has a considerable dead and dying over story. The So. Fork of the East Fork site is located on the edge of a natural opening with a mixed conifer over story on the NE side of both tents. WCO has adjusted the access routes to both camps in order to account for this natural occurrence. WCO continues to remove "hazard trees" as they have increased in number annually. Both dead standing and green trees have come down at these locations including incidents of them coming down across our frames but, not during a time of occupancy yet. These historically approved skeleton frames with base logs provide the occupants a higher level of safety from falling trees compared to an aluminum frame or shock cord internal structures which do not. Native material skeleton frames are necessary for us to provide for the outfitted public's health and safety now more than ever. Also, these camps are used well into the fall season (September and October) when snow accumulation would crush a conduit frame at an elevations of 8,300 and 7,400 respectively. These camps are typically DISMANTLED by definition, the first week of November (see Definitions.)	

Number	Comment	Forest Service Response
	• The EA does not include or make mention of the 1,000's of overnight visitor days which outfitters have purposefully reduced in sensitive high mountain lake basins because of overnighting stock & outfitted visitors at assigned sites rather than at sensitive lake destinations. The EA should recognize this fact as it is documented in outfitter annual post-use reports. 2.) How have those features or necessary improvements which provide for basic human needs, affected other wilderness visitor's experiences pre or post designation in the Boulders and White Clouds? • The EA does not document complaints by other visitors who have encountered these features before and after Wilderness designation in the HB and WC Wilderness areas. Do these rustic improvements representative of basic human needs detract from others' wilderness experience? Where is your monitoring and reports of what others have felt on encountering outfitter camps in the HB-WC Wilderness?	

Number	Comment	Forest Service Response
	• If you have done such monitoring, what did it consist of? Where is the questionnaire and who was surveyed? We hear nothing but praise and heart-felt thanks from those who randomly encounter these sites during bad weather, wind storms, freezing sleet, unexpected snows or when physically exhausted from a self-guided experience. (Example: The Rhon Road House @ the confluence of the So. Fork of the Kuskowim and Tatina Rivers in the Alaska Range, is commonly considered a "Safety Cabin" by users.) A Wilderness visitor's chance encounter of any outfitter camps is considered good fortune and personal discovery as these locations cannot be found on a GPS or Forest Service maps or within the locally available Trip Guides. Gauging this attitude should be made at the resource level by local monitoring of visitor attitudes specific to this resource. 3.) Did these features affect to Congressman's determination for suitability as Wilderness? • If these temporary features had been of significance to Congressman Simpson, the Legislation would not have been introduced, supported or signed into law. • There would have been letters of protest on file from the conservation community which your EA would have cited. 4.) Where is the list of complaints and complainants whose experience in the White Clouds was degraded by the presence of tent frames or their contents? • The EA does not describe statistics and numbers of complaints from your monitoring over the past 28 – 30 years specific to this place.	

Number	Comment	Forest Service Response
	5.) The EA fails to provide encounters within Wilderness which degrades the experience for outfitters and outfitted public. Have you considered our perspective in this Analysis or that of the outfitted public? Guideline 2125, page 26 directs implementation of the wilderness character monitoring framework of *Keeping It Wild 2* but where is reference to monitoring responses, attitudes, concerns from the outfitted public? Where and how will those publics be monitored? How do you intend to gauge their views on Wilderness character? Outfitted clients are your visitors and members of the public at large.	
WCO-20	17. Page 27 7.2 Sawtooth NRA General Management Standards 2101* Manage both federal and private lands in such a manner as to best provide (1) the protection and conservation of the salmon and other fisheries; (2) ~~to ensure the preservation and protection~~ the conservation and development of the ~~natural, scenic,~~ scenic, natural, historic, pastoral, ~~and fish and~~ wildlife, and other values, contributing to and available for public recreation and enjoyment, including the preservation of sites associated with and typifying the economic and social history of the American West; ~~and to provide for the enhancement protection of the associated recreational values~~ in accordance with Public Law 92-400. Delete reference to "enhancement" and replace with actual language in Public Law 92-400. Please accurately quote the SNRA Act of 1972; do not insert language which is not part of the ACT. This language is very important to the Outfitting and Guiding industry in so much as Outfitting and Guiding truly	See response to comment IOGA-22.

Number	Comment	Forest Service Response
	represents the "economic and social history of the American West." The Plan shall quote the SNRA ACT word for word if you are referencing it in the Plan and the EA.	
WCO-21	18. DEFINITIONS The EA does not reference the following definitions found in Merriam-Webster's New World Dictionary accurately. Please add as corrected to provide future managers a greater understanding of these terms in the Glossary of the Plan and EA. **Dismantle** – To strip of covering, to strip of furniture, equipment, etc., to take apart, to disconnect the pieces, to destroy the integrity or functioning of. **Protect** – To shield from injury, or danger, or loss; guard or defend. **Preserve** – To keep from harm, damage, danger, evil, etc.; protect or save. To keep up, carry on or maintain. **Untrammeled** – Not confined, not restrained, not impeded; originally used to describe the act of not damming a free flowing river, ie the Colorado River through the Grand Canyon. (This definition in the Plan and EA has been expanded beyond the original intent, by Landres et al. 2015.) Where is the source of the definition of Untrammeled which is commonly used in the Plan and EA? **Maintain** – To keep or keep up with, carry on. To continue in or with. To keep in a certain condition or position. To keep in existence or continuance; preserve. To uphold or defend. To support by aid, influence or protection **Enhance** – To make greater as in cost, value, quality, desirability, attractiveness, etc. To heighten improve or augment, etc. (Remove the reference to	See response to IOGA-44.

Number	Comment	Forest Service Response
	"Enhance/Enhancement" of Wilderness in all cases within this Plan and EA.) **Structure** – Manner of building, constructing, organizing. Something built or constructed such as a building or dam. **Building** – Anything that is built with walls and a roof, as a house, factory, etc.; structure. General term applied to a fixed structure in which people dwell, work, etc.; edifice **Feature** – The make, shape, form or appearance of a thing. A distinct or outstanding part, quality or characteristic or attraction. **Installation** – A complete mechanical apparatus fixed in position; the act of setting up for use or service **Fixed** – To fasten or attach; to make firm, stable or secure. To fasten or secure firmly. **Skeletal** – Having supporting framework; something reduced to its minimal form or essential parts. **Frame or framework** – A basic structure serving to hold the parts of something together or support something constructed or stretched over or around it; skeletal structure. **Permanent** – Lasting or intended to last indefinitely without change; enduring without fundamental marked change. (This does not represent an outfitter skeleton frame of a wall-tent as it is subject to the forces of nature.) ** The definition referenced in Standard 2188 is not entirely accurate. The definition in FSM 2320.5 does NOT represent Commercial Services and state what is identified under FSM 2323.13g – Outfitter and Guide Operations. (That definition of a permanent structure or installation is in all likelihood referencing FS Structures, Installations, & Buildings such as outhouses, bridges, kiosks/signage, cattle guards, treated wood and steel fences, administrative sites, etc.) Outfitter and Guide	

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	simple temporary structures and features are just that; rustic, crude, using native materials, temporary & dismantled at the end of the period of use. These may be authorized by the District Ranger as per 2323.04e – #2 under District Ranger responsibility. **Permanent Improvement** – Improvement to property or land that will remain indefinitely and is now an integral part of the property; fixed, enduring, abiding, not subject to change. Temporary – Lasting, enjoyed, effective, serving or used for a limited time only. (Limited time could refer to a season of use…it is not specific in definition.) (Webster's definition states nothing about "remaining in place for more than a specific time of use, when it then is deemed permanent.") **Management** – The act of handling, controlling, directing, etc. The act of having charge of, direction, conduct or administration of. **Stewardship** – The conducting, supervising or managing something; especially: the careful and responsible management of something entrusted to one's care; i.e. stewardship of natural resources. **Cache** – A safe inaccessible storage place for similar items; food or supplies. (No length or duration is mentioned, therefore the 14 and 16 days limits must be referencing Forest Service Handbook/Directive, Forest Plan or RMP language? Please cite as not mentioned in EA definition.)	
WCO-22	19. Page 33 7.10 Recreation Resources Page 33 **Objective 2159** Use visitor education and indirect management techniques to achieve objectives, preferring indirect methods of reducing visitor impact. Consider direct methods <u>such as mandatory self- administered visitor permits for large organized groups camping together,</u> when indirect	See response to IOGA-23.

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	methods are insufficient to adequately protect wilderness character. See "Balanced Common Sense Alternative"	
WCO-23	Page 33 **Standard 2165** Limit group size to a maximum of 12 people unless inventoried camp site will accommodate more or user is permitted otherwise by the Agency. (Allow for an increase in group size at "outfitter reserved or authorized sites" as identified in individual operating plans.) See" Balanced Common Sense Alternative"	See response to IOGA-24.
WCO-24	Page 33 **Standard 2166** Limit the combined number of recreational stock in on group to 14 head of stock unless inventoried camp site will accommodate more or user is permitted otherwise by the Agency. (Allow for an increase in number of head of stock at "outfitter reserved or authorized sites" as identified in individual operating plans.) See "Balanced Common Sense Alternative"	See response to IOGA-25.
WCO-25	Page 33 **Standard 2168** Retain Alternative C where restrictions already exist at highest elevation Lakes. See "Balanced Common Sense Alternative"	See Response to IOGA-26.
WCO-26	Page 33 **Standard 2169** Prohibit tethering recreational stock within 100 feet of lakes, streams and springs. Utilize the current standard (Alt.C) for the simple reason that the topography of lake basins, stream sides and location of springs may not afford	See response to IOGA-27.

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	any tie ups at all. Also the Agency tie ups at Chamberlain Lakes are non-conforming to the 200 ft. min. of Alt. A. See "Balanced Common Sense Alternative" Page 34 **Standard 2170** Prohibit grazing by recreational stock within 100 ft. of lakes, streams or springs. Continue to utilize the standard established in Alt. C for the same reasons above. Grazing may not exist on a side hill 200 ft. away from a lake, stream or spring. Consider promoting the use of electric fence enclosures for various reasons. See "Balanced Common Sense Alternative"	
WCO-27	Page 34 **Standard 2171, 2172** Retain these Standards as part of the "Common Sense" Alternative	See response to comment WCO-42 for response to proposed alternative.
WCO-28	Page 34 **Standard 2173** No need to use prohibitive language as these destinations as they are self-regulating; there is extremely little stock use at these destinations due to aspect, slope, access, rocky terrain & trail conditions. Since stock use is prevalent in Walker and Island Lakes, allow for such use to continue. See "Balanced Common Sense Alternative"	See response to IOGA-28.
WCO-29	Page 34 **Standard 2174** Delete as this restriction has no place in the WMP. This is not in reference to a commercial enterprise but, to the personal sport of trapping & is regulated by the IDF&G. See current Rules and Regulations on Trapping.	See response to IDFG-23 (similar comment to IOGA-29).
WCO-30	Page 34 **Guidelines 2179** Identify where one can find information on proper camping techniques, food storage and	See response to IOGA-30.

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	containment as none is provided in the WMP and move to Education.	
WCO-31	Page 34 **Guidelines 2182** Initiate a mandatory visitor permitting system located at trailheads into high use areas such and Big Boulder Creek, Little Boulder Creek, North Fork of the Big Wood and Boorn Lakes during the periods of highest visitation in July 1 thru Labor Day. Maintain voluntary trial registration system during shoulder seasons at these popular trailheads and also at less visited trailheads leading into more remote sections of the Wilderness. This is the only feasible way to obtain good monitoring data for future management decisions. See "Common Sense Alternative"	See response to IOGA-31
WCO-32	20. Page 38 7.11 Commercial Services Present Goals which are positive and consistent with the Sawtooth Wilderness Plan for Outfitters/Guides where applicable. Page 38 **Goal 2183** Delete word ~~Ensure~~ and mirror Goal #1 in Sawtooth Wilderness Plan. Outfitters provide quality services that enable the public to use, access, enjoy and understand the recreational and other values of wilderness, emphasizing opportunities for primitive or unconfined types of recreation, physical and mental challenge, inspiration and solitude.	See response to IOGA-32. The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.
WCO-33	Page 38 **Goal 2184** Delete word ~~Ensure~~ and ~~modeling~~; add statement to mirror & highlight Goal #2 in Sawtooth Wilderness Plan. Outfitters protect the wilderness resource by ~~modeling~~ helping the public understand and use wilderness responsibly and demonstrate stewardship of this natural resource.	See response to IOGA-33. The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.

Number	Comment	Forest Service Response
WCO-34	Page 38 **Goal 2185** Delete word ~~Ensure~~ and mirror Goal #3 in the Sawtooth Wilderness Plan. Outfitters play a role in educating the public in wilderness values, wildlands interpretation, plant and animal ecology and geology". ~~providing opportunities for the public to develop awareness, appreciation and understanding of the wilderness resource and its natural and cultural history.~~	See response to IOGA-34. The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction.
WCO-35	Page 38 **Objectives 2186** Maintain outfitter and guide priority use permit holder service days at existing actual use levels based on a 5-year review of actual use consistent with ~~FSH 2709.14.53.In and GLM H-2930-1, IIIA~~ current Forest Service and BLM Handbook direction. Evaluate changes in amount of use, type of use, operating areas, or service day allocation through a needs assessment, capacity analysis ~~and determination of the extent necessary,~~ consistent with ~~FSH 2709.14 53.1f.~~ Forest Service Handbook direction~~, to prevent negative impacts on wilderness character. Service Day limits will be based on 5-year analysis of actual use~~. Restate to make more concise. There is nothing in the EA which explains "determination of the extent necessary" therefore it appears to be arbitrary. Delete last sentence as not necessary to restate as in the Wilderness Plan; Plan speaks at great lengths to preserving, protecting and maintaining the Wilderness resource. Reduce redundancy.	See response to IOGA-35.
WCO-36	Page 38 **Objective 2187 Delete entire Objective** ~~Develop temporary outfitter and guide use pools that reflect existing use, including amount, type, and operating areas the existed at the time of designation. Allocate Temporary use on a first-come, first-serve basis. Increases in temporary use pool days may only~~	See response to IOGA-36.

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	~~occur after completing a needs assessment, capacity analysis, and a determination of the extent necessary.~~ The Authorizing Official shall consult the Rec. Special Uses Handbook 2709.14 Chapter 53 in order to specifically coordinate with outfitters in the development of use pools should, at some time in the future, the Forest completes a Needs Assessment and Capacity Analysis – Discussed 11/20/17	
WCO-37	Page 38 **Standard 2188** Do not authorize permanent structures or installations associated with recreation special uses. ~~A permanent structure is a constructed feature remaining for more than one season.~~ See FSM 2323.13g for examples of permanent structures: cabins, toilet buildings, tent frames with floors and sides. **The WMP should provide a complete and entire worded reference to FSM 2300 – Recreation, Wilderness and Related Resource Management Chapter 2323.13g – Outfitter and Guide Operations** This section the Forest Service Manual specifically identifies what is considered a Permanent Structure and it speaks to "dismantling" the frames and poles at the end of each season. These temporary skeleton structures or features are specifically located at authorized sites and do NOT consist of "cabins, toilet buildings, or tent frames with floors and sides" as cited in this Chapter. Existing sites and associated temporary features are approved in each Outfitter's Operating Plan which are part of the Outfitter's Special Use Authorization.	Standard 2188 was removed, as it is covered by default in 2189, and policy. (Same response for IOGA-37.)
WCO-38	Page 38 **Standard 2189** ~~Approve only temporary structures and facilities for outfitter and guide operations necessary to meet the public need in a manner compatible with the wilderness environment.~~ The District Ranger may authorize the construction and installation of simple and temporary structures,	See response to IOGA-38.

Number	Comment	Forest Service Response
	including corrals, but excluding cabins for outfitter and guide pack stock operations in accordance with the Forest Plan direction. See FSM 2323.04e. A temporary structure is a constructed feature that is erected and dismantled (see Definition) ~~within one season or less.~~ after the period of use which is based on the individual outfitter Operating Plan.	
WCO-39	Page 2190 **Standard 2190** Authorize assigned campsites for outfitters and guides in Zones 3 & 4 and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas. Authorize spike and drop camps away from high-use areas on a case-by-case basis. Allow progressive camping & drop camps per the Outfitter Operating Plan and annual itinerary. Drop camp locations are based on where the clients want their gear dropped and we have no choice of where that destination is. Spike camps would be authorized on an "as needed" basis and progressive camping trips are identified on the annual itinerary and Outfitter Operating Plan.	Revised 2190: Authorize assigned campsites for outfitters and guides in Zones 3 and 4 and locate them to reduce conflicts with non-outfitted users and to protect sensitive areas. Changes to existing assigned campsite locations would be evaluated in a needs assessment, capacity analysis, and/or extent necessary process.
WCO-40	Page 39 **Standard 2191** ~~Ensure~~ Outfitter operating plans for priority use and temporary use outfitting and guiding permittees ~~direct outfitters to~~ are models of appropriate wilderness practices and incorporate awareness of wilderness values in their interaction with clients and others. The EA should recognize that Outfitters are models of wilderness ethic and have been for decades. We have self-imposed limits on stock, on the number of clients, on numbers of saddles and equipment plus Special Use Permit limits on Priority Use Days. Outfitters reduce visitor impacts at high elevation sensitive areas by camping at authorized reserved sites. Outfitters are stewards of the Wilderness resource and the EA should acknowledge our collective stewardship by our	The IDT does not support these edits, as the WMP provides management direction to the agencies. This is not a statement about outfitter services. The wording as proposed reflects that direction. Also comment IOGA-40.

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	actions: picking up others trash, burying others feces, clearing trails for all users, conducting ourselves and our clients in an appropriate manner showing respect to other visitors and helping other visitors enjoy the resource responsibly. We continue to provide "Leave No Trace" educational materials to drop camp visitors, utilize weed free stock feed and continue to practice "Leave No Trace" stock handling techniques.	
WCO-41	Page 39 **Standard 2192** Prohibit permanent caches (See FSM 2323.13 g and BLM Manual 6340 B.2.j for additional direction.) Unattended feed will be allowed at destinations as defined by the operating plan. Feed bundles must be left in such a manner as to blend in with the natural environment. Permanent caches are not allowed in the Sawtooth Wilderness Plan, Page I-40 and this language would provide consistency and also by creating a distinction between stock feed and equipment or personal property. Place your Glossary definition of a "cache" within the Recreation Resources Section 7.10 to reference the non-outfitted visitor practices of the public leaving camping items cached for longer than 14 or 16 days respectively.	See response to IOGA-41.
WCO-42	**Alternative D – Balanced (Common Sense) Alternative** Utilize a blend of all three Alternatives to achieve balanced approach only where management is needed to protect and preserve the Wilderness resource. Make necessary corrections to the HB-WC Wilderness Plan & EA to reflect the following Alternative D:	As indicated in the comment, some of the direction presented in the new alternative is already presented and analyzed in existing alternatives. Anything reviewed in other alternatives is not included here. New direction is addressed. Line officers may select portions from any of the presented and analyzed alternatives for the final decision.
WCO-42	Recreation Resources	The proposed direction is responded to in another comment: WCO-23; See response to comment IOGA-24.

Number	Comment	Forest Service Response
	• Limit group size to a maximum of 12 people camping together during the months of July 1 – Labor Day unless serviced at a reserved camp as authorized to a commercial service provider or at an inventoried site identified for larger groups. New Direction	
WCO-42	• Restrict camping in an area with a combined number of recreational stock in excess of 14 head between the months of July 1 – Labor Day, unless located at a site inventoried for larger numbers or at a reserved campsite for a commercial services provider as identified in their OP and annual itinerary. New Direction	The proposed direction is responded to in another comment.WCO-24; See response to comment IOGA-25
WCO-42	• Initiate mandatory self-issued permitting system at high-use trailheads including Big Boulder, Little Boulder, Boorn Lakes and NF Big Wood River during months of July 1 – Labor Day. Voluntary registration at these high use trailheads has been inconclusive. All other trailheads will maintain a voluntary registry system. New Direction	The proposed direction is responded to in another comment. WCO-31; See response to comment IOGA-31
WCO-42	• Prohibit grazing by rec stock with 100 ft. of lakes and streams or springs. Encourage use of electric fencing to confine stock, evaluate grazing needs and monitor consumption. New Direction	Encourage use of electric fencing to confine stock, evaluate grazing needs and monitor consumption. Use of electric fencing is one of many ways to confine recreational stock and may be promoted through education.
WCO-42	• If the following System Trails are removed from the Forest Service Trail inventory over time, clearly state in the Plan that "it would be legal for others to maintain these trails by doing Level 1 maintenance in order to allow passage." New Direction	Outfitter and guide maintenance of trails would be authorized in accordance with policy, special use permit, and annual operating plans. Note: For Trail 674, the mileage stated incorrectly referenced the full length of the trail from Slate Creek road to Warm

Number	Comment	Forest Service Response
	○ WC Wilderness: Trail 674 (above O'Caulkins Lake to Warm Springs, trail 671 juncture) and Trail 684 (Wickiup Creek) ○ HB Wilderness: Trail 113 So. Fork of the East Fork (upper 5.2 miles) • Maintain all other system trails at required Forest Service Standards and Levels. New Direction	Springs Trail (671). Correct mileage above O'Caulkins Lake to Warm Springs is 3.9 miles. Maintenance of system trails is covered by policy – no need to restate that direction in the Plan.
WCO-42	• Educate and discourage stock use at destinations of concern. Stock use is self-limiting at the following destinations because of aspect, slope, access, terrain, trail location/condition, injury risk to stock & lack of available forage at elevation. Campsites are not well suited to stock use for the same reasons. Included are: Slickenside Creek, above Quiet Lake, Boulder Chain Lakes Creek above Lodgepole Lake, Gunsight Creek, Bighorn Creek, and Big Boulder Lakes. (Discouraging stock use would not apply at Island or Walker Lakes.) New Direction & Move to new Category	The recreational stock restriction areas are for resource protection, in addition to educating users. Although these areas may be terrain limiting, regulations allow for pre-planning for those unfamiliar with the terrain.
WCO-42	Commercial Services • Do not authorize permanent structure or installations associated with recreational special uses. (A "permanent structure" is defined [by Webster's Dictionary] as something build or constructed for use or service such as a building (structure); lasting or intended to last indefinitely, and enduring without fundamental marked change (permanent.) (See FSM 2323.13g for examples of permanent structures: cabins, toilet buildings, tent frames with floors and sides.) Correct Direction	The proposed direction is responded to in another comment. See response to IOGA-37: delete 2188.

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WCO-42	• The District Ranger may authorize the construction and installation of simple temporary structures, including corrals but excluding cabins, for outfitter and guide pack stock operations, in accordance with Forest Plan direction. A temporary structure is a constructed feature such as a skeletal tent frame which is erected and dismantled (per definition) after the period of use which is based on the individual outfitter operating plan. This temporary feature provides for the health, safety and welfare of the public. Correct Direction	The proposed direction is responded to in another comment. See response to IOGA-38 (same as WCO-38).
WCO-42	• Authorize assigned campsites for outfitters and guides in Zones 3 and 4 and locate them away from high-use areas to reduce conflict with other users. Authorize spike camps away from high-use areas on a case-by-case basis. Allow progressive camping and drop camps as per the outfitter Operating Plan and annual itinerary. Correct Direction	The proposed direction is responded to in another comment. See response to WCO-39
WCO-42	• Outfitter operating plans for priority use and temporary use outfitting and guiding permits recognize that outfitters represent stewardship of the wilderness resource and such plans incorporate awareness of wilderness values including interaction with clients and others. New Direction	The proposed direction is responded to in another comment. See response to IOGA-40 (same as WCO-40).
WCO-42	• Prohibit permanent caches. (See Appendix for definition.) Correct Direction	The proposed direction is responded to in another comment. See response to IOGA-41 (same comment as WCO-41).
WCO-42	Rangeland Resources • BLM would establish their own direction regarding irrigation or water spreading within their portion of the Wilderness (459 acres within the WC Wilderness). Potential effects will depend on site-specific NEPA or MRA. (Forest Service policy FSM 2323.26b) New Direction	Given that this activity did not occur in the BLM portion of the WC Wilderness prior to designation, this direction would have no effect on that portion of the Wilderness. Standard 21113 was revised to read: Water use for irrigation to maintain livestock grazing operations will be in accordance with existing water rights issued by the State of Idaho with priority dates predating the wilderness designation.

Number	Comment	Forest Service Response
WCO-42	• As trapping is done NOT as a business but is considered sport, the Wilderness Plan does not have the authority to manage or control these personal activities just as it does not address hunting or fishing. These are under the authority of the IDF&G. New Direction	The proposed direction is responded to in another comment. See response to comment IDFG-23 (same as WCO-29/IOGA-29).
WSF-01	On behalf of the Wild Sheep Foundation (WSF), please accept this comment letter concerning draft management plans for Hemingway-Boulders, Jim McClure-Jerry Peak and White Cloud Wilderness areas. We commend the USFS and BLM for recognizing the importance of minimizing risk of disease transmission from domestic sheep and goats to bighorn sheep. Along those lines, we recommend that pack goats not be permitted within areas where bighorn sheep occur.	Alternatives A and B include restricting pack goat use in bighorn sheep areas to varying degrees.
WSF-02	However, if permitted we support Alternative A but offer the following recommendations to ensure effective spatial and temporal separation between bighorn sheep and pack goats: 1. Implementation and management of a permit system for pack goat use. Pack goat users would be informed on required and recommended actions for reducing risk of contact between pack goats and bighorn sheep when obtaining a permit. 2. Required disease testing and health inspections of pack goats prior to use. 3. Require any observed contact between pack goats and bighorn sheep, as well as any lost pack goats, to be reported to the Forest Service as soon as possible. 4. Limit the number of pack goats per party.	Testing does not eliminate the risk of disease transmission. Additionally how tests are done and the frequency of tests affects the results and reliability of tests. Goats may be exposed to disease from other goats after testing. See response to comment NAPgA-19 for listed items 1 and 2. Listed items 3-6 are included in Alternative A (Standard 2155). #7. Requiring pack goats to have bells and/or identification tags is not included in the standard for pack goat management (Alternative A) because the agencies included the primary, most effective measures for reducing the risk of contact. Additional measures may be promoted through education, particularly as science regarding disease transmission improves.

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	5. Require pack goats to be leashed or in direct control by their owner. 6. Require pack goats to be high-lined or restrained in campsites. 7. Require pack goats to have bells and identification tags attached to their collars.	
WSF-03	Please feel free to contact the WSF if we can provide additional information or support on matters relative to wild sheep conservation and management. Thank you for the opportunity to comment and express our concerns. We look forward to hearing from you on this vitally important matter.	All commenters will remain on the mailing list.
WW/ WWP-01	*Please consider the following comments on the October 25, 2017* ***Hemingway-Boulders and White Clouds Draft Wilderness Management Plan (WMP) and Draft Environmental Assessment (EA)****, submitted on behalf of Western Watersheds Project (WWP) and Wilderness Watch.* **Introduction** We have been involved in comments on these Wildernesses. Our earlier suggestion to create one plan is not being followed. We feel that is in error—indeed the Jim McClure-Jerry Peak and Hemingway-Boulders Wildernesses share a border. Regardless, the administration of the three wildernesses will have to be closely coordinated. See the attached comments for the Jim McClure-Jerry Peak Wilderness.	The agencies determined at the initiation of the project to undertake two planning efforts. As stated in the supplement to the scoping letter (winter 2016-2017), "Two factors drove this decision. First, resources and uses differ in each area. Second, this separation aligns with administrative boundaries as the legislation for these wildernesses established boundaries along the Sawtooth National Forest and Salmon-Challis National Forest lines. BLM-managed lands are included in both the White Clouds and JMJP wildernesses; therefore, the BLM will be participating in the development of both plans."

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WW/ WWP-02	**I. The Plan's Description and Analysis of Wilderness, Including Untrammeled Wilderness and Wilderness Character, Needs to be Revised.** Our scoping comments provided significant detail on untrammeled wilderness and wilderness character. Regarding this overarching issues, those comments noted (bracketed text added): We have several concerns and questions with protection of wild or untrammeled wilderness and preserving wilderness character, the proposed desired future conditions (DFCs), management of human uses of the wilderness, and how the existing Forest Plans and proposed management goals, standards and the like address our concerns over preserving wilderness. Some of the proposed management direction is quite positive as well. We also have suggestions on how the proposed plan could be improved. The DFCs in the existing Forest Plans, and those proposed in this document, fail to recognize the key element of wilderness and the overriding defining attribute of wilderness character--untrammeled wilderness. The proposed action on pages 12 and 14 (page 13 is a map) lists five attributes of wilderness character. The list is highly problematic. The attached paper by wilderness professionals points out the fallacy in basing policy on the five attributes. Perhaps the best example [of the problem] is the Other Features of Value criterion. The scoping later states: > **Other Features of Value—Area** may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. Though not required of any wilderness, where they are present they are part of that area's wilderness character, and must be	Other features of value, as defined in the Wilderness Act, were considered in both Wilderness Management Plans, and where appropriately described, such as the formation of Herd Lake by a landslide. This was determined significant enough to highlight and discuss in the JMJP Plan/EA.

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	protected as rigorously as any of the other four required qualities. Relying on the "Other Features of Value" criterion, the agencies have confused the clear meaning of the Act by trying to shoehorn in structures like no longer needed agency installations into this category when structures are clearly prohibited in section 4(c). Any exceptions are clearly spelled out in the Act in section 4(d). The special features are clearly described in the Senate Report on the Wilderness Act. It does not include the kind of structures the agency sometimes wants to maintain that serve no wilderness preservation purpose. While no specific structures are mentioned in this plan, it does open the door to prohibited activities.	
WW/ WWP-03	With regard to overall direction, the WMP treads the same unsupportable ground as the scoping letter. *See* Plan at 5, 6, 9 and 10. It cites to Landres et al. 2015 to suggest that "Although wilderness character is a complex idea and is not explicitly defined in the Wilderness Act, the qualities of wilderness character are described as follows (adapted from Keeping it Wild 2 [Landres et al. 2015]) ..." *See* Plan at 5. It then defines the five supposed wilderness character attributes. The last of these is quoted above. The WMP would seem to suggest the statutory terms are unclear (natural v. untrammeled or special features v. natural) and that tradeoffs need to be made to the extent those tradeoffs violate the prohibitions in section 4(c) of the Wilderness Act. Such an interpretation as a general rule violates well-established rules of statutory construction and impermissibly creates conflicts within the statute where none exist. This unsupportable idea suggests that actions taken to protect one of these qualities may diminish another quality without any guidance within the Act on how to resolve the conflict.	The WMP states that the goal of stewardship is to preserve wilderness character as a whole (see Goal 2103). The five qualities of wilderness character represent tangible aspects of wilderness character and are appropriately used to organize information in the WMP (p. 5, and 9-10). Monitoring established indicators for qualities of wilderness character provides essential data to determine trend and help inform decisions that ultimately will preserve wilderness character. Likewise, proposed site-specific projects would be analyzed to understand the effect on the various qualities of wilderness character but ultimately, decisions must preserve wilderness character in the long-run.

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	However, the Wilderness Act does not state that there are five qualities of wilderness character nor does it provide conflicting definitions for wilderness qualities. Instead, this is a position that the administrative agencies have recently developed, without formal process, and is often interpreted in a manner that is at odds with rules of statutory construction and the plain language of the Wilderness Act. To the extent that there is an administration conflict between various uses of wilderness and preservation of wilderness, the statute and the agencies' regulations and management guidance provide direction for resolving those conflicts in favor of wilderness preservation. *See*, e.g., 16 U.S.C. § 1133(b). The statute should be construed "as a symmetrical and coherent regulatory scheme," *Gustafson v. Alloyd Co.*, 513 U.S. 561, 569 (1995), and a "harmonious whole," *Fed. Trade Comm'n v. Mandel Brothers, Inc.*, 359 U.S. 385, 389 (1959). As one law professor explains: > In contrast to other public land management statutes, which typically authorize agencies to consider and weigh diverse values through exercise of their scientific and policy expertise, the Wilderness Act required certain areas to be managed predominantly for one use: wilderness preservation. > > […] > > Unlike all other land-management statutes, the Wilderness Act's basic purpose was not to delegate authority to expert agencies, but rather, to exclude certain lands from the application of the agencies' specialized expertise, to restrain agency flexibility, and to protect (with limited, narrow exceptions) certain lands from the impact of the sort of policy choices land managers typically make.	

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	Sean Kammer, *Coming to Terms with Wilderness: The Wilderness Act and the Problem of Wildlife Restoration*, 43 ENVTL. L. 83, 100-101 (2013). See attached. Given these clear errors, we suggest that the Forest Service revamp the introduction to the plan and make changes that conform to the Wilderness Act.	
WW/ WWP-04	The plan needs to better address how Section 6 of the plan and the EA influenced and will influence decisions derived from the proposed action. One good example is that of fire. "Fire hazard is increasing in Douglas-fir and lodgepole stands due to increasing mortality from Douglas-fir beetle and mountain pine beetle outbreaks and resulting increased fuel loads." *See* Plan at 16. Elsewhere the Plan reaches a similar erroneous conclusion: > Substantial lodgepole and whitebark pine community mortality has occurred over the last 10– 15 years because of mountain pine beetle outbreaks. In many locations within the wildernesses, an abundance of snags and surface fuels [i.e. excellent wildlife habitat and biological capital for the Forest] now exist, making high-intensity and high-severity fire more likely. *See* Plan at 21 (bracketed text added). However, considerable research shows that beetle outbreaks do not increase fire hazard. (See among others Hart, S.J. et al. 2015 Area burned in the western United States is unaffected by recent mountain pine beetle outbreaks. PNAS.; Six, D.L. et al. 2014. Management for mountain pine beetle outbreak suppression: does relevant science support current policy? Forests 2014, 5, 103-133; Harvey, B. J., Donato, D. C., Romme, W. H. and Turner, M. G. (2014), Fire severity and tree regeneration following bark beetle outbreaks: the role of outbreak stage and burning conditions. Ecological Applications, 24: 1608–1625. doi:10.1890/13-	This is incorrect. The goals, objectives, standards, and guidelines in WMP provide the guidance for future management decisions. See response to JM 3-1.

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	1851.1). The problem with including this myth in the draft WMP and EA is that it misinforms future management actions that may be taken regarding suppression of natural fires or outright manipulation of Wilderness through agency-ignited fire or other vegetative controls.	
WW/ WWP-05	The WMP discusses MOUs between fish and game agencies. See Plan at 17. The MOU, *Policies and Guidelines for Fish and Wildlife Management in National Forest and BLM Wilderness* (USDA Forest Service, BLM, and AFWA 2006) is contrary to the Wilderness Act. Yet, the Plan states: > The guidelines in this document will be applied for managing activities including (but not limited to) use of motorized equipment, application of pesticides, fish and wildlife research and management surveys, facility development and habitat alteration, conservation of threatened and endangered species, population sampling, fish stocking, wildlife damage control, and visitor management to conserve wilderness wildlife resources. See Plan at 17.	See response to comment IDFG-05.
WW/ WWP-06	Regarding the wilderness section of the Proposed Action (PA), goal 2107, Plan at 25, admits that naturalness is a function of wildness. This demonstrates the agencies recognize this fundamental issue and the overarching goal of untrammeled or wildness. However, goal 2105 reduces untrammeled wilderness and should be reworded. As we noted in past comments: > The 1964 Wilderness Act governs the stewardship of the wilderness system. This visionary law defines Wilderness in part as "an area where the earth and its	The term "wilderness management" is in a sense contradictory; however, management of wilderness is required in order to balance the human uses legally allowed in wilderness (including intentional or unintentional environmental consequences) and its protection for present and future generations. Land managers are obligated to manage the wilderness resources at the highest level of protection as set forth in the Wilderness Act, many other laws, agency policies, and best available scientific research. It is a challenge to balance use and preservation/protection of wilderness lands in their natural condition, but it is a

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	community of life are untrammeled by man, where man himself is a visitor who does not remain." Untrammeled means unmanipulated or unconfined, where humans do not dominate or impose human will on the landscape. Wilderness designation brings a special protection for Wildernesses and requires the federal land management agencies like the Forest Service to not manipulate or dominate the wilderness. Rather, federal agencies are required by the Wilderness Act to preserve the wilderness character of Wildernesses, in essence to protect their wildness. This mandate is reflected in the epigram written by the drafter of the Wilderness Act, Howard Zahniser of the Wilderness Society, who wrote, "With regard to areas of wilderness, we should be guardians not gardeners." This fundamental tenet of wilderness stewardship was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight "fundamental principles" for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, "Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness….Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness."	responsibility that land managers, working with partners, take very seriously. Therefore, although goals 2105 and 2107 may appear to contradict each other, they are necessary in order to protect and preserve overall wilderness character.
WW/ WWP-07	The objective (2113) to incorporate partners and volunteers needs qualification. The agencies are devolving too much to partners in Wilderness administration. These entities do not have the authority to administer Wilderness. With regard to the	Working with partners, whether other federal agencies, state, county, or local agencies, non-profits, friends groups, private land owners, etc. is current practices for all land managers. Lessons learned over the years has proven that working together

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	savings clause in the Wilderness Act stating that "[n]othing in this chapter shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests," 16 U.S.C. 1133(d)(7), does not serve to eviscerate the administering agency's responsibilities under the Wilderness Act. See *Wilderness Watch v. Vilsack*, 229 F.Supp.3d 1170, 1181-82 (D. Idaho 2017) (citing *National Audubon Society, Inc. v. Davis*, 307 F.3d 835, 854 (9th Cir. 2002)). "The 'overarching purpose' of Congress in passing the Wilderness Act was to preserve the 'wilderness character' of that land." *Vilsack*, 229 F.Supp.3d at 1181-82 (citing *High Sierra Hikers Ass'n v. Blackwell*, 390 F.3d at 648). "Congress made preservation of wilderness values 'the primary duty of the [agency], and it must guide all decisions as the first and foremost standard of review for any proposed action.'" *Vilsack*, 229 F.Supp.3d at 1182 (citing *Greater Yellowstone Coalition v. Timchack*, 2006 WL 3386731 at *6 (D. Idaho Nov. 21, 2006). Further, the relationships the agencies build with partners can cause a conflict of interest and lead to those entities being given undue deference in Wilderness administrative decisions. This is particularly true of user groups.	with our local communities and adjacent land owners towards common goals to protect our natural and cultural resources, and visitor experiences results in more positive results than working in isolation. This is not to say that agencies are to be delinquent in their mandated responsibilities, but rather that it takes all interested parties working together to protect an enduring Wilderness Resource. See response to comment KW-04, which also references the NFS Trails Stewardship Act.
WW/ WWP-08	Points 2109 and 2116 (structures) could come into conflict. Point 2109 should be a standard. The idea that no-longer used agency structures (2116) may need to be maintained conflicts with the Wilderness Act and case law. See *Wilderness Soc'y v. U.S. Fish & Wildlife Serv*., 353 F.3d 1051, 1061-62 (9th Cir. 2003) { TA \l "*Wilderness Soc'y v. U.S. Fish & Wildlife Serv*., 353 F.3d 1051, 1061-62 (9th Cir. 2003) (en banc)" \s "*Wilderness Soc'y v. U.S. Fish & Wildlife Serv*., 353 F.3d 1051, 1061-62 (9th Cir. 2003) (en banc)" \c 1} (en banc) (Wilderness Act "sets forth the Act's broad mandate to protect the forests, waters, and creatures of the wilderness in their natural, untrammeled state" and "show[s] a mandate of preservation for wilderness and the essential need to keep [nonconforming uses]	Standard 2116 conforms with policy: throughout FSM 2320, including: 2323.13, 2323.26, 2323.37, etc., and 2320.2: 3. Minimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation. See BLM Manual 6340 1.6.B.2.i and j. Installations may only be allowed in wilderness areas if they are associated with a valid existing right (as noted in 1.6.B.3.b), if necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act (as noted in 1.6.B.3.c), including measures required in emergencies involving the health and safety of persons within the area, allowed under a special

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	out of it."); *Wilderness Watch v. Mainella*, 375 F.3d 1085, 1091-92 (11th Cir. 2004) (maintaining structures simply to prolong their existence does not serve the purpose of the Wilderness Act). Indeed, the Ninth Circuit has described the Act's prohibition on structures as "one of the strictest prohibitions[.]" *Wilderness Watch v. U.S. Fish & Wildlife Serv*., 629 F.3d 1024, 1040 (2010) { TA \l "*Wilderness Watch v. U.S. Fish & Wildlife Serv*., 629 F.3d 1024, 1040 (2010)" \s "Wilderness Watch v. U.S. Fish & Wildlife Serv., 629 F.3d at" \c 1}.	provision of Section 4(d) of the Act, or explicitly identified in the legislation designating a particular wilderness. Further, wilderness must be managed in concert with other legislation, including, for example, the NHPA. (BLM Manual 6340 1.6.A.5.) **Wilderness Soc'y v. U.S. Fish & Wildlife Serv., 353 F.3d 1051, 1061-62 (9th Cir. 2003)** • Tustumena Lake, Kenai Wilderness, Kenai NWR – salmon hatchery project. FWS issued a permit to the CIAA for the Enhancement Project, which involved catching salmon outside the wilderness area, hatching eggs, and releasing salmon into the wilderness area. • The project was designed primarily to promote the commercial interests of fishing interests in the Cook Inlet, not wilderness values. The court held that the project constituted a commercial enterprise prohibited by the Wilderness Act. **Wilderness Watch v. Mainella, 375 F.3d 1085, 1091-92 (11th Cir. 2004)** • Cumberland Island Wilderness (NPS) - use of a 15-person van to shuttle tourists to Plum Orchard, a Park Services historical area just outside of the wilderness zone. NPS claimed that it needed motorized access to meet its obligation to maintain the historic resources on the land. • "Any obligation the agency has under the NHPA to preserve these historical structures [in wilderness] must be carried out so as to preserve the 'wilderness character' of the area."

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		Wilderness Watch v. U.S. Fish & Wildlife Serv., 629 F.3d 1024, 1040 (2010). • Kofa NWR and Kofa Wilderness (FWS) – built water structures for sheep without proving they were the minimum necessary for the administration of the area as wilderness. Key language: "But a generic finding of necessity does not suffice...; the Service must make a finding that the structures are "necessary" to meet the minimum requirements for the administration of the area" (emphasis in original).
WW/ WWP-09	Point 2117 does not properly emphasizes natural processes because the opening it gives to manipulation of Wilderness. See for example FSM 2323.42. The way it is worded, the exception will swallow the rule. We are already seeing numerous instances of ecological manipulation in Wilderness. The MRA process is seriously flawed as are the Framework for Evaluating Ecological Intervention in Wilderness--which to our knowledge has not been finalized--and KIW2 (see point 2125). In any case, none of these processes have gone through formal public comment or NEPA.	Reword 2117: Allow natural processes to dominate and maintain ecosystem functions, including natural restoration. Where human activities have substantially degraded the wilderness condition, active management may be considered to restore wilderness character. In addition to an MRA, the Framework for Evaluating Ecological Intervention (or most current) is a valuable method that may be used for evaluating necessary and appropriate action. NEPA analysis would be required for ecological manipulation within wilderness, or any federal action that has the potential to impact the environment. Also see response to comment IDFG-07 for discussion of MRA/MRDG, and IDFG-1 for discussion of the Framework.
WW/ WWP-10	**II. The Forest Service Should Ban Lethal Predator Control Activities for the Benefit of Livestock Grazing, and Further Analyze its Impacts.** We renew and incorporate by reference our January 31, 2017 comments regarding lethal predator control activities for the benefit of livestock grazing by entities such as Wildlife Services. There is no practical difference between guideline	See response to BWCC-14.

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	21116 in the current Draft Wilderness Management Plan (WMP) and guideline 2143 which was the subject of our previous comments. See Plan at 43.	
WW/ WWP-11	Natural processes and natural selection should be the primary factors determining the diversity of fish and wildlife in the Wildernesses. See FSM 2323.33c. Lethal predator control activities disrupt these processes and directly contradict the Wilderness Act's mandate to preserve "the wilderness character of the area" in a natural state (The Wilderness Act (Section 4)). There is no "need for [lethal predator] control" for the benefit of livestock producers in the Wilderness. The Wilderness quality of "untrammeled" is defined in the EA as an "area [that] is unhindered and free from intentional actions of modern human control or manipulation." EA at 2. Predator control is antithetical to this quality. Predator control manipulates an area for the benefit of livestock grazing. Livestock operators should be made aware that they are assuming the risk of loss of livestock due to predation when utilizing public lands, that they should not expect that natural systems will be further disrupted to accommodate commercial activities, and that they will not be compensated by the Forest Service for such losses. Livestock operators have access to a broad suite of both passive and active non-lethal predator deterrent methods. And in these Wildernesses, ranchers who voluntarily waive a permit back to the agency may receive fair compensation from a third party for the permanent retirement of that permit. Thus, operators would endure minimal hardship should they choose to graze their livestock in areas where predators do not occur.	The Wilderness Act of 1964 and the enabling legislation (P.L. 114-46) do not expressly prohibit predator control in wilderness areas. They do, however, allow pre-existing grazing operations to continue in areas designated as wilderness (See Section 102(e) of PL 114-46). APHIS' ability to implement predator control for the benefit of livestock producers was affirmed in Forest Guardians v. ANIMAL & PLANT HEALTH INSPECT., 309 F. 3d 1141 - Court of Appeals, 9th Circuit 2002, Case number 01-15239 court case. Also see response to BWCC-14.

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WW/ WWP-13	Such actions are also not warranted because an increasing number of studies have found that predator control is not even effective in reducing livestock depredation—unless the wolf population is totally eradicated (which would be antithetical to wilderness). Research shows that livestock depredation by coyotes and wolves may actually increase following lethal control. For example, Wielgus & Peebles (2014) concluded that killing wolves actually increases cattle depredation, finding that increased predator mortality is associated with compensatory increased breeding pairs, compensatory number of predators, and increased depredations. Treves (2005) noted several studies showing depredations are often isolated incidents without repeat, even without lethal control.	The Wilderness Act of 1964 and the enabling legislation (P.L. 114-46) do not expressly prohibit predator control in wilderness areas. They do, however, allow pre-existing grazing operations to continue in areas designated as wilderness (See Section 102(e) of PL 114-46). APHIS' ability to implement predator control for the benefit of livestock producers was affirmed in Forest Guardians v. ANIMAL & PLANT HEALTH INSPECT., 309 F. 3d 1141 - Court of Appeals, 9th Circuit 2002, Case number 01-15239 court case. Also see response to BWCC-14.
WW/ WWP-14	Finally, standard 21137, which prohibits "competitive events, training events, and contests," Draft Plan at 43, should be expanded to include additional measures prohibiting hunting or trapping contests beginning and/or ending on areas outside the wilderness from crossing wilderness boundaries during any part of the event or contest. This is a real threat considering the "predator derbies" that have been held in Salmon several times over the past few years.	Exclusion of wilderness would be a condition of a competitive event permit. Further, this topic is covered by existing policy. BLM 6340: 1.6 (C) 13. D. iii. Activities that are not wilderness-dependent may be prohibited without degrading opportunities for unconfined recreation. Non-wilderness-dependent activities may also impair aspects of wilderness character and, when this is the case, should be prohibited. Such activities may include: A. Contests, such as physical or mental endurance of a person or animal,, foot races, canoe or boat races, competitive trail rides or other forms of competition, and survival contests; FSM: 2323.13h - Competitive Events - Do not permit competitive events, including competition involving physical or mental endurance of a person or animal, foot races, canoe or boat races, competitive trail rides, survival exercises (including military), or other activities of this nature in wilderness.

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WW/ WWP-15	For these reasons, the Forest Service should analyze the impacts of lethal predator control on the environment. However, neither the Proposed Action nor the analyzed alternatives do so. Nor do any of the alternatives consider the cessation of predator control activities in the Wilderness. The EA failed to consider the impacts of predator control activities to wilderness characteristics including untrammeled qualities and naturalness.	The Wilderness Act of 1964 and the enabling legislation (P.L. 114-46) do not expressly prohibit predator control in wilderness areas. They do, however, allow pre-existing grazing operations to continue in areas designated as wilderness (See Section 102(e) of PL 114-46). APHIS' ability to implement predator control for the benefit of livestock producers was affirmed in Forest Guardians v. ANIMAL & PLANT HEALTH INSPECT., 309 F. 3d 1141 - Court of Appeals, 9th Circuit 2002, Case number 01-15239 court case. Also see response to BWCC-14.
WW/ WWP-16	The EA should also consider whether predator derbies in the region are likely to continue, and how they might affect these Wildernesses.	See response to WW/WWP-14.
WW/ WWP-18	However, we do not support the exceptions to Standard 21111: unreasonable cost or less frequent mechanized travel. The Wilderness Act requires preservation of "the wilderness character of the area" (The Wilderness Act (Section 4)). Wilderness character is described as untrammeled, natural, and undeveloped. Plan at 5. To achieve these characteristics, range improvements which are in disrepair or are no longer functional should be removed, and should not be replaced with new structures. Range improvements in allotments which have been retired should be removed immediately. Additionally, the "use [of] irrigation or water spreading only to maintain livestock grazing operations and only where practiced prior to the designation of wilderness," is also incompatible with wilderness characteristics and should be prohibited. Plan at 41. Further, we are not aware of where this may be occurring.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Maintenance of existing improvements is a term and condition of the term grazing permit and is required to be completed by the permittee. Additionally, livestock grazing is not the "action" but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary.

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WW/ WWP-19	We also support Standard 21110 requiring maintenance of "range improvements using non-motorized, non-mechanized means." Plan at 41. We do not support motorized or mechanized maintenance as this type of activity also is incompatible with preservation of wilderness character, which should take priority to commercial uses of the land. Again, we are not aware that motorized use is occurring for livestock grazing purposes in the Wilderness.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Maintenance of existing improvements is a term and condition of the term grazing permit and is required to be completed by the permittee. Any proposal for motorized/mechanized use would be evaluated on a case-by-case basis through the MRA process.
WW/ WWP-20	Goal 21106 "provid[ing] for continued livestock grazing in wilderness in a manner that minimizes impacts to wilderness character," Plan at 40, should be clarified to include requirements that livestock operators utilize only non-lethal predator controls, night gathering of sheep, regular location reporting, emergency response plans in the event of near contact with bighorn sheep, and other methods to minimize impacts to wildlife while within the wilderness boundaries. Allotment management plans should likewise be amended to include such measures to ensure minimal impacts to wilderness character, and be commensurate with those prohibitions imposed on recreational stock, which have less impact on the land than commercial stock. Plan at 33-34.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Additionally, livestock grazing is not the "action" but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary.
WW/ WWP-21	The EA fails to consider the impacts of granting MRAs for mechanized rangeland improvements. The Draft EA acknowledges that "[t]he sights and sounds of motorized and mechanized uses can penetrate the wilderness and affect a visitor's experience." DEA at 40. But the Draft Wilderness Management Plan allows range maintenance with motorized equipment where: "a) practical non-motorized alternatives do not exist; and b) the motorized use is expressly authorized in the	Maintenance of existing improvements is a term and condition of the term grazing permit and is required to be completed by the permittee. The Congressional Grazing Guidelines state "…"The maintenance of supporting facilities, existing in an area prior to its classification as wilderness (including fences,...stock tanks, etc.) is permissible in wilderness." The use of motor vehicles and motorized equipment is allowable only "where practical

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	grazing permit and advanced written permission for each maintenance activity is granted by the FS or BLM, as appropriate; and c) the motorized use was allowed prior to wilderness designation." Plan at 41. The DEA does not give a sense of how often the Forest Service will grant MRAs for such use. It should explain this further. If such permission is given frequently, it will degrade wilderness characteristics in a way that needs more analysis.	alternatives do not exist," and such use is "occasional," "expressly authorized," and "based on a rule of practical necessity and reasonableness." Since MRAs are prepared in response to a request by permittees and evaluated on a case-by-case basis, there is no ability for the Agency to predict how many may be granted. To attempt to analyze a certain number would be purely speculative and inappropriate in this process.
WW/ WWP-22	**IV. The Draft EA Should to Consider the Effects of Grazing on the Wilderness and Potential Opportunities to Minimize Such Effects in the Future** The Draft EA declines to analyze in detail the impact of rangeland resources within the wilderness area. It instead relies on a previous analysis contained in the 2003 Forest Plan FEIS—an analysis that is 14 years old. Plan at 31. Section 4(d)(4) of the Wilderness Act permits pre-existing grazing to continue on designated wilderness "subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Grazing is likely to continue into the reasonably foreseeable future. And, although Congressional mandate prevents grazing instructions from being altered simply because an area has been designated as wilderness, it does not prevent future grazing instructions from considering methods to minimize grazing impacts to wilderness areas.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Additionally, livestock grazing is not the "action" but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary.
WW/ WWP-23	**V. Bighorn Sheep** Draft WMP Standard 2154 prohibits pack goats within East Fork Herd Home Range, which we support, but does not discuss prohibiting commercial sheep. Plan at 30. Further, the EA and Plan do not indicate the boundaries of allotments and how that may overlap with bighorn sheep habitat. Similarly, draft WMP	There are response plans in place that include BMPS for domestic sheep grazing permitees. These plans are developed by IDFG and signed by IDFG and the permitees. Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be

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	Standard 2155 lists measures to minimize contact between pack goats and Bighorn sheep but no similar or equivalent measures for commercial sheep. Id at 30. See for example, W. Watersheds Project v. BLM , No. 4:07 - cv - 151 - BLW, ECF #166 (D. Idaho, Oct. 2, 2009. Further, point 2155 is completely unenforceable as it is voluntary.	permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Additionally, livestock grazing is not the "action" but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary. 2155 is a standard and therefore mandatory and enforceable.
WW/ WWP-24	The draft EA concedes that only one group of pack goat users registered to use the wilderness in 2016 and wilderness rangers did not encounter any pack goat users during patrols within areas now designated wilderness from 2011 through 2016. Plan at 71. But the EA argues that excluding pack goats and their users "would displace that use elsewhere, depriving pack goat users the opportunity for wilderness experience in these two areas." EA at 66. Anywhere bighorn sheep occur should be off-limits to pack goats and domestic sheep because of the threat of disease transmission (see attachments 1 and 2). The home range in the plan is far smaller than what the agencies' own map shows for bighorn sheep (see attachment 3). That area shown on the map should be the exclusion zone.	First paragraph – correct, this is what the plan states. Exclusion of pack goat use under Alternatives A or B would impact pack goat users. As noted on p. 8 of the WMP and p.4 of the EA, development of allotment management plans or allotment evaluations are undertaken separately from the WMP. The East Fork Herd Home Range is based on data provided by IDFG, and is applied in Alternative A. See response to IDFG-21. Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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		Additionally, livestock grazing is not the “action” but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary.
WW/ WWP-25	Lastly, the draft EA does not discuss the impacts of domestic sheep grazing to bighorn sheep and how that may affect Wilderness. Indeed, there are no maps to show if there is range overlap and, if so, to what degree that occurs. A variety of measure could have been evaluated in the draft WMP such as reducing allotments sizes to exclude bighorn habitat in domestic sheep allotments, changes of livestock use, or encouragement/facilitation to have the allotments voluntarily waived back where allotments overlap bighorn habitat.	Permitted livestock grazing was specifically authorized in the 1964 Wilderness Act "(2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process. Additionally, livestock grazing is not the “action” but rather the management of wilderness, so an in-depth analysis regarding livestock grazing was not necessary. As noted on p. 8 of the WMP (Issues Resolved by Policy) and p.4 of the EA (Issues Not Analyzed in Detail) development of allotment management plans or allotment evaluations are undertaken separately from the WMP.
WW/ WWP-26	**VI. Native Fish** Goal 2147 is positive, but partially contradicted by other objectives and standards and guidelines. Fish stocking (2153), shouldn’t be done with non-native species. Further, it would seem there is no need to stock native species as they are already a component of the Wilderness. How fish stocking might be done (aircraft) is also a serious concern.	Fish stocking within the Wilderness areas is governed by Forest service policy 2323.34 as well as AFWA. In regards to stocking methods the following policy is applicable; **2323.34b-** Stocking shall normally be done by primitive means, however, Regional Foresters may permit dropping of fish from aircraft for those waters where this practice was established before the area was designated a wilderness. Conduct aerial stocking pre-or post-visitor seasons. Landings are prohibited. Specify mitigation for stocking methods in wilderness implementation schedules.

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WW/ WWP-27	Further, Objective 2151 considers the removal of fish (presumably stocked) from occupied waters "to reestablish historic habitat for the return of native fish species, or to remove either native or non-native fish from historically fishless waters." Both federal and state must agree the action is "necessary for protecting and improving wilderness character." Removal action may get an MRA and NEPA analysis; suggests it also may not. Methods may include using biological controls, such as the temporary use of a sterile, non-native predatory fish species. Plan at 30. The possibility that the non-native predatory fish are not sterile is a serious concern.	Either action listed would require an MRA if a prohibited use and NEPA analysis would be required depending on the treatment. Wording has been revised. While it's possible that a non-sterile fish can get stocked, it is highly unlikely due to the fish being hybridized as well as strict quality controls which are implemented
WW/ WWP-28	Standard 2153 allows fish stocking by state "only in coordination with the Forest Service to perpetuate or recover native threatened or endangered species within historically occupied waters, or to reestablish or maintain non-native fish where established prior to wilderness designation and likely to survive perennially." Plan at 30. Suggests any historical stocking location may still be stocked. Again, it is hard to imagine where native species would need to be	Governed by Forest service policy 2323.34 and AFWA.
WW/ WWP-29	Standard 2138 is a prior existing management objective to protect habitat for the isolated bull trout population above the falls on Germania Creek. Plan at 28. Any evidence it has been successful thus far? Further, is any of this habitat within the Wilderness as Germania Creek itself was excluded (unfortunately so) from the Wilderness?	Bull Trout densities within the upper part of Germania creek are some off the highest observed within the Sawtooth NRA. While Germania Creek proper is not within the wilderness area many of its' tributaries are.
WW/ WWP-30	Standard 2139 is a prior existing management objective to reduce effects to fish habitat and water quality from livestock grazing within the tributaries of the East Fork Salmon River and Slate Creek subwatersheds. The Upper East Fork Salmon	**Forest Service policy-2323.25 - Range Analysis** Follow the standards in FSM 2210 for range analysis in wilderness. Where an approved allotment management plan exists at the time an area is designated as wilderness, review it in context with the congressional guidelines and policy. Document

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	subwatershed is the priority. Plan at 28. Any evidence it has been successful thus far?	necessary modifications in the Forest or allotment management plan.
WW/ WWP-31	Standard 2140 is a prior existing management objective to protect spawning and rearing areas within streams and rivers during critical spawning and incubation periods. The Upper East Fork Salmon subwatershed is the priority. Plan at 28. Any evidence it has been successful thus far?	**Forest Service policy-2323.25 - Range Analysis** Follow the standards in FSM 2210 for range analysis in wilderness. Where an approved allotment management plan exists at the time an area is designated as wilderness, review it in context with the congressional guidelines and policy. Document necessary modifications in the Forest or allotment management plan.
WW/ WWP-32	The draft EA does not consider the effect of grazing on native fish, the effect of stocking on native fish or other aquatic organisms such as amphibians, and the effect of fish stocking on wilderness. These are serious omissions.	Grazing is not the action and therefore was not analyzed. Rather razing is governed by Forest service policy 2323.23, 2323.24, 2323.25, and 2323.26. Fish stocking is directed by Forest Service policies-2323.34 as well as AFWA. **AFWA- POLICIES AND GUIDELINES FOR FISH AND WILDLIFE MANAGEMENT IN NATIONAL FOREST AND-BUREAU OF LAND MANAGEMENT WILDERNESS (as amended June 2006)** **Fish Stocking** Fish stocking may be conducted by the State agency in coordination with the Federal administering agency to perpetuate or recover a threatened or endangered species, or to reestablish or maintain indigenous fish species. Any species of fish introduced for management purposes prior to wilderness designation may be managed as indigenous fish species if the species is likely to survive. State agencies may continue to stock those waters traditionally stocked prior to wilderness designation. State and Federal agencies should carefully

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		evaluate stocking those waters that consistently require supplementation for reasons other than angler-induced mortality. Selected species for stocking will be determined by the State agency in close cooperation and coordination with the Federal land management agency. In order of preference for stocking fish species is (a) Federal threatened or endangered species, and (b) indigenous species. Numbers and size of fish and time of stocking will be determined by the State in coordination with Federal agencies. Lakes and streams currently **without fish** may be considered for stocking, if there is mutual agreement that no appreciable loss of scientific values or adverse effects on wilderness resources will occur. **It is generally undesirable to stock previously unstocked waters. Because these areas generally reflect natural ecosystem processes, they may possess high scientific values. Proposals for fish stocking that would involve uses generally prohibited under Section 4 (c) of the Wilderness Act w**ill be considered and may be authorized by the Federal administering agency through application of the MRDP as outlined in Section E., General Policy.
WW/ WWP-33	**VII. Recreation Resources** Party size (2165 and 2166) is confusing and contradicts research (see Cole, D.N. 1989. Low-impact recreational practices for wilderness and backcountry. USDA Forest Service, Intermountain Research Station, Gen. Tech. Rpt. INT-265. Ogden, UT.; and Watson, A. et al. 1993. Hikers and recreational stock users: predicting and managing recreation conflicts in three wildernesses. USDA Forest Service, Intermountain Research Station, Research Paper INT-468. Ogden, UT). Numbers of stock should be reduced. Perhaps a single limit on the number of heartbeats should be instituted.	The Cole, 1989 article was referenced and cited in the Wilderness specialist report. Watson, et al., 1993 was referenced during the completion of the specialist report, although it wasn't specifically cited in the report or EA. Also see response to comment JM1-10 regarding analysis of smaller party sizes. The comment on treaty rights is outside the scope of this EA. We cannot put limits on a federally recognized tribe(s) that have a preexisting treaty which grants full access to these areas. Tribal Rights and Interests-Standards-21105 states "Group size and length of stay limitations do not apply to the Tribes when exercising off-reservation treaty rights."

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	The section on treaty rights addressing party size does not clarify whether treaty uses in Wilderness currently or are expected to exceed the party size standards.	
WW/ WWP-34	An elevation limit for firewood gathering and campfires may make some sense, but how will it be enforced? Signing detracts from Wilderness. This may be an issue of recreational carrying capacity being exceeded use rather than an elevation problem per se.	See response to comment BCHI-05.
WW/ WWP-35	**VIII. Commercial Services** The goals, objectives and standards surrounding commercial services need to be informed by a needs assessment, including looking at what is both necessary and proper. 16 U.S.C. § 1133(d)(5). Interpreting the Wilderness Act's specific exemption for commercial services in § 1133(d)(5), the Ninth Circuit has held that "the statutory scheme requires, among other things, that the assigned agency make a finding of 'necessity' before authorizing commercial activities in wilderness areas." *High Sierra Hikers Ass'n v. Blackwell*, 390 F.3 630, 646 (9th Cir. 2004). However, "a finding of necessity is a necessary, but not sufficient, ground for permitting commercial activity in a wilderness area." Id. at 647. The finding must be "specialized," and "[t]he Forest Service may authorize commercial services only 'to the extent necessary.'" Id. (citing 16 U.S.C. § 1133(d)(5)) (emphasis in original). Courts have emphasized that the prohibition against commercial activity is "one of the strictest prohibitions of the Act." *Californians for Alternatives to Toxics v. U.S. Fish and Wildlife*, 814 F. Supp. 2d 992, 1016 (E.D. Cal. 2011) (citing *Wilderness Watch v. U.S. Fish and Wildlife Serv.*, 629 F.3d 1024, 1040 (9th Cir. 2010)). And, "[t]he limitation on the Forest Service's discretion to authorize commercial services only to 'the extent	NEPA was conducted for outfitter and guide activities on the Sawtooth NRA in 2008 and a capacity assessment was conducted for much of the lands now designated wilderness in 2015. Current outfitter operations are consistent with management of the area as wilderness, and include activities that help segments of the public use and enjoy wilderness areas for recreational or other wilderness purposes. The WMP is not the appropriate avenue for the detailed analysis necessary for this level decision. The Sawtooth NRA received funding to conduct the prework for a needs assessment and extent necessary evaluation beginning in 2018.

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	necessary' flows directly out of the agency's obligation under the Wilderness Act to protect and preserve wilderness areas." *Blackwell*, 390 F.3d at 647. Accordingly, "if an agency determines that a commercial use should trump the Act's general policy of wilderness preservation, it has the burden of showing the court that, in balancing competing interests, it prepared the 'requisite findings' of necessity." *High Sierra Hikers Ass'n v. U.S. Dept. of Interior*, 848 F. Supp. 2d 1036, 1046 (N.D. Cal. 2012) (citing Californians for Alternatives to Toxics, 814 F. Supp. 2d at 1017; *High Sierra Hikers Ass'n v. U.S. Forest Serv.*, 436 F. Supp. 2d 1117, 1131 (E.D. Cal. 2006) ("[W]hen there is a conflict between maintaining the primitive character of the area and between any other use . . . the general policy of maintaining the primitive character of the area must be supreme.")). Accordingly, the agency must make a reasoned, specialized finding of necessity before authorizing commercial services in wilderness, and it must also show that the number of commercial service permits, if any are authorized, is no more than necessary to achieve the "recreational or other wilderness purposes of the area." 16 U.S.C. § 1133(d)(5). This requirement to complete a comparative and qualitative needs assessment applies both to maintaining current levels of commercial activity and increasing activity. *High Sierra Hikers Ass'n v. U.S. Dept. of Interior*, 848 F. Supp. 2d at 1047. The draft WMP does not provide this information. In fact, it avoids looking at this important issue altogether except in context of increasing the temporary outfitter user day pool. When will a needs assessment be done to look at existing permitted uses, temporary uses that are effectively permanent under this plan, and any other types of outfitted use? This assessment must be done before commercial activity in wilderness can be permitted.	

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WW/ WWP-36	**IX. Minerals** Standard 21121 needs to be clarified to avoid potential conflicts with the Wilderness Act. Specifically, this does not seem to be completely consistent with section 5 of the Wilderness Act.	Section *5* of the Wilderness Act speaks to State and Private lands within Wilderness Areas. *However Section 5(b) "In any case where valid mining claims or other valid occupancies are wholly within a designated national forest wilderness area, the Secretary of Agriculture shall, by reasonable regulations consistent with the preservation of the area as wilderness, permit ingress and egress to such surrounded areas by means which have been or are being customarily enjoyed with respect to other such areas similarly situated.*" In the case of the Hemingway-Boulders Wilderness, there is currently no "customary" ingress or egress to valid mining claims. Any desired future access by a claimant or operator would need to be evaluated under a plan of operation and reviewed by a certified mineral examiner to ensure proposed operations are consistent with valid existing rights and consistent with the Wilderness Act. The ID Team proposes following modification(s) to Standard 21121 to alleviate any confusion of the term "surface-use authorization" and simplify this standard, in particular with the final sentence pertaining to motorized use. Section 5(b) of the Wilderness Act describes motorized use for mining purposes, and is not restated in the WMP. Revision to 21121: *"The plan of operation must outline all terms and conditions for reclamation and rehabilitation of an area upon completion of mineral exploration or development activity. This includes a timeline for removing all structures, equipment and support facilities for the operation and the area impacted by mineral operations must be restored as nearly as practicable to the contour and appearance of the landscape before operations commenced."*

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WW/ WWP-37	**X. Land and Special Uses** This section is inconsistent with the narrow provisions of the Wilderness Act regarding services such as outfitting and guiding. For example, standard 21138 violates the Wilderness Act as commercial filming is not a commercial service. It is therefore prohibited by the Wilderness Act.	Established by policy (FSH 2709.11 45.51b), and BLM Manual 6340 (Section 1.6 C. 4). This plan does not propose to change policy.
WW/ WWP-38	**XI. Zones** Our past comments noted, "Care must be taken to ensure that management zones are consistent with the Wilderness and the Act. In particular, we have concerns with the description of Zone 4 …" That has not changed. The plan still allows in zone 4, areas which "are substantially affected by human activity." That is contrary to the Wilderness Act and the zone management descriptions must be altered.	The zoning concept acknowledges that at the time of designation portions of the wilderness included areas with heavier visitor use and level of development. Section 7.22.4. Zone 4 Desired Conditions states: "A high degree of wilderness integrity is maintained to the maximum extent practicable."
WW/ WWP-40	**XII. Monitoring** There is nothing new of substance from the earlier PA. How is current monitoring going to inform this monitoring plan? We also raised a concern about how KIW2 was being used. Monitoring, if done properly, may provide substantial benefit. However, the KIW2 process automatically sets untrammeled wilderness against naturalness or other characteristics and this leads to diminishing the essence of wilderness—it wildness.	See response to comment ICLWS-02, and WW/WWP-06.
WW/ WWP-41	**XIII. Wild and Scenic Rivers**	Any proposed changes to current grazing permits would by analyzed during grazing permit NEPA and the subsequent decision process.

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	The draft EA does not consider the impacts of grazing on the eligible wild and scenic river segments. This needs to be changed.	As noted on p. 8 of the WMP and p.4 of the EA, development of allotment management plans or allotment evaluations are undertaken separately from the WMP. Also see response to LK-06 regarding Wild and Scenic Rivers.
WW/ WWP-42	**Conclusion** In conclusion, we support inclusion of objective 2159, to "not wait until wilderness character has been irretrievably degraded to implement management restrictions." Plan at 33. We urge the Forest Service to consider this proactive approach in all its administrative decisions in the Hemingway-Boulders and White Clouds Wilderness.	Objective 2159 also supports Recreation Goal 2158 in being proactive in managing recreation while preserving the wilderness resource.
WW/ WWP-43	Please keep both of our organizations updated on this plan.	All commenters will remain on the mailing list.