

United States  
Department of  
Agriculture

Forest  
Service



# Chapter VI

## **Public Comments on DEIS and Proposed Forest Plan**

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## CHAPTER VI

### CONSULTATIONS AND COMMENTS OF AGENCIES, ORGANIZATIONS AND PERSONS ON THE DEIS AND PROPOSED FOREST PLAN WITH FOREST SERVICE RESPONSES

#### A. INTRODUCTION

This chapter describes the process used in receiving and responding to public comments on the DEIS and Proposed Forest Plan. Public participation activities and the comments received are summarized. Comment categories and a table of respondents which indicates how individual comments were grouped are included. Categorized comments and responses are included for most comments that were received. Comments from government agencies and elected officials are reprinted along with responses.

#### B. SUMMARY OF PUBLIC PARTICIPATION ACTIVITIES

The process of identifying issues, concerns, and opportunities that were analyzed and used to guide development of the EIS and Plan are discussed in Appendix A to the EIS.

The proposed Plan and Draft EIS were filed with the Environmental Protection Agency and made available to the public on July 26, 1985. More than 225 copies of the Draft EIS and Plan and more than 500 copies of the separate summary of the documents were distributed to individuals, groups and agencies during the comment period. News releases were prepared and distributed to newspapers that serve the area which discussed both release of the planning documents and the schedule of open houses that were held on the Plan. Copies of the EIS, Plan and Appendices were also available for review in public libraries in Challis, Arco, Mackay and Idaho Falls and university libraries at Idaho State University, University of Idaho and Boise State University.

Open houses were held in Challis, Mackay, Salmon, Pocatello, and Idaho Falls. A number of discussions were held with individuals to answer questions and clarify points. Meetings also occurred with several of those who commented on the DEIS to answer questions and discuss concerns. These discussions and meetings occurred with organization representatives and officials or spokespersons for Indian tribes, state agencies and federal agencies as well as individuals. The deadline for submission of written comments was October 25, 1985. The schedule for preparation of the Forest Plan and the final EIS was such that it was possible to include all written comments received by November 29, 1985, even though some of the comments were received after the comment period closed.



### C. SUMMARY OF THE COMMENTS RECEIVED

The Challis National Forest received 633 separate letters on the Proposed Plan and DEIS. Fifteen individuals also attended open houses that were held during the comment period.

Several letters were very detailed and expressed concern about various resources and management proposals made in the Proposed Plan or identified in the various alternatives in the DEIS. In analyzing the comments received it was apparent that many of the responses resulted from Idaho Conservation League Alerts that were circulated to league members and news stories instead of personal reviews of the planning documents. Several individuals who reviewed copies of the document summary suggested that additional information be included in the final documents that was already contained within the full draft documents.

Because the set of draft documents released for public review was so intense, technical, comprehensive and voluminous, many commenters expressed misunderstandings and confusion. Although much of the required data is by nature very technical, many comments were used in the effort to simplify and clarify the more confusing parts of the final documents.

Decisions made in the FEIS and Selected Land and Resource Management Plan are based on five factors: 1) law, 2) technical information, 3) resource capability, 4) professional judgement and 5) public input. Within the other four factors public input influences decisions where Forest management has the option of using one of several different emphases. Public input is an ongoing, changing factor.

The use of public comments is not strictly a vote-counting process. The decision-maker evaluates the content of each comment relative to legal and technical constraints and professional judgement.

As described in 40 CFR 1503-4, comments about the Proposed Plan or DEIS were treated in the following ways:

1. Comments offering technical corrections or pointing out inconsistencies have been used to revise the final documents.
2. Comments resulting from misunderstanding of what was meant in the documents indicated areas where the Proposed Plan or DEIS needed clarification. Corrections were made in the final documents, or the a correction was not made was explained in the response to the comment.
3. Comments requesting clarification or questioning some part of the analysis process were clarified in the final document package, or answered in the response to the comment.
4. Many comments required adjustments to the text of the DEIS and Proposed Plan, such as typing errors, omissions, incorrect numbering and/or statement inconsistencies.

Comments suggesting changes in the Plan direction, outputs, and land management prescription assignments were carefully considered by the forest management team. Much of this input was adopted. Where feasible, management direction was revised or added in response to the comment. The responses to comments that follow indicate where suggested changes were made, or the reasoning for not adopting the suggested change. Many comments requesting changes in the Proposed Plan did not result in any modification. There are several reasons why a favorable response was not possible in each case:

1. A suggested change may be beyond the Forest Service jurisdiction or legal bounds. For example the Forest Service cannot establish or remove wilderness designation.
2. A suggested change may be beyond the scope of the EIS. The purpose of the FEIS is to disclose the effects of emphasizing different activities on different parts of the Forest, not to describe every detail of how these activities will be conducted.
3. Each suggested change must be considered in light of other comments received on the same subject, as well as other needs and uses of the National Forest. Some responses did not consider the consequences of a requested change on other resources or interests. Multiple use management involves a series of compromises. The intent of the Forest Plan is to produce the best mix of uses on the Challis National Forest for all citizens of the United States. Changes made in response to public comment are designed to meet the established purposes of the National Forest System.

Oral input on the draft Forest Plan was obtained from the several public meetings and discussions with various individuals and groups. Views expressed were:

1. Resentment that environmental organizations were conducting a letter writing campaign in an attempt to sway the Forest Plan in favor of more wilderness. Some contacts said they could have retaliated but chose not to do so.
2. A perception that the Forest is being closed to motorized travel even though ORV use is one of the fastest growing recreation activities in Idaho.
3. There is local support for maintaining the current level of grazing and timber harvest on the Forest in order to help retain local businesses and stabilize the local economy.
4. There was some disappointment that we were proposing any additional areas for wilderness designation. Leaving many areas in an unroaded and undeveloped state was supported. There was also disappointment that more areas were not proposed for wilderness designation.
5. Support for keeping all areas open to a variety of multiple uses. Desire to keep the maximum area open to mineral activity.

## D. CONTENT ANALYSIS

This content analysis summarizes the major subjects raised by the commenters on the proposed Forest Plan. The purpose of this overview is to give a sense of what is being said by the public. Summarized specific comments are included in the public comment and Forest Service response section.

### 1. General

Many of the comments received expressed a desire to keep the Forest the way it is, this came from commenters who perceived the Plan as a significant change in management direction, rather than organized, updated, monitored resource management. A concern was expressed that the Forest would change drastically tomorrow if the plan was implemented. Some of the comments suggested that the Plan was written for political reasons and does not represent adequate protection for the Forest.

Several commenters focused on the 50 year projections that were given in the DEIS and not on the 10 to 15 year length of the plan before a major revision would occur. They often expressed concern over projected events in the fifth or later decades. Comments suggested that additional information be included especially maps showing in detail where various activities had occurred in the past or were proposed for the future. Some commenters interpreted direction given within a resource activity discussion as setting an over all Forest emphasis priority.

Concern was expressed that too much emphasis was placed on PMV as a selection criteria. Many commenters stated a preference for an alternative other than the Forest Service preferred alternative. Most of these expressed support for Alternative 3 although creating an additional alternative with a "Public use emphasis" was also suggested. Many comments also suggested that goals, objectives, standards and guidelines be modified in a way that was perceived to be more beneficial to a specific resource or activity.

### 2. Recreation

Commenters expressed a desire that those specific activities which they were involved in should receive added emphasis. Commenters wanted both more areas open to off-road vehicles and more areas closed to off-road vehicles. Several comments suggested that trail maintenance be given increased emphasis. Some were interested in having additional facilities provided for developed recreation including on-Forest trailer dump stations. Several persons expressed a desire that emphasis be placed on identifying and preserving cultural resources on the Forest. A few believed that the operation of Custer and the Dredge should receive emphasis, but were concerned that the use of a concessionaire for operation of these facilities might lead to inappropriate commercialization that would detract from these sites.

### 3. Wilderness

Commenters supported both more wilderness and less wilderness. Some expressed a concern that all undeveloped unroaded areas that they now think of as wilderness must be included in a proposal for legislative Wilderness designation. They felt that these areas would disappear if not given a formal Wilderness designation. The areas that had significant support for Wilderness designations were: Boulder/ White Clouds, Lemhi Range, Pahsimeroi Mountains, Pioneer Mountains, King Mountain, Diamond Peak and Borah Peak.

Reasons given for supporting additional Wilderness designation included: economic importance; need to save roadless areas; uniqueness; protect entire ecosystems; important for wilderness type uses; for multiple uses that Wilderness offers; protect natural scenic beauty; aesthetics; reduce recreation pressure on currently designated Wilderness areas in the surrounding area; important for tourism and recreation uses (hunting, fishing, hiking); don't want area ruined; protect watershed and water quality; protect key wildlife ranges; valuable for a variety of wildlife and habitats; protect fish habitat especially anadromous fish habitat; keep area as is, in natural state; protect for future; important to surrounding communities; wild and rugged, one of the last wild places; provides solitude; protect resources and wilderness qualities; strong public support; meets all requirements of the Wilderness Act; protect riparian areas; protect from damaging uses; protect from mining activities; and protect from logging and road building. The Lemhi Range Roadless Area was also supported because it was recommended for Wilderness designation in the RARE II Final EIS.

Reasons given opposing additional Wilderness designation included: restricts access to public lands to only a few people; good areas for off-road vehicle use are hard to find; and eliminates many resource uses including timber harvest and potentially valuable mineral activity.

### 4. Wildlife

Because of the values identified for wildlife related activities during the planning process, wildlife should receive greater emphasis. Comments expressed concerns that wildlife did not receive adequate emphasis in areas of conflict between wildlife and domestic grazing. Riparian areas were mentioned frequently as sites of adverse effects on wildlife habitat. It was suggested that specific forage allocations be made for wildlife use especially in areas such as key winter ranges. Concern was expressed about the potential for disease transmission from domestic livestock to wildlife especially bighorn sheep.

Several commenters expressed concern over the impacts of roads on various wildlife species. Many comments expressed the opinion that designation of areas as Wilderness would have the greatest benefit to wildlife.

Management of habitat for threatened and endangered species was a concern of several individuals. In areas of potential wolf recovery habitat the ability of the Forest to provide adequate protection was questioned given the potential for reduced budgets. Concern was expressed over the selection of management indicator species (MIS). Some commenters felt other MIS were more appropriate to monitor certain habitats or the methods of monitoring were inappropriate.

## 5. Fisheries

Many commenters expressed concerns that water quality and stream conditions needed to be protected to maintain or improve fish habitat. Comments concentrated on the need to insure that adequate habitat was available to support increases in the number of anadromous fish that are expected to reach the forest. Comments also discussed the importance of the Forest as anadromous fish spawning and rearing habitat to meet Indian Treaty rights to take fish both on Forest and down the Columbia River system.

## 6. Riparian

Many commenters were concerned about the condition of and protection of riparian areas. The importance of these areas to the well being of wildlife and fish was stressed. Many of these comments expressed concern over impacts or potential impacts to these areas from grazing, mining, roads or recreation.

## 7. Timber

Several commenters expressed concern that restrictions applied to timber sale activities in order to protect other resources were too lenient while one respondent felt that the restrictions were much too strict. Road construction and water quality were the two areas of greatest concern. Some commenters mentioned past failures in regenerating timber sale areas.

Comments addressed concerns with timber sales that were offered below cost and that failed to return all costs to the Federal treasury. The increase in projected sale volumes from 3 million board feet (MMBF) per year during the first decade to 10 MMBF at the end of the fifth decade concerned several commenters who mentioned that this represented more than a 3-fold harvest increase. Several comments stated that the values assigned to timber were old and did not reflect costs or returns in the current depressed market.

## 8. Range

Several commenters were concerned with grazing administration especially in areas of perceived conflict with wildlife and fisheries such as riparian areas and key habitat areas. General concern was expressed about range condition. Apparent poor appearance of certain specific areas was also mentioned. Current levels of grazing on the Forest and projected increase in grazing levels during the later decades generated several comments.

The value assigned to grazing was felt to be too high relative to values for non-commodity resources.

## 9. Minerals

Some commenters felt that minerals received too much emphasis in the Plan and that greater restrictions should be placed on mineral activities. One stated that no mining should occur on the Forest. Several commenters were concerned about potential impacts to water quality, potential for destroying wilderness values, increased access creating adverse impacts on wildlife and reclamation work not being completed because of the depressed minerals market.

## 10. Water Quality

High water quality was recognized as a valuable resource on the Forest. Several commenters expressed a desire to see water quality requirements strengthened to reduce the potential for sedimentation in streams. Concern was expressed that activities such as mining, logging, livestock grazing, road construction and vehicle use should be controlled so that water quality will not decrease. Several commenters viewed road construction and maintenance as major threats to water quality.

## 11. Fire Management

A few commenters identified a need for fire management plans Forestwide. Several commenters were concerned that fire suppression which used heavy equipment had the potential for doing greater damage than fires which were allowed to burn. Some stated that areas burned by wildfire should be considered in determining the need for vegetation manipulation projects.

## E. COMMENT GROUPINGS AND LIST OF PERSONS, ORGANIZATIONS AND AGENCIES WHO COMMENTED

The persons, organizations and agencies that commented on the DEIS and Proposed Plan are listed on the following pages. Because the 600+ responses received were too voluminous to print economically, only those letters received from government agencies and officials are printed along with individualized responses. Rather than respond to all other letters individually, major points from each letter were summarized along with similar points from other letters, these points were grouped by major topic and a response was prepared for each of the major points. The listing of responses show the topics in which each respondents major points were discussed. Some judgement was required in preparing the groupings. For example a specific comment which deals with wildlife use and livestock grazing in riparian areas may be grouped under wildlife, range or riparian. Each of the groupings identified should be reviewed to determine how a specific comment was addressed. Copies of all letters received are on file in the Challis National Forest Supervisor's office and can be made available for public review during normal business hours.

In order to gain a more complete understanding of any issue, responses to letters received from government agencies and officials should be reviewed. In many cases a more specific or slightly different question was asked in these

letters and the associated response provides insight into an issue that is greater than that obtained only from the summarized comments and responses.

1. Categories Used For Grouping Comments (identified by letter code):

<u>Category</u>	<u>Letter Code</u>
Wildlife and Fisheries Management	(A)
Wilderness Proposals, Roadless Management and Research Natural Areas	(B)
Soil, Water and Air Management	(C)
Timber Management	(D)
Recreation and Lands Management	(E)
Roads and Off-Road Vehicle Management	(F)
Fire Management	(G)
Minerals Management	(H)
Range Management and Pesticide Use	(I)
DEIS and Forest Plan: Document Content and General Comments, Management Direction and Monitoring, Alternative 3	(J)
Riparian Management	(K)
Hydroelectric Proposals	(L)

## 2. List of Persons, Organizations and Agencies Who Commented

The following persons, organizations, and agencies commented on the draft EIS and Forest Plan. They are listed in alphabetical order and indexed by category or categories where their comments and similar comments are addressed:

NAME	CATEGORY CODE											
	A	B	C	D	E	F	G	H	I	J	K	L
AAKER, DONALD		X		X	X	X		X				
ABERNETHY, PETER		X		X							X	
ADELMAN, DONNA		X									X	
ADLER, SAM		X									X	
AFFOLTER, QUINCE	X	X	(X)		X			X		X		
AHO, MARGARET	X	X			X						X	
AITKEW, BRUCE	X	X		X	X	X					X	
ALBERTSON, LOUISE L.		X		X		X					X	
ALLEN, EDWINA	X	X	X	X	X	X					X	
ALLEN, JOHN W.	X	X	X	X	X						X	
ALLISON, LOIS	X	X										
AMERICAN WILDERNESS ALLIANCE (FRITZ, PAUL)	X	X	X	X	X	X				X		
AMSORGES, JOYCE		X										
ANDERSON, PETER	X	X		X							X	
ANDERSON, ROBERT M.		X		X	X						X	
ANDERSON, TODD W.	X	X	X		X							
ANIDA, DIANA SUE	X	X	X		X	X					X	
ANIMAL PLANT HEALTH INSP. SERVICE												
ARGAST, GENE								X				
ASSOCIATED LOGGING CONTRACTORS (JENSEN, DONALD)	X	X	X	X	X	X	X	X	X	X	X	X
AUDUBON SOCIETY (COLE, PETE)	X	X	X	X	X			X	X	X	X	
AUSTIN, BRUCE		X										
AXLINE, KETH	X	X		X							X	
AYLWARD, PAUL	X	X										
BACH, JR. WILLIAM K.	X	X			X						X	X
BAGGETT, JEFF		X									X	
BAILEY, JEFFREY S.	X	X		X	X	X		X		X		
BAIRD, DENNIS	X	X		X	X					X	X	
BAKER, BRENT	X	X		X							X	
BAKER, RAY	X	X						X				
BALDWIN, CAROL		X										
BARD, DONALD M.D.	X	X				X					X	
BARRY, JOHN	X	X	X	X	X						X	
BARRY, WARREN AND ALMA		X		X	X			X	X	X		
BARTLETT, ROBERT W. II	X	X		X	X	X						
BASHAW, CARRIE		X									X	



NAME	A	B	C	D	E	F	G	H	I	J	K	L
BATCHELDER, R. A.	X	X		X				X				
BAZOVSKY, JOHN		X										
BEAVEN, JANE	X	X		X	X			X		X		
BECKSTROM, MARIA	X	X	X	X	X			X				
BELLAVANCE, MARSHA	X	X		X								
BELLAVANCE, LEE		X									X	
BENNETT, ROBERT & JENNY		X		X							X	
BERENSON, JANET	X	X		X					X	X		
BERGERSON, LINDA	X	X	X	X	X						X	
BERNON, BEN		X						X			X	
BEUMELER, T. R.	X	X		X	X						X	
BEZDEKA, STEVE	X	X									X	
BISHOP, JEAN E.	X	X									X	
BLAINE COUNTY COMMISSION (REYNOLDS, ALAN)		X	X	X	X					X	X	X
BLAIR, CHARLES	X	X	X	X	X	X		X			X	
BLAKESLEE, GINNY		X										
BLOOM, J. E.											X	
BLOOM, REBECCA	X	X		X		X					X	
BLOOM, RICHARD		X		X							X	
BONLER, BELINDA		X										
BONNEVILLE CO. SPORTSMAN'S ASSN. (HUEBNER, M. F.)	X	X	X	X	X			X	X	X		
BOOMER, PAT		X		X								
BOPP, KEVIN	X	X	X	X	X						X	X
BOWERS, CHET		X		X	X						X	
BOWLER, BRUCE	X	X		X	X						X	
BOWLER, PETER A.	X	X		X	X	X					X	
BOYER, JEFFREY K.	X	X		X	X					X	X	
BOYLSTON, MICHAEL	X	X		X	X					X	X	
BRADEN, BYRON	X	X	X		X						X	
BRAGGA, CHARLES	X			X	X	X					X	
BRAY, RICHARD D.		X										
BRITTON, JIM					X	X						
BROWN, MATTHEW		X			X							
BROWNING, ART					X	X	X					
BUFFINGTON, BETSY	X	X	X	X	X						X	
BUREAU OF LAND MANAGEMENT (HASZIER, CHARLES J.)												X
BURGESS, JACK		X			X							
BURKE, JOHN A.		X		X	X					X	X	
BURNELL, PHYLLIS A.	X	X									X	
BURNS, STANLEY M.		X		X							X	
BURTON, ORDEN	X	X			X							
BUSCH, JO ANNE		X				X	X	X				
BUSHELL, LINDA	X	X		X							X	
CACCIOLONE, CAROL		X									X	
CANO, JACQUIE	X	X			X			X			X	
CAPONE, TERRY F. H.		X									X	
CAREY, RANDY L.	X	X		X	X						X	X
CARLSON, BRENT A.		X			X	X					X	

NAME	A	B	C	D	E	F	G	H	I	J	K	L
CARLSON, KEITH AND MARILYN		X		X	X	X			X	X		
CARLSON, KEN	X	X									X	
CARNEY, PHIL		X										
CARNEY, SUE		X										
CARPER, RENICE	X	X	X		X							
CARROCK, JACK C.		X									X	
CARSON, M. E.		X									X	
CARIWRIGHT, KATE		X			X						X	
CASE, JOEL T.	X	X	X	X	X	X		X	X	X	X	X
CASEY, WILLIAM		X			X						X	
CATHART, LINDSEY		X									X	
CHANDLER, ASA & NEWLAND, WANDA	X	X	X	X		X					X	
CHEVERON USA (FLESCHE, LISA)									X		X	
CHISHOLM, WILLIAM K.	X	X	X	X	X	X		X	X	X		
CHIZUM, PATRICIA		X									X	
CHOU, JEREMY		X									X	
CHRISTENSEN, RHONDA		X		X	X	X					X	
CLINKENBEARD, ROBERT L.		X									X	
COEUR D'ALENE WLDF FED (GAINE, V.R./SCHNIDER, CLIFF)	X	X	X	X	X	X			X	X		
COFFMAN, JENNA		X	X			X					X	
COLEMAN, E & V		X	X								X	
COLLINS, JO ELLEN		X										
COLLIS, WENDY		X		X	X			X		X		
COLONE, TERESA	X	X				X						
COLUMBIA RIV. INTER-TRIBAL FISH COMM(WAPATO, T.S.)	X	X	X	X	X	X		X	X	X	X	X
CONNOLLY, M. K.		X		X	X	X		X		X		
COOK, JEFF		X		X	X	X				X		
COOK, JR. JEFF		X			X	X						
COOPER, ROGER L.	X	X		X	X				X			
CORROCK, LILA J.		X										
CRABTREE, STEPHEN	X	X									X	
CRAFT, JOAN	X	X		X	X	X			X	X		
CRAIG, CONNIE	X	X			X						X	
CRANDALL, DAVID L.		X				X						
CRANDELL, CHRISTINE AND (25) OTHERS		X			X	X						
CRAWFORD, DON	X	X	X		X	X		X		X		
CRAWFORD, TIM	X	X	X	X	X			X	X	X		
CROOK, JEFFREY	X	X	X	X	X	X		X		X		
CROSBY, MIKE		X									X	
CURRAN, JIM		X		X				X		X		
CURTIS, RICHARD L.		X			X	X				X		
CUSTER COUNTY COMMISSIONERS		X									X	
DACKERY, JAMES S.		X		X						X		
DARR, SHEILA	X	X		X						X		
DAVENPORT, DAVID		X								X		
DAVENPORT, PATRICIA	X	X	X		X							
DAVEY, NANCY		X		X		X						
DAVIS, DENNIS		X								X		
DAVIS, JENNIFER		X		X						X		

NAME	A	B	C	D	E	F	G	H	I	J	K	L
DAVIS, MICHELE		X										
DAY, ERNIE	X	X		X	X			X		X	X	
DELANEY, HELEN	X	X								X		
DELORY, PETER	X		X		X							
DEVERY, STEPHEN	X									X		
DIXON, JERRY	X									X		
DIXON, ROSS	X									X		
DOAN, DONNA M.	X											
DOE BPA BONNEVILLE POWER ADM (MORRELL, ANTHONY R.)										X		X
DOKE, GLENNA		X			X	X						
DOWNING, GLENN RAY AND JOAN K.	X	X		X	X			X		X		
DREW, CHARLES		X			X							
DUDLEY, DAVE, MR AND MRS.	X	X			X			X		X		
DUKE, BETH	X	X		X		X		X		X		
DURBIN, MARLENE		X		X	X	X				X		
DeBREE, MARK W.	X	X		X	X	X			X	X		
DeJOHN, DOUGLAS W.	X	X		X	X	X						
DeNIRO, ELIZABETH	X	X			X			X				
EASON, ALAN L.	X	X	X	X	X	X		X		X		
EASTERWOOD, BILL		X			X							
EDEN, WILLIAM	X				X				X	X		
EGNATZ, ANDREA	X	X								X		
EKLUND, KEN					X					X		X
ELLIS, ROBERT W.		X			X					X		
ENGELMANN, EARL		X								X		
ENVIRONMENTAL PROTECTION AGENCY R-10, (BUND, R. S.)	X		X		X		X	X	X	X	X	X
ERICKSON, LILL	X	X		X	X				X	X	X	
FENN, STANLEY		X		X	X	X			X	X		
FEREDAY, JEFFREY C.	X	X	X	X	X	X				X		
FINCH, STEVE		X		X	X							
FISHER, ERIK	X	X		X		X				X		
FITZSIMMONS, NANCY	X	X		X								
FLORENCE, KRISTINE	X	X		X						X		
FORD, PAT	X	X	X	X				X	X	X		
FORSTMANN, CANDIDA C.	X	X		X						X		
FOSTER, ANDREA			X		X					X		
FOSTER, BRENT	X	X	X	X		X			X	X	X	
FRANKEL, THOMAS		X		X	X	X				X		
FRAULUL, MYRNA		X								X		
FRISELLA, JANET		X		X		X				X		
FRITZ, JANE	X	X		X	X					X		
FRUSTEIN, MICAH	X	X			X					X		
FUNK, JAMES AND MARLOW		X			X					X		
GALLANT, FRANK		X		X	X			X		X		
GAMBLES, MARIE	X	X	X	X	X			X		X		
GANTT, GAMEWELL E.	X	X		X	X	X		X		X		
GAPAN, LEE ANN		X		X				X		X		

NAME	A	B	C	D	E	F	G	H	I	J	K	L
GARDNER, OLIN	X	X		X	X	X		X		X		
GAROUTTE, DALE AND HELEN	X	X	X	X	X	X				X		
GAU, MAXINE G.	X	X		X	X				X	X	X	
GEHRKE, CRAIG, J.	X	X		X				X	X	X	X	
GEHRKE, PAMELA	X		X	X	X					X		
GIBBONS, HOPE & GIBBONS, MANLEY A.	X	X			X					X		
GLACCUM, ELLEN		X		X	X	X		X		X		
GRAHAM, CAROLYN	X	X		X						X		
GRANTHAN, STEVE	X	X		X	X	X		X		X		
GRATTON, DENNIS	X	X		X	X				X	X		
GREENE, WILLIAM AND MOERSHEL, DAVID	X	X			X	X				X		
GREER, LINDA	X	X		X		X				X		
GREGAS, NORMAN P.	X	X	X	X					X	X		
GROBERG, JENNIFER	X	X			X					X		
GROLL, STACIE S.	X	X			X					X		
GUERNSEY, ROGER L.	X	X		X		X				X		
HACKNEY, STEPHEN, CAROL, ANNIE, URSULA	X	X		X		X				X	X	
HAGEN, EVERETT										X		
HALL, GLENN E.	X			X	X			X		X		
HALL, JULIE	X	X	X	X	X					X		
HALL, TOM A.		X										
HAMANN, WAYNE		X	X	X						X		
HAMILTON, MICHAEL	X			X				X		X		
HAMLYN, CINDY	X	X										
HANLEY, PATTY		X										
HANSON WES, GERTIE AND (3) OTHERS	X	X		X	X	X		X		X		
HANSON, ROBERT D.	X	X	X	X	X	X		X	X		X	
HANWRIGHT, J. C.		X								X		
HANWRIGHT, PATRICIA		X			X					X		
HARDY, GARNEY		X	X	X	X	X				X		
HARPSTER, DOROTHY J.	X	X										
HARRIS, KENNETH E.	X	X	X	X	X				X	X		
HARRIS, SARAH J.	X	X	X	X	X				X	X	X	
HART, LOU		X										
HARTLEY, LAURIE		X			X					X		
HARWOOD, ROBERT		X								X		
HATCHERSON, MICHAEL		X			X	X				X		
HAWKES, JUDE	X	X		X	X	X		X		X		
HAYES, WILLIAM S. AND MARJORIE G.	X	X	X	X	X	X		X	X	X	X	X
HEEKER, BARBARA	X	X										
HELLER, BARBARA		X			X							
HENDERSEN, HILL, RULON AND ARDATH	X	X			X							
HENSLEE, PAUL	X	X		X		X		X		X		
HIGGINS, ALEX		X										
HILL, ADRIAN A.	X	X	X	X	X					X		
HILL, DOLORES	X	X		X					X		X	
HINNEN, MICHAEL	X	X			X			X		X		
HOBBINS, RICHARD		X			X					X		
HOBDEY, C. SCOTT						X				X		
HOLLAND, DAVID J.	X				X	X				X		

NAME	A	B	C	D	E	F	G	H	I	J	K	L
HOLLY, LISA		X									X	
HOLM, MARY	X	X									X	
HOODERPYL, ARDNT		X										
HOURIHAN, TINA	X		X	X						X	X	X
HOWARD, G. SCOTT		X									X	
HUBBARD, DOUGLAS E.	X	X		X								X
HUGHES, CHRLES		X										
HUMMEL, KAY	X	X	X	X	X	X		X			X	
ID ENVIRONMENTAL COUNCIL (HAUSRATH, ALAN R.)	X	X	X	X	X					X	X	
ID NAT. AREAS COORD. COMMITTEE (WELLNER, CHARLES)		X			X			X				
ID NAT. RES. LEGAL FOUNDATION (STOCKLEY, EDWIN A.)	X		X	X	X	X				X	X	X
ID OUTFITTER & GUIDE ASSOCIATION (SIMONDS, GRANT)	X		X								X	
ID STATE DEPT OF HEALTH & WELFARE (STOKES, LEE W.)	X		X	X				X	X	X		
ID STATE DEPT. OF FISH & GAME (CONLEY, JERRY)	X	X	X	X	X	X	X	X	X	X	X	X
ID STATE HISTORICAL SOCIETY (GREEN, THOMAS J.)								X			X	
IDAHO CONSERVATION LEAGUE (KRIS, CAROL)	X	X	X	X	X	X	X	X	X	X	X	X
IDAHO PETROLEUM COUNCIL (ANDY ANDERSON)					X		X		X		X	
IDAHO SPORTSMEN'S COALITION (MITCHELL, RON)	X	X	X	X	X	X	X			X	X	X
IDAHO STATE-GOVERNOR (EVANS, JOHN V.)	X	X	X	X	X							X
IDAHO TRAIL MACHINE ASSN (COLLINS, CLARK L.)		X			X	X						
IDAHO WILDLANDS DEFENSE COALITION					X						X	
IRVING, MICHAEL J.	X	X		X	X							
ISAACSON, CAROL		X			X						X	
JACOBS, JERRY		X			X							
JAHN, GREG	X	X		X	X					X	X	
JAYNE, JERRY	X	X	X	X	X	X	X	X	X	X	X	
JOCHIN, KENNETH J.	X	X		X	X						X	X
JOHNSON, CONNIE	X	X		X	X		X				X	
JOHNSON, KIM A.	X			X	E					X	X	X
JONES, DAVE		X			X							
JONES, PAT	X	X		X	X						X	
JONES, TERRY	X	X		X		X					X	
KAUFFMAN, JENNY		X		X						X		
KEARNEY, JOHN		X										
KEELAN, ALEXIS		X	X	X				X	X	X		
KEENER, KEITH AND MARGARET	X	X		X				X		X		
KELLER, JOHN		X										
KELLER, MARK	X	X	X	X				X	X			
KELLER, PAMELA	X	X		X	X						X	
KELLY, PATSY A.	X	X	X	X							X	
KIDD, LAWRENCE A.	X	X		X		X		X		X		
KIKEL, JO ANNE		X				X						
KINCANNON, LINDA		X									X	
KING, DON	X		X						X		X	
KING, JOHN		X									X	
KITTAMS, WALTER H.		\			X						X	
KITTRICK, J. A.	X	X		X								

NAME	A	B	C	D	E	F	G	H	I	J	K	L
KLEIN, GEORGE M.		X		X							X	
KLENE, BARBARA J.	X	X				X						
KNAPP, BRENT	X	X	X	X	X	X		X		X		
KOLBRENER, RICHARD		X		X		X						
KOSHUTA, CHERYL R.	X	X	X	X	X			X		X		
KRANZ, JAMES W.	X	X			X					X	X	
KRENZ, D.		X		X					X			
KRIZ, CAROL	X	X	X	X		X				X		
KROOS, ROBERT		X									X	
KURTZ, GENE AND BARBARA	X	X		X	X	X			X	X		
KUSLEIKA, LINDA	X	X	X	X		X						
LALSON, AL	X	X			X				X			
LAMBRECHT, KEITH	X	X		X	X			X	X	X	X	
LANE, JOHN		X										
LE MOYNE, SYLVIA		X	X	X	X	X		X				
LEAVELL, JEANA					X						X	
LEAVELL, WILLIAM	X	X	X	X	X	X		X	X	X		
LEE, CONNIE	X	X		X								
LEFNER, LARRY		X								X		
LEMLY, RICHARD S.		X										
LESLIE, AUBREY	X	X			X							
LESSLER, EVELYN		X										
LILBURN, BERT		X			X	X				X		
LILBURN, PAMELA		X			X							
LIMAN, LOUELLA		X			X					X		
LINDBLOOM, JAMES	X	X		X	X				X	X	X	
LINHART, CAROL		X								X		
LIPOVAC, PETER	X	X	X	X	X	X				X		
LOGSDON, HENRY, GOODNOW, VAL	X	X	X	X	X	X		X		X	X	
LOREN, ANDREW		X			X					X		
LOWE, JOSEPHINE KERR		X								X		
LUCAS, CLAUDIA		X								X		
LUCIER, LORRAINE	X	X		X	X			X		X		
LUFKIN, ELISE	X	X								X		
LUNTEY, ROBERT S.		X	X	X	X			X	X			
LYCKMAN, GREG	X	X		X	X					X		
LYDIG, DEAN A.	X	X		X	X			X		X		
MABBOTT, CHARLES	X	X	X	X	X				X	X		
MAKEY, GARY		X			X							
MARLER, MELODY & KEMPSKI, KEITH J.	X	X		X	X					X		
MARLETTE, AMY		X		X	X			X		X		
MARLETTE, GUY		X		X	X					X		
MARR, B.		X				X						
MARSHALL, JOHN	X	X	X							X		
MATHER, KRISTINE	X	X	X	X	X	X				X		
MATHEWS, DAVID		X		X	X	X		X				

NAME	A	B	C	D	E	F	G	H	I	J	K	L
MATTESON, MOLLIE Y.	X	X	X	X	X	X					X	
MATTHEWS, LAURIE L.	X	X		X		X					X	X
MAXEN, A.	X	X			X						X	
MAXEY, MELODY	X	X									X	
MAYFIELD, M. R.		X									X	
MEAD, STEPHEN	X	X			X	X			X			
MEDBERRY, MIKE	X	X		X		X					X	
MELLON, SCOTT						X					X	
MIGEL, DAUCHY			X	X							X	
MILLARD, BRUCE	X	X		X							X	
MILLER, B. B.		X									X	
MILLER, LLONE		X									X	
MILLER, WARREN N.	X	X			X						X	
MILLER, WESTERLY		X										
MILLIMAKE, GAIL	X	X	X	X		X					X	
MINER, GREGORY F.		X			X							
MINNICK, WALTER C.	X	X		X						X	X	
MIRAMS, LISA		X			X						X	
MLADENKA, GREG				X		X					X	
MONGE, MARION C.	X	X			X						X	
MONNIE, S. M.	X	X		X	X					X	X	X
MOORE, CHRISTY	X	X		X	X			X	X	X		
MOREAULT, AMIE		X									X	
MORETINE, ELSIE	X	X		X	X			X		X		
MORRISSEY, ARDIE		X										
MOSER, KENT		X			X						X	
MOUNTAIN STATES INVESTMENT CORP (ALLEN ?)	X	X	X	X	X			X				
MULLINS, WILLIAM		X			X						X	
MUNTER, ANDY	X	X		X	X	X					X	
MURPHY, PAT	X	X		X	X					X	X	
MCCARTHY, PATRICK	X	X		X	X							
MCCUE, J. C.		X		X							X	
MCCUE JR., J.G.		X									X	
MCDONALD, JOHN		X									X	
MCDONALD, LOIS		X		X								
MCDOWELL, M. F.	X		X		X							
MCCLHANON, CLIFFORD								X			X	
McGEE, PAITI	X	X			X						X	
McGOWN, JR. JOHN		X	X								X	
McINTIRE, MARK AND JOY		X									X	
McKEAN, THOMAS ADAMS	X	X			X						X	
McKENZIE, JAN		X		X	X			X		X		
McROBERTS, GLEN MRS.		X										
McNAMARA, DEBBY		X		X		X					X	
NAUTCH, IRENE M.	X	X		X	X			X	X	X		
NAVA, MARIA G.						X	X	X				
NEZ PERCE TRIBE (RUEBEN J.)	X										X	
NICHOLSON, BRANT		X			X						X	

NAME	A	B	C	D	E	F	G	H	I	J	K	L
NICHOLSON, T. J.	X	X	X									
NICKEL, TOM	X	X		X	X			X		X		
NORDSETH, TERESA L.		X			X							
NORTON, TOM		X			X					X		
OBEE, DOLI S.	X	X	X	X	X	X				X		
OCHIRO, JIM	X	X			X					X		
OCROWLEY, JANET	X	X	X	X	X				X	X		
OILWORTH, KERRY M.	X	X								X		
OLBUM, BINA		X										
OLSON, DANA	X	X		X	X	X				X		
OLSON-COOPER, CHRISTINE	X	X		X	X					X		
ORB, SUZANNE		X								X		
ORVILL, STU		X										
OSBORN, CALVIN		X			X	X						
OSBORN, JOHN	X	X	X	X	X		X		X	X	X	
OSWALT, KAREN		X										
OWENS, JEANNE	X	X	X	X	X	X		X	X	X		
OYEN, PEGGY		X								X		
PACE, DOUG		X			X					X		
PACHOLKE, JAMES B.	X	X	X	X	X			X		X		
PANHANDLE ENVIRONMENTAL LEAGUE (BUWELL, ROGER, W.)	X	X								X		
PAR, RALPH		X								X		
PARIS, RICHARD F.	X	X		X	X			X		X		
PAUL, LIZ					X	X		X		X		
PAYNTER, PENNY D.	X	X								X		
PEACOCK, ERIC A.	X	X	X	X	X				X	X	X	
PEMBERTON, ANNE		X										
PENNINGTON, PAITY	X	X			X					X		
PETERSEN, SUE		X		X		X	X		X			
PETERSON, BROOKE		X			X							
PETERSON, LARSON		X								X		
PHILLIPS, K.L.		X		X	X					X		
PIGOTTETT, SARA	X	X			X					X		
PLOGER, SCOTT	X	X		X	X	X				X		
POMEROY, C. W.		X								X		
POMEROY, J. N. MR AND MRS.	X	X			X							
POMEROY, TOM	X	X	X		X	X			X	X		
POTT, NICOLA		X			X					X		
POTTER, DEE FORD		X										
POTTS, HALEEN		X			X					X		
POUND, DON AND LINDA		X			X	X						
PRESTEL, SCOTT	X				X	X				X	X	
PRESTON, SCOTT		X		X		X		X		X		
PRICE, KEVIN T.	X	X	X	X		X				X	X	
PRICE, MICHAEL		X			X					X		
PRIMUS, HERMANN	X	X			X							



## NAME

A B C D E F G H I J K L

FRUSYNSKI, MARK	X	X		X	X			X		X	
PULLIAM, CARLA	X			X						X	
PYLE, BARBARA	X										
RABE, FRED		X	X						X		X
RAEBER, HILDEGARD	X	X			X	X					
RANDOLPH, PAUL	X	X	X	X	X	X		X	X		X
RASMUSSEN, KEITH	X									X	
RAU, DONALD G.	X	X			X			X			X
REMBELSKI, ALANE	X			X						X	
RENZO, PETER	X		X					X	X	X	
RIEDEL, MICHAEL L.	X										
ROBEL, VERNON	X	X									
ROBERTS, HADLEY	X	X	X	X	X	X	X		X	X	X
ROBERTS, JAMES	X	X									
ROBINSON, MARY										X	
ROBINSON, ROLAND	X	X			X					X	X
ROBNETT, JENNIFER	X									X	
ROCKY MTN OIL & GAS ASSN (FRELL, ALICE I.)	X			X		X		X		X	
ROGERS, JOEL	X		X	X						X	
ROLE, PHILIP A.										X	
ROME, DAVID	X										
ROPE, RON	X		X	X						X	
ROSE, JOHN	X		X		X			X			
ROSE, WESLEY G.	X		X	X					X	X	
ROSEBERG, RALPH B.	X	X		X	X					X	
ROSS, JOHN	X	X		X						X	
ROSS, JOHN A.T.	X	X		X			X			X	
ROTH, CHAR	X	X		X	X			X		X	
ROW, JACQUEI	X	X		X		X		X		X	
RUFFRIDGE, RICK	X	X		X	X			X	X	X	
RUGGER, W.	X	X		X							
RUNKEL, FRED	X	X		X	X			X		X	
RYDALCH, ANN	X					X					
SAAB MARKS, VICKI	X	X		X	X	X				X	
SAS, BETH	X	X		X						X	
SCALES, LAURA	X										
SCALES, N. W.	X										
SCALES, NICK	X			X						X	
SCHAEFFER, BRIAN	X	X	X	X	X	X		X	X	X	
SCHAMHARST, MARIE	X		X					X		X	
SCHARNHORST, BRUCE AND HOLLY	X									X	
SCHARNHORST, D. F.	X			X	X			X		X	
SCHIFFLER, BEVERLY	X	X						X		X	
SCHILLING, CHRISTINE H.	X			X						X	
SCHNEIDER, BETTY	X	X		X	X			X		X	
SCHNEIDER, SID	X									X	
SCHULTE, MICHAEL L.	X	X			X						
SCOTT, BRADFORD	X	X									

NAME	A	B	C	D	E	F	G	H	I	J	K	L
SCRIBNER, SARA	X	X			X						X	
SEKULA, ANN	X	X			X						X	
SEWELL, TOM R.		X		X		X					X	
SHEEHAN, MARK		X									X	
SHEEHAN, TOM AND SYDNE	X	X			X	X						
SHEEN, JAY			X		X						X	
SHERM, JOHN	X	X										
SHOKAL, RUTH	X	X	X					X				
SHOSHONE-BANNOCK TRIBES (TIMBANA, K. M.)	X			X				X	X	X		
SIERRA CLUB (MAUGHAN, RALPH)		X	X	X	X	X		X	X	X		
SIERRA CLUB-N. ROCKIES CHAPTER (JOHNSON, RICHARD)	X	X	X	X		X		X	X			
SILAR, CHRISTOPHER		X									X	
SIMMON, DEBBI	X			X				X		X		
SIMMONDS, DAVID	X	X		X	X						X	
SKINNER, RICHARD A.	X	X		X							X	
SLATER, SHERI		X										
SMART, WILLIAM		X										
SMITH, CATHERINE P.	X	X			X			X		X		
SMITH, RICHARD				X				X	X			
SMITH, STEVEN H.			X		X						X	
SNYDER, GERRY	X	X		X	X						X	
SOLOMAN, ANNE	X	X			X							
SORENSEN, CAROLE KING	X	X		X		X					X	
SORENSEN, RICK		X										
SPIEGEL, CLARA												X
SPRYS, TOM	X		X	X	X	X			X	X		
STALLARD, LYN L.	X	X		X							X	
STANEK, CHIP		X									X	
STRONY, ROB	X	X		X						X	X	
STAPLETON, MERT		X									X	
STAPP, CATHERINE	X	X									X	
STELLARD, JACK	X	X		X							X	
STEVENSON, ELIZABETH	X	X									X	
STEVENSON, JOHN					X						X	
STEWART, MELISSA	X	X	X	X	X	X		X			X	
STITZINGER, GUL		X								X		
STONE, LYNNE	X	X		X	X	X					X	
STOPEL, R.		X									X	
STOWELL, J. S.		X									X	
STOWERS, DAVID		X	X	X	X						X	
SULLIVAN, MIKE		X			X							
SUMELL, NANCY	X	X			X						X	
SUMMERS, JACK P.	X	X		X				X			X	
SWAGERTY, WILLIAM R.		X	X			X					X	
SWANSON, JOHN R.	X	X	X	X	X	X		X		X	X	X
SWANSTRON, JEFF	X	X	X		X						X	

NAME	A	B	C	D	E	F	G	H	I	J	K	L
TATSUMO, ROD	X	X			X	X		X		X		
TEIPNER, CINDY	X	X	X	X	X	X	X	X	X	X	X	X
THE NATURE CONSERVACNY (MOSELEY, BOB)	X	X								X	X	
THEILE, ART	X	X		X	X						X	
THOMPSON, JASON		X			X						X	
TIBBOTT, EVAN J.	X	X			X	X		X		X		
TINNO, PAM	X	X		X					X			
TINSLEY, JOEL	X	X		X	X	X		X		X		
TINSLEY, VICTORIA	X	X		X	X			X		X		
TOBIAS, NELLE	X	X	X	X	X			X	X	X	X	X
TONSMEIRE, FRAN	X	X									X	
TORF, MARK	X	X		X	X	X		X		X		
TRAPEN, PAT	X	X									X	
TRUEBLOOD, ELLEN	X	X			X						X	
TUBULL, SCOTT	X	X									X	
TULLO, DANIEL	X	X	X	X	X	X		X				
U.S. CONGRESS (REPRESENTATIVE STALLINGS, RICHARD H.)	X	X			X	X	X		X	X		
U.S. DEPT. OF TRANSPORTATION (GREEN, M.)					X	X				X		
U.S. FISH & WILDLIFE SERVICE (SHAKE, Wm. F.)	X	X		X	X	X		X	X	X	X	X
U.S. DEPT. OF COMMERCE (EVANS, DALE R.)	X		X	X	X			X		X		X
U.S. DEPT. OF INTERIOR (POLITYKA, CHARLES S. )	X	X	X		X	X		X	X	X	X	X
U.S.D.A. SOIL CONS. SERVICE (HOBSON, STANLEY N.)												
UNKEL, MARGOT	X	X	X	X	X	X	X		X	X	X	
VAZZA, NALDO	X	X		X				X		X		
VEGA, MARGARET						X	X	X				
VIGELAND, TED		X									X	
VISSERS, COR	X	X	X	X	X	X			X			
VISSERS, COR		X		X	X	X				X		
WALDEN, R. C.		X									X	
WAND, ELEANOR AND JOHN		X	X		X							
WARD, R. ELEANOR		X		X		X						
WARD, T.	X	X									X	
WARDWELL, ED	X	X			X						X	
WATERS, RON	X	X	X		X	X					X	
WEATHERBY, BECKY	X	X									X	
WEBB, PETER		X									X	
WEBSTER, GORDON		X										
WEIERTHNER, GEORGE	X	X	X	X		X	X		X	X	X	X
WEIGOLD, THEODORE		X			X			X		X		
WELCH, CHERYL	X			X				X		X		
WELCH, JEANNE		X										
WELLINGTON, CHARMAINE		X										
WENCHE, GVELYN		X										
WENDT, RICK		X									X	
WERNEX, JOSEPH J.		X			X							
WEST, NANCY	X	X	X			X					X	
WEST, PHILLIP, B.		X			X	X					X	
WHEELER, DENNIS		X									X	

## NAME

A B C D E F G H I J K L

WHEELER, JOHN AND SADIE	X	X			X								
WHITING II, HENRY		X											
WIETHORN, JULIE	X	X			X	X		X		X			
WILCOX, DAVID	X	X		X	X					X	X	X	
WILDERNESS CLUB, POCATELLO H.S. (CROLY, ADRIENNE)		X		X							X		
WILDERNESS RIVER OUTFITTERS (TONSMEIRE, JOE)		X		X	X					X	X		
WILDERNESS SOCIETY (ROBINSON, THOMAS A.)	X	X	X	X		X	X			X	X	X	
WILDLIFE MANAGEMENT INSTITUTE (POOLE, DANIEL A.)	X			X		X				X	X	X	
WILKINS, CLAUDIA	X	X		X					X		X		
WILLARD, CATHERINE		X											
WILLIAMS, GEORGE B.		X											
WILLIAMS, KAREN	X	X	X	X	X						X		
WILLIAMS, RUSSEL	X	X				X					X		
WILSHIRE, THOMAS		X			X						X		
WILSON, MARY ELLEN		X			X								
WINTER, TODD	X	X		X	X						X		
WISE, RON AND MIMSI	X	X		X	X		X				X		
WITNER, SHEILA		X											
WIZNER, SHELLEY		X									X		
WOOD RIVER NORDIC (VANDERBILT, ANN)	X	X			X						X		
WOOD, RUTH	X	X		X	X				X		X		
WOOD-ROY, SUSAN	X	X		X	X	X			X		X		
WOODWARD, CHARLES	X	X		X	X				X		X		
WOODWARD, LINDA		X											
WORBOIS, DEAN M.	X	X		X	X	X					X		
WORCH, ELLEN M.		X									X		
WRIGHT, MACHILE		X									X		
WUERTHNER, GEORGE	X	X	X	X					X		X		
WYATT, J. L.	X	X		X	X			X					
WYMAN, PETE	X	X	X	X	X				X	X	X	X	
YOST, DOE	X	X		X	X					X	X		
YOUNT, STUART	X	X	X	X	X	X		X			X		
ZAPPANI, CYNTHIA		X									X		
ZAREMSKY, JEFFREY		X									X		
ZUCKERT, JUDI		X		X	X	X		X			X		
ZWEIKEL, LYNN		X									X		

## NAME

A B C D E F G H I J K L

Names on the following letters are illegible:

(Box 1769, Ketchum, ID)						X							
(1900 Warm Springs Rd, Ketchum, ID)	X								X		X		
(Box 1666, Ketchum, ID)		X		X	X						X		
(Box 4017, Ketchum, ID)	X	X											
(Box 1991, Ketchum, ID)		X									X		
(Box 742, Homedale, ID)		X											
ARN ?, STU P. (Box 3760, Ketchum, ID)									X				
ASH ?, GARY (Box 1821, Ketchum, ID)	X	X										X	
CAN ?, CLAUDIA (Box 203, ?, ID)		X										X	
F ?, WYATT (Eagle, ID)	X	X			X							X	
ID ALPINE CLUB (STEVEN ?)		X	X	X	X	X						X	X
JEFFRY, ELRANA (Box 1822, Sun Valley, ID)			X			X							
KESSLER, LX (Box 101, Bliss, ID)		X											
MATT ?, B. J. (Box 1567, Ketchum, ID)		X											
OT ?, TOM (Box 1827, Ketchum, ID)	X		X								X		
PAUL ?, PAM	X	X		X						X	X	X	
RAYMOND J. ? (Box 2728, Ketchum, ID)		X											
THOMAS E. ? (Box 3912, Ketchum, ID)	X	X		X					X				
VAN PA ?, RHETT (Box 744, Ketchum, ID)		X										X	
WITT ?, RICHARD (Box 2314, Ketchum, ID)		X	X			X							X
WRIGHT ?, KAREN (Box 2403, Ketchum, ID)			X			X							

F. COMMENTS AND RESPONSES1. Comments and Forest Service Responses By Category

## A. WILDLIFE AND FISHERIES MANAGEMENT

### Wildlife

Public Comment: We urge the Challis National Forest to confer with the Idaho Dept. of Fish and Game in meshing the Forest Plan with the Proposed Serious Injury Guidelines.

Response: Serious Injury Guidelines are not in the Plan because they are only proposals at this time.

Public Comment: The advice of the Idaho Department of Fish and Game is all that should be necessary for the line officer to base his decision on.

Response: The Idaho Department of Fish and Game is consulted on wildlife issues. The Forest Service has responsibility of addressing issues and concerns voiced by other agencies and the public.

Public Comment: The Standards and Guidelines for wildlife are weak and do not represent a high level of commitment to the wildlife resource.

Response: Wildlife Standards and Guidelines have been strengthened.

Public Comment: Maintain or improve elk habitat effectiveness to at least 75% of optimum. Use elk habitat guidelines to determine effectiveness and manage habitat properly.

Response: See Plan IV-14, q. Elk Habitat Relationships for Central Idaho will be utilized when making resource decision.

Public Comment: Avoid activity near ungulate migration routes and grazing areas or suspected wolf homesites during migratory periods (Sept. 15 to Jan. 15).

Response: This will be considered on a project by project basis.

Public Comment: Maintain 100 yard buffer between cutting units, and/or roads near riparian areas in drainage bottoms and meadow complexes.

Response: See Plan, IV-32, j and Plan, IV-29, d, 2. and Road Construction Standards and Guidelines d 2.

Public Comment: Design cutting units in an irregular shape to reduce sight distances.

Response: Project design is determined by an interdisciplinary team on a project by project basis.

Public Comment: Where feasible, lay out roads to reduce sight distances.

Response: Refer to Timber Standards and Guidelines, item k.

Public Comment: Use K-V dollars to conserve or improve wolf prey habitats.

Response: Plan, IV-16, q, emphasizes the use of K-V funds to enhance other resources which, depending on the location of the sale, could be used for wolf prey habitats.

Public Comment: Inform and educate the public in key areas through newspaper articles, talks to school children or other interested groups, and interpretive signs.

Response: Currently, the Challis National Forest uses various media methods to inform and educate the various user groups. In the future, this method of education will be utilized more to its potential.

Public Comment: Improve beaver habitat (a wolf prey species) with aspen or willow plantings.

Response: The Forest will support the Wolf Recovery Plan, when it is approved, which addresses this issue.

Public Comment: The Challis DEIS and proposed Plan do not reflect consideration and coordination of anadromous fish goals and objectives with the State, other federal, and tribal organizations.

Response: A Standard and Guideline has been added which requires that "All management activities which have a potential to significantly affect anadromous fish will be submitted to Federal, State, and Tribal interests for their review and comments."

Public Comment: Alternative 3 does not represent the mix of forest activities which benefits wildlife most. It emphasizes other commodity resources also. We request that you give Alternative 3 strong consideration during your review.

Response: Strong consideration was given to Alternative 3, however Alternative 11 better met the issues and concerns derived through the scoping process.

Public Comment: The Hanson Lakes area is prime habitat for mountain goat, gray wolves, bobcat and lynx, and needs protection.

Response: This area is not proposed for any significant development.

Public Comment: Improve the coordination of activities with other agencies.

Response: Comment noted.

Public Comment: Because of the Multiple Use and Sustained Yield Act of 1960, wildlife and fish and four other resources are to be managed and considered in the planning process.

Response: We agree. They all received consideration under each alternative.

Public Comment: Habitat for wildlife is shrinking.

Response: The plan does not significantly or adversely affect wildlife habitat.

Public Comment: Wildlife are not suited to having their range fenced.

Response: Wildlife can fully utilize their habitats if ranges are fenced correctly. Range Standards and Guidelines require that fences be constructed and modified to allow for wildlife passage.

Public Comment: To what extent is Forest wildlife dependent on off-Forest areas and is this a critical limitation to their success?

Response: Several big game species especially antelope and deer are dependent on public lands managed by the Bureau of Land Management for their critical winter range needs. In some areas this definitely can be a limitation to their success on the Forest.

Public Comment: A 20% change in population, as shown in the wildlife monitoring section Plan V-9, would represent serious injury and would not be acceptable.

Response: This table has been changed to read 10-15%.

Public Comment: Technology is not available to monitor capability for the stringent planning goals and objectives programed.

Response: Technology is available but budgets will determine levels of execution.

Public Comment: Habitat diversity needs to be discussed in the effects, comparisons, and environmental consequences of alternatives.

Response: Because of the low level of activities that would modify vegetation under any alternative, habitat diversity would remain essentially unchanged.

Public Comment: What is the present state of wildlife habitat?

Response: In Table IV-7, (EIS, 1V-17), predicted and existing habitat capability levels are compared between alternatives. Also see wildlife and fish under No Action Alternative and Analysis of the Management Situation.

Public Comment: East Fork is one of your most important sagegrouse management areas.

Response: A comment was added (Plan, IV-82).

Public Comment: Under research needs in the Plan, you might mention the on-going cooperative USFS-BLM-IDF&G elk study in Herd Creek.

Response: This section identifies future needs not on-going studies.



Public Comment: Mineral leases should be denied where they will undermine important water, fish, wildlife, recreation, and range values.

Response: Where other values are extremely high stipulations on leases may restrict or preclude any activity on the ground.

Public Comment: Non-game wildlife species need management.

Response: We agree. The management for MIS also considers non-game habitat.

Public Comment: In Chapter IV, add goal to follow wildlife habitat guidelines.

Response: This is included in the Standards and Guidelines (Plan, IV).

Public Comment: What is the maximum variability in funding for habitat restoration work?

Response: Funding for habitat improvement varies substantially. Alternative 9 with one structure and three acres of habitat improvement would cost approximately \$1400 vs Alternative 4 which has 32 structures and 1400 acres for approximately \$69,000.

Public Comment: The sagebrush habitat of the Pahsimeroi is home to the Black-throated Sparrow, where a small, disjunct population survives in the northwest part of the sparrows' range.

Response: There are no planned activities that will significantly affect the Black-throated Sparrow habitat.

Public Comment: The opportunity to observe wildlife still exists in the Pioneers, but at a distance because of overcrowding.

Response: Comment noted.

Public Comment: The fisheries and wildlife survey (Goal 3, Objective 2) should be described in the final documents (Plan, IV-4, Goal 3).

Response: GAWS is briefly described in the Glossary. Detailed information on inventory procedures is too lengthy for inclusion in the EIS or Plan, but is available at the Challis National Forest offices.

Public Comment: On page IV-129 of the Plan, change "Refine big game...to "Define and protect big game..." and eliminate "as needed".

Response: We corrected the statement (Plan, IV-132).

Public Comment: Plan, V-9, the decrease of 10% is unacceptable because this would severely impact wildlife populations.

Response: The statement has been reworded.

Public Comment: Increasing big game herds creates an illusion of management that does not exist and the EIS should state this.

Response: We agree and have explained this in several areas including FEIS, IV-18.

Public Comment: In the management area descriptions, mountain lion, black bear, and game birds should be mentioned more often.

Response: Comment noted.

Public Comment: Add Idaho Department of Fish and Game goals to Plan II-14.

Response: They are incorporated by reference.

Public Comment: No policy is indicated for snags or species which require old growth dead and dying timber.

Response: We have established some general guidelines for snag dispersal (Plan, IV-18, x). In addition we have included a reference to the Challis National Forest Snag Management Plan.

Public Comment: Give priority to the protection and management emphasis of wildlife over timber, and other commodity resources.

Response: The Forest Service manages for multiple uses, no resource receives full emphasis Forest-wide. Wildlife and fisheries resources have received additional emphasis in the Plan. Sufficient quality and quantity of habitat will be provided to meet Idaho Department of Fish and Game population objectives. Management area prescriptions, objectives, and standards and guidelines will provide for maintenance or improvement for wildlife habitat.

Public Comment: Wildlife provides for greater long term public interest than marginal subsidized timber values.

Response: Timber to sustain local mills can be provided without significantly affecting wildlife values. FORPLAN shows wildlife and fish values much higher than livestock and timber values.

Public Comment: Wildlife is a better economic base than the livestock or timber industries.

Response: See above.

Public Comment: Wildlife values are too low. The value used for a wildlife RVD (game and non-game) is too low. These values should be a \$50/WFUD for deer hunting, \$60/WFUD for elk hunters, \$85/WFUD for small game, and \$64/WFUD for fishing. Refer to Loomis and Sorg March 1985.

Response: At the time of our FORPLAN runs, these new values had not been formalized. Therefore, RPA values were used.

Public Comment: If the problems on economic analysis were corrected, FORPLAN would emphasize wildlife even more.

Response: At the time of our FORPLAN runs, these new values had not been released for use. Therefore, RPA values were used. PNW calculations were not used as a decision criteria.

Public Comment: We are not in favor of timbering; it is needed for wildlife habitat.

Response: Timber management prescribed in the Plan has little conflicts with wildlife.

Public Comment: Because other outputs are not varied enough, wildlife was never allowed to increase substantially.

Response: In our FORPLAN runs wildlife was not affected substantially by variation of other resource outputs, therefore, it was deemed not necessary to provide a wide range of outputs.

Public Comment: The Plan only gives minor emphasis to wildlife, but increases timber harvest three times.

Response: During the ten year planning period, we don't plan to increase timber harvest or grazing. We are giving more emphasis to wildlife and fish resources.

Public Comment: We do not believe you can increase wildlife with the projected increases in livestock grazing, timber production, and road construction.

Response: See preceding response. Most big game populations will increase in the first few years simply because animal numbers are far below the habitats carrying capacity. Our management activities will have relatively little effect on overall population numbers until later decades when the habitat nears carrying capacity.

Public Comment: Recreation and wildlife should be acknowledged as outputs of primary importance, with commodity uses maintained at current levels into future decades.

Response: Recreation and wildlife have been acknowledged as outputs of primary importance. Commodity uses have been maintained at current levels in the first decade. All activities and outputs may be revised at the end of the first planning period.

Public Comment: Consider modifications to your preferred Alternative 11 that will better reflect an evolving emphasis on fish, wildlife, water quality, improved range management, and dispersed recreation.

Response: Alternative 11 reflects a change from current management to an increased emphasis on fish, wildlife, dispersed recreation, water quality and improved range management. Specific standards and guides, objectives and management area prescriptions will help achieve these.

Public Comment: The Plan is heavily weighted toward livestock and timber, with little regard to wildlife.

Response: See above response.

Public Comment: If over-grazing is reduced, carrying capacity for wildlife would increase.

Response: The Challis National Forest has more wildlife habitat than is presently being used. Reduction in livestock would have little effect on wildlife populations.

Public Comment: Livestock should be kept out of riparian areas to leave more food and cover for wildlife.

Response: We disagree. Research conducted in the intermountain west has shown that riparian areas can be successfully grazed by livestock. Where current grazing systems are failing to improve important riparian areas, we will develop alternative management methods to meet riparian objectives. See Standards and Guidelines, Chapter IV.

Public Comment: How will AUMs be distributed between livestock and wildlife?

Response: We provide for wildlife habitat and forage needs on an allotment by allotment basis. The allotment interdisciplinary team determines specific objectives to meet soil and water, vegetation, wildlife and other resource needs based on range and other information available. See also Range and Wildlife Standards and Guidelines and Goals and Objectives.

Public Comment: In Plan, IV-14, there should be utilization guidelines established for key wildlife areas.

Response: The extreme variability of various wildlife species needs for various key areas and various allotments dictates that standard utilization rates would not necessarily fit all situations across the Forest. We encourage the Idaho Department of Fish and Game as their time permits, to join allotment management plan interdisciplinary teams and help develop objectives and specific utilization rates for specific key wildlife areas.

Public Comment: Management Area 9 has a significant increase in grazing use. This Management Area supports an important elk herd. How are you going to resolve the conflicts which are sure to arise?

Response: Grazing increases are not planned in the ten year period covered by the Plan.

Public Comment: What guidelines will be used to mitigate livestock/wildlife conflicts? Simply stating they will be mitigated does not state management direction on how they will be mitigated. See Plan, IV-143

Response: Normally an interdisciplinary team will prescribe specific mitigation measures. Plan, IV-4, Goal 2, Objective 4, states: place priority on improving essential fish and wildlife habitats. Range, Goal 2 states: manage all allotments to maintain suitable range in satisfactory condition and improve suitable range that is less than satisfactory ecological condition. Riparian Objectives will guide the interdisciplinary team so that mitigation measures are developed that meet these objectives. Guidelines such as the Elk Habitat Relationships for Central Idaho and sage grouse guidelines will be used. Also see Plan, IV, Standards and Guides section.

Public Comment: It seems that wildlife have a disproportionately small share of forage but contribute more to PNV than cattle even with the inflated grazing value used.

Response: We disagree. All wildlife habitat needed to meet Idaho Department of Fish and Game population objectives have been provided for in the Plan. We agree that wildlife gives higher PNV.

Public Comment: Possibly consider making allowances for winter maintenance of wildlife by ranchers, following the increase of the grazing fees to current market rates.

Response: Comment noted. Current laws and regulations do not provide for this.

Public Comment: Your proposal to triple the timber harvest and to subordinate wildlife to livestock grazing is one that any independent private analyst and planner would reject out of hand as illogical.

Response: There is no increase in timber harvest planned in the 10 year period covered by the Plan. Wildlife has not been subordinated to livestock grazing. The Plan provides habitat for continued increases in wildlife, but only allows for present levels of livestock grazing.

Public Comment: Acreage burned by unplanned fires should be deducted from acreages of identical habitat scheduled for controlled burning or spraying in order to maintain an adequate amount of sagebrush for sage grouse, antelope and mule deer.

Response: Natural fire occurrences are considered in meeting our objectives.

Public Comment: Harvest timber for wildlife objectives only.

Response: The Challis National Forest will manage approximately 96,000 acres for timber production, which may provide benefits to wildlife. Other acres may be treated for wildlife or other resource objectives.

Public Comment: Harvesting 660 acres in Sawmill Canyon will severely impact big game habitat. Fully implement the Elk Habitat Relationships for Central Idaho. Reduce the size of clearcut to 26 acres.

Response: We disagree. The Plan contains standards and guidelines directing the use of Elk Habitat Relationships for Central Idaho. Our management direction for Sawmill Canyon states that we will provide big game security needs.

Public Comment: Monitoring and wildlife studies done for timber cutting should be charged to timber budgets.

Response: Forest Service policy requires that monitoring is paid for by the benefiting program.

Public Comment: Plan, IV, Wildlife Standards and Guidelines needs to be quantified and specific. Eliminate soft and non-binding words - "weasel words".

Response: Statements have been strengthened.

Public Comment: Improve standards and guidelines on Snag Management.

Response: Because of the very small amount of acres programed for our timber harvest program, we prefer to have some general guidelines with the wildlife biologists and the silviculturists working together on the ground to design specific snag management requirements.

Public Comment: The costs of wildlife procedure and mitigations burden the entire timber management program.

Response: The Forest Service is required by NEPA, NFMA, regulations and policy to use an Interdisciplinary Team to develop and evaluate mitigation measures.

Public Comment: Wildlife should not restrict re-entries for timber harvest with uneven-aged management.

Response: We agree.

Public Comment: Timber harvest can help meet wildlife goals.

Response: We agree.

Public Comment: Greater emphasis needs to be placed on preserving old growth.

Response: Forest management in the first decade has little effect on number of old growth areas.

Public Comment: With the loss of so much habitat in the west for our big game animals every effort should be made to preserve the unroaded areas that still exist. Areas should be managed as "Roadless" because of their wildlife values.

Response: Most roadless areas will remain essentially unchanged through the first decade. Our proposed development activities will not have a significant effect on wildlife habitat or populations in the next 10 years. See Appendix C, DEIS.

Public Comment: Wildlife habitat should be protected from road building and a travel plan should be part of the Plan.

Response: Road construction proposals will be assessed by an I.D. team (including a wildlife biologist). Many factors and impacts are considered and weighed prior to a decision. Impacts on wildlife habitat will possibly occur.

The Forest Travel Plan is not included as part of a ten-year Forest Plan as it needs to be reviewed annually and updated as needed (See ORV Standard and Guideline 11).

Public Comment: In Chapter III of the Plan, add a paragraph to 3 which addresses the issue of road management vs. wildlife security areas and types and amounts of consumptive WFUDS that can be provided under various levels of road closures.

In Chapter IV add goal 6, "Develop and implement a cooperative road management program to protect and/or improve fish and wildlife habitat, and to maintain non-motorized WFUD opportunity".

Response: We feel that we will be able to maintain non-motorized WFUD opportunity and protect big game security through Standards and Guidelines under timber and ORV's, and Objective 6, under Goal 2 in Facilities (Plan IV-10). We are proposing few miles of new road each year for the first decade.

Public Comment: Use road closures to mitigate wildlife needs.

Response: Road closures, whether seasonal or year round, will be used to mitigate wildlife conflicts with other resources. See Standards and Guidelines for road management.

Public Comment: The Idaho Fish and Game Department should determine which roads are to be closed for wildlife.

Response: We will coordinate closely with the Idaho Department of Fish and Game on all road closures. See Standards and Guidelines for road management.

Public Comment: On Plan, IV-169, you state that access will be created for fuelwood gathering. Will there be seasonal restrictions? Access management as it related to big game harvest is a major concern.

Response: Fuelwood access roads, like many roads on the Forest, may have seasonal closures to meet watershed or wildlife needs.

Public Comment: You should display to the public specific effects on wildlife habitat if the roadless areas are developed.

Response: This information is contained in Appendix C of the EIS. Because future mining activities are unknown and specific locations of other projects are not known, it is not possible to describe more specific effects on wildlife.

### Management Indicator Species

Public Comment: King Mountain roadless area offers some of the best bighorn sheep habitat in this region.

Response: We agree.

Public Comment: Because security cover for elk is in short supply key elk habitat should be removed from the timber base.

Response: There is ample security cover for elk except in localized areas. The Plan contains standards and guidelines directing the use of Elk Habitat Relationships for Central Idaho.

Public Comment: The success of road closure policies must be proven prior to the roading of critical elk habitat.

Response: We agree that enforcement of road closures has been a problem in the past. Revised standards and guidelines under road management, timber harvest, and off road vehicle use will help to address this problem.

Public Comment: Elk and antelope should have equal consideration with domestic livestock. Currently they do not.

Response: Elk and antelope do not have equal consideration with livestock on every acre. In some management areas, wildlife are emphasized over livestock, in others both wildlife and livestock are emphasized.

Public Comment: What is the quality/quantity of forage remaining for elk following the grazing season?

Response: This varies from year to year and area to area due to livestock and wildlife use patterns and weather. However, there is adequate forage to meet the needs of present and projected elk populations.

Public Comment: Regeneration of Douglas-fir with lodgepole provides inferior habitats for elk.

Response: We generally agree, but we will meet the cover objectives as stated in Elk Habitat Relationships for Central Idaho, before logging adjacent areas.

Public Comment: Bighorns should receive higher emphasis in the Plan.

Response: The Challis National Forest will cooperate and coordinate closely with the Idaho Department of Fish and Game on any bighorn sheep transplants. We have met with the Fish and Game and agreed on transplant sites and are preparing environmental assessments for those transplant sites. We are encouraging the Fish and Game to transplant more bighorn sheep into available habitat as soon as possible.



Public Comment: Give equal consideration to elk, bighorns and goats; if we crowd them out they will be gone forever.

Response: Habitat needs of all three are provided for in the Plan.

Public Comment: Mule deer are not scarce on Management Area 14.

Response: We agree. They are, however, much below potential habitat capabilities.

Public Comment: Mountain goats in the Boulder Mountains need the protection of primitive wilderness.

Response: This area has been proposed for Wilderness.

Public Comment: Mountain goats may not be below minimum viable on a Forest-wide basis.

Response: The MVP capability level takes into account the historical range of mountain goats on the Challis National Forest. If only current range is taken into account, populations are not below minimum viable. This has been clarified in the Plan.

Public Comment: There should be a different selection of Management Indicator Species. Your Management Indicator Species do not represent species which management plans can be built around.

Response: We disagree that management plans cannot be formulated using these species. Our selection process for identifying MIS has identified a group of plants and animals that are indicative of ecological conditions. Most of our animal species are on common grounds with the state fish and game department species management plans and can be realistically monitored.

Public Comment: There should be an MIS identified to monitor dead and dying timber.

Response: This is not a significant issue. See previous statement.

Public Comment: Pileated Woodpecker or any of the Idaho Department of Fish and Game species of special concern should be chosen as MIS.

Response: Possibly the Pileated Woodpecker, or some state sensitive species, better represents species dependent upon "old growth", or climax coniferous forest, but it would be difficult to determine their population dynamics with our limited resources. It would be hard to equate a population or habitat index.

Public Comment: There should be a discussion on the trade-offs of MIS.

Response: The Analysis of Management Situation (6/15/82) discusses trade-offs of MIS with management objectives. AMS is available for review at the Forest Service Supervisors Office.

Public Comment: How can you increase the capability for red squirrels by 10%?

Response: Old growth will increase by 10%.

Public Comment: The discussion on wildlife habitat types or PACAS and the MIS associations on DEIS III-11 through III-13 is unclear.

Response: Describing the wildlife data base in only a few pages is difficult. The Glossary describes PACA types. The Analysis of the Management Situation (6/15/82) located at any Challis National Forest office contains more detailed definitions and explanations.

Public Comment: The implication that climax coniferous forest is not deer or elk habitat is untrue.

Response: Mature conifer stands were not necessarily classified as "climax coniferous forest". The habitat types described were classified as "savanna forest, spruce-fir/forest or seral coniferous forest". One of the assumptions of the wildlife data base is that the animal spends 90% of its life occupying that habitat. If this assumption had not been made, it would have been impossible to delineate habitat which is most preferred by the species and require special management emphasis.

Public Comment: Red squirrel populations are not tracked, but in DEIS, III-10 you said that population objectives and populations can be established and tracked for Management Indicator Species. This inconsistency should be corrected.

Response: The statement (EIS, III-11) reads: "They are species for which populations and habitat objectives can be established, and will be tracked as indicators of habitat capability." Red squirrel habitat or "climax coniferous forest" will be tracked as acres of habitat.

Public Comment: You have designed a system to use old growth to monitor squirrel populations Plan, V-9. This violates the concept of MIS.

Response: Monitoring either populations or areas of habitat suffices the concept of MIS.

Public Comment: Selection of MIS must include a discussion of criteria and an explanation of how each will actually be monitored.

Response: See Plan, II (Wildlife MIS Selection Criteria) and Plan, V, Wildlife Monitoring Plan.

Public Comment: Add a Standard and Guideline which addresses problem of domestic sheep - bighorn sheep disease transmission. The Challis Plan ignores the responsibility toward restoring an Idaho bighorn population. Bighorn sheep should have priority over domestic sheep and cattle.

Response: See new Wildlife Standards and Guidelines o, (Plan, IV-14).

### Threatened and Endangered Species

Public Comment: Further formal and informal consultation with the Fish and Wildlife Service will be necessary on project-specific cases in potential wolf areas.

Response: The procedure in dealing with projects occurring within the Recovery Plan area is to consult formally or informally with the Fish and Wildlife Service. This recommendation will be followed.

Public Comment: Has it been proven that wolves and intensive grazing are compatible?

Response: No. Compatibility has not been determined.

Public Comment: Threatened and Endangered Species should be protected by wilderness, or recovery areas should be designated.

Response: Each T&E species will have a recovery plan developed by an interagency team. Wilderness is not essential for the recovery of T&E species.

Public Comment: Include language that the Forest will participate in reintroduction programs for endangered species that were indigenous to the Forest. The Grizzly bear should be introduced into Management Area 1.

Response: The species recovery teams will make recommendations for relocation of T&E species to the Secretary of Interior for approval. The Forest Service and the specific Forests involved will participate in decisions to relocate threatened and endangered species on Forest Service lands.

Public Comment: Your commitment to restoring the habitat of Threatened and Endangered Species, such as the gray wolf, hinges on sufficient deer and elk prey base.

Response: Management direction in the Plan provides sufficient habitat and protection measures for deer, elk and beaver within wolf recovery areas.

Public Comment: Has the Plan complied with the Endangered Species Act?

Response: Yes. The Fish and Wildlife Service has stated that our Forest Plan "is not likely to jeopardize the existence of the gray wolf" and will "not affect" the bald eagle or the peregrine falcon.

Public Comment: Protection of Federally classified endangered plants should be emphasized.

Response: Currently the Challis National Forest does not have any Federally classified threatened or endangered plants.

Public Comment: Coordinate with miners to avoid conflicts at critical times in key wolf habitats.

Response: This will be addressed when a wolf recovery plan is finalized. Details will be considered on a project-by-project basis in the wolf recovery areas.

Public Comment: Evaluate both short and long term effects of potential developments on key wolf habitats.

Response: This will be considered on a project-by-project basis.

Public Comment: When feasible, lay out roads as recommended in the Timber and Road Management Section so that sight distances are minimized.

Response: Forest Standards and Guidelines in the Forest Plan will be adhered to by future projects. This includes sight distances as recommended within the Elk Habitat Relationships for Central Idaho.

Public Comment: Inform and educate users about wolf ecology and the endangered status of the wolf. Present information to local groups such as gun clubs, hunter associations, hunter safety classes, and school classes that are interested in the wolf.

Response: Comment noted.

Public Comment: Add a clause to grazing permits, timber purchase contracts, and outfitter and guide special use permits about wolves so that these groups will know - (a) of potential wolf presence in their area; (b) that killing wolves is illegal because of their endangered status; (c) to report sightings to this office; and (d) to contact this office for further information.

Response: This information will be made available as needed.

Public Comment: Close ungulate winter range with potential wolf activity to snow machines.

Response: Wildlife and Fish Standards and Guidelines i, Plan IV-13, has been revised to address this concern.

Public Comment: Locate any new trails away from key wolf use areas, if their presence becomes known.

Response: This will be considered on a project-by-project basis on the wolf recovery areas.

## Fisheries

Public Comment: The Forest must maintain its fisheries resource for its sport fishing value.

Response: The Forest agrees and is committed to maintaining or improving the sport fisheries resource.

Public Comment: Please make a commitment in the final Plan to totally protect anadromous and wild trout habitats.

Response: Management Areas that contain anadromous fisheries or important resident fisheries have management prescriptions that emphasize maintenance and/or enhancement of fisheries habitat.

Public Comment: Better fisheries habitat management should be a long range primary objective.

Response: The Forest agrees. The Plan under goals and objectives indicates the need for improved fish habitat management. Forest-wide standards and guidelines give general direction on how to improve management with specifics shown under individual management area prescriptions and guidelines.

Public Comment: The Forest must protect its fisheries resource from the impacts resulting from commodity uses such as road building, mining, grazing, timber harvesting and hydroelectric development, as well as non-commodity recreation.

Response: The Forest Plan Standards and Guidelines are the basis for protecting the fisheries resource from commodity resource impacts. Grazing, road building, and minerals are the major commodity impacts to fisheries. Other activities are not presently having or expected to have major impacts to habitat on the Forest. Interdisciplinary teams evaluating activities that may impact fish habitat will have a fisheries biologist as a member.

Public Comment: Wilderness designation is necessary to preserve fisheries values.

Response: Wilderness will not necessarily solve existing fish habitat problems on the Forest. Many conflicts with fisheries are tied to range and minerals which can still continue to operate in wilderness areas but with additional restrictions.

Public Comment: Semi-primitive designation is preferred, as opposed to wilderness, to preserve the fishing opportunity.

Response: Comment noted.

Public Comment: Fisheries impose opportunity costs to timber and other commodity use values.

Response: Fisheries, along with other resources (water, soils, wildlife, recreation, etc.), impose some restrictions on timber activities so that their own values are not unreasonably impacted. NEPA requires that this be done.

Public Comment: We believe you have not adequately reflected the dollar outputs of fish in comparison with the commodity products (timber, mining, and range). In short, fisheries present economic benefits.

Response: Dollar outputs for fish are based on values for fisherman user days (FUD's) that were set by the Resources Planning Act (RPA). The total output values shown in the alternatives are based on an estimate of expected FUD's generated by resident fish on Forest and on anadromous fish, generally off Forest. Almost 50% of the total benefits on the Forest were derived from fishery values (see Table II-7A, Alternative 11, Page II-114 of the EIS).

Public Comment: Establish a 25% sediment threshold as it can provide a buffer for potential problems in respect to fry emergence as opposed to the 30% threshold hold by in the plan. The "Guide For Predicting Salmonid Response to Sediment Yield in Idaho Batholith Watersheds" indicates that a 20% imbeddedness fry emergence is about 78%, while at 30% it drops to 18% -- a 60% reduction.

Response: The 30% is an upper limit with the real constraint being the 2% limit on increase over existing. Fry emergence is based on sediment levels in the redds, not in the stream in general. Unpublished research has shown that redd building by steelhead and salmon is quite effective in cleaning fines from gravel. A redd created in a stream with 30% fines in the spawning gravel, could easily reduce the fines to less than 25%, which would provide adequate fry emergence.

Public Comment: Priority must be given to protecting anadromous fisheries habitat. Priority must be given to protecting the fisheries resource. Boulder/White Clouds, Marsh Cr., Bear Valley Cr., Star Hope Cr., Pioneer Mtn. Range, Copper Basin Area, Iron Bog Lake, Smiley Mtn., Herd Cr., Ross Fork and Ross Fork Basin, East Pass Cr., Bowery Peak, Jersey Peak, Big Lost River Basin, Lemhis, Pahsimeroi Mtns., and Borah should be protected in their entirety for the purpose of salmon, steelhead and resident fisheries habitat preservation.

Response: Anadromous fisheries are heavily emphasized in four management areas (1,3,4,5) and are emphasized along with other resources in four others (6,7,8,9). We are also emphasizing the anadromous fish resource through the goals and objectives and standards and guidelines.

The Forest is committed to maintaining or improving the sport fisheries resource.

The Plan under goals and objectives identifies the need for improved fish habitat management. The Forest wide standards and guidelines give general direction on how to improve management with specifics shown under individual management area prescriptions and guidelines.

Public Comment: Table II-7 shows an increase in allotted AUM's beginning in the first decade and continuing through decade 5. This may lead to a direct conflict with fish.

Response: There is no increase in grazing in the ten year planning period and there is no anticipated increase in impacts to fisheries. Forest direction should work to reduce impacts. Projections shown through the five decades can change in the next planning period.

Public Comment: Address the unconscionable act of landowners drawing off water for agricultural purposes, leaving salmon and trout high and dry.

Response: State law requires that all new diversions be screened and allow for water needs of fish. At present there are only a few minor diversions on small streams that are a problem.

Public Comment: The Forest Service must be careful not to ask more of a mitigation measure or technique than it can give.

Response: We agree and plan to monitor the effectiveness of mitigation measures to see if they accomplish what we expect.

Public Comment: Explain how fish habitat capability can increase in spite of expected increases in sediment production from mining.

Response: Site specific increases in sediment from mining should be offset by onsite mitigation and decreases in sediment from other sources because of improved management techniques and sediment reducing projects. This should result in an increase in overall habitat capability.

Public Comment: Why were resource "benchmarks" developed for only three outputs (timber, grazing and wilderness), but not fish, wildlife and recreation?

Response: These benchmarks were not required.

Public Comment: Has the Forest adopted Idaho's Anadromous Fish Goals (1984-1990) or has it conducted its own surveys and determined these to be reasonable targets?

Response: Habitat will be provided under the Plan to meet or exceed the State's goals.

Public Comment: Why is the present habitat so much lower than maximum habitat potential?

Response: Existing populations of anadromous fish are low in comparison to habitat potential due to past and present impacts from dams on the Snake and Columbia Rivers, commercial fishing and onsite degradation of habitat. As these problems are solved numbers of fish should come much closer to predicted habitat potential. The preferred alternative predicts habitat capability to reach 90% of potential by the end of the 50 years.

Public Comment: The final EIS should present more information about fish habitat and water quality conditions.

Response: A general habitat condition rating for each stream or lake on the Forest has not been done. Information on many areas is available in Forest fisheries files. All streams meet state water quality standards.

Public Comment: Heavy fines should be imposed to companies equal to the price of restoration as commensurate with the destroyed product.

Response: The Forest Service does not have the authority to impose fines. We document damages and the courts determine responsibility and may impose penalties.

Public Comment: The Forest should adopt a monitoring plan to evaluate mining, timbering and grazing impacts on fisheries habitat. Also show how information derived will be used. What types of "change in management direction"?

Response: A monitoring program will be set up to evaluate and monitor sediment levels on priority streams that are being or could be impacted by resource activities. Information collected will be used to update direction in Allotment Management Plans, help schedule timber harvest and help plan habitat improvement projects. See new Objective 1 under Wildlife and Fisheries Goal 4.

Public Comment: Area analyses should be performed for any area in which development or resource use is contemplated near important aquatic resources or other sensitive habitats. These should also receive public review as draft EA's or EIS's.

Response: Existing policy provides for draft review of an EIS and for a review of an EA prior to making a decision.

Public Comment: BPA projects should be clearly identified because they are intended as mitigation for effects on anadromous fish that occur "downstream", off CNF lands, and should therefore not enter into evaluations of habitat impacts that occur on the Forest.

Response: The Forest has not identified at this time any fisheries projects in the Plan for BPA funding. BPA money is available to the Forest to evaluate and accomplish projects to increase anadromous fish production as mitigation for downstream problems created by the dams. BPA funding will not be used to mitigate on Forest activities.

Public Comment: Delete the weasel phrase "where feasible" in "Protect anadromous fish spawning areas from disturbance by livestock and other activities where feasible." State that such areas will be fully protected in this clause.

Response: The Standards and Guidelines have been strengthened.



Public Comment: The EIS should state that values associated with anadromous fisheries are influenced by provisions of the Northwest Power Act, and are not the result of any manipulation by the Forest Service.

Response: The final EIS recognizes the Northwest Power Planning Act. As the fish are re-established in Forest habitat the value of the Forest contribution to the runs will greatly increase.

## B. WILDERNESS PROPOSALS, ROADLESS MANAGEMENT AND RESEARCH NATURAL AREAS

### Wilderness Management-Roadless Management

The Forest received many comments on its draft management plan. Most of these comments supported more wilderness acreage in addition to the 160,000 acres proposed. The comments primarily addressed five areas that were not proposed as wilderness in the draft management plan: The Northern Lemhis, Diamond Peak, Pahsimeroi Mountains, King Mountains, and the Herd Creek area of the Boulder/White Clouds. There were a variety of reasons given as support for wilderness designation, most stressing the undeveloped nature of the land and its suitability for wilderness. Without doubt, each of the areas is of sufficient size, of undeveloped character and of inherent quality to meet the standards of the wilderness act. Each area has no deficiencies that would preclude management as wilderness.

There also exists a strong opposition to any more wilderness from local communities, and commodity and motorized user groups. There are also many who want to see the roadless areas remain undeveloped but without a formal wilderness classification. Opposition to wilderness from these groups has remained strong from the RARE II process to present. They want the areas to remain open to all multiple uses. Their perception is that Idaho has provided its fair share of wilderness and the resources of the remaining lands will be needed for future generations.

The proposed land management plan for the Challis National Forest projects little development in these five areas. Four of the areas, the North Lemhis, Diamond Peak, the Pahsimeroi Mountains and the Boulder/White Clouds will remain essentially unroaded and undeveloped. King Mountain will be managed to provide a mix of resource activities and opportunities. Most of each of these roadless areas will still be suitable for formal wilderness designation in the next planning period.

While the forest does not propose activities in its plan which would seriously impact the wilderness characteristics of these five roadless areas, some perceive a serious threat to the integrity of them and prefer wilderness designation as a guarantee of protection. There evidently exists both a distrust of Forest Service plans and a fear of mining, oil and gas exploration and hydroelectric development that may occur in addition to Forest Service activities. There appears to be little that can be done in the short term to solve the distrust problem or to reach a fully acceptable balance of wilderness to nonwilderness.

Part of the North Lemhis and Diamond Peak roadless areas have been assigned a management prescription for a semiprimitive non-motorized recreation experience. A few trail corridors have been left open to accommodate trail bike use.

Establishment of these 5 roadless areas as wilderness would not significantly increase the very low level of wilderness type use that exist now. However, it would increase trail maintenance and administrative cost to the Forest Service as well as eliminate the motorized recreation use which is occurring now.

The Forest Travel Plan provides the Forest Service with a means of closing areas that receive significant damage from motorized vehicles.

The roadless areas on the Challis NF were broken into groups based on wilderness values and public input throughout the planning process.

The groups are:

1. Those areas with the highest wilderness character and strongest public support. They have been recommended for wilderness. There is also opposition to this recommendation. The areas are: Borah Peak, portions of the Pioneer Mountains, portions of the Boulder/White Cloud roadless areas.
2. Those roadless areas with high wilderness character, but both strong support for and strong opposition to, proposing them for wilderness. These areas were not supported for wilderness by the Governor, nor the Idaho Congressional Delegation. There are very few intrusions planned into these areas. They will remain virtually unchanged and will be available for wilderness consideration in the next round of Forest planning. A semiprimitive/non-motorized recreation prescription has been assigned to parts of two areas. These areas are: North Lemhis, Diamond Peak, Pahsimeroi, King Mountain, and portions of the Pioneer Mountains and Boulder/White Clouds.
3. Those roadless areas with moderate to low wilderness values and low public support for and strong opposition to proposing them for wilderness. Most of each of these areas will also remain unroaded and undeveloped and will be available for wilderness consideration in the next round of Forest planning.

The numerous public comments received on wilderness were summarized into the following issues:

Public Comment: Want consideration of more wilderness classification especially in: Lemhi Range (Northern), Pahsimeroi Mountains, Diamond Peak, King Mountain, Boulder/White Clouds Peaks, and Pioneer Mountains.

Public Comment: There is a need for more wilderness.

Response: The Plan proposes an additional 201,000 acres for Wilderness designation. This is in the Borah Peak, Pioneers and Boulder/White Clouds areas. This would designate approximately 39% of the Challis National Forest as Wilderness.

Public Comment: Wilderness classification is needed for protection of watersheds and water quality.

Response: Little activity is planned in the listed roadless areas that would affect these resources.

Public Comment: Your analysis does not comply with the California vs. Block decision. You do not present a wide range of wilderness alternatives or adequate site specificity.

Response: A wide range of alternatives was developed in the Forest Plan FEIS. Table II-4 in the DEIS shows the range of wilderness alternatives on a forest-wide basis. The 11 alternatives have a percentage range from 0 to 100% and the wilderness benchmark is 100%. Each roadless area was recommended as wilderness in at least one of the alternatives. If only a portion of a roadless area was recommended for wilderness in an alternative, it was recommended for wilderness, in total, in one of the other alternatives.

Data in the Forest Plan FEIS shows the projected 10-year changes for resource outputs, activities, benefits and costs. These changes measured from the first decade of the current situation are shown for each alternative.

The planning documents were developed with full public participation. They include sufficient information to advise the decision maker, Congress, and the public concerning what will happen if the area is recommended for wilderness or assigned to other management options through the 10-15 year planning period. Information indicating what activities are scheduled, when and where scheduled impacts can be expected for the planning horizon, and which lands are capable of and suitable for being assigned a timber prescription, is available in the planning documents and the Forest record.

When complying with 36 CFR 219.17 in addressing the concerns described in the California vs. Block decision, the Forest Plan, FEIS, and Record of Decision have corrected the indicated deficiencies. Appendix C includes site specific discussions of the effects on roadless areas by alternative.

Public Comment: Wilderness will provide additional recreation.

Response: Alternative 11 indicates that Primitive Recreation is the main objective for these areas. The same type that would occur under Wilderness. ORV use in these areas is not presently significant.

Public Comment: Wilderness provides better economics, more revenue for the area and is cheaper to manage.

Response: Differences in management costs and revenue are insignificant between designated wilderness and management under Alternative 11.

Public Comment: Wilderness will protect the land for future generations.

Response: Planned activities in Alternative 11 through the first planning cycle, ten years, will not preclude the vast majority of these areas being eligible for wilderness.

Public Comment: Wilderness will protect the areas from timber harvest.

Response: The timber harvest in the 10 year planning cycle is only 2,500 acres within the management areas that include the listed roadless areas. Only part of the harvest is within the roadless area. Appendix C indicates roadless areas where timber harvest will probably occur.

Public Comment: Wilderness protects the areas from oil and gas development.

Response: Projected ground disturbing activity in the next ten years is low. Stipulations listed in the Forest Plan protect or mitigate these activities.

Public Comment: Wilderness protects geologic features.

Response: Little or no activity is planned in the listed roadless areas that would affect geological features.

Public Comment: Wilderness protects unique scenery.

Response: Little or no activity is planned in the listed roadless areas that would affect these resources.

Public Comment: Wilderness provides unique solitude.

Response: Alternative 11 provides for management of these areas in their present undeveloped state.

Public Comment: Wilderness protects Indian use and rights.

Response: The preferred alternative will not adversely affect Indian rights.

Public Comment: Wilderness provides better wildlife habitat.

Response: Little or no activity is planned in the listed roadless areas that would significantly affect wildlife habitat.

Public Comment: Wilderness prevents hydroelectric development.

Response: Economics of accessibility will limit this activity to the edge of roadless areas. Demand for this type use is not high at the present time. Hydroelectric development in the first planning cycle is estimated to be insignificant.

Public Comment: We have too much wilderness. We need more wilderness. We support the Moody/Kostmayer Idaho Wilderness Act of 1985.

Response: Comments noted.

Public Comment: There is a magnificent wilderness resource concentrated on the Challis National Forest and it should be protected. There is no compelling reason to do otherwise.

Response: We agree. Including the proposals in the Plan, 39% of the total Forest would be within designated Wilderness areas. In addition, more than 70% of the entire Forest outside of these designated areas will retain its wilderness values through the 10-15 year planning period.

Public Comment: The Idaho public has officially spoken out in favor of the conservationist proposal as shown by RARE II records and hearing records.

Response: Comment noted.

Public Comment: Why did you propose fewer acres for wilderness designation than proposed under RARE II? Why were the North Lemhis proposed for wilderness under RARE II and not in the Plan?

Response: At the time RARE II was conducted, the North Lemhis were in the Administration's Wilderness proposal; however, at the time of the McClure wilderness hearings, the current administration testified against including this area.

Public Comment: Demand for wilderness will dramatically increase in the future.

Response: At the end of this 10-15 year planning period more than 70% (approximately 1.1 million acres) of the Forest outside of designated Wilderness will be available for consideration as additions to designated Wilderness.

Public Comment: Wilderness would provide economic stability into perpetuity.

Response: The Plan provides for a variety of outputs and activities, including Wilderness use, that provide economic stability.

Public Comment: The value of oil and gas potential is inconsequential and cannot be used to support a no wilderness recommendation.

Response: Detailed evaluation of oil and gas value has not been conducted. A variety of factors was considered in making the decision to propose or not propose an area for Wilderness designation.

Public Comment: The preferred alternative does not do a good job of protecting wilderness values.

Response: We disagree. Including the proposals in the Plan, 39% of the total Forest would be within designated Wilderness areas. In addition more than 70% of the entire Forest outside of these designated areas will retain its wilderness values through the 10-15 year planning period.

Public Comment: A Federal court decision requires an analysis of nonwilderness management of roadless areas.

Response: A comparison of the effects of management under each alternative is shown in EIS Appendix C.

Public Comment: The value of each roadless area as wilderness must be evaluated, including the benefit to state and local economics, and conservation and protection of wildlife, vegetation, soils, water, land stability and air quality.

Response: The value of each roadless area for wilderness, as displayed in Appendix C, meets the requirements.

Public Comment: The economic, aesthetic and spiritual benefits of wilderness would easily offset the minimal opportunity cost.

Response: Comment noted.

Public Comment: Maximum wilderness is the economically superior alternative.

Response: Our analysis shows this; however, more than economics was considered in selecting the preferred alternative.

Public Comment: It appears your wilderness recommendation may be mostly based on Senator McClure's rabid anti-wilderness position. Nowhere in the Plan is a good argument made that supports such a small wilderness recommendation.

Response: Our wilderness recommendation is based on wilderness values of the roadless area and public input.

Public Comment: Creating a wilderness area on the east side of the Forest, near the population centers, would be significant from a recreational, social and economic basis.

Response: We believe that Borah Peak proposal meets this concern.

Public Comment: Wilderness offers a variety of multiple uses.

Response: Although wilderness offers a variety of uses, it does not provide as many multiple use options as non-wilderness designation.

Public Comment: Protect current "defacto" wildernesses.

Response: This is consistent with our current management strategy. The Plan will not affect most of the currently unroaded areas. Slight to moderate effects will occur on less than 5% of these areas.

#### Research Natural Areas

Public Comment: Include a stipulation in the Standards and Guidelines about protecting RNA's from grazing.

Response: Light grazing occurs in some of the proposed RNA's. Whether or not this continues, will be decided in the Committee's establishment report, after consultation with all involved parties.

Public Comment: RNA's need specific Standards and Guidelines to protect them, prior to establishment.

Response: See the Forest-wide Management Direction Standards and Guidelines on page IV-12, e. Special Areas.

Public Comment: The management direction and Standards and Guidelines for the proposed Smiley Mountain RNA is a good model for all proposed RNAs.

Response: All proposed RNA's have now been recommended for establishment in the management direction section for each management area.

Public Comment: Acreage figures for proposed RNA's are inconsistent in the EIS.

Response: Corrections have been made. These acreage figures may be adjusted in the establishment reports.

Public Comment: Lime Creek was incorrectly added to the list of proposed RNA's. It should be Middle Canyon.

Response: The correction has been made.

Public Comment: Stop illegal wood cutting up Middle Canyon, which is not compatible with RNA status.

Response: We have provided direction in the Plan to protect proposed RNA's. We are monitoring that area to ensure that this activity is not repeated.

Public Comment: Designate "Jaggle Peak Ramp" (in the heart of the King Mtn. roadless area) as an RNA.

Response: This proposal has been referred to the Idaho Research Natural Area Committee for evaluation.

Public Comment: A provision should be made to recommend additional areas to fill the needs suggested by the Idaho Research Natural Area Coordinating Committee.

Response: The Forest Service and other interested parties are continuing to locate areas to fill those needs.

Public Comment: The Challis NF is required to follow the National Rivers Inventory in designating Wild and Scenic Rivers.

Response: No waters on the Challis National Forest are on that inventory.



### C. SOIL, WATER AND AIR MANAGEMENT

Public Comment: The Forest should develop the non-market values (Soil, Water, Air) and give priority over the Market Values.

Response: Resource priorities for site specific areas may be established on a project by project basis.

Public Comment: Protecting water quality should be a major long term management objective and stated in the Plan.

Response: The Plan does emphasize water quality. Statement 5a (Plan IV-20) in the Standards and Guidelines section of the Plan has been modified to read "Ensure that all management-induced activities meet state water quality standards, and Forest water quality goals, including sediment constraints."

Public Comment: The Forest should develop a stream classification system. The stream classifications under the Bonneville Power Administration (BPA) contract should be adopted.

Response: The Forest will adopt a stream classification system. An addition was made to the Goals and Objectives section (soil, water and air) of the Plan. BPA stream classification has not been completed.

Public Comment: Instream flows are planned. Will this methodology only measure present surface flows? Will diversion of water be considered? Will reduction in surface flow due to channel disturbance by cattle be considered? This activity can result in changes in surface flow due to soil compaction and evaporative losses of water from channel widening and riparian cover reduction.

Response: The methodology used for instream flow quantification is not limited to only measuring present flows. Expected flows are developed for ungaged drainages using flow duration characteristics of nearby gaged streams in a dimensionless form. Actual instream flow needs are determined through regression techniques on channel characteristics, regardless of active or planned diversions.

The concern of reduced surface flow due to channel disturbance by cattle is valid. Since there are no provisions to consider the effects of grazing activity on evaporative and seepage losses under the current instream methodology, it will be incorporated into the channel stability inventory program so potential problem reaches can be identified.

Public Comment: Management needs to develop a detailed water quality monitoring system (program).

Response: The Forest has an approved water quality monitoring plan which is referenced in the Monitoring and Evaluation section of the Plan (V-12).

Public Comment: Management needs to show current water quality conditions. Also, existing habitat quality conditions need to be presented. Show the management prescriptions to be applied to each. Conduct a study of the impacts of pollution to waters such as Ralph Cavanaugh's of the Natural Resources Defense Council.

Response: Water quality data is limited Forest-wide to project related activities in which representative projects are monitored to determine Best Management Practices effectiveness. Funding has been inadequate in the past to perform any baseline monitoring and there is no indication that future budgets will increase substantially. Consequently, water quality conditions Forest-wide are assumed to be better than the monitored water quality conditions located immediately downstream of potential sediment delivery points. To adequately cover this concern, the statement has been changed (Plan, IV-21, 5, i).

Public Comment: Conduct a study of oxygen levels in streams in relation to seasons of the year, temperature, stream discharge volume where the waters studied would be in their natural condition before being materially altered.

Response: Oxygen content, like any other parameter, will be incorporated into the water quality monitoring program when warranted after monitoring objectives are established.

Public Comment: How can fish habitat capability increase and water quality improve when sediment also increases? If sediment yields are expected to increase under Alternative I (DEIS, II-135 paragraph 4 [FEIS, II-136]), how can water quality improve (paragraph I)?

Response: The sediment levels that appear in the EIS show the potential for production among alternatives. So when water quality improves and sediment increases together, as in the RPA alternative, more funds will be available for improvement, administration and mitigation which will probably reduce the sediment output below the projected level.

More importantly, the sediment output related to range and mineral activities are assumed not to change significantly among alternatives. Consequently, the sediment values projected for each alternative does not necessarily reflect the water quality improvement that may be realized with an increased emphasis in range administration and improvement programs.

Overall, the Forest-wide water quality will be improving for the alternatives that emphasize range, water, and fishery improvements while constraining commodity outputs.

Public Comment: Have the Clean Water Act and Safe Drinking Water Amendments been fully addressed in this Plan?

Response: The Plan has been modified. A new provision in the Standards and Guidelines section (Plan, II-28, IV 10, a, 5) addresses the maintenance of drinking water systems on the Forest.

Public Comment: Address the risk of impacting domestic water supplies from Forest management activities before this resource is contaminated.

Response: This concern is addressed in Management Area 13 of the Plan.

Public Comment: The Watershed Condition Inventory referenced in Plan, IV-18 should be included or summarized in the FEIS or Final Plan.

Response: A description of Watershed Condition Inventory has been included in the Glossary.

Public Comment: The Forest should regulate activities to prevent stream contamination or develop mitigation measures.

Response: See Plan, IV-20, 5a and Plan, IV-22, 6c and 6e.

Public Comment: Describe the procedures which the Forest uses to protect water quality. The present procedure is fragmented. Discuss cumulative impacts of mining on watershed.

Response: Protection of water quality is accomplished through Best Management Practices (BMP's) and water quality provisions. Earth disturbing activities must meet the applicable BMP's to reduce impacts on water quality. As an assurance that water quality will not be impacted, selected management activities will be monitored and evaluated to determine the effectiveness of BMP's. Cumulative impacts will be analyzed for construction activities within a watershed, primarily associated with sediment production.

Public Comment: To protect streams, watersheds, and water quality, lands unsuitable for timber harvest should be excluded in the timber base.

Response: Lands unsuitable for timber production have been excluded (See EIS, II-126).

Public Comment: The DEIS should contain a thorough discussion of the adverse impacts to the pattern and timing of water runoff, impacts to stream drainages and its flow pattern as a result of timber harvesting which alters the physical characteristics of these areas.

Response: The timber harvesting program for the Forest will not significantly impact the pattern and timing of runoff, relative to normal seasonal variations.

Public Comment: It is satisfying to see that harvest activities are planned using actual sediment data as opposed to using exclusively the model (DEIS, IV-33). However, should y-axis of Figure IV-2 read 0.1 percent, etc? We expect you mean 10 percent, etc.

Response: The y-axis of Figure IV-2 is correct on identifying 0.1 percent, etc. As explained in the text (FEIS, IV-32), the sediment yield values are much lower than would naturally occur at a critical reach because the sediment yields are projected Forest-wide. Consequently, the expected sediment levels such as 10 percent, etc., over natural in a watershed setting are diminished when related to total Forest output.

Public Comment: Protect streams, water quality, soils, streambanks, and fish from cattle impact.

Response: See Forest Plan, Standards and Guideline section.

Public Comment: Will mitigating grazing damage be effective along streams?

Response: Modification of grazing practices alone are not the complete answer for improving damaged streams. Stream improvement projects and exclosures may be required to effectively improve sections of damaged streams.

Public Comment: Protection of riparian zones is of great importance in stream management.

Response: Standards and Guidelines for water resources and riparian areas of the Plan adequately address this concern.

Public Comment: The opportunity costs of water quality are a burden to the market values.

Response: The opportunity costs of water quality are relative to demand, both local and downstream. The Forest does not feel the opportunity costs of water quality is a burden to market values.

Public Comment: Management should maintain clean, wild and scenic rivers (streams) for recreation and aesthetic purposes.

Response: Rivers such as the Middle Fork of the Salmon River which are designated wild and scenic are maintained for recreation and aesthetic purposes.

Public Comment: Activities producing sediment beyond existing levels should be prohibited.

Response: We disagree. See Plan, IV-13, 2, c.

Public Comment: Reduce sedimentation by protecting the water quality from motorized traffic.

Response: See ORV Standards and Guidelines (Plan, IV-29, d, 2).

Public Comment: Management should classify stream level sediment beyond which a company may not go.

Response: Standard and Guidelines (Plan, IV-13, 2, c) establish a sediment threshold limit.

Public Comment: Do not use computer programs to derive estimates of sediment to be added to water. This is using incomplete data. Streams need to have sediment monitoring systems.

Response: Computer-derived sediment levels will be used in conjunction to actual sediment values established in the field. Standard and Guideline 2, b, (Plan, IV-13), requires that sediment levels be monitored for anadromous fish and important resident fish streams.

Public Comment: Challis National Forest's preferred alternative with the third highest sediment yield raises some questions regarding your commitment to water quality and fisheries resources.

Response: The commitment to water quality is demonstrated in the support given to a progressive water quality monitoring program in the Plan.

Also, specific standards and guidelines are established in the Plan which set sediment threshold limits that may affect earth disturbing activities.

Public Comment: Why did you have outputs for sediment from timber harvest and road maintenance, but none for road construction/reconstruction?

Response: Projected sediment outputs included road construction and reconstruction activities on arterial and collector systems. This explains the higher sediment output projected for alternatives that schedule higher levels of construction/reconstruction of arterial and collector systems.

Public Comment: Why are there four low (55, 57, 58, 59) sediment groups?

Response: These low sediment groups were developed for different geographic areas on the forest but they all used the same value in the FORPLAN model.

✓ Public Comment: Present a sediment model depicting the combined effects of road building, timber, mining, and grazing.

Response: At present, the Forest does not have the capability of modeling sediment associated with grazing activities. Until this happens, the Forest will have a problem in projecting an accurate account of sediment production by model alone.

Public Comment: The Forest should address the concerns expressed for streambank stability and monitor those activities which impact this delicate area.

Response: This has been included (Plan, IV-6, Soil, Water and Air, Goal 2, Objective 1).

Public Comment: The Salmon and Pahsimeroi River drainages should have a stream improvement program to provide benefits in recreation, fishing and fish habitat.

Response: Projects for that portion of the Salmon and Pahsimeroi River drainages on the Forest are included in the Forest Watershed Improvement Needs Inventory (refer to Management Area Direction).

Public Comment: Management should make streambank stability a priority and provide for its protection in the future.

Response: This is consistent with Forest Plan direction.

Public Comment: Protecting air quality should be a major long term management objective and stated as such in the Plan.

Response: A management objective has been added to the Soil, Water, and Air section of the Plan, which addresses the protection of air quality.

Public Comment: Management needs to address impacts to air quality resulting from prescribed burning.

Response: See Plan, IV-9, Goal 3, Objective 4.

Public Comment: Shifting slash disposal from burning on-site to the same volume of use in woodstoves can increase the net air quality impacts for the following reasons: timing of burning is changed to when temperature inversions are more likely, the location to woodstove burning is in concentrated areas, thus becoming a human health concern in addition to being a visibility issue, and finally, these smoke particles are small enough to penetrate deep into the respiratory tract where they might also be carcinogenic.

Response: This issue is outside the scope of the Plan since air quality standards associated to woodstove burning should be established and regulated by the State.

Public Comment: It is requested, in an effort to educate the public, that pamphlets be distributed to discuss the association between woodstoves and air pollution in relation to health concerns, and tips on woodstove operation. These could be distributed when issuing wood permits.

Response: This comment is noted, but is outside the scope of the Plan.

Public Comment: The discussion on page II-135 of the DEIS regarding the effect of alternatives on sediment and water quality is vague.

Response: The discussion (FEIS, II-136) has been modified.

Public Comment: There is inadequate discussion of the effects of mitigation measures. These are frequently used and listed, but there is not thorough discussion of why the measures in fact mitigate against the damage that otherwise would be caused.

Response: A more specific discussion on mitigation measures is not possible because the Plan is not capable of addressing the exact location and schedule of most projects during the planning period. Mitigation measures are determined during an environmental analysis of specific projects.

Public Comment: Protecting soil quality should be a major long-term management objective and stated in the Plan.

Response: Emphasis is placed on soil quality. See Plan, IV-6 Goals and Objectives.

Public Comment: The Plan should present a thorough discussion of hazardous soils and slope conditions.

Response: Hazardous soils (properties other than slope or mass instability) are not specifically identified at this time, due to a lack of detailed soil inventory information on the Forest. See Plan, II-38 or EIS III-40.

Public Comment: When dealing with two watersheds in implementing a management technique, spatial distribution of the sensitive soils should be considered which would dictate different management programs for each drainage using professional judgment.

Response: This statement is correct. The implementation of the Forest's Progressive Soils Inventory, along with detailed soils evaluations on site disturbing activities, will help refine the process.

Public Comment: How is natural soil productivity evaluated for an area and how are changes measured?

Response: Natural soil productivity is the inherent capability of a soil to produce a natural vegetative cover. On rangeland the unit of measure is pounds per acre; on timberland it is based on site index.

A component of the Progressive Soils Inventory is the identification of model soil series sites (as close to the natural state as possible), and determination of their productive potential. Once this information has been obtained, Best Management Practices can be developed through the monitoring of resource activities.

Public Comment: The DEIS contains inadequate information on soils. EIS, III-33, 34 lists the four major soil groups; cites the Forest's objectives, but lists only one source of documentation: Analysis of the Management Situation, August 1982. The reference to other documents is inadequate. The DEIS should contain the criteria and process used to assign "permissible soil loss values" since the Plan gives assurance there will be no irreversible damage to soils.

Response: This section was rewritten (FEIS, III-40).

Public Comment: It is not possible to tell from the DEIS or proposed plan whether soil disturbing activities will take place on highly erodible soils. The statute requires assurance in this area.

Response: The Plan provides that timber harvest is restricted to slopes less than 45 percent. Mass instability areas have been mapped and commercial timber occurring within these delineations removed from the timber base. Best Management Practices will be implemented to prevent soil loss on highly erodible soils. Conducting detailed soil inventories, within project areas, will also assist in identifying highly erodible soils and defining mandatory mitigation measures.

Public Comment: What are Order II vs III soil inventories? Are these done before roading or logging activities?

Response: A detailed Soil Survey (Order II) will be conducted prior to soil disturbing activities such as roading or timber harvest. Definitions are included in the Glossary.

Public Comment: Is soil productivity change due to cattle use accounted for?

Response: The Modified Soil Loss Equation was used to develop sediment yield tables from rangeland impacts. The sediment model mainly displays impacts from timber harvesting and roading activities; grazing impacts, due to the lack of an acceptable methodology, have not been thoroughly displayed. We addressed the issue through monitoring, Best Management Practices and Standards and Guidelines.

Public Comment: Prevent soil compaction due to timber harvest.

Response: A standard or guideline addressing prevention of detrimental compaction has been developed and incorporated into the Soil, Water and Air Standards and Guidelines. See Plan, page IV-22, 5, s.

Public Comment: The Plan fails to analyze dirt bike impact to soils.

Response: See Off-Road Vehicle Standards and Guidelines.

Public Comment: Productivity is lost when erosive or shallow soils are disturbed. It is more cost effective to not develop these sites. Unstable batholith soils are unsuitable for timber harvest.

Response: Mass instability areas were identified and commercial timber stands within these areas were removed from the timber base. Implementation of the Standards and Guidelines, b., c., d., and h. under Soil, Water and Air (see Plan, V-20-21), along with the development of Best Management Practices will help assure that sensitive soils are not disturbed.

Public Comment: The Forest should prohibit timber sales on steep slopes which result in higher risk of erosion and mass failure.

Response: No timber harvest is planned on steep slopes or areas of high risk of mass failure. See Plan, IV-16, g.

Public Comment: "Worst case" scenarios should be presented for proposed timber sales on steep slopes and their impacts on soils in terms of stability.

Response: "Worst case" scenarios are not a requirement for the Forest Plan. They will be used where needed on a site specific project analysis. Timber Standards and Guidelines (Plan, IV-16, g) restrict tractor logging to slopes less than 45 percent.

Public Comment: The DEIS should be revised to include analyses of known mitigation techniques resulting from soil disturbing activities.



Response: The DEIS is not the document to analyze mitigation techniques for soil disturbing activities. These measures will be displayed within each project's Environmental Assessment. The number and type of mitigation technique are dependent on the nature and complexity of the various projects.

Public Comment: The Forest should address the opportunity costs burdened on the market values due to soil values.

Response: If soils information is carefully utilized in the initial planning steps of a project, the burden on opportunity costs would have little or no effect due to the need for less expensive mitigation measures.

Public Comment: The following are suggested measures for reducing opportunity costs: allow for entire drainages to be prescribed at one time to save on the costs; do not allow the sediment constraints to become finalized in the Plan; allow for increased road gradients to 10-15 percent on acceptable soils; use vertical cut banks and allow for some sloughing on permanent road closures and delete the fertilization standards and guidelines.

Response: In drainages where significant timber lands are located, an Environmental Analysis will be done to evaluate cumulative impacts and to identify opportunities to reduce costs. Sediment constraints are needed to protect fish spawning areas and are being retained in the plan. Road gradient and construction standards will be determined on a case-by-case basis. We have no fertilization standards and guidelines.

#### D. TIMBER MANAGEMENT

Public Comment: Why harvest timber in Morgan Creek?

Why harvest timber in Management Area 3?

Why harvest timber in Sawmill Canyon?

Why is there timber management in Furnace Creek?

Harvest timber only around the fringes of the Lemhis, Diamond Peak, Pahsimeroi Mountains, and King Mountain.

The timber program ignores the National Interest, RPA and NFMA.

Response: Both the Multiple Use-Sustained Yield Act of 1960, and the National Forest Management Act of 1976 (NFMA) confirmed the long-standing direction contained in the Organic Act that the National Forests are to be managed for continuous production of timber. These areas have suitable timber lands that can be reasonably harvested and managed for timber on a long term sustained-yield basis in harmony with other resource objectives. The law directs that the sale of timber from each National Forest must be on a sustained-yield basis.

Public Comment: The Forest Service has abandoned multiple use for logging.

Harvest timber only to help other resources.

Harvest timber only to enhance wildlife habitat.

There is a lack of coordination between timber and other resources.

Timber harvesting is shortsighted.

Manage federal lands for all folks, not just timber interests.

Response: The Challis National Forest is managed for all multiple use values. Only 7,000 acres (or less than .3 of 1 percent of the total forest acres) are programmed for harvest during the 10-year planning period. This harvest provides for diversity of age class of conifer stands which is beneficial to wildlife.

Public Comment: Remove the Challis National Forest from the timber base.

Don't reduce the timber harvest. Don't harvest any timber.

Response: Other harvest options were considered in various alternatives but were not selected because they would not meet the local demand for sawtimber products.

Public Comment: Don't subsidize the timber industry with deficit timber sales.

Response: A deficit sale simply indicates that under particular market conditions the costs for the average operator may not allow him to make a profit on the harvesting and processing of the trees included in a particular sale. The sale is offered for competitive bids. Forest Service competitive sale procedures assure that the public receives the market value of the timber.

Public Comment: The Plan and/or the Forest Service over-emphasizes timber. The Challis National Forest is logging at the maximum sustained-yield.

Response: Maximum sustained yield is estimated at 57 million board feet per year. The planned annual harvest for the ten year planning period is only 3 million board feet. The preferred alternative does not over-emphasize timber.

Public Comment: The Lemhis, Pahsimeroi Mountains, Pioneers, King Mountain, Diamond Peak, Boulder/White Clouds, Basin Creek, Borah Peak, Mackay Front, Antelope Creek, and Thompson Creek shouldn't be logged. They have low timber values.

Response: The Forest Plan, which programs timber management for the next ten years, excludes most of these areas of concern except for small acreages in King Mountain, Sawmill Canyon, and Pahsimeroi Mountains. Timber to be harvested in these areas can be harvested economically and in balance with other resources.

Public Comment: Fuelwood values in the Plan are too high.  
The timber values in the Plan are too high.

Response: Fuelwood and timber values were used in determining present net value (PNV). PNV was not a factor in selecting the preferred alternative, it was only used in comparing the alternatives.

Public Comment: Timber harvesting only benefits a few people.  
The Plan and EIS should show what values the timber program creates or enhances.

Timber harvesting is multiple use and serves more people than wilderness.

Response: The communities where the National Forests are located also benefit from timber harvesting. Twenty-five percent of the receipts for the timber sale are returned to the counties where these lands are located to be used for schools and roads. Timber harvest also provides local employment opportunities, creation of healthy, viable vegetative communities, and contributes to local and regional demands for timber products.

A study based on 1972 data showed that timber increased in "value added" nearly 17 times between the stump and delivery of finished timber-based products to final consumers. This means that every \$1 million in National Forest timber sales generates additional economic activity worth \$17 million.

Public Comment: An accelerated timber harvest will lower the costs of roads.  
Timber harvesting results in roads.  
Timber harvesting is a guise for building roads.  
The Forest Service should look at road costs in terms of the needs of other forest resources, and not just the viability of timber sales.  
Previous timber harvesting may have helped elk habitat, but this was offset by the roads.

Response: Roads are charged as a cost against the immediate timber sale. These roads will provide access to later harvest on the sale area and to other timber sales in the vicinity. If their costs were amortized over the total volume of timber to be hauled on them, the "monetary profitability" of the initial sale would be improved. These roads can be managed as open or closed, depending on other resource needs.

Public Comment: The timber industry is on the decline in Idaho and other resources (especially tourism) can offer a better value and replace the losses in the timber industry.

Response: Comment noted.

Public Comment: Recognize the Timber Sale Modification Act of '84 in determining allowable cut.

Response: The Federal Timber Contract Payment Modification Act has no significant impact on the Challis National Forest. Only one sale on the Challis was turned back under this program. This Act does not determine the calculation of allowable harvest levels.

Public Comment: Remove unsuitable timber lands from the timber base. Identify unsuitable timber lands in this Plan. Identify lands unsuitable for timber harvest, but necessary to meet Forest objectives. Identify suitable timber lands in the Plan. The Challis National Forest has little commercial timber so where will the proposed triple harvest come from?

Response: Timber Management Land Classification is displayed in Table IV-2, Page IV-37 of this Plan. Unsuitable lands have been removed from the timber production base through the land suitability screening process. There is no increase in timber during the ten-year planning period.

Public Comment: Plan needs to include a map and/or schedule of the 10-Year Action Plan. The Plan should identify insect and disease infestation areas. The Challis National Forest needs a pest management program.

Response: A schedule of the 10-Year Timber Sale Action Plan is included in the Plan, IV-221. A map showing this great a detail would not be feasible (due to physical limitations) to include in the Plan. Annual aerial surveys identify areas of insect and disease populations and plans are developed from these surveys.

Public Comment: Charge for fuelwood permits.

Response: In most cases the Challis National Forest charges for fuelwood.

Public Comment: In the Management Prescription for the Marsh Creek MA, you say that there are 5175 acres of suitable Douglas-fir timber lands; yet on the Preferred Alternative Map, there are 8175 acres.

Response: There was an error on the map. It has been corrected.

Public Comment: Logging harms wildlife.

Remove the elk habitat areas from the timber base.

The Plan should clearly state that there are trade-offs with wildlife when timber is harvested.

Are there any wildlife improvements in timber?

There is not enough data to show the impacts of logging on wildlife.

Response: In most instances, temporary displacement of some wildlife species during the actual logging operations is offset by the long-term benefit derived from the diversification of the habitat created by logging. Wildlife habitat may also be improved following timber sales using KV funds (Plan, IV-17, q).

The design of many timber sales improves wildlife habitat. The costs of these sales are most often counted against the income from the timber and not against the benefit to wildlife or other resources. Because of concern for other resources, lower volumes are taken from any given area at any one time and smaller areas are harvested within given drainages to help protect wildlife and other resources.

Public Comment: Diversity is a poor reason to justify timber harvesting. Timber harvesting accomplishes age class diversification.

Response: Diversity is but one of many indirect benefits of timber sales. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for recreation and firewood gathering, wildlife habitat improvements, employment, and income from both commodity and non-commodity products.

Public Comment: Timber/logging is secondary to wildlife and fish and/or soil and water.

Response: With proper mitigation, they are not mutually exclusive.

Public Comment: Logging harms streams and/or fish.

Response: With proper mitigation and today's logging practices, sales to be offered will not degrade streams by any significant amount. See Soil, Water and Air Standards and Guidelines a, (Plan, IV-20).

Public Comment: The Challis National Forest has been planting lodgepole pine in Douglas-fir sites. Will you also plant Douglas-fir on lodgepole pine sites or where you have had regeneration failures?

Response: Planting of lodgepole pine as a nurse crop for the eventual natural establishment of Douglas-fir may be practiced on some harsh Douglas-fir sites (Plan, II-23). Sites where regeneration failures of Douglas-fir occurred are being successfully regenerated with lodgepole pine which serves as a nurse crop to aid in establishment of Douglas-fir.

Public Comment: Logging is incompatible with recreation. An aggressive timber program will benefit developed recreation.

Response: Roads constructed for timber sales often provide access for additional recreation opportunities.

Public Comment: Logging impacts are unscenic.

Response: The short term impact of logging may detract from visual quality. Visual quality is a consideration in timber sale analysis preparation.

Public Comment: Logging degrades air quality.

Response: Degradation of air quality is very minimal and of short duration.

Public Comment: On what economic factors is the future triple timber harvest based on?

Response: Projections for increase in timber harvest in future decades was based on potential economic growth of the area and projections of the capability of the commercial timber lands.

Public Comment: The range of alternatives is restrictive in timber output. The timber program creates disincentives for future timber industry development.

Response: The range of alternatives allows for a low of 1 MMBF to a high of 9 MMBF annual harvest in the first decade. This is a reasonable range based on projections for the next 10 years. The Forest Plan is responsive to the public issues of meeting the needs of the local dependent industry. See Plan, IV-5, Timber Goal 1 and Objectives 1 and 2.

Public Comment: Clearcutting is a major concern.

Response: Only a 10 year period is now displayed in the Plan. The long term management allows for more cutting in later decades. Clearcutting is the preferred silviculture treatment for lodgepole pine.

Public Comment: Economics of precommercial thinning should be evaluated.

Response: Precommercial thinning according to the stand development projections does show an increase in growth of the resident stand, which on an increased volume production basis, makes it an economically sound practice on good sites. The acres displayed in the Plan will be thinned by K-V financing (a cooperative fund collected from timber sale receipts).

Public Comment: Why use shelterwood or even-aged management?

Response: The silvics of Douglas-fir require partial shade for natural regeneration. Shelterwood harvest is used in the Plan to demonstrate yields. The silvics of lodgepole pine require openings for natural regeneration. Those openings (clearcut) are created naturally by fire, insects, disease or other catastrophe which result in even-aged stands.

Individual stands will have stand specific silvicultural prescriptions written to utilize the full range of cultural management treatments.

Public Comment: Timber values are too high. Use '85 RPA values for timber. Use the GAO '84 accounting methods for timber values.

Response: The values for timber used were from actual sales data for the 1973-82 period. This data reflects an average of high and lowering timber values. The value used is of little importance with the very low annual harvest level of the preferred alternative. Timber value is only one of many factors used to evaluate alternatives and was not a decision criteria.

Public Comment: Don't log old growth.  
Manage 10% of each drainage for old growth.  
Put more emphasis on old growth.  
Old growth and over-mature timber are not the same thing.

Response: Only 95,916 acres of 792,500 acres of forested land will be managed for timber production. This leaves the balance of 792,500 acres of Forest land primarily in over-mature and/or old growth stands. Distribution of old growth timber is guided by Standards and Guidelines J (Plan, IV-17).

Public Comment: Keep the timber harvest at the status quo.

Response: The Plan maintains present harvest levels during the 10 year planning period.

Public Comment: Logging needs good mitigation and/or monitoring and/or firm guidelines and the Plan should identify those.  
Logging mitigations are a myth.  
The timber program is burdened by mitigation costs.  
Follow Elk Relationships in Central Idaho closely.  
Silvicultural needs are ignored.  
Utilize slash for firewood to improve the air quality.  
Maintain 100 yard buffer strips between cutting unit.  
In Morgan Creek coordinate timber harvest with elk needs.  
Close logging roads after logging is done.  
Avoid logging in riparian areas.  
Don't log along the Salmon River.  
Leave buffer strips around riparian areas.

Response: The Standards and Guidelines for timber harvest on the Challis National Forest were developed by an Interdisciplinary Team and also directed by the National Forest Management Act (NFMA). Many of the above public comments are incorporated into the Standards and Guidelines. Timber Standards and Guidelines start on page IV-16. Other resource Standards and Guidelines further direct timber management.

Public Comment: Follow Fish and Game recommendations when logging.

Response: The Idaho Department of Fish and Game personnel are asked to review and provide input into timber sale activities on a sale by sale basis.

Public Comments: Low logging rate will not protect the Forest from pest infestations. The main value of timber on the Challis National Forest is for cover, soil and watershed. Selective logging is preferable to clear cutting in order to protect soil and water. Coordinate logging roads with mining roads.

Response: Comments noted.

Public Comment: There are too many fuelwood permits.

Response: We disagree. Permits are issued to meet public demand. There is an adequate supply of fuelwood available on the Forest.

Public Comments: Establish a public awareness program on the value of old growth. The timber harvest in Sawmill Canyon can be lived with. Timber data are vague or weak. Timber can be harvested from already roaded areas.

Response: Comments noted.

Public Comments: The Forest is approaching National Park standards, guidelines and objectives. The FORPLAN runs are questionable.

Response: We disagree.

Public Comment: Offer timber sales of short duration in areas where a significant chance of resource conflict exists.

Response: There are no long term (over three years) sales planned on the Challis National Forest.

Public Comment: Timber management is run by mathematics and non-thinking computers instead of professional judgment.

Response: We disagree. Computers and mathematics are simply tools used in the management analysis of resource uses and activities and are invaluable in identifying the most biologically, economically and socially acceptable mix of management opportunities. Professional judgment of an interdisciplinary team is used in the development and selection of silvicultural prescriptions for all management activities.

Public Comment: Lower the standards for logging, raise the allowable skidding gradient; remove more basal area on the first cut.

Response: Gradients in excess of 45% limit the maneuverability of skidding equipment which results in more damage to the residual stand needed for natural regeneration. Removal of more basal area in the shelterwood harvest of Douglas-fir would compromise the ability to naturally regenerate these stands.

Public Comment: Public timber harvest conflicts with private timber harvest.

Response: There is very little private timber land in the surrounding area.

Public Comment: There is an ample supply of timber left in Alternative 3.



Response: We agree.

Public Comment: Don't harvest timber in roadless areas before classification.

Response: No timber harvest is planned in the areas recommended for wilderness and several other roadless areas with high wilderness values. Only part of the 7000 acres programmed for timber harvest during the 10 year planning period extends into the edge of other roadless areas. The unroaded and undeveloped areas will remain virtually unroaded.

Public Comment: Timber management is short-changed in Starhope and Wildhorse.

Response: We disagree. The Plan identifies 3000 acres of suitable lands in management area 11 which includes Starhope and Wildhorse.

Public Comment: Timber is a renewable resource which should be harvested for the shelter and benefit of all.

Response: Timber is a renewable resource which can be harvested where the public benefits outweigh the impacts on other resources, uses and activities. The Plan provides for a level of timber harvest to meet present and projected demand for the next 10 years.

Public Comment: Wilderness proposals eliminate timber harvest which eliminates a potential tax base.

Response: We agree.

Public Comment: The economically attractive lands have all been cut.

Response: We disagree. Our Analysis has identified 95,916 acres of economically feasible lands for timber management of which only part have previously been harvested.

Public Comment: Why is the timber level lower under the constrained budget than under the reduced budget?

Response: To be able to continue the amenity programs at a more viable level and still be able to meet minimal local demand for sawtimber.

Public Comment: What are the cumulative effects of mining, grazing, and logging?

Response: See EIS, Chapter IV-1 through IV-60.

Public Comment: Use fuelwood "production" in timber base.

Response: There are presently two classifications of timber accounted for in the timber base, Live and Dead. Dead volume offerings does not offset the offerings of live timber.

Public Comment: Timber harvest evaluations reflect the mill price of lumber instead of the preparation costs.

Response: Timber preparation costs are included in the analysis.

Public Comment: The Challis Community is not dependent on logging.

Response: We agree; however, the local timber industry adds diversity to the economy, provides a product locally and can be a valuable tool in maintaining health vegetation communities and meeting other resource management objectives.

Public Comment: There are too many fuelwood roads.

Response: To date, less than 8 miles have been constructed for fuelwood access.

Public Comment: The Plan understates the ability of the forest to produce timber.

Response: The EIS shows a wide range of ability to produce timber. Selecting a low output (Alternative 11) now does not preclude the possibility for increased outputs in subsequent planning periods.

## E. RECREATION AND LANDS MANAGEMENT

Public Comment: Roadless areas have intangible benefits.

Response: Appendix C of the EIS, Roadless Area Evaluation, displays tangible, as well as intangible, benefits for all roadless areas on the Forest.

Public Comment: The Challis National Forest should recognize the economic potential of recreation in the state of Idaho, and should manage the lands with the tourist industry as a priority influence.

Response: The Plan provides recreation opportunities to meet the present and expected demand.

Public Comment: Provide more developed recreation.

Response: For the level of visitor use predicted, the Plan will meet the demand.

Public Comment: When will the Knapp Creek Road be closed?

Response: The Knapp Creek Road will be closed when we revise our travel plan.

Public Comment: Change items i and j (Plan, IV-30, II Riparian). In item i, ("Discourage camping along streams, etc..."), change "Discourage" to Restrict". In item j, ("Restrict grazing and trampling by recreational stock, etc..."), strike out "grazing" and "trampling by".

Response: Rather than restrict, or limit, recreational livestock use and camping in riparian areas (even problem areas), forest-wide, we choose to manage area-by-area. If significant resource damage begins to occur in an area, we can prohibit, limit, or take whatever action is necessary, to eliminate the problem, i.e. restrictions on recreational livestock in the Wilderness. We have reworded the statement about recreational livestock. (Plan, IV-32, h and i).

Public Comment: Recreation activities may damage riparian wildlife habitat, and the Plan should address future recreation effects on anadromous fisheries. There was a concern expressed about hunter/hiker pressure on wildlife habitat.

Response: See response above.

Public Comment: Provide an adequate discussion of environmental consequences.

Response: We have adequately discussed environmental consequences in chapter IV of the EIS.

Public Comment: Substantiate the recreation monitoring process, or plan.

Response: We are confident that the program outlined will meet our needs (Plan, V-6-8).

Public Comment: Provide a detailed analysis of the outfitter industry.

Response: A detailed analysis of the outfitter industry is outside the scope of the Plan.

Public Comment: Minimize or eliminate ORV use, specifically dirt bike use.

Response: Off-road vehicle use is a valid use of National Forest land. Restrictions or closures will be applied where unacceptable resource damage occurs. Specific direction is included in ORV standards and guidelines.

Public Comment: Wilderness areas should start at trailheads in order to discourage ORV violations.

Response: Proposed wilderness boundaries in the Pioneer Mountains have been moved to the trailheads to aid administration. ORV restrictions at other trailheads will be considered where conflicts with wilderness use occur.

Public Comment: Leave some roadless areas roadless rather than designate them wilderness.

Response: Currently roadless areas, which are not designated as wilderness areas will remain in an essentially unroaded and undeveloped condition.

Public Comment: The Plan does not show enough recognition of the outfitter and guide industry's needs.

Response: We feel that the outfitter and guide industry has been adequately considered.

Public Comment: The Forest Service should maintain wilderness guard stations.

Response: The Management Plan for the Frank Church--River of No Return Wilderness directs us to evaluate intermittently-used administrative sites, and maintain needed sites in a manner which harmonizes with wilderness environment on the Challis National Forest.

Public Comment: Develop RV dump stations on the Forest.

Response: This is not appropriate for the low level of campground use and dispersed use occurring on the Forest. This service is commercially available in surrounding communities.

Public Comment: Why is there no WFUD multiplier used in IMPLAN?

Response: The high cost of data gathering prohibited determination of a multiplier.

Public Comment: Reduce available WFUD's to reduce animal harassment.

Response: The Forest Service has little control over WFUDS. We only manage habitat.

Public Comment: A drift fence is needed around Iron Bog Research Natural Area.

Response: The fence is planned for construction.

Public Comment: Balance dispersed and developed recreation on the Forest.

Response: Outputs for dispersed and developed recreation in the preferred alternative meet anticipated demands.

Public Comment: There is a need for drinking water and developed sites for Borah climbers. Presently, people are developing their own web of side roads and campsites at Birch Springs.

Response: Development in the Birch Springs area is not presently in our recreation development plans. Direction for Management Area #16 is to monitor use at the trailhead, and evaluate the need for development.

Public Comment: The Water Trough Timber Sale is not a good idea with regards to recreation.

Response: This sale is scheduled to be offered in FY 1987. Prior to this, the sale proposal will be subjected to an environmental assessment. Any issue or concern with its impact on recreation will be fully evaluated.

Public Comment: Dispersed recreation emphasis should be placed in semiprimitive areas.

Response: Dispersed recreation is emphasized on the Forest.

Public Comment: Continue interpretation and maintenance of Custer, the museum, and Yankee Fork Dredge, as examples of Idaho's natural and cultural heritage. Develop a Plan for five years and ten years management. Budget more money for staff and for maintenance. Employ a person year round to oversee the area. Continue Forest Service management to prevent possible commercialization (food and beverage sales) by concessionaires, which would result in loss of character and public appeal.

Response: We will continue to maintain and display Custer, and the dredge, following direction in the Yankee Fork Composite Plan (Plan, IV-76). Reduced Forest Service budgets have made it necessary to seek concessioners to manage these facilities (Plan IV-1). Operation will comply with the management agreement.

Public Comment: Condition of Boulder Creek, Fall Creek, Summit Creek and Kane Creek Trails in the Pioneer Mountains, is deteriorating from overuse and lack of maintenance.

Response: We have strengthened the Standards and Guidelines (Plan, IV-11, b, 2), in the Forest Plan by adding the following: As a minimum keep system trails open, remove significant hazards, and correct conditions resulting in serious resource damage.

Public Comment: The current visual quality (beauty, pristine quality, natural, spectacular, unspoiled condition) of the Forest should be maintained, because of economics associated with recreation and tourism, and future generations' needs. People come to the Forest because of beauty (clean mountains, pristine conditions).

Response: Visual Resource Management is a part of planning and the implementation of any project on the National Forest.

Public Comment: Protect the visual quality of North Lemhi, Boulder/White Clouds, Pioneers, Pahsimeroi, Diamond Peak, King Mountain, Borah Peak.

Response: There are no planned activities that will affect the visual qualities of these areas.

Public Comment: Slash burning may reduce visual quality.

Response: True, but it is short term.

Public Comment: Visual impacts resulting from timber harvests were not discussed.

Response: The effects of timber harvest, as well as other forest uses, are summarized in EIS, IV-4 and IV-5, Table IV-3.

Public Comment: Emphasis on visual resources is too great. So much so that it impacts other resource activities and costs.

Response: Visuals are an integral part of resource management and may constrain or add to the cost of carrying out other uses or activities.

Public Comment: Activities should be mitigated to meet visual resource needs, not prohibited, if conflicts occur.

Response: We agree.

Public Comment: Concern over visual quality eliminates jobs. Timber should not be required to pay the extra cost of timber sales caused by meeting visual quality objectives. The benefiting activities should pay these costs.

Response: Visuals are an integral part of resource management and may constrain or add to the cost of carrying out other uses or activities.

Public Comment: It might be better to designate the Borah Quake Area as a geologic area rather than an RNA, though either would probably be appropriate. Add direction for Borah Earthquake Area in Management Areas 16 and 17.

Support a Borah Quake National Natural Area, and a plan to prepare for anticipated recreation increases there, with visitor information facilities and area guides.

Response: The Forest will recommend the Borah Earthquake area as a Geological Area. An Earthquake Interpretive site is presently being planned for this area. See Plan, IV-137 through 138, Management Direction for Management Area 16.

Public Comment: The Arco Pass Arch should first be designated a geologic area and then evaluated for recommendation as a National Natural Landmark.

Response: The Forest anticipates no activities or projects that could affect the Arco Pass Arch; therefore, no special interest area designation will be pursued at this time. The Forest will consider such designation if the need arises.

Public Comment: The Challis Forest has so many areas of special interest that designation of a few of these as Special Interest Areas would add to the interest and enjoyment of visitors to the Forest. Suggestions:

- a. Landslide area in Management Area 16 (presently used as examples with aerial photos in at least two geologic text books).
- b. The head of Kane Creek and Kane Lake in Management Area 11.

Response: The Forest anticipates no activities or proposals that could affect the landslide area near Carlson Lake; therefore, no Special Interest Area designation will be pursued. The Forest will consider such designation if the need arises.

The headwaters of Kane Creek and Kane Lake will not be considered as a Special Interest Area. These geologic features are within the proposed Pioneer Mountains Wilderness and need no further special designation.

Public Comment: The archaeological and historic properties along the Middle Fork of the Salmon River should be nominated to the National Register of Historic Places in the next two years, as they are clearly eligible. This should be added to page IV-46 in the management prescription of Management Area 1. Section 10 of the National Historic Preservation Act of 1966, as amended, required federal agencies to nominate eligible properties to the National Register of Historic Places.

Response: The Forest Plan recognizes the cultural history of the area as a component of the Wilderness resource and provides for appropriate protection, interpretation, and additional research. See Frank Church--River of No Return Wilderness Plan. The Forest Plan, IV-49, A03 contains additional management direction.

Public Comment: The statement, page IV-33, that "other historic sites will be allowed to deteriorate naturally and prehistoric sites would receive no special protection except on an emergency basis" needs to be clarified so it will indicate sites not eligible for the National Register will be allowed to deteriorate naturally. Otherwise, you will need to seek the comments of the Advisory Council on Historic Preservation (following Section 106 of the National Historic Preservation Act of 1966) because this policy would be considered an adverse effect (see CFR 800) on National Register properties.

Response: The Forest will continue to pursue the option of managing significant historic VIS sites (i.e., Custer, Bonanza, and the Yankee Fork Gold Dredge) through Memorandums of Understanding with the State Historic Preservation Officer, the Forest Service, and interested concessionaire-type organizations or companies. Other non-significant (sites not eligible for inclusion on the National Register of Historic Places) sites and some significant historic sites may be allowed to deteriorate naturally. Prehistoric sites will be avoided, but otherwise would receive no special protection/mitigation, except as the need becomes apparent. In cases where significant sites are adversely affected through neglect or adverse effects are expected, the Forest will seek comments from the Advisory Council on Historic Preservation (following section 106 of the National Historic Preservation Act of 1966). See Plan, IV-34, d. Cultural Resources for revised statement.



## F. ROADS AND OFF-ROAD VEHICLE MANAGEMENT

Public Comment: Future road building should be prevented.

Response: Road building in wilderness areas is prohibited. Roads may be constructed in areas designated for multiple use management as required to support resource management needs.

Public Comment: Restore lands to their original condition by rehabilitating roaded areas.

Response: See Plan, IV-29, c Road Management 4-6.

Public Comment: Maintain and enforce seasonal or year-long closures where appropriate. Enforce Road Management Plan; close old roads and seed as needed.

Response: Plan IV-29 c, Road Management 2,4,5,6 and Plan IV-12, Off-Road Vehicles, 3 addresses the Forest's direction concerning road management which includes temporary and permanent closure as options.

Public Comment: Roads open up wilderness areas, exploit the land, and open wildlife habitat areas to the masses.

Response: Roads are not constructed, operated or maintained to "exploit the land and wildlife", etc., but to provide access for users and managers of National Forest System Lands. The National Forests belong to the masses.

Public Comment: Although by comparison the actual number of miles of new road on the Challis under the preferred alternative appears small, the impact of construction and reconstruction would be, as suspected, very large.

Response: We disagree. The impacts of constructing the numbers of miles or road identified in the Plan are very small. A road constructed on a 30% or less sideslope creates an earth disturbance 22 feet or less wide; this translated into 2.7 acres per mile. The planned construction of 3.0 miles per year would disturb a total of 8 acres.

Public Comment: Pristine forested areas outweigh any so-called economic benefits of road building. Such road building to reach the scattered, low profitable lumber is economically prohibitive. Also, "deficit road building" is opposed.

Response: "Deficit road building" will not be required to harvest the level of timber identified in the Plan.

Public Comment: How are funds generated to maintain roads?

Response: Road maintenance funds come from the Federal Highway Trust Fund which is appropriated by Congress, and partially financed from gas taxes. Additional road maintenance funds come from shared maintenance agreements with special users such as timber operators, miners, commercial haulers, etc., paying a share commensurate with their use.

Public Comment: Roads will hasten the loss of fishing, hunting, recreation, aesthetics, water quality, soil quality, habitat quality, riparian areas, watershed, wildlife security areas, vulnerability of T&E species, salmon/steelhead resources, sediment production and its impact to fisheries and gray wolves and their prey.

Response: The resource values listed are considered in the Environmental Analysis preceding any design or construction of a new road.

Public Comment: Protect the Salmon River drainage by prohibiting future road construction for timber, mining, etc.

Response: The small amount of planned road construction for timber harvest in these drainages will not create a significant enough impact to warrant prohibition. The Forest Service does not have the authority to prohibit road construction needed for valid mining operations. Any road construction in these drainages will be done with full consideration of water quality.

Public Comment: Leave the access to Kent and Ryan Peaks in the Boulder Mountains, in its primitive state or else this beautiful area will open up to the "Winnebago" masses.

Response: There are no plans to build roads into the Kent Peak or Ryan Peak areas. This area is recommended for wilderness.

Public Comment: Road development in the unsuitable timber-producing areas of Basin Creek, Thompson Creek, Pioneer Mountains, Borah Peak, Mackay Front, North Lemhi and Antelope Creek would be unprofitable and environmentally damaging.

Response: Roads will not be constructed into these areas if they are unprofitable and/or environmentally damaging. There are suitable timber-producing lands in these areas.

Public Comment: Protect White Clouds, Diamond Peak area, Lost River Range, Bellas Lakes and Broad Canyon from road building.

Response: Part of these areas are in proposed wilderness areas and will be protected from roading. The amount of road in the other areas is very small.

Public Comment: Disagree with the Plan's assertion that to accommodate dirt bike traffic, areas in the Pioneers will not be designated as wilderness.

Response: The Plan does not make this assertion; however, bikers represent a legitimate sector of the public and an effort is being made to accommodate their needs and recreational desires. The highest quality area of the Pioneer Mountains is recommended for wilderness.

Public Comment: The Challis National Forest should permanently close and rehabilitate the washed-out road from Wildhorse Creek up to the proposed Wilderness at Fall Creek.

Response: The trailhead in Fall Creek is scheduled for relocation and rehabilitation. The road will not go beyond the trailhead. The proposed wilderness boundary has been moved to the trailhead.

Public Comment: Since the Plan does not show location of the sale or the proposed roads in the Buck Canyon areas, it cannot be supported.

Response: Proposed road locations are project specific details and are not included in the Forest Plan. This information is available to the public at the District Office in Mackay, or the Supervisor's Office in Challis.

Public Comment: Rooding plans should be included in the Management Area Section of the Plan. The road miles planned in the Preferred Alternative map is very vague.

Response: Specific rooding plans are not available at this time. The miles planned for the preferred alternative are estimates. The actual miles may vary as the specific timber sale activities are refined. Specific project plans are outside the scope of the Forest Plan.

Public Comment: Low quality, high sediment producing fire roads can be hurriedly bulldozed into roadless areas, which once cut, cannot be or simply aren't closed to traffic. Therefore, you should identify intended methods of fire suppression and indicate for each management area, where bulldozers will and will not be used in the control of fires.

Response: As a matter of policy, fire lines and fire roads are closed, scarified, water-barred and seeded immediately after the fire is declared controlled. Intended methods of fire protection cannot be identified until an "Escaped Fire Situation Analysis" is completed, which is an analysis of what potential a given fire has considering the existing fuel types, fuel moisture, present and predicted weather conditions and the terrain conditions. After the prediction of the fire behavior is made, then an analysis is done to determine suppression strategies, which could be any or a combination of several strategies which include 'confinement', 'containment', or 'control'. Considerations in determining suppression strategies include environmental issues, economics, availability of fire-fighting resources, the resource and property values at stake. Considering all the parameters involved in this process, it would be impossible to write a scenario for each area on the Forest where fire might occur. There are just too many variables to consider.

Public Comment: In the Plan, IV-10, 11. Facilities, Goal 2, Objective 3, change statement to read "construction of new roads will be to standard necessary to service identified needs and protect resources, with emphasis on water quality".

Response: Additional wording is not required. Water quality is always an issue during the project Environmental Analysis process whenever it applies.

Public Comment: In the Plan IV-28, c. Road Management, 7, change statement to read "Do not allow sidecast of eroded materials from road construction or maintenance to enter a stream channel".

Response: Inserting the word 'eroded' makes the meaning of the sentence less clear.

Public Comment: Plan, IV-29, the road construction guideline regarding design speed should be reworded to eliminate "compromise". The design speed will be determined by the speed the terrain will permit within the necessary environmental constraints.

Response: The wording was changed.

Public Comment: Road and site restoration costs and road maintenance through the next rotation associated with logging should be presented more clearly.

Response: These are project specific issues, which are not addressed in the Plan. These activities are governed by the Standards and Guidelines (Chapter IV).

Public Comment: Stable and unstable soils are said to be highly intermingled. How is this dealt with relative to logging and road building?

Response: The more unstable soils are avoided as much as possible for timber harvest and road building. Soils inventories and classifications are done on each road and timber project. If a road is located through an area of poor soils, then better soils are imported for surfacing to reduce soil losses through erosion, wear and weathering. (See Plan, IV-20, 5 Soil, Water and Air, b & h.)

Public Comment: Are soil inventories done before roading is started?

Response: Yes.

Public Comment: Challis National Forest should implement corrective actions from past road failures to enhance anadromous fish habitat.

Response: The effects of past road construction and maintenance activities on anadromous fishery habitat is a priority concern on the Forest. One of the purposes of the road reconstruction program is to make road improvements such as more stable surfacing and improved drainage in order to protect and improve fishery habitat.

Public Comment: The Plan states that no roads will be designed without an approved EA or EIS but that exceptions will be made by the Forest Supervisor. What, specifically will be the standards for making exceptions? How can the public evaluate the reasonableness of even this road construction program without knowing where they will be built and on what soils and slope?

Response: Reference to exceptions to the Environmental Analysis process being made by the Forest Supervisor has been deleted (see Plan, IV-29, c. Road Management 3).

Public Comment: Special road construction location and limitations on the quantity allowed in any one year cause development cost and amortization periods to become astronomical in addition to the opportunity costs burdened on mining and timber due to these limitations.

Response: The miles shown are estimates of miles needed for timber sales, these are not limitations. Actual miles may vary. There are not any estimates in the Plan for miles of new road construction for mining.

Public Comment: Road location constraints reduce timber outputs and income.

Response: This is true. Without constraints significant environmental damage can and has occurred.

Public Comment: Road costs identified for the max timber run of \$220/MCF (\$49/MBF) new construction are related on a 8 MBF/acre and .02 miles/acre harvested for new construction cost of \$19,600/mile. The 9 MBF/acre and .02 miles/acre harvested are assumptions. However, this cost per mile is for local roads which should be low standard. Obviously, past construction has not been to these low standard specifications, or has failed to locate the road in the least costly locations. Reconstruction costs of \$54/MCF (\$12/MBF) accelerate this overall cost to cause the "below cost" issue to raise its head again. Road costs could be drastically reduced if you would: Reinstigate flag line road location, Fully implement low standard road specifications, Implement permanent road closures following timber sale activity, Reduce the clearing limits to minimums, Use natural vegetation stabilization, Reduce road widths, Allow for increased road grades, Waterbar and outslope roads, Use vertical cut banks, Use road closures, Augment timber sale roads which are built to accommodate other uses, Insure all users of roads maintain the roads, Delete the fertilization standards and guidelines.

Response: Many of the suggestions are already being used. These suggestions for reducing road costs will be considered in the future timber sales and road construction planning. Some of the recommendations may be used and some may not depending on the circumstances at each site. The Plan does not include fertilization standards and guidelines.

Public Comment: Roads and trails should be maintained.

Response: We agree.

Public Comment: Challis National Forest should build more roads to make areas, including wilderness, more accessible to those unable to hike into such areas.

Response: The Plan calls for reconstruction of approximately 120 miles of road. Much of this involves roads that accesses the wilderness such as the Sleeping Deer Road and the Beaver-Loon road. The only roads planned for construction are associated with timber sales or fuelwood harvest. Some of these may be left open if there is a specific public need. Any new roads associated with mining will normally be closed to the public.

Public Comment: The Forest Service's intention to coordinate mineral with timber transportation in an effort to minimize road impacts is supported.

Response: Comment noted.

Public Comment: Recreation areas should have designated rights-of-way of sufficient width to allow bridge replacement, roadway widening, or elimination of safety hazards such as bad curves. Roadway improvements within a defined corridor designated for highway use do not require a "4(f) determination".

Response: There are no 'designated rights-of-way' for Forest roads within National Forest lands.

Public Comment: In the Plan IV-29, Road Management, 2, include provision of quality hunting as a reason for seasonal road closures.

Response: Roads will be closed where quality hunting is a management goal.

Public Comment: The final EIS and Plan should identify and separate dispersed recreation areas according to motorized and non-motorized use. This is because certain trails must be identified for upgrading. The trails must be designed for motorized use, that is: hardened, regraded and recontoured to prevent soil erosion. Dedicated State funds are available for this purpose.

Response: We do not plan to separate motorized or non-motorized trail use in all areas. Wilderness, proposed wilderness, areas managed for a non-motorized recreation experience and other areas closed in the Forest Travel Plan are closed to motorized vehicles. A few trails are being constructed or upgraded for motorized use with state funds. However, most trails are general purpose trails open to all uses. Trail maintenance funds are not large enough for trail hardening.

Public Comment: The statement that all roads will be closed for which there is no "present or foreseeable use" is clearly inadequate. It provides no specificity that can be measured or evaluated.

Response: See revision in Plan IV-29, c, 4.

Public Comment: Instead of reviewing management alternatives, including closure, if roads fall below the lowest acceptable level of maintenance, such road in disrepair should be closed first and then alternatives reviewed which could include reopening the road under acceptable standards.

Response: Road closure decisions are made as a result of a number of management concerns, including disrepair.

Public Comment: Certain roads should be maintained exclusively for logging as suggested by IDF&G. This provides secure areas for wildlife, reduced erosion from traffic and also does not allow the expansive road system to be justified by tourist use when there is no need for this activity.

Response: A decision to build new roads is based on the management objectives for a given area. In most cases this results in a "single use" road such as for timber or minerals. In other instances, the road is needed for a variety of uses in combination such as minerals, timber and firewood gathering. Tourist use is a legitimate road use.

Public Comment: Road closures should be better enforced.

Response: Stronger Standards and Guidelines have been included in the Plan which are intended to provide better enforcement of road closures and off-road use violations.

Public Comment: Semiprimitive motorized designation offers the best balance for all concerned.

Response: The Plan provides for a mix that best meets the needs of the public.

Public Comment: Challis National Forest needs a stronger commitment to road management.

Response: The Plan carries a stronger commitment to road management than has been practiced in the past. This includes higher budget requests for road maintenance and a commitment to a program for road closures.

Public Comment: Challis National Forest should consider Roadless Management as this will ensure recreation growth and hold down deficit timber sales.

Response: In several management areas, the direction is to maintain the unroaded and undeveloped character of the area.

Public Comment: If roads must be built, listen to the recommendations of the Fish and Game Department and propose reference to their suggestions in the Plan.

Response: Part of the Environmental Analysis process for evaluation of proposals for new road construction is solicitation of public issues and concerns to the proposal. The concerns of the Fish and Game will be considered, along with any other concerns of the public or other agencies.

Public Comment: The best goal for access management on the Challis National Forest should be no increase in open-road density as proposed by Idaho Dept. of Fish and Game.

Response: This goal would be inconsistent with other management goals in the Plan.

Public Comment: Add to Plan IV-4, goal 6 which states "Develop and implement a cooperative road management program to protect and/or improve fish and wildlife habitat and to maintain non-motorized WFUD opportunity". Maybe this should be in Plan, IV-10-11, Facilities, Goal 4.

Response: The concern is covered under Plan, IV-10 Goal 2, Objective 6.

Public Comment: Idaho Dept. of Fish and Game strongly supports, and will actively cooperate in implementing Plan, IV-29, c., 6 on road closures.

Response: Comment noted.

Public Comment: Idaho Dept. of Fish and Game recommends Challis National Forest specify how they will resolve vehicle/wildlife conflicts. The Plan IV-169 states more access will be created for fuelwood gathering. Will there be seasonal restrictions? Access management as it relates to big game harvest is a major concern of Idaho Dept. of Fish and Game.

Response: The design criteria and environmental constraints for new roads for fuelwood access will be developed through the E.A. process.

Public Comment: Best Management Practices for high hazard lands require very expensive road construction in order to reduce mass failure risks. There is a concern that in the past many Forest Service roads have not been built to appropriate standards. If during period of budget restrictions, poor roads are constructed on unstable soils, the mass failure risk will be greatly increased.

Response: We agree.

Public Comment: Budget enough money to hire enough enforcement officers to police road closures.

Response: A more aggressive policing of road closures is planned through a more thorough training program for present employees involved in other activities.

Public Comment: Budget enough money to implement a public education program to explain the reasons for road closures, and to announce their locations and time periods.

Response: See Plan, IV-29, c., 6.

Public Comment: Establish a system that assumes that all roads are closed, unless they are posted "open". This system discourages vandalism of closure signs, and is much more enforceable than the posting of "closed" signs. It has proved effective in eastern Oregon.

Response: The Challis National Forest is not heavily roaded; therefore, we have few road closures. Signing open roads would greatly increase our signing cost. Our present policy is compatible with the four adjacent Forests.

Public Comment: Build roads for single purpose use and never open it for general public use unless a need is demonstrated.

Response: Some roads are built for a single purpose use and not open to the public. Examples are some mining roads, some timber roads, and some special use roads. The determination of what a road is to be used for, is the result of a project environmental analysis.

Public Comment: Institute area closures where necessary and make them year-around and permanent.

Response: See Plan, IV-29, c., 4.



Public Comment: Employ seasonal closures during times of soft roadbeds, elk calving, hunting season, etc., to provide security for big game.

Response: See Plan, IV-29, c., 4.

Public Comment: ORVs not staying on designated trails are the ones who spoil the sport for their colleagues and create the demand or wish to ban vehicles from pristine lands. Flagrant disregard for signs posted "No Motorized Vehicles Beyond This Point" has been observed.

Response: The Plan provides direction to enforce ORV closures.

Public Comment: The Plan fails to analyze adequately the potential impacts of dirt bike use on wildlife populations, soil and fisheries in the Pioneer Mountain area and elsewhere. In general, motorized vehicles create adverse impacts including damage of resources, degradation of ecosystems, damage to watershed, fish habitat, trails and disturbance of wildlife. They are noisy and smelly, they ravage and roar, impact other users, and detract from solitude. They leave oil traces, deep tracks in wet areas, cause erosion and visual impacts. If more roads are made into the Challis National Forest, more and more bikes, etc., will be ruining these roads and scaring wildlife. Give more importance to riparian quality than to motorized use. Motorized use is incongruous with wilderness character.

Response: ORV use is a valid use of Forest lands. The Forest has developed standards and guidelines for ORV use, Road Closures, and Riparian areas. See Chapter IV of the Forest Plan.

Public Comment: "The most damage is expected under Alternative 2 since it makes the most area available for ORV use". What facts is this statement based on?

Response: This alternative maximizes commodity resources, and developed (motorized) recreation over dispersed recreation resulting in more potential roading and subsequent resource damage.

Public Comment: We question the DEIS assumption that if you make more land available to ORV use, you will have an increase in ORV use. Good areas for motorized users are becoming hard to find.

Response: ORV use depends more on the quality of the land and trails than the acreage. ORV trail users seem to want the same type of back country experience as backpackers and horsepackers. Where the Forest has trails into quality back country, they are heavily used.

Public Comment: What are the RVDs due to ORVs since enactment of the 1964 Wilderness Act?

Response: This information is not available.

Public Comment: Mgmt. Area 16 - Management directions A01, A02 and B01 need to be implemented soon, as a number of wheel tracks are beginning to appear on the open slope faces of the Lost River Range. In late September, I noticed this was beginning to be a particular problem near the earthquake scarp.

Response: Comment noted.

Public Comment: For Dry Creek and Long Lost Creek, we strongly support A12. The trailhead should be at the old Dry Creek dam. However, closing the Dry Creek jeep road to ORVs also means closing the Long Lost Creek jeep road too, doesn't it?

Response: The Long Lost and Dry Creek jeep trail will be closed to motorized vehicles. Both drainages are within the proposed wilderness.

Public Comment: Land designations vs. user percentages do not reflect an equitable balance (31% of public lands have been set apart for the exclusive use of only 6% of the users; only about 39% of the trails in the Challis National Forest are open to ORVs).

Response: The mix of wilderness vs. non-wilderness areas, and open vs. closed areas, is appropriate to meet present demand.

Public Comment: ORVs require far more miles of trail on a per capita basis.

Response: Comment noted. Large areas have been designated open to ORV travel in the Forest Travel Plan.

Public Comment: Portions of the proposed Pioneer Wilderness would prohibit loop access for several of the fine trails which have been built using Idaho State ORV funds on your Mackay District in the Copper Basin Area.

Response: No Idaho State ORV funds have been spent on trails within the proposed Pioneer Wilderness. We recognize that this Wilderness proposal will limit where these funds can be spent in the future.

Public Comment: Roadless protection is inferior to wilderness as it fails to protect from ORV intrusions. There are very many more miles of dirt road open to motorcycles in the Challis National Forest than there are trails for non-motorized travel.

Response: Wilderness designation does eliminate ORV use; roadless management does not. Roads do not meet the needs and desires of many trail bike users.

Public Comment: ORV trails are substantially more expensive to construct and maintain than horsepacking or hiking trails. ORV trails are more damaging to other resources than horsepacking or hiking trails. Motorized vehicles create adverse impacts including dust and degradation, particularly from early season use in wet meadows.

Response: Comments noted.

Public Comment: Bellas Gulch, Broad Canyon and Bear Canyon Trails are already built. They should be nonmotorized to provide easy access for wilderness users who only day hike.

Response: Bellas Canyon, Broad Canyon and Bear Canyon Trails are all within the Pioneer Mountain Proposed Wilderness and will be closed to motorized vehicles.

Public Comment: Protect Arrowhead, Angel, Goat, Bellas, Boulder, Iron Bog, Golden, Big, Rough and Long Lakes.

Response: Arrowhead, Angel, Goat, Bellas and the Boulder Lakes are within the Pioneer Mtn. Proposed Wilderness and will be closed to motorized vehicles. Iron Bog Lake is not in the proposed wilderness, but the trail to the lake is quite primitive and is presently closed to ORV use. Golden, Big, Rough and Long Lakes are within the Lake Creek drainage. The trail to Lake Creek has been totally reconstructed for trailbike use, and will be managed for their use.

Public Comment: Within the Boulder/White Cloud area protect Herd Peak, Jerry Peak, Bowery Peak, Hunter Creek Summit, Meridian Peak, Sheep Mountain, Pass Creek, Herd Creek and Lakes Basin.

Response: All of these areas except Lakes Basin are within the Boulder/White Cloud Proposed Wilderness or are within areas closed to motorized vehicles.

## G. FIRE MANAGEMENT

Public Comment: Fighting fires in essentially roadless areas with no timber values is not cost-beneficial and cannot be justified.

Response: Timber is not the only value at stake when fighting wildfires. Life, property, watershed values, wildlife values and the threat of the fire becoming a major conflagration are all major concerns for any wildfire. A fire may be: allowed to burn where natural barriers would contain it; confined to a general area with minimal suppression and monitored; or controlled. It may also be allowed to burn within prescription if it is in an area covered by a Fire Management Action Plan.

Public Comment: Past fire suppression policies have led to the present insect and disease infestations, by not letting fire remove susceptible and diseased stands.

Response: There is a relationship between fires and insect and disease, but allowing all wildfires to burn would not eliminate insects or disease.

Public Comment: The Forest needs to burn 10-20 thousand acres a year instead of the planned 1000 acres to correct past abuses created by suppression activities. Hence the need to eliminate some livestock grazing and plan for a reduction in AUMs.

Response: As fire area management planning continues, more areas will be designated to receive limited suppression action for wildfires. One of the issues to be considered in fire area management planning will be range conditions and fuel conditions.

Public Comment: The Forest should explain in detail how they plan to manage wildfires and escaped controlled burns with methods of suppression.

Response: This is based on escaped fire analysis for each fire.

Public Comment: When rehabilitating burned areas, seeding mixtures should benefit wildlife.

Response: This is one of the goals the rehabilitation planning team considers.

Public Comment: We support the Forest's intention to develop plans for the use of naturally prescribed fire in the Frank Church--River Of No Return Wilderness. We strongly urge the Forest to provide for the use of "man-ignited prescribed fire" where necessary to maintain ecosystems.

Response: The Fire Management Plan for the Frank Church--River of No Return Wilderness has been completed and approved. It contains these provisions.

Public Comment: We support the Forest program to implement "let burn" policies and agree that natural processes will play the most important roles in affecting forest diversity over time.

Response: The Forest Service does not have a "let burn" policy per se; all fires receive an appropriate response. However, this could be monitoring the fire to verify that it is burning within the planned prescription, established in the Area Fire Management Action Plan. Currently the only action plan that has been developed is for the Frank Church--River of No Return Wilderness.

Public Comment: Forest fires are handled in a casual manner in the DEIS. The potential for a very large and costly fire exists. We submit that fire suppression costs, and the loss of the timber resources to fire, is completely unacceptable, when a strong timber management program can drastically reduce the risk of fire while providing our nation with its demand for wood products.

Response: The preferred alternative does not have what is considered a strong timber management program. The most significant issue here is that the merchantable timber on this Forest is located in areas of very low historic fire occurrences. Therefore, fuels reduction is not a legitimate reason for intensive timber management on this Forest.

Public Comment: The claims shown in the DEIS, of fire control, should be substantiated.

Response: Estimates of fire effects, fire control and suppression costs are based on "Level II Fire Planning", which is a program used throughout the Forest Service for making these projections.

Public Comment: The DEIS does not provide for fire policies tailored for the individual alternatives. The concept that four very general plans can cover all the alternatives is not realistic. In each case, the plan is to put out all fires as quickly as possible, regardless of whether the cause is by man or of natural origin.

A fire policy which merely seeks to minimize the size of the burned area is no policy at all. It will only meet the objective of utilizing the funds available for fire suppression.

Response: The Plan does not require all fires to be put out as quickly as possible. It requires a suppression action which is cost effective and protects life and property. The suppression action could include any one of a number of responses (confinement, containment, control or monitoring). See Plan IV-8, Goal 2. As far as the policies are concerned, they are the same for all alternatives. The cost effectiveness and ability to detect and respond are the variables.

## H. MINERALS MANAGEMENT

Public Comment: The draft EIS favors the minerals industry over wilderness and/or other non-commodity resources.

Response: By law, exploration and development of minerals is a "statutory right" rather than an opportunity such as grazing or timber harvest, and so it is treated differently than other resource values. It is not the intent of the Challis National Forest to "favor" minerals over other resources.

Public Comment: Anadromous fish, wildlife and freshwater habitat (riparian areas) must be protected and given priority over mineral activity.

Response: See Plan, IV-7, Minerals, Goal 2.

Public Comment: Require complete bonding and reclamation. Take action to stop noncompliance. Require removal and safe disposal of hazardous wastes resulting from mineral activity.

Response: Wording in the Plan has been changed. Plan, IV-7, Goal 2, Objective 3 addresses this issue.

Public Comment: Mining operations are generally short-term economic ventures or outright get-rich-quick schemes that seldom benefit future generations or the long term economic potential of the state or nation. Tourism and recreation, which depends on unspoiled wildlands and wildlife habitat, will ultimately provide economic stability for Idaho.

Response: Comment noted.

Public Comment: Ban all mineral activity on all current proposed and/or potential wilderness areas; ban all forms of mineral activities on the Forest, and ban extensive oil and gas exploration activities in areas with marginal or low potential capabilities. Keep mineral activities at current levels.

Response: Banning minerals activities or controlling the level of mineral activities is outside the authority of the Forest Service. Only Congress can ban mineral activity since it is a right granted by the 1872 Mining Law. The Forest will recommend that the BLM not issue new leases within the proposed wilderness areas.

Public Comment: There is no apparent conflict between mineral exploration activities and establishing designated Wilderness or managing an area as wilderness. In a national emergency, Congress could allow development of strategic minerals in proposed or established Wilderness.

Response: Comment noted.

Public Comment: The DEIS provides no rationale for not conducting coordination efforts between proposed mining activities and other resources, especially fisheries, wildlife, soil and water.

Response: Coordination of mining activities with other resource concerns is done through the NEPA (Environmental Analysis) process, on every proposal.

Public Comment: Contradiction exists between maintaining water quality, fishery habitat and riparian habitat and allowing proposed or potential mineral activities.

Response: These are not mutually exclusive activities and goals. We can have both. Minerals are to be developed in environmentally acceptable ways and in concert with other resources. (see Plan, IV-6, 7 Minerals.)

Public Comment: The DEIS also suggests that these resources are to be sacrificed in favor of minerals in Star Hope and Wildhorse Creeks.

Response: Plan, IV-111 states that because of the mineral values in these areas the potential exists that investments made in surface resources may be lost or the value of the investment may be reduced if mineral development occurs. This is intended as a caution that investments may be more cost effective in other locations.

Public Comment: There is a concern that sediment production and potential impacts to spawning gravels result from minerals activities. The DEIS needs to explain how anadromous fisheries and minerals benefits could both increase together when past history has shown the opposite.

Response: The Forest shares this concern. The most significant issue for any Environmental Assessment process in response to mineral activity proposals in anadromous fishery watersheds is water quality. Approval of such proposals is contingent on mitigation and/or prevention of siltation of spawning gravels. The mineral regulations (36 CFR 228, published in 1974) provide a framework for the Forest Service to ensure better protection of surface resources from degradation by mining activities that was not available before. The Standards and Guidelines in the Plan were developed to safeguard anadromous fish. (see Standards and Guidelines, Chapter IV, Minerals, Soil and Water, and Wildlife).

Public Comment: Scars from mining activities (open-pit mines, dumps, exploration roads, etc.) are not recreationally or visually pleasing. Access roads to pristine areas are overused by the mining interests which contribute to unsafe conditions.

Response: The Forest Service is also sensitive to visual scars left from mining activities. Every reasonable effort is made to minimize and mitigate these impacts in any new proposed mining activities (See Plan, IV-22, 6 minerals, d, 1-5). The Forest is not aware of situations where excessive mining traffic is creating a safety problem.

Public Comment: Political and industry pressures force the Forest Service to sell off entire ecosystems to mineral interests.

Response: The Forest Service, by law, responds to industry proposals to explore for and extract minerals on National Forest System Lands. Through the interdisciplinary Environmental Analysis process, the surface resources are protected as much as possible.

Public Comment: DEIS intentionally attempts to eliminate or reduce commodity (minerals) outputs and jobs by (1) proposing additional wilderness, and (2), by proposing more restrictions and costly mitigation measures.

Response: The areas proposed for new wilderness designation have very few acres with high mineral potential. There was no attempt to reduce mineral outputs and jobs. The Forest Service is committed to a Multiple Use management. There are no proposed restrictions and mitigation measures in the Plan that are any more restrictive than are currently being used. The restriction and mitigation measures the Forest will impose on a given mining activity are for the protection of the environment, and in keeping with the minerals laws and regulations.

Public Comment: Minerals, oil and gas exploration and development activities are needed to promote industry and jobs in Idaho.

Response: Comment noted.

Public Comment: Maps are needed showing known locatable resources with acres of high, medium and low potential available under various management criteria. The Plan also lacks tables and specificity on acreage with potential and possible operating restrictions. Summarize recent and on-going mineral projects, including any past "accidents" on the Forest. This summary should include: 1) a brief synopsis of mining history, 2) an economic breakdown of mining activities, and 3), a list of presently exploited minerals.

Response: Claim maps showing the locations of all recorded mining claims on the Forest and mineral potential maps are available for viewing in the Forest Supervisor's Office in Challis. A general map and table showing locatable mineral potential have been added (EIS, III-31-32 and Plan, II-29-30). FEIS, IV-23, Table IV-10 shows general levels of restriction by potential for oil and gas. Specific operating restrictions are determined at the time a Notice Of Intent for a mining activity is submitted. Restrictions for small mining activities are contained in the Forest-wide Small Mining Environmental Assessment which is on file in any Challis Forest Office. The current situation is included in Chapter II of the Plan. 1) A brief synopsis of mining history is shown in Plan II-26 and 27. 2) The Forest Service does not keep track of the economics of mining. The U.S. Bureau of Mines does have some production records for mining activities. 3) A list of minerals that are being mined or have been mined on the Forest is on page II-26 of the Plan.

Public Comment: Industry approves of the Forest's effort to include energy and minerals in the planning process; however, the method used is misguided and inaccurate, thereby constraining possible mineral activities. Industry also supports intention to coordinate transportation needs (roads) for both minerals and timber to minimize road construction related impacts.



Response: The comment about the method used refers to the \$ 1.00 per acre value for oil and gas leasing, which is the current amount returned to the treasury for lands leased for oil and gas exploration. This is the best value available under the current conditions. To date, there has been no drilling activity on any lands leased on the Challis National Forest for oil and gas exploration. For the foreseeable future, it must be assumed that the only value of the leases is the \$ 1.00 per acre per year. If, by the next round of planning, there is activity on these leases, then the values will be modified to reflect the activities taking place at that time. These values are used in estimating the PNV (present net value) for each of the alternatives considered in the Plan. The PNV was not the basis for selection of the preferred alternative but a common base to compare alternatives.

Public Comment: The DEIS does not adequately address overall or cumulative impacts of all the land disturbing activities within the Columbia River Basin, especially as those impacts relate to anadromous fisheries habitat and production.

Response: This is outside the scope of the Challis National Forest Plan.

Public Comment: FORPLAN does not allow for trade-off analysis, in terms of minerals, as required by NEPA and NFMA.

Response: The Draft Environmental Impact Statement process is a "trade-off analysis". FORPLAN is one of the tools used in the process.

Public Comment: The Forest must assess the impacts of prescriptions on subsurface resources and associated activities, as well as determining what the best and highest use of an area is, and should consider waiving certain stipulations if it is demonstrated that certain mineral operations can be conducted in such a way which would eliminate the need for such restrictions.

Response: This is accomplished through site specific Environmental Analysis at the time that activity is proposed on a given lease. However, when a lease is applied for, there is no way of telling what kind of operation will be proposed, if any. Therefore, the Forest will recommend the stipulations that fit the conditions that are apparent at that time.

Public Comment: The plan goes into detail outlining the mandates of the 1872 mining law, but does not outline the mandates of the Clean Air Act, the Clean Water Act, the Endangered Species Act, NEPA, and other laws which mandate environmental protection.

Response: When compared to other resource discussions in the EIS, Chapter III, we do not believe that one sentence on the 1872 Mining Law is a detailed statement. The intent of the plan is not to restate all the rules and regulations governing the operations of the Forest. However, minerals is a special issue in that certain "Rights" are guaranteed to miners and prospectors, hence the reference to the mining laws and regulations.

Public Comment: The Forest cannot relegate responsibility for environmental problems caused by mining to other agencies.

Response: The Forest does not relegate its responsibility to other agencies. However, there are other agencies that have overlapping charges for protecting the environment such as EPA, the Idaho State Department of Water Quality, etc. Where these overlaps occur, the agencies work together to ensure compliance. By cooperative agreement one agency may assume the "Lead" role, but the other agencies do not give up their responsibilities and authorities in the process.

Public Comment: Without a definition of "conservative use of overly restrictive surface use stipulations and management direction" (Plan IV-7) Goal 1 and Goal 2 appear to present a conflict in terms. Delete Goal 1.

Response: These goals are not in conflict, but are both goals that guide the Forest in responding to minerals applications to lease or explore for oil and gas or prospect for, develop and mine locatable minerals.

Public Comment: Mineral withdrawals should be made in order to protect soil, recreation, wildlife, fish, scenic values and watersheds.

Response: Some areas on the Forest have been withdrawn from mineral entry (EIS, III-24 and Plan, II-23) to protect developed recreation sites. Other types of withdrawals that were suggested would require special legislation. Surface resources in other areas can be adequately protected within the plan of operations or lease stipulations and permits.

## I. RANGE MANAGEMENT, PLANTS AND HERBICIDE USE

### Range Management

Public Comment: Overgrazing is a concern especially in Squaw Creek and Morgan Creek.

Response: This concern is noted. The Plan sets firm direction to improve the administration of these allotments and to insure that management plans are followed. Refer to Range Goal 2 and Riparian Standards and Guides, Chapter IV of Forest Plan.

Public Comment: Range policy is striking a poor bargain for the Government which charges an AUM fee one-third that charged on the open market. It is noted that the permittee can even afford paying the penalty for overgrazing.

Response: The method of calculation (formula) for grazing fees is set by legislation. The fee is derived from that calculation.

Public Comment: Two comments stated that helping the ranchers is important, but shouldn't be the dominant consideration.

Response: The public issue the Plan is responding to is maintaining the locally dependent ranching community, which includes economic diversity and stability. Maintaining the ranching economy is not the dominant consideration.

Public Comment: Why was \$14.06 used for the value of an AUM when the treasury usually gets less than \$1.40 per AUM? Do not increase fees but increase protection of the resource.

Response: The economic data used in the Forest Plan is based on the estimated value of the use and not the amount collected or returned to the Treasury. Uses such as wildlife and wilderness were assigned high values, although in these cases no money returns directly to the Treasury. The Plan directs an increase in administration of grazing allotments.

Public Comment: Trade-offs between incremental increases in AUM's (with associated management efforts and range improvements) and loss of wildlife and fish production were not adequately presented.

Response: There are no planned increases in livestock during the ten-year planning period. Based on current Idaho Dept. of Fish and Game population projections, wildlife and fish needs will be met.

Public Comment: Protect streams to benefit fish habitat, reduce sedimentation and maintain water quality. Bank sloughing a concern also. How will State water quality standards be maintained when cattle produce sediment and bacteria loads in streams? Are municipal water sources protected from this type of activity?

Response: The Forest Plan states that all water will meet State water quality standards (See Forest Plan, page IV-20, 5, a). Maximum allowable sediment standards have been set in the Plan. These sediment standards will guide the Forest in meeting State water quality standards. The Garden Creek Municipal Watershed is currently being evaluated to see if it can be grazed.

Public Comment: Areas threatened by livestock are a major concern. Does emphasis given to protection of riparian types in V-shaped drainages imply more frequent inspection, different forage removal standards, lower AUM's, reduced use, etc? Could water trough location without fencing aid in improving distribution of cattle and prevent riparian damage?

Response: Emphasis to riparian area could be one or more of the items mentioned. The exact needs will be determined on a case-by-case basis and included in the Allotment Management Plans.

Water troughs could aid livestock distribution; however, cattle prefer riparian areas because of lush forage, water, shade, higher humidity and moderated temperatures.

Public Comment: Increased livestock use adversely affects anadromous fish habitat and reduces a food source for bald eagles.

Response: Bald eagles are very infrequent users of the Forest. Only one or two sightings are known in the past several years. They are primarily winter residents along the Salmon River. There may be some roosting on the Forest during winter, but none have been observed. The Fish and Wildlife Service biological opinion states that the proposed plan will not affect the bald eagle.

Public Comment: Maintain non-use of vacant allotments adjacent to wolf habitat areas as possible.

Response: Comment noted.

Public Comment: Identify alternate allotments to transfer use in case of conflicts in key wolf habitat when possible.

Response: Presently, there are no open allotments near the wolf recovery area.

Public Comment: Consult informally with Fish and Wildlife Service on allotment management plan update, livestock class changes (e.g., sheep to cattle), or grazing period extensions.

Response: This is normal operating procedure when dealing with an area within a Recovery Plan.

Public Comment: Inform permittees and their riders or herders of the possible presence of wolves and their endangered status. Emphasize that it is illegal to kill wolves in Idaho.

Response: This information will be incorporated into the Allotment Management Plan.

Public Comment: Recommend weekly monitoring of the distribution of cattle.

Response: Monitoring frequency of cattle distribution is dependent on the complexity or sensitivity of the allotment; past permittee cooperation and performance.

Public Comment: Encourage permittees to follow husbandry programs that do not result in cows calving or sheep lambing during summer grazing period. Very young calves or cows calving may invite wolf predation losses.

Response: Comment noted.

Public Comment: Remove or destroy livestock carcasses to avoid potential habituation of wolves to livestock as food.

Response: Comment noted.

Public Comment: There needs to be better cattle - range management ("regulation and enforcement equal management") and monitoring, etc.

Response: The Plan provides management direction for improving range management. An additional item has been added to the monitoring section (Plan, V-10).

Public Comment: Need to implement cattle rotation to reduce impact to any one area.

Response: The Plan directs that rest-rotation or deferred grazing systems be used wherever possible (see IV-14, 3, d).

Public Comment: Specify forage ratios for wildlife and livestock in range plan.

Response: The Plan directs that allowances for wildlife forage, water, and breeding or reproduction needs, will be made (see IV-15, 3, y).

Public Comment: Provide clear classification of the following:

- stream types
- present state of range bordering these streams
- past levels of AUM's
- efforts made to improve range
- present prescriptions and anticipated benefits (from this examination upward trends can be determined to be either slow or fast)

Response: Some of this information is contained in the Analysis of the Management Situation on file in the Challis National Forest offices. Stream data and vegetation condition along all streams is not available. The Plan provides direction to obtain this information.

Public Comment: Range activity should be maintained at current levels.

Response: Plan allows for grazing to continue at present level during the ten year planning period.

Public Comment: Issue grazing permits that are of shorter duration where resource conflicts exist (such as near spawning areas).

Response: Specifics for dealing with resource conflicts and seasons of use will be determined on a case-by-case basis by an interdisciplinary team and will be included in the allotment management plan.

Public Comment: List the major ranching operations and AUM use by each.

Response: This information is available at the Forest Supervisor's Office. This information is not necessary to evaluate the effects of the proposed action, or alternatives.

Public Comment: Include maps of AUM distribution on watersheds and distribution of deer and elk during cattle grazing seasons and after cattle are withdrawn.

Response: AUM's for each management area have been added to the management area description. Estimated number of deer and elk per management area are shown in Plan, Appendix C, and the AUM's in local forest offices. Livestock use generally occurs from 6/15 to 10/15. Deer and elk are on the allotments for much longer periods of time. For elk it may be year long.

Public Comment: Provide a breakdown of the present condition of range resources. How does Challis National Forest intend to allocate AUM numbers and address condition in areas of poor, good, fair range condition?

Response: Present range condition is shown in the Plan (II-20). Distribution of AUM's by allotment is shown in Plan, Appendix B.

Allocations are based on carrying capacity of an allotment, not on the basis of range condition. Allotment management plans set the management direction for the allotment, including specific areas of concern such as those in poor condition.

Public Comment: Provide site specific plans for rehabilitation of range lands which are not in good or better condition.

Response: Site specifics are included in the allotment management plans.

Public Comment: Forest-wide management direction, standards and guidelines are difficult to interpret. Suggest having the Standards and Guidelines summarized in one place and perhaps duplicated elsewhere because of the relation between wildlife/fishery topics to grazing and timber.

Response: Standards and guidelines apply Forest-wide and across all resource uses and activities. We believe it is not necessary to group by resource.

Public Comment: EIS should indicate total grazing fee receipts for each alternative together with a breakdown of all associated costs. Public and permittee need to be advised of true grazing costs and benefits.

Response: Grazing fees may vary from year to year and are determined from a formula set by legislation. It would only be appropriate to show collections vs. administrative cost if it was done for all uses.

Public Comment: Environmental consequences of converting a sagebrush-dominated community to a grass-dominated community need to be discussed more fully. What habitat will be lost? What will be the effect on species that use the habitat that will be lost? What replacement grasses will be used? What will be the effect of these grasses?

Response: There are little, if any, adverse environmental consequences when changing a sagebrush-dominated community to a grass/forb-dominated community. Sagebrush is not eliminated from the site. The amount of sagebrush removed is based on the objectives of the area determined in the Environmental Analysis process.

Public Comment: Can any coordination with BLM and private owners be achieved in range management?

Response: Yes. See Goal 4, Objective 1, page IV-5 of the Forest Plan.

Public Comment: If any range improvements are made, will any benefit wildlife also or will additional production be consumed by cattle?

Response: The management direction in the Plan provides for wildlife needs in range improvements.

Public Comment: Considering the value of Herd Cr. to anadromous fish runs, why is grazing so intensive here and why is a 60% riparian forage level set as a standard?

Response: The Herd Creek Allotment has improved under the present management system and stocking rates. However, riparian areas need more attention. Present emphasis is to improve the condition of these areas. Maximum use levels of 40% are allowed for riparian areas in this management area.

Public Comment: Are cattle removed soon enough from ranges for significant prewinter regrowth to occur?

Response: No. The cool season bunch grasses of our ranges grow primarily in the spring and early summer while there is ample soil moisture. Very little, if any, regrowth occurs in the fall.

Public Comment: What is implied by the statement that there will be an emphasis on allotments with grazing plans? How many allotments have plans? Has range inventory been done on other plans so that proper levels of grazing are established? Does money for improvement go only to allotments with plans? How many allotments require cost-sharing for improvements?

Response: Some allotments have had management plans developed and intensive management systems initiated. Money has been expended on the development of these allotments and specific management objectives and monitoring requirements established. Our emphasis on these allotments is to ensure that the management plans are being followed and management objectives are met. Range inventory has been done on all allotments; management plans have been completed on 45 allotments. The remaining 31 are scheduled to be completed by 1995. Range improvement money is spent primarily on allotments with management plans. Range improvements on all allotments require cost sharing by the permittee.

Public Comment: What is the range FRES strategy and how does intensive vs. extensive range management work?

Response: See Glossary for definition.

Public Comment: What is the difference between range and watershed improvement?

Response: Range and watershed improvement are synonymous when the project improves vegetative cover. However, some range improvements are structures like fences, water developments, etc. Watershed structural improvements are terraces, waterbars, riprapping streambanks, etc.

Public Comment: Decreasing range funding while AUM's increase appears to be a contradiction. An increase in funding should be needed for allotment administration to assure proper levels of grazing. Decreased use would result in improved range condition.

Response: There is no increase in AUM's during the ten year planning period. The 50-year projections shown in the EIS were in error. See Corrections on II-129 of the EIS.

Public Comment: Grazing livestock on public land is a privilege, not a right. The Plan inappropriately gives existing allotments priority and absolute viability in violation of NEPA and NFMA.

Response: Neither the DEIS or Plan suggests that a grazing permit is a right. Livestock grazing on National Forest System lands is a privilege issued by permit.

Public Comment: All other resource areas (watershed, riparian and water quality needs) have suffered funding shortages except range.

Response: Appropriations for range administration and management have undergone funding reductions comparable to other resources.

Public Comment: There is a need for more intensive livestock management to protect other resources.

Response: We agree. Allotment Management Plans are being written or updated by Interdisciplinary teams to improve management, reduce conflicts and adverse impacts on other resources.



Public Comment: The rate of improvement rather than trend should be specified.

Response: The 'trend' concept has long been established as commonly used principle in range management.

Public Comment: It is questionable whether enough mitigation measures can be used to overcome wide spread watershed disturbance.

Response: Where management and mitigation practices are unable to correct watershed problems caused by a physical activity, the physical activity causing the watershed problem will be curtailed.

Public Comment: Establishment of an upward trend as a guideline for range conditions is questionable, in that if range conditions are already severely degenerated, a slow upward trend may delay essential relief to dependent fisheries and wildlife.

Response: Our goal is to improve rangeland to fair or better condition. After establishing and initiating a grazing system, trend of the soils and vegetative community is used to determine effectiveness of our management actions. Trend is not a guideline for range condition. The values are independent of one another.

Public Comment: Do not use range improvements requiring mechanical equipment in unroaded areas.

Response: Range will not make roads into unroaded areas for purpose of range improvement work. There may be situations, however, such as installing pipelines, digging ponds and airlifting supplies where mechanical equipment may be used, provided the effects on other resources from getting the equipment to and from the site is minor.

Public Comment: The management direction for East Fork stresses the range resource. This is major anadromous fish habitat.

Response: It also stresses protection of wildlife and fish habitat. Please refer to Plan, IV-82-84 and Forest-wide standards and guidelines for Fisheries and Riparian Areas.

Public Comment: Range values are threatened by allowing mining.

Response: Mining is a legitimate use of the National Forest just as other multiple use activities. Mining activities to date have not removed substantial acreage from range. Our policy directs the rehabilitation of mining sites upon termination of the mining activity.

Public Comment: In respect to range, Alternative 3 is essentially identical to Alternative 8. Comparatively speaking, there is relatively little difference between the alternatives. This suggests alternative grazing levels were not seriously considered.

Response: The major differences between Range in Alternative 3 and 8 are: (1) range administration dollars drops to \$236,000 in Alternative 3 and \$277,000 in Alternative 8, (2) Range improvement dollars in Alternative 3 is \$73,000 and Alternative 8, \$40,000, and (3) permitted AUM's start out at 112 M in first decade for both alternatives, then drops to 106,000 in Alternative 3 and to 96,000 in Alternative 8. Refer to page II-130-131 of the EIS.

### Plants

Public Comment: There is a need to protect the ecosystems of the Boulder/White Clouds area.

The Challis National Forest has done a commendable job in recognizing the importance of status surveys in rare plant conservation.

Acknowledge in the Plan that future research and study is needed to ensure protection of viable populations of sensitive plants.

Does the Forest plan for the future of the plant quality?

What are the range habitat maintenance effects on native plants?

What is being done to protect sensitive plants from grazing?

Wildlife habitat can, in some cases, be improved by prescribed burning on non-endangered plants.

The east side of the King Mountain roadless area is unique for its plant communities.

Response: We believe that the standards and guidelines contained in the Forest Plan, the monitoring and evaluation program, establishment of several research natural areas and mandated management of Federally classified plant species adequately addresses these concerns.

### Herbicides

Public Comment: It is not economically sensible to implement herbicide use as people's health and long term consequences to the environment outweigh its monetary value.

Herbicide spraying presents long term environmental consequences and this practice should be discontinued.

If water quality is of high priority to the Forest, then herbicide use should be discontinued.

Herbicide or pesticide use requires more extensive environmental analysis which would warrant a separate EIS.

The final plan should provide specific information as to what types of herbicides will be used and in which locations.

The Forest is not carefully handling and correctly labeling its herbicides.

The DEIS and Plan do not evaluate the impacts of potential herbicide use in the noxious weed control program. Will such use be evaluated with site specific EA or EIS?

Challis National Forest needs to address the effect of herbicide use on native plants.

Response: The Intermountain Region is currently preparing an EIS, which will address the issues raised through our public involvement process. Management direction for herbicide use identified in the EIS, will be incorporated into our Forest Plan direction. Site specific Environmental Analysis will be done for Forest projects.

Public Comment: The Forest Plan should contain an integrated pest management program. As outlined in 36 CFR S219.27(a)(3), this requires the utilization of principles of integrated pest management in all management prescriptions in Forest Plans. The regulation provides, "Under this approach all aspects of a pest-host system should be weighed to determine the situation-specific prescriptions which may utilize a combination of techniques including, as appropriate, natural controls, harvesting, use of resistant species, maintenance of diversity, removal of damaged trees, and judicious use of pesticides. The basic principle in the choice of strategy is that in the long term, it be ecologically acceptable and compatible with the forest ecosystem and the multiple use objectives of the Plan". The proposed Forest Plan and the DEIS do not adequately set forth such a pest control plan.

Response: We use integrated pest management on a continuing basis at the project level to prevent, minimize and monitor pest activities.

J. DEIS AND FOREST PLAN: DOCUMENT CONTENT AND GENERAL COMMENTS, MANAGEMENT DIRECTION AND MONITORING, ALTERNATIVE 3

Document Content and General Comments

Public Comment: Mitigation measures assumed or identified in the DEIS and Forest Plan should be analyzed to determine their effectiveness in neutralizing the problem.

Response: Mitigation measures identified in the Forest Plan will be monitored to insure that they are meeting their intent.

Public Comment: We are skeptical of "vague promises of best management practices and the implementation of the Standards and Guidelines".

Response: The Forest Plan will be the working document for the management of the Challis National Forest. All other Plans will be modified to conform to it. The Management Direction, Standards and Guidelines are the most essential part of the Plan.

Public Comment: The Forest Service should manage to "protect" instead of managing to "harvest".

Response: The laws pertaining to National Forests require the Forest Service to manage for multiple use, which includes both protection and wise use of our natural resources.

Public Comment: The DEIS should consider and evaluate that timber harvest will result in irreversible resource damage.

Response: Properly managed timber harvest will not result in irreversible resource damage; in fact, it may benefit other resources.

Public Comment: The DEIS is not specific enough to determine environmental consequences and affected environment.

Response: The EIS evaluates alternatives which are Forest-wide in scope and have cumulative Forest-wide effects. More specific information will be evaluated in specific project analyses as the plan is implemented.

Public Comment: The Plan should track the changes in roadless acres throughout the planning period.

Response: Appendix C, table C for each roadless area shows the acres to be affected by alternative.

Public Comment: The DEIS and Plan are too complex for reviewers to capture everything.

Response: We agree that the documents are complex. During the public review period we were available to assist reviewers in understanding the Plan. We will continue to work with the public in this regard.

Public Comment: There is not a broad range of alternatives/outputs.

Response: The range of alternatives is adequate considering resource capabilities and the range of options available. This range includes all reasonable alternatives which were rigorously explored and objectively evaluated, as well as other alternatives which were eliminated from detailed study with a brief discussion of the reasons for eliminating them. The range of alternatives is reasonable, based on the nature of the proposed action.

Alternatives were developed to adequately address the issues identified during the analysis, and are relevant to the decision being made. Alternatives considered in detail were developed and discussed fully and impartially. The range of alternatives does not foreclose prematurely any option that might protect, restore and enhance the environment (FSH 1909.15, 23.2).

For some proposals the possible number of reasonable alternatives is very large, or even infinite. For example, the proposal to designate wilderness areas within the National Forest involves an infinite number of alternatives, ranging from 0 to 100 percent of the Forest's roadless acreage. When the possible number of alternatives is very large, only a reasonable sample covering the full spectrum of alternatives must be presented in an EIS. For the above proposal a reasonable range of alternatives included allocating an additional 0, 3, 9, 12, 14, 18, 56, 75, or 100 percent of the Forest's roadless acreage to wilderness. With currently designated wilderness areas these alternatives included 31, 33, 36, 38, 39, 41, 62, 73 and 86 percent of the total Forest as wilderness.

The range of alternatives and outputs associated with dispersed recreation, wildlife and fisheries were controlled by influences independent of Forest Service activities. Primarily, recreation is influenced by disposable income and free time, while game populations, season length and licenses to hunt and fish are controlled exclusively by the state. Secondly, habitat capability is considerably higher than current fish and game populations, and most of this habitat is located in areas of unsuitable range and areas that are unsuitable or unscheduled for timber harvest. Increases in wildlife populations during the next decade will occur independently of other Forest activities.

Public Comment: Plan and DEIS do not comply with NEPA and NFMA.

Response: The Plan and EIS both comply with NEPA, NFMA and Forest Service planning regulations.

Public Comment: Best management practices do not necessarily mean compliance with water quality standards.

Response: The Forest Plan states that State water quality standards will be met.

Public Comment: The DEIS does not analyze the mitigative measures in detail.

Response: The Forest Plan provides management direction, standards and guidelines for establishing mitigation. The details for site specific activities will be included in environmental analysis and project plans.

Public Comment: The DEIS does not address the cumulative impacts in detail.

Response: The DEIS addresses cumulative impacts on a Forest-wide basis; it is not intended to evaluate site-specific details except for roadless areas. The Plan is broad in scope. Details are addressed at the project level.

Public Comment: The DEIS does not address catastrophic failures or events.

Response: This was not a specific issue as such and therefore was not evaluated.

Public Comment: Action schedule for construction/reconstruction of roads is not clear.

Response: The action schedule on Plan, IV-221 shows the miles of roads to be constructed and reconstructed with each timber sale for the first five years and estimates the miles for the second five years. Plan, IV-222 shows the schedule for reconstruction of the arterial and collector roads during the ten year period. This is as specific as presently possible.

Public Comment: Because specific data is not displayed for range management, it is difficult to decide if the preferred alternative is the same as the current situation.

Response: The level of grazing for the ten-year planning period is the same as the current situation. However, the direction for managing the rangelands has been strengthened.

Public Comment: The EIS and Plan should discuss the need for deferring or eliminating livestock grazing on particular allotments for other resource reasons.

Response: These decisions are made in individual allotment plans.

Public Comment: Values or benefits assigned to range are unrealistic.

Response: The values assigned to livestock grazing were developed by the Agriculture Research Service for the Challis area.

Public Comment: Identify rangelands in poor condition and address rehabilitation plans.

Response: Acres of range in unsatisfactory condition are shown in Plan, II-20. There are no specific rehabilitation plans for any area. It is anticipated that improvement can be obtained through management. Site specifics are addressed in allotment management plans.

Public Comment: The DEIS does not make an adequate review of roadless areas.

Response: A detailed review of each roadless area is contained in Appendix C to the EIS.

Public Comment: Factors which could affect roadless acres such as small hydroelectric development, mining, and other forest land uses need to receive more discussion in the EIS.

Response: Table C in Appendix C for each roadless area shows the estimated impacts to each roadless area during the ten-year planning period.

Public Comment: Management areas are too large in size to identify implications of specific management direction.

Response: The size of the management areas were selected because of broad level data base and to simplify the Version II FORPLAN model.

Public Comment: The DEIS does not display the existing situation. More narration is needed.

Response: The existing situation is summarized in Plan, Chapter II and EIS, Chapter III. A more detailed description is contained in the Analysis of the Management Situation, a several hundred page document, available for review at the Forest Supervisor's Office.

Public Comment: Existing land inventory information should be summarized in the Final EIS.

Response: Summaries of existing land inventory information are not required or appropriate for the EIS.

Public Comment: Final EIS and Plan should identify and manage potential mass failure areas.

Response: Mass failure hazards mapping has not been completed for the Forest. The mapping will be completed and used in evaluation of project level activities.

Public Comment: Exploitation of commodity outputs wastes the taxpayer's money and does not contribute to the long-term stability of the surrounding community.

Response: The Plan does not exploit commodity outputs. It provides for multiple use of resources, as required by law. The long-term sustained yield of the resources provides for long term stability of the surrounding communities.

Public Comment: Dispersed recreation should not be broken out between motorized and non-motorized use.

Response: Evaluations in the EIS have been based on the total dispersed recreation. In an attempt to reduce use conflicts, portions of the North

and South Lemhi management areas have been identified for non-motorized recreation. Most other areas outside of Wilderness or proposed Wilderness are open to all types of dispersed recreation.

Public Comment: The Challis National Forest Plan is a "plan to plan", rather than a "plan to act".

Response: The Plan is a plan to act that provides management direction, standards and guidelines. Where information was lacking, the Plan provides direction and a schedule to obtain it.

Public Comment: The preferred alternative overwhelmingly favors grazing, timber, and mining at the expense of wildlife, fisheries, and amenities.

Response: The preferred alternative provides for increases in wildlife, fish, recreation and wilderness, and for the present levels of grazing and timber harvest. It also provides for improved management of timber and range to reduce impacts on other resources. It allows for mineral exploration and development.

Public Comment: The Plan should specifically adopt and describe The Area Analysis Process and consider: 3rd Order Drainages, period of time between projects, all activities producing sediment and multiple ownership drainages.

Response: The area analysis process is in the development stage. When it is fully developed, it will not be described in the Forest Plan. This process is more appropriately covered in separate handbooks that provide guidance.

Public Comment: Much of the information required in the EIS exists, and can be reasonably included in the final documents.

Response: It is neither possible nor required to include all available information in the EIS. The EIS is supposed to be analytical rather than encyclopedic (40 CFR 1500.4).

Public Comment: Management prescriptions that provide compliance with the Interim Primary Drinking Standards should be specified in the final Plan.

Response: See Plan, IV-10, 11. Facilities, Goal 3 objective 4.

Public Comment: The rationale for increasing commodity outputs should be documented or justified in the EIS.

Response: No commodity outputs are increased in the ten-year period covered by the Forest Plan. At the end of the first planning period, output levels will be reevaluated and may change when the Plan is revised. It is possible that mineral production (including oil and gas), which is beyond the direct control of the Forest Service, may increase depending on mineral discoveries and market conditions. Output projections for five decades were used to compare long-term trends of alternatives. They show increases in timber and range in some alternatives. The FORPLAN model shows the Forest has the capability of increasing commodity outputs and still allows for increases in recreation, wildlife, fish and wilderness.



Public Comment: In compliance with the Federal Land Policy and Management Act of 1976, the EIS and Plan must address existing future utility and transportation corridors and long range corridor windows.

Response: See EIS, III-42 and Appendix D.

Public Comment: The Plan should identify management direction for communication facilities.

Response: See Plan, IV-28, 10. Facilities, b. Communications.

Public Comment: The appendix document needs a master table of contents.

Response: Table of contents has been added.

Public Comment: The cooperative USFS-BLM-IDFG Elk Study is worth mentioning under research needs.

Response: The section on research needs only identifies the need for new research.

Public Comment: Calculation of PVB for Alternative 10 is incorrect.

Response: It has been corrected.

Public Comment: Current budget trends may constrain the Forest from achieving the stated goals and objectives.

Response: Reduced budgets will at least delay achieving the goals and objectives.

Public Comment: On Plan, IV-11, C, 3, you should delete "mitigation".

Response: We disagree.

Public Comment: The Challis National Forest Plan should be coordinated with the Bureau of Land Management and their Management Framework Plans.

Response: This has been done.

Public Comment: Criteria for selecting the preferred alternative should be identified in the EIS. How was the preferred alternative selected? Protection of ecological systems, Amenity vs. commodity emphasis, Recreation emphasis, Economics, Wilderness values, Future demands for wilderness, Proportion of wilderness to non-wilderness, Wildlife, fish, and T&E species, Water quality, Current use and demand for use of Forest System Lands, Tribal rights, FORPLAN, Multiple Use, RARE II and/or Politics should be used as decision criteria.

Response: The preferred alternative (Alt. 11) was selected using the Trade-off Evaluation Process (TEP). The criteria used in that process were derived from the 14 issues which were generated from 800 public comments at the beginning of our planning process.

The rationale used in selecting Alternative 11 as the preferred alternative was stated in the Record of Decision in the EIS.

Public Comment: To what extent will the Forest address tribal treaty rights? The United States Federal Court interpreted tribal rights to include not only fishing, but also the right to have the environment upon which the fish depend protected from degradation.

Response: The Forest Plan provides for maintenance of the environment, and recognizes the right of the Shoshone-Bannock Tribe to fish and hunt on their usual and accustomed places on the Forest. It also provides for maintenance or enhancement of anadromous fish habitat that supports the Columbia Tribes fisheries.

Public Comment: To what level will treaty rights be managed for:

- a. Wildlife enhancement/protection?
- b. Anadromous fisheries enhancement/protection?
- c. Trout and other fresh-water fish enhancement/protection?

Response: The goal of the Challis National Forest is to manage fish and wildlife habitat to meet the Idaho Department of Fish and Game's population goals. This will meet Treaty Right needs.

- d. Non-game species, such as eagles?

Response: The Forest does not presently manage any habitat specifically for eagles. Bald eagles are rarely seen on the Forest, and we are not aware of any problems with Golden eagle habitat (condition or amount).

- e. Gathering rights?

Response: The Forest recognizes the right of the Shoshone-Bannock Tribes to gather traditional items such as plants, roots, and small animals.

Public Comment: There is a need for formal consultation between the Challis National Forest and the Tribes on the effects of the Plan and other activities on tribal needs.

Response: We have consulted with the Indian Tribes potentially affected by our Forest Plan.

Public Comment: Forest needs to upgrade natural resource data base as much as possible during the next decade.

Response: We agree.

Public Comment: What method was used to evaluate mineral resources and was a trade-off analysis used to determine how energy and mineral resources are affected by surface resource allocations and prescriptions?

Response: Geologic reports and maps, reports of present and past mineral activities, industry interest, claim and lease locations and other information were used to evaluate mineral resources. Table IV-10 (EIS,

IV-23) shows the results of the trade-off analysis for oil and gas leasing actions. Locatable mineral activity may occur in any area that is not withdrawn from mineral entry. Wilderness designation is the primary type of withdrawal which precludes many types of mineral activities to protect surface resource. Other than in withdrawals (legislative and administrative), mineral entry may occur anywhere on the Forest. A final trade-off analysis must be made at the time a specific mineral activity is proposed. These trade-offs are a function of location, size and type of the operation and are evaluated as part of the project Environmental Analysis process. The minerals trade-off analysis was conducted outside of FORPLAN.

Public Comment: Why was a constant number of total recreation visitor days (RVD) used for all alternatives?

Response: The RVD increase on the Forest was predicted using information from local, State and Federal agencies. Because of limits placed on certain types of recreation, such as river floating permits and some hunting licenses as well as a lack of new major recreation developments, we assumed that the total number of RVD's would remain constant between alternatives. As the emphasis shifts among alternatives the total number of RVD's is unchanged but shift among developed, dispersed and wilderness recreation. Use levels are a result of peoples' free time and available money, not as a result of change in our management direction. Present recreation opportunities far exceed present use levels.

Public Comment: You need to prepare a worst-case analysis where data is incomplete or where there is scientific uncertainty. Worst-case analyses should be prepared to evaluate effects of: sediment in water on resident fish populations, roads and cattle on elk populations, or lack of available funds on funding of certain programs.

Response: We feel that the scientific data we had to base the decisions on was adequate and that the evaluation conducted in preparing the EIS on the Forest Plan did not require preparation of a worst-case analysis as defined in 40 CFR 1502.22. It will be done on a project-by-project basis, where needed before implementing a project.

Public Comment: The roadless area analysis needs to show exactly what the impacts are to fish numbers and habitat under each alternative.

Response: Table C for each roadless area in Appendix C provides this information.

Public Comment: Trade-off between increases in AUM's and loss of wildlife and fish production is not adequately shown.

Response: The Maximum Range Benchmark adequately shows this effect when compared with the alternatives.

Public Comment: Throughout your analysis of roadless areas, you discuss the position of interest groups, the Governor, Senator McClure, etc. Why don't you discuss the Moody-Kostmayer Bill that is currently in Congress?

Response: The Moody-Kostmayer Bill represents the same position as the environmental interest groups.

Public Comment: The Forest failed to provide the public with a Section 6K analysis under NFMA. You have not identified uneconomic timber lands and removed them from the timber base.

Response: They are included in those acres that are not available, capable and suitable.

Public Comment: The Forest makes no attempt to describe PNV of managing each roadless area for either wilderness or development. This makes it impossible for the public to make an informed analysis of and decision on how the Forest should be managed.

Response: We are only required to determine PNV for each alternative. It is not necessary to describe PNV for each roadless area as there will be very little development occurring in them.

Public Comment: The Plan should contain a detailed analysis of the guiding and outfitting industry.

Response: The Forest recognizes the importance of the guiding and outfitting industry to the local and state economies; however, this was not an issue identified during the planning process. The Plan will not adversely affect outfitting and guiding. A detailed analysis is not needed for an understanding of the Plan.

Public Comment: Economic efficiency analysis cannot be completed because of lack of ability to assign values to certain outputs.

Response: PNV was used to compare alternatives. The EIS discusses some outputs as being nonpriced and recognizes that they are qualitative and are considered outside of economic analyses.

Public Comment: There is confusion about the category for some outputs ie. wilderness is valued because of relation to enhanced recreation or fish and wildlife.

Response: We agree that some of the outputs are related. An attempt was made to separate these influences.

Public Comment: How non-priced or semi-quantitative rationales for management affected the selection process or mixes of inputs to a FORPLAN run is not clear.

Response: Non-priced outputs of alternatives were not included in FORPLAN runs. They were considered in the trade-off evaluation used to select the preferred alternative.

Public Comment: Expenditures during the first decade for later possible increased timber harvest are not justified.

Response: The Plan does not provide for large expenditures during the first decade for possible increases in timber production in later decades.

Public Comment: Agriculture is cutting back so investing considerable time and money in intensively managing range to increase AUMs is not justified.

Response: Investing to intensively manage range is for improved rangeland condition and benefit to other resources.

Public Comment: 16 USC 1604(g)(3)(E)(IV) and (F) requires that economic impacts on each advertised sale area be assessed - the plan decision for even-age management was made without doing this assessment.

Response: Economic impact analyses of individual sales will be done before the sale is advertised.

Public Comment: Congress intended for determination of timber land suitability to identify lands where managing for timber production was economically unwise, these lands are to be designated as not suited for timber production until the next Plan is developed at which time the designation can be reconsidered.

Response: This was done in determining timber lands as available, capable and suitable.

Public Comment: Provide a map that identifies: lands which are not cost effective also lands where direct cost as identified in 219.14(b)(2) exceeds direct benefits [219.14(b)(1)] but which will be harvested under the Plan (this will show the public which lands do not meet economic tests but will be managed for timber production).

Response: These lands have not been mapped in detail at present.

#### Management Direction and Monitoring

Public Comment: Management direction in the Plan is not clear enough.

Response: Some clarification has been made, however, the purpose of the Plan is to give broad level direction across the Forest. This is refined for management areas and in standards and guidelines which apply to site specific situations.

Public Comment: Standards and Guidelines sound good, but no real direction or commitment is made.

Response: The Management Direction, Standards and Guidelines, are the Forest commitment for management of the Challis National Forest.

Public Comment: There should be Regional and Inter-Regional guidelines to resolve differences and inconsistencies between Forests with riparian standards and guidelines.

Response: We have added Management Direction to the Plan that provides for development of more specific Riparian Habitat Standards and Guidelines which will be coordinated with adjacent Forests.

Public Comment: Adjoining Forests should coordinate management direction in common drainages.

Response: Coordination of management with adjacent Forests is an on-going process.

Public Comment: Goals in Appendix B should be referred to as prescriptions.

Response: This portion of Appendix B discusses technical information about the FORPLAN model. The goal statements (Appendix B-23 and B-24) are general narrative statements that apply to FORPLAN Coordinated Allocation Choices. In this case the name goal is consistent with the usage in FORPLAN.

Public Comment: Objectives should be more specific.

Response: A number of the objectives have been rewritten to be more specific.

Public Comment: There is no management direction for RNA's.

Response: Standards and Guidelines for existing Research Natural Areas are contained in direction for the Management Area where they are located.

Public Comment: Management direction is often too vague to understand what sort of protection is to be given.

Response: Activities occurring within a Management Area must follow the appropriate management direction Standards and Guidelines as outlined in the Forest Plan. Further requirements may be applied when a particular project is proposed depending on its complexity and the potential environmental consequences.

Public Comment: Management direction for timber in Management Area 20 is unacceptable.

Response: During the ten-year planning period, no scheduling of sawtimber sales and subsequent road construction will occur. Post and poles will be harvested from existing roads.

Public Comment: Management direction for timber in Management Area 22 is unacceptable.

Response: We disagree. Management Area 22 is one of the most productive timber areas on the Forest. Timber harvest can occur in harmony with other resources and objectives.

Public Comment: We support management direction of Management Area 25.

Response: Comment noted.

Public Comment: We generally support the rest of your management directions, although there are a lot of details about grazing with which we are unfamiliar.

Response: Comment noted.

Public Comment: Expand Standard 11 f to read: "Discourage livestock concentration in riparian areas and within 100 feet of lakes and perennial streams; restrict or prohibit livestock grazing in identified problem areas and near critical aquatic resources (such as anadromous fish spawning or rearing areas and domestic water supplies)".

Response: See revised statement Plan, IV-32, 11, f.

Public Comment: The rationale for the sediment standard of 2% and 30% for fine sediment (Plan, IV-21, 5, f) should be explained further.

Response: The Guide for Predicting Salmonid Response to Sediment Yields in Idaho Batholith Watersheds, (Aug. 1983), indicates that anadromous fish fry emergence is greatly reduced if fine sediment within the redd exceeds 20%. Redd construction cleans the spawning gravels and reduces fine sediment within the gravel by more than 50%. Redd design keeps the gravel clean until the fry emerges. The 30% standard applies to fine sediment in spawning gravels at the tail of pools before a redd is constructed. Redd construction will reduce the fine sediment to an acceptable level. For activities proposed on the Forest, expected sediment yield is calculated. If the projected sediment yield from the activity would exceed 2%, modification of the proposed activity or mitigation will be required to reduce the projection to less than 2%. The 2% standard is intended to limit the rate of fine sediment increase, while the 30% standard is a total fine sediment limit. A sediment producing activity that could not be totally mitigated would not be allowed where sediment levels are at or above 30%.

Public Comment: The Plan should emphasize modifying standards as warranted by better information. Many streams in near-pristine condition (20% sediment imbeddedness) may be allowed to deteriorate to 30%, if the S&G is implemented.

Response: See preceding response. As Forest-wide inventories, monitoring, and best management practices are developed and tested on the Forest (along with further research findings) standards and guidelines will be modified to better reflect these findings. A stream will not be allowed to deteriorate more than 2% from new activities.

Public Comment: Plan, IV-9, Goal 3, Objective 1, delete "Emphasize" and change to read, "Enforce compliance in the administration of special use permits".

Response: Emphasizing administration of special use permits includes enforcement.

Public Comment: Change sentence #3, Plan, IV-23, f., in General Program Guidelines to end " . . . , in the Plan and EIS if the applicant has provided an adequate site-specific environmental support document".

Response: We disagree. At the time of leasing, a site-specific proposal has not been made. Stipulations can be identified for individual leases and geophysical exploration permits using this EIS as guidance. An Environmental Analysis will be conducted and documented as appropriate on any earth-disturbing proposals when they are received. Site-specific requirements will be determined at that time.

Public Comment: The most important resource value of the Challis is perhaps watershed, followed by fisheries, wildlife, and recreation.

Response: All resources are important, however some receive greater emphasis in specific areas.

Public Comment: Many of the Management Areas discussions do not address cultural resources. The fact that the total Forest lies within Aboriginal Indian lands, makes this not acceptable.

Response: See Plan, IV-3, Goal 7, Objectives 1-4, and Plan, IV-11, c. Cultural Resource guidance pertains to all management areas and will be adhered to.

Public Comment: Describe how results of monitoring will be made known to the public.

Response: If monitoring results are outside of acceptable variability that will require a plan amendment the public will be notified as part of the normal public involvement process.

Public Comment: Reporting periods are too long.

Response: We believe the reporting periods are adequate.

Public Comment: Add a variation criteria of  $\pm 5\%$  for budgets to the monitoring and evaluation program on page V-6 of the Plan.

Response: Monitoring of resource activities and outputs will determine if budgets are adequate to meet Forest management direction.

Public Comment: Periodic monitoring should be identified for potable water that is provided for public use.

Response: State law and Forest Service regulations require that water supplies must be periodically tested if they are made available for human consumption.

Public Comment: Monitoring will require monies which have not been forthcoming in the past.

Response: Monitoring will receive additional emphasis under the Plan to ensure that the program is implemented.

Public Comment: Because of crude monitoring methods and lack of funds for frequent monitoring a stream with 20% imbedded fine sediment could degrade to 40% before you knew it.



Response: We believe that the monitoring technique is adequate. The Plan makes the commitment to conduct monitoring. Areas where activities may produce sediment will receive more frequent monitoring than other areas.

### Alternative 3

Public Comment: Alternative 3 will still sacrifice 66% of remaining wilderness to save some.

Response: During the ten-year period covered by the Plan very few of the areas currently eligible for Wilderness designation will be affected by management activities. Roadless areas not currently proposed for wilderness designation are not being sacrificed. They will be reconsidered for wilderness designation in future planning cycles.

Public Comment: Not selecting Alternative 3 maintains grazing at expense of Indian and non-Indian fishermen.

Response: Better management and more range, water, and fishery improvement, as is emphasized in the selected alternative (Alternative 11), will reduce impacts to the streambanks and aquatic environment. This will result in improved fish habitat.

Public Comment: Why so much road construction in Alternative 3?

Response: Much of the road construction and reconstruction in this alternative results from improving access to meet the needs of recreation users.

Public Comment: Fish outputs appear to have been deliberately adjusted so Alternative 3 would not look too good.

Response: No outputs were adjusted to benefit any alternative.

Public Comment: It is strange that Alternative 3 was not selected, given the overwhelming importance of non-commodity outputs.

Response: If non-commodity outputs were the only issues considered, Alternative 3 may have been selected. However, in considering all outputs, commodity and non-commodity, as well as the way each alternative addresses issues, concerns and opportunities, Alternative 11 was selected.

Public Comment: How can riparian conditions deteriorate under Alternative 3?

Response: They don't (See EIS, IV-35).

Public Comment: Why is the increase in game so very modest in Alternative 3?

Response: Game populations are controlled by Idaho Dept. Fish and Game administration. Although the Forest conducts activities that improve habitat quality, this does not significantly affect population numbers in any of the alternatives presented in the EIS.

Public Comment: In Alternative 3 bighorn sheep should have priority over domestic stock.

Response: Alternative 3 does not give priority to either livestock or Bighorn Sheep. This alternative allows for increases of Bighorn Sheep and contains a slight reduction in domestic livestock AUM's.

Public Comment: Add Hanson Lakes to the Wilderness proposal in Alternative 3.

Response: The portion of the Hanson Lake roadless area on the Challis National Forest has relatively low wilderness values and was not included in the wilderness proposal.

Public Comment: Change Alternative 3 to greater emphasis on recreation similar to the Sawtooth National Forest's Public Use Emphasis.

Response: We feel that the range of alternatives is adequate.

Public Comment: It appears that the emphasis placed on recreation in Alternative 3 is not consistent with the recreation outputs listed in Table II-7.

Response: The number of recreation visitor days of use is not a result of our management emphasis but the amount of free time and money people have to spend on leisure activities. The total RVD's of developed, dispersed and wilderness use is the same for each alternative. Based on FORPLAN modeling, the alternative with more wilderness or emphasis on dispersed recreation show increased RVD's in those areas and reduced RVD's in developed sites.

Public Comment: Alternative 3 is financially realistic.

Response: Comment noted.

Public Comment: It does not seem reasonable that bighorn sheep and elk habitat needs would not be met with lower levels of livestock grazing in Alternative 3.

Response: Table II-11 (EIS, II-139) has been changed to correct this error.

Public Comment: If grazing and timber were maintained in Alternative 3, commodity resources would be de-emphasized.

Response: We feel that this concern can be considered as a possible modification of the selected alternative.

Public Comment: Why are administrative and road costs so high in Alternative 3?

Response: Errors in EIS, Table II-7 have been corrected.

Public Comment: Alternative 3 has minimal costs, is economically important, best for growth of business and the economic future of Idaho.

Response: This is not consistent with the Social and Economic Impact Analysis conducted in the EIS Appendices, B-44, relative to the non-commodity values listed in B-49.

Public Comment: Alternative 3 is the only alternative that would adequately protect wildlife and anadromous fish, benefit wildlife the most, and provide the greatest increase in wildlife and fish habitat capability.

Response: The preferred alternative along with others adequately protect wildlife and fish. Alternative 3 does provide the greatest increase in habitat capability.

Public Comment: Adopt Alternative 3, except delete wilderness proposal for Diamond Peak, Pahsimeroi and King Mountain and change to the number of acres proposed for Wilderness designation in the North Lemhis to those shown in RARE II.

Response: This is not consistent with the objectives of Alternative 3.

## K. RIPARIAN MANAGEMENT

Public Comment: Allow grazing where it doesn't affect riparian areas.

Response: Most riparian areas can be managed to allow for grazing and other uses. Where the management objectives cannot be met they will be given protection.

Public Comment: Can Challis National Forest clarify how increased forage production would be attained to offset the impacts on riparian zones?

Response: Increase in forage production (AUM's) will be attained through vegetative manipulation practices such as burning or herbicide application, structural improvements (fencing, water development) to make unused or light use areas more available and general improvement of range forage condition.

Public Comment: Install permanent fencing or other range improvements to protect riparian areas.

Response: It is not feasible to fence all riparian areas. Both temporary or permanent fencing will be used to protect sensitive areas. Also some riparian pastures will be fenced to better regulate use. Other improvements such as water developments will be used to reduce impacts on riparian areas.

Public Comment: Stock driveways should be closed in riparian areas, not as stated "if possible".

Response: Mountainous areas are highly intersected by riparian areas, especially streams. There are situations where it is impractical or impossible to avoid some riparian areas. This is not a serious problem on the Challis National Forest since we only have two sheep stock driveways.

Public Comment: There is a need to mention riparian improvements in allotment management plans. Grazing on public lands must be balanced with careful stewardship of a critically important riparian habitat.

Response: Allotment management plans are developed on an individual allotment basis. They are developed within the scope, direction and guidelines of the Forest Management Plan. Riparian areas will be specifically addressed. An interdisciplinary team consisting of wildlife, fisheries, range, watershed, soil, visuals, recreation and archaeology discipline (or combinations thereof) are used to formulate alternatives and trade-offs associated with each alternative and recommend specific management objectives for the allotment.

Public Comment: The final plan should include a commitment to exclude grazing in riparian areas which host trout and anadromus fish.

Response: With proper management, these resource activities can be compatible.

Public Comment: There should be specific goals and objectives regarding riparian area management to protect the fragile riparian areas.

Response: See page IV-1, 1 General, Goal 3 and Management Direction Standards and Guidelines on page IV-31, 11 Riparian, in the Forest Plan.

Public Comment: There are numerous examples of streambank erosion along Broad Creek and degradation due to grazing in Broad Canyon (Betty and Goat Lakes), Iron Bog Creek and Lake area.

Response: Additional Management Direction and Standards and Guidelines have been added to management areas to improve these conditions.

Public Comment: The income from timber sales should help to repair the past degradation of salmonid streams.

Response: Special K-V funds collected from timber sale receipts can be used for resource improvement within the sale area.

Public Comment: Special consideration should be given to erosion control in areas where timber sales are in close proximity to riparian areas.

Response: We agree. Our policy is to exclude timber harvest from riparian areas (Plan, IV-32, 11, j).

Public Comment: The Challis National Forest should ensure that timber will be harvested only where protection is provided for wetlands and other bodies of water in which a myriad of detrimental events could happen, i.e., water temperature changes, temperature blockages, water course blockages and sediment deposits.

Response: Wetlands management is adequately covered in Management Direction Standards and Guidelines (Plan, IV-11-32).

Public Comment: Use of buffer zones around riparian areas should be standard.

Response: See Plan, IV-31, 11 Riparian.

Public Comment: It is necessary to select an indicator species to reflect habitat changes in riparian areas.

Response: This is a complex issue with a great variety of vegetation and ecosystems involved. Selection of indicator species to fit all community types is not practical. We believe that the current management indicator species are adequate.

Public Comment: Protection of riparian areas needs to be emphasized.

Response: Refer to chapter IV, page 1, 31 & 32 of the Forest Plan.

Public Comment: Rate of improvement rather than trend should be specified.

Response: The 'trend' concept has long been established as commonly used principle in range management.

Public Comment: There should be more baseline riparian data collected on condition and then compared by Alternatives.

Response: This information is not presently available. The Plan provides direction to inventory, monitor and evaluate physical and biological conditions within these communities. The collected information can be used in future planning processes.

Public Comment: Development in wetlands or flood plains should not be allowed.

Response: We disagree. Refer to chapter IV, page 30, 11 f, of the Forest Plan.

Public Comment: There is a need to be more specific about improvements of riparian areas.

Response: Site specific management direction will be developed by an interdisciplinary team as individual range allotment plans are updated or developed.

Public Comment: In the management prescriptions for the various Management Areas, you say you will emphasize riparian habitat, but are not specific on how you will accomplish this management direction.

Response: In Chapter III of the Forest Plan under Issue 2 the Forest has committed itself to conducting "an intensive effort to inventory, monitor, and evaluate physical and biological conditions within these vegetative communities. Following the evaluation process, specific direction concerning riparian management would be developed. In the interim, riparian Standards and Guidelines have been developed and will be implemented within Allotment Management Plans.

Public Comment: There appears to be a lack of significant long-term improvements in the riparian areas. Damage to these areas, including stream banks, has greatly accelerated.

Response: In the last 50 years there has been significant overall improvement on our rangelands, primarily due to improved management. The riparian areas have also benefited. The new plan direction will result in continued improvements of riparian areas.

Public Comment: The final plan should consolidate and establish management direction that will be taken regarding riparian zones.

Response: See standard and guideline outlined in IV-31 of the Plan.

Public Comment: It is suggested that jointly funded projects to improve riparian areas in upper Salmon drainage (Marsh Creek-Bear Valley) would be beneficial.

Response: We agree. We are presently attempting to identify co-op projects with the Bonneville Power Administration, Idaho Department of Fish and Game and Shoshone-Bannock Indian Tribe.

Public Comment: What are the consequences of damage that is occurring within riparian zones? The DEIS does not adequately discuss this.

Response: Forest-wide data is not available, so effect cannot be discussed. The evaluations will be handled on a case-by-case basis.

Public Comment: You should allow no more than 20%-30% use of new leader production.

Response: Research has determined that browse plants can sustain a maximum of 50% use and maintain proper vigor and reproductive potential. Specific allowable use rates will be set by an interdisciplinary team in the Allotment Management Plan based on objectives of each allotment.

## L. HYDROELECTRIC PROPOSALS

Public Comment: The Northwest Power Planning Council, Proposed Work Plan Pacific Northwest Hydro Assessment Study (Aug.1, 1984)... will be published in 1986 and will be used to identify areas and stream reaches that, due to their value to fish, should be protected from hydroelectric development.

Response: Comment noted.

Public Comment: It is the Forest Service's duty to impose terms and conditions that will assure adequate protection for National Forest lands from harm resulting from hydroelectric development. Consideration of necessary terms and conditions should be a part of each Forest's planning process.

Response: The statement regarding the duty of the Forest Service in responding to applications for hydroelectric projects on the Forest is correct. Hydroelectric projects are handled through the special use permit process. Terms and considerations for these permits are contained in the Forest Service Manuals. Special considerations such as minimum instream flow requirements are resolved in response to a project specific proposal through an interdisciplinary Environmental Analysis.

Public Comment: Plan IV-25, Lands, a. Special Uses, 1, change to read "Give priority to permits needed to protect public health, safety and provide community service." Delete the phrase "...and are energy related". Members of the Northwest Planning Council stated "the region will not need new hydroelectric power projects until well into the 21st century." Based on this, placing hydropower permits in a "priority" status would be difficult, if not impossible, to justify.

Response: The statement will remain unchanged. The Forest Service has 60 days to respond to the Federal Energy Regulatory Commission for application for Hydroelectric Development, so priority must be given to the related special use permit applications. The Forest Service does not evaluate the need for additional hydropower projects, this is one of the functions of the Federal Energy Regulatory Commission. The Forest Service is only concerned with the effect of the proposal on the forest environment.

Public Comment: Are seasonal flushing or bankfull flows required by the Forest Service in special use permits for hydropower projects ?

Response: Yes, see Plan, IV-21, 5, e.



## 2. Letters From Government Agencies and Elected Officials With Forest Service Responses

This section of Chapter VI contains copies of letters received from other government agencies and elected officials. Each letter is accompanied by a response.

The following letters are printed in this section:

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U S ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

NOV 1 1981

REPLY TO  
ATTN OF M/S 443

Jack Griswold, Forest Supervisor  
Challis National Forest  
Forest Service Building  
P.O. Box 404  
Challis, Idaho 83226

Dear Mr. Griswold

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) and proposed Land Resource Management Plan for the Challis National Forest, Idaho, prepared by your staff. The DEIS presents several alternatives for management of the Forest's 2.5 million acres while the proposed Plan expands on the DEIS preferred alternative. Our detailed comments on both documents are enclosed. Our review was conducted in accordance with our responsibility under Section 309 of the Clean Air Act to determine whether the impacts of proposed federal actions are acceptable in terms of environmental quality, human health, and welfare.

We wish to thank you for providing us with additional time for our review. The Forest Plan/EIS is a major planning document which deserves both the efforts put into its development by your staff and the close attention of the public and of other agencies.

Based on our review and in consideration of the enclosed detailed comments, the DEIS and proposed Plan are rated EO-2 (Environmental Objections - Insufficient Information). A summary of the EPA rating system for draft EISs is also enclosed for your reference. This rating primarily reflects our concern for potential water quality impacts associated with livestock grazing, minerals exploration and development, and timber harvesting. In some cases, we were unable to determine the extent of impacts from the information presented. Our detailed comments touch on several other issues as well, and are intended to provide constructive input to the Challis National Forest's ongoing planning efforts.

We believe that much of the information and analyses that were not in the draft documents exist or can be made available, and can reasonably be included in the final documents. We are confident that we will be able to work together effectively during the revision process so that the Final EIS and Plan will be the adequate planning documents we all desire.

Thank you for the opportunity to review the DEIS and Plan. If you have any questions, please contact Brian Ross of our EIS and Energy Review Section at (206) 442-8516 or FTS 399-8516. Once you have had a chance to consider these comments, Mr. Ross will contact you to offer our assistance during your revision process.

Sincerely,

*[Signature]*  
Robert S. Burd  
Director, Water Division

**RESPONSE**

Your EO-2 rating of our Forest Plan is based on expectations of detailed information that is more specific than is appropriate for Forest planning. Much of the information you are requesting is not available. The level of analysis of impacts you desire to see will be done in Environmental Analysis of site specific projects.

A brief description of surveys and inventories has been added to the Glossary.

VI-123

USEPA REGION 10 DETAILED COMMENTS  
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT  
AND PROPOSED LAND RESOURCE MANAGEMENT PLAN  
FOR THE CHALLIS NATIONAL FOREST, IDAHO

RESPONSE

General

1 The Forest Plan is meant to be a document which outlines the direction for management of the CNF's resources. It is designed to establish the framework for planning, we recognize, however, that Forest Plans typically do not provide the detailed planning for individual projects. One of the Plan's major purposes is to provide detailed descriptions of the standards and processes that will be used for planning specific activities on the CNF during the next 10 to 15 years. Given the projected outputs of the EIS preferred alternative, the Plan describes how these outputs may be achieved. The key, however, is that the outputs are targets. The standards presented in the Plan (both forestwide and management area-specific) are interpreted as the primary "rules." The EIS describes the affected environment and analyzes the environmental consequences of implementing alternative management schemes. The EIS, then, is meant to support the reasonableness of the Plan in terms of the potential for its implementation to result in adverse impacts.

2 In order to determine whether the standards and planning framework in the proposed Plan will sufficiently protect environmental quality, public health, and welfare, the associated EIS should include more detailed descriptions of the affected environment and environmental consequences. In general, too little information regarding existing conditions on the CNF is presented. Without adequate descriptions of existing conditions (including any current degradation) an adequate environmental consequences analysis is difficult to perform. Similarly, it is difficult to determine whether any impacts that are evaluated may be acceptable, or whether the proposed standards sufficiently avoid or minimize impacts.

3 Many of the following discussions should be read with this background, additional discussions of existing conditions and the processes the Forest Service will utilize during implementation of the CNF Plan will help provide the necessary support for later specific planning decisions. We believe that much of what we suggest for inclusion in the Final EIS and Plan is readily available or can be reasonably obtained. We are optimistic that the final documents will be adequate for decisionmaking and for planning future activities on the CNF that are environmentally sound.

Fisheries and Water Quality

4 The Final EIS should present more information about existing fish habitat and water quality conditions. For example, the DEIS and Plan discuss anadromous fish as being below minimum viable population levels on the CNF. Is this true for both steelhead and chinook salmon? Estimated numbers of fish that represent minimum viable populations for each species should be presented in the final documents.

5 Critical habitat areas for anadromous fish and species of special concern (as designated by the Idaho Department of Fish and Game) should be identified on maps. It would be most useful for these maps to be indexed by management area designation. We believe that critical fish habitat areas on the CNF should include those having any spawning or rearing habitat for anadromous fish (especially chinook salmon). Designated beneficial uses for specific streams, as listed in the Idaho Water Quality Standards, including restrictions on activities which may occur (e.g., discharges to Special Resource Waters) should be summarized in the Final EIS. For many activities that will occur on the CNF the "serious injury" standard will apply, this standard should be referenced in the final documents.

(Page 1, paragraph 1) Outputs shown in the plan are projected outputs based on the information used in the analysis. Because of broad level data used and other factors, the outputs may vary. For example the Timber Output of an average of 3 million bf per year was the projected need to meet local dependent mills. If the actual demand is lower, less will be offered. The 30 mmbf per decade is the maximum allowable harvest, and not a target.

(Page 1, paragraph 2) We have described this in general as it relates to potential Forest-wide impacts. Because of lack of specific proposals we cannot evaluate further.

(Page 1, paragraph 3) Most of the data you are asking for is not available or too voluminous to be included. A general habitat condition rating for each stream or lake on the Forest has not been done. Information on many areas is available in Forest Fisheries files.

(Page 1, paragraph 4) Both steelhead and salmon are considered to be below MVP even though the BPA hatchery program has greatly increased steelhead runs in the Salmon River which is outside the Challis National Forest boundary.

The MVP information was developed based on an average of 10 pounds per acre. These figures are office estimates only. We do not have factual information concerning MVP of each species.

(Page 1, paragraph 5) The Forest Service and Idaho Department of Fish & Game do not have the critical stream reaches identified. All anadromous fishery streams are considered to be critical by the Department of Fish & Game. A small map has been included on page II-15 of the Forest Plan showing the location of each of the anadromous fishery streams.

Idaho State Serious Injury Guidelines are presently only in draft form. However, the Standards & Guidelines are designed to prevent serious injury.

RESPONSE

The existing habitat quality should also be presented. This could be accomplished by presenting, for example, a List of Specific Streams and Assigned Standards as an appendix to the Final Plan. The appendix could include the existing habitat condition of each stream measured either as percent fines by depth (to correspond with the CNF's proposed sediment standard) or as percent of biological potential (to be similar to the discussions presented in many of the other Forest Plans for National Forests in Idaho). Once the Final EIS has identified these watersheds and described their existing conditions, this appendix would show the management prescriptions which would be applied to these important aquatic habitats. This information would allow the public to see how the Plan will take existing conditions into account, it would also help to better describe both the basis and the need for such management decisions as deferring particular drainages from timber harvesting.

Fishery Standard The DEIS and Plan propose a fishery standard that would "Prohibit or mitigate activities that will, or have a potential to, increase sediment in spawning gravels 2 percent over existing levels or to a maximum of 30 percent" (proposed Plan, p IV-12). This standard is extremely important in that it can directly affect planning for a variety of activities on the CNF including grazing, mining and timber harvesting. Because it would be such a key aspect of planning, implementation, and monitoring of activities, it should be discussed in more detail in the Final EIS and Plan.

The increment portion of the standard (two percent over existing levels) would appear to be appropriately protective of aquatic resources in general assuming 1) that the baseline for evaluation doesn't change with each new activity, 2) that all sediment producing activities in a watershed be taken into account in the analysis, and 3) that consideration is given to critical habitats and degraded areas which should be managed for recovery or for no degradation. If the baseline against which increases in percent fines by depth are measured is allowed to change after each project, or if all sediment producing activities in a watershed are not considered, the effect of the incremental standard would be to allow all drainages to approach the overall standard of 30 percent fines by depth. This should not be the intent of the standard. While increases exceeding two percent fines by depth may not cause significant effects to aquatic resources in some drainages, those in other drainages may require more protection. We believe that anadromous fish in particular should be managed for no effect so that their population has every opportunity to increase above the minimum viable level.

The proposed overall standard of 30 percent fines by depth would seem to be too high, its technical basis should be supported and documented in the Final EIS & Plan. For example, the DEIS states (p IV-32) that "fry emergence significantly diminishes when the fine sediment by depth approaches 30 percent." Actually, the relationships presented in Appendix E of Stowell, et al (1983)\* (admittedly based on limited data) show that above 20 percent fines by depth steelhead fry emergence success declines rapidly and chinook emergence success becomes more variable at best. In both cases, no apparent differences in emergence success occur between the levels of 0 and 20 percent fines by depth. Thirty percent fines by depth therefore does not represent a threshold beyond which effects may occur, but is a level which causes impacts. On the other hand, a 20 to 25 percent overall standard would appear to be defensible for the batholith portions of the CNF, a similar standard would be reasonable for other areas as well.

(Page 2, paragraph 1) A habitat quality index has not been developed for our anadromous or resident fish streams. Information is presently being collected and summarized in the Northwest River Study. A table displaying the percent fines for those streams which have been sampled is contained in the Forest AMS.

(Page 2, paragraphs 2-3) The 30 percent sediment threshold is a point at which we will not allow any new activities to take place in a drainage unless it can be shown that the activity will not increase sediment or could even reduce it. The 2 percent constraint is the guideline that will stop major sediment increases from management activities from occurring. This says that no sediment level in any stream can be increased more than 2 percent over existing levels (i.e., if existing is 22 percent then maximum level would be 24 percent). Existing levels of sediment (greater than 1/4") have been and will be determined by core samples and future monitoring will be done using core samples or by newer methods if they are more reliable. Impacts of proposed activities will be determined using the R1-R4 model and monitoring will be done as needed to validate the results and refine the model.

(Page 2, paragraph 4) Thirty percent is an upper limit with the real constraint being the 2 percent limit on increase over existing. Fry emergence is based on sediment levels in the redds not in the stream in general. Unpublished research has shown that redd building by steelhead and salmon is quite effective in cleaning fines from gravel. A redd created in a stream with 30 percent fines could easily have less than 25 percent fines and provide adequate fry emergence.

\* Guide for Predicting Salmonid Response to Sediment Yield in Idaho Batholith Watersheds US Forest Service, Northern and Intermountain Regions, August, 1983

**RESPONSE**

**Deferrals.** We recognize that the status of anadromous fish populations on the CNF is due largely to "downstream" effects, and that fish habitat is not the primary factor limiting recovery. However, the remaining populations are so reduced that any additional avoidable impacts to them caused by land management activities would be extremely difficult to justify. This position is supported by recognition of the considerable public resources being committed to enhancement of anadromous fish habitat in the Salmon River basin (e.g., BPA-funded projects for off-site mitigation of "downstream" effects), and the concern of resource agencies for maintaining potential habitat, as well as that which is presently utilized. The CNF obviously recognizes these concerns, as evidenced by the proposed deferral of several watersheds for timber harvesting in the first decade. Similar consideration does not appear to be given to other sediment producing activities, however. Indeed, timber harvesting will affect much less land than will livestock grazing on the CNF. The Final EIS and Plan should therefore discuss the need for deferring or eliminating livestock grazing on particular allotments (see Riparian Area Management, below).

Once the EIS has adequately described the critical fish habitat areas (or other protected uses such as drinking water supplies) and their existing conditions, the acceptability of grazing in those areas can be judged based on the feasibility of mitigation measures that could be applied. In other words, if the EIS identifies a critical fish habitat area, and full mitigation of grazing-related effects on that habitat area is not feasible, consideration should be given to deferring use of or eliminating that grazing allotment. If such an allotment were not proposed for deferral or elimination, its use should be thoroughly analyzed and the analysis open to public review under NEPA.

**Stream Recovery.** The assumption is that currently degraded habitat will recover in a decade if deferred from timber harvest activities. This assumption is theoretical at present. The Final Plan should discuss how recovery will actually be measured and taken into account before new activities are permitted to occur. Stream recovery eventually becomes an existing conditions issue, and the Plan is the appropriate document to disclose the process that will be used to determine existing conditions, now or in the future (i.e., after recovery has been allowed). If existing conditions are only indirectly considered, "serious injury" could result incrementally.

**Meeting Water Quality Standards.** Because of 1) the lack of discussion of existing conditions, 2) the use of a fishery standard which may cause rather than minimize impacts, and 3) the uncertainties associated with stream recovery, the DEIS and Plan do not establish that water quality standards can be met under the preferred alternative. We are confident that, by addressing our concerns and comments, the CNF will present a Final EIS and Plan which clearly show that water quality and important aquatic resources will be adequately protected, while providing CNF personnel with the necessary flexibility to manage day to day activities on the ground. We recognize that in doing so, some of the output levels presented in the DEIS and Plan may have to be revised (e.g., for streams where the Final Plan presents a standard of "No Effect," sediment producing activities such as livestock grazing may have to be restricted more than was discussed in the proposed Plan).

(Page 3, paragraph 1) We have not identified any allotment where livestock grazing needs to be deferred or eliminated because of adverse sediment production. Grazing will be managed on the basis of site specific objectives developed in an Environmental Analysis and Allotment Management Plan.

(Page 3, paragraph 2) See Page 1 paragraph 5.

(Page 3, paragraph 3) That is not our assumption. Timber harvest or other earth disturbing activities that through modeling show an increase of sediment in streams already exceeding threshold limits will continue to be prohibited unless sediment impacts can be mitigated completely. Restoration work on existing sediment producing sites could reduce the bedload level to a point where other activities could be resumed.

(Page 3, paragraph 4) State water quality standards are presently met on all streams based on water quality data collected. New Standards & Guidelines and Best Management Practices should insure that streams will continue to meet state standards. Monitoring will continue to insure that best management practices are maintaining water quality. Fishery standards have also been established requiring impacts to be minimized.

#### Riparian Area Management

The importance of riparian zones to water quality and fish and wildlife habitat quality greatly exceeds the actual area occupied by riparian vegetation. Any evaluation of the cost effectiveness of production of other outputs in these areas should reflect this fact. It is essential to carefully consider how activities such as timber harvest and livestock grazing can be made compatible with other riparian area resource goals (e.g., protecting and enhancing water quality and fish habitat potential), if activities are to occur, they should occur in such a manner that impacts are minimized. In our view, the most appropriate management for riparian areas adjacent to critical or important fish habitat would be their classification as unsuitable for disturbance.

The intent of the proposed Plan is to promote long-term improvement in riparian area quality while providing other outputs. We are concerned, however, that the existing condition of specific riparian areas relative to critical aquatic resources has not been adequately addressed. The proposed Plan (p II-13) states that "most of this (riparian) habitat is in less than satisfactory condition." The relationship between this statement and that on page II-18, "The percentage of riparian (areas) in less than satisfactory condition are, Dry meadows 13 percent, wet meadows 7 percent, aspen 1 percent and willow 3 percent," should be clarified. To the degree that they are known, degraded riparian areas should be specifically identified in the EIS along with the degree of degradation (e.g., relative to the riparian standards adopted in the final Plan). Once this information is presented it will be possible to determine whether appropriate standards have been developed.

From the DEIS and Plan, one can determine that some substantial amount (most?) of the riparian areas on the CNF are degraded, that livestock grazing is the major problem in riparian areas, and (proposed Plan, p II-18) that "Current grazing management has not resolved all riparian conflicts and deteriorating riparian conditions continue in some sites." Are presently degraded and/or deteriorating areas causing impacts to (or slowing recovery of) any critical habitat areas for anadromous fish or species of special concern? If so, and if mitigation cannot feasibly be provided, the final documents should consider deferral of grazing on these allotments until monitoring shows that recovery has taken place and that grazing would not adversely effect the fish habitat. The statement is made on page II-18 of the proposed Plan, that "Such (deteriorating riparian) conditions will probably continue until further technical knowledge is achieved and management systems are refined to deal with problem areas." It is difficult to accept this statement. The USFS Intermountain Forest and Range Experiment Station is a leader in developing riparian management strategies which allow grazing to occur in an environmentally acceptable manner. Where grazing cannot be made compatible with other resources using presently available methods, it should be deferred. We suggest that the wording regarding riparian area management be revised in the Final Plan to better protect critical aquatic resources on the CNF. A possible way of doing this would be to expand Standard 11d on page IV-30 of the proposed Plan to read as follows (underlined portion added),

"Discourage livestock concentrations in riparian areas and within 100 feet of lakes and perennial streams, restrict or prohibit livestock grazing in identified problem areas and near critical aquatic resources (such as anadromous fish spawning or rearing areas and domestic water supplies)."

#### **RESPONSE**

(Page 4, paragraph 1) Most riparian areas can be managed to allow for grazing and other uses and protect anadromous and other fish habitat. Where management objectives cannot be met they will be given protection.

(Page 4, paragraph 2) The issue of riparian areas has come into focus in the last 3 to 5 years. They have not been the emphasis of Challis National Forest Management over the past 2 decades. Emphasis has been on improving vegetative cover and watershed condition of all range areas.

Range analysis studies that have been taken in most of the larger riparian areas show the vegetative and soil conditions in good to excellent condition. The percent of areas in less than satisfactory condition is shown in Plan II-20. Most of our riparian areas are narrow stringers along streams that are so small that no range studies have been established in them. Studies in riparian areas did not take into account stream bank stability, overhanging vegetation needs, stream shading or the aquatic environment. Considering all aspects of riparian areas and their relationship to water quality and fisheries, many are not in the condition we want them.

Riparian areas have improved over the past 30 years due to discontinuance of common use grazing (use by both cattle and sheep), shortening of grazing seasons, initiation of improved management systems and some reduction in livestock numbers. How fast these areas are improving or if some are not is not known because of the lack of trend studies.

The Forest Plan for the first time, sets management direction Standards and Guidelines for riparian areas.

The Plan has been reworded. We do not have condition and trend information which show riparian areas are deteriorating. Some of our riparian areas are in low ecological status. Ecological status objectives have only been established for a few areas.

(Page 4, paragraph 3) There are localized areas where degraded riparian habitat is not allowing for adequate recovery of anadromous fish habitat. These areas are being identified and corrective measures are being planned.

RESPONSE

Soil/Slope Hazards

1 The Final EIS should present a thorough discussion of hazardous soil and slope conditions on the CNF. Existing land inventory information should be summarized in the Final EIS in such a way that readers can overlay this information (along with information on critical fish habitat areas, for example) on the Forest Plan maps that show management area designations. In this manner potential large scale resource conflicts would be immediately apparent, as would the CNF's mechanism (management area designation) for dealing with them.

2 BMPs for high hazard lands require very expensive road construction or timber harvesting techniques in order to reduce mass failure risks. We are concerned that, in the past, many Forest Service roads have not been built to appropriate standards. If, during periods of budget restrictions, poor roads are constructed and soil disturbing activities occur on steep, unstable slopes the mass failure risk will be greatly increased.

3 The effort to identify specific areas having a significant mass failure risk, and to identify special management direction for those lands, is important for two primary reasons. First, one large mass failure can result in more water quality and fish habitat degradation than a wide variety of other activities occurring in a watershed over a long period of time. Second, to the extent that high hazard areas are known and can be managed appropriately, mass failures resulting from planned activities on the Forest would have to be considered avoidable. We believe that sufficient information is available for these discussions to be included in the Final EIS and Plan.

Mining

4 The DEIS presents little information regarding impacts of past and present mining activities. The DEIS does state that mining activity on the CNF is expected to significantly increase in the future. Several important questions that are raised by the lack of specific information presented in the DEIS should be addressed in the Final EIS.

- Has water quality monitoring been used in the permitting of mining activities up to the present, i.e., does specific information exist so that the Forest Service could determine whether and where problems may have occurred?
- Is there existing degradation that is of an extent that violations of water quality standards are occurring at or below mine sites and mining operations?
- Is any existing degradation due to non-compliance with operating plans, and are current operating plans adequate for sufficient environmental protection?
- Where there is ongoing degradation due to past mining activities, what options exist for remedial measures to be taken?
- How will existing degradation be taken into account when planning for other types of activities in the affected watersheds?

(Page 5, paragraph 1) Hazardous soils (properties other than slope or mass instability) were not specifically identified at this time, due to a lack of soil inventory information on the Forest. See Chapter II of the Forest Plan and Chapter III of the FEIS under Soils. A discussion of hazards is only appropriate where project activities are proposed.

(Page 5, paragraph 2) We agree. Some roads have not been constructed to what we would determine appropriate standards today. Standards & Guidelines for road construction will be followed at any budget level.

(Page 5, paragraph 3) Preliminary, potential mass failure hazards have been identified on 7 1/2 minute quads. More detailed inventories will be done on a site specific basis for evaluation of proposed projects and activities.

(Page 5, paragraph 4) Water quality monitoring is used to monitor mining activities. It has been an ongoing program for active mines for the past 10 years on a monthly basis. Monitoring of macroinvertebrates is also used to detect effects on contaminants that could have been released, but have not been detected in the monthly water chemistry sampling. There have been instances where violations (primarily sediment) have been detected through the monitoring program, and corrective action taken.

Current operating plans are adequate for significant environmental protection.

Management Area 6 has the greatest concentration of past mining activity. The management direction for this area provides for an evaluation of past activity to determine reclamation needs. There are no known serious problems.

The primary option for reclamation is to negotiate with the present claim holder to correct the problem when an operating plan is submitted. The primary issue with both past and present mining activity is sedimentation.

**RESPONSE**

- 1 Will water quality monitoring in relation to future mining activities be sufficient to detect serious water quality degradation, and to trigger timely modification of operating plans if necessary?

The last two questions should also be addressed in the Final Plan, especially in Chapter V

Cumulative Effects of Planned Activities

- 2 The DEIS and Plan do not specifically mention the use of area development analyses; through conversations with the CNF planning team staff, we understand that they are being considered (e.g., in the Morgan Creek watershed). We have discussed the use of area analyses with other national forests in Idaho and strongly support their use. It would appear that much of the detailed analysis we feel to be necessary, but which the Forest Plan cannot provide and is often missed by individual project evaluations, would be included in this new level of study. For example, area analyses would be the most appropriate mechanism for evaluating the cumulative effects of many similar activities, and the combined effects of different types of activities, in a fairly large area and over a period of time.

- 3 Because detailed and specific analysis of these impacts are extremely important, the Final Plan should specifically adopt and describe the area analysis process. For example, the following points should be discussed: On what level (3rd order drainages?) would such analyses be performed? What period of time between projects would be considered? Would all activities producing sediment in the area to be analyzed be included (e.g., timber harvests, plus roads, mines, grazing, etc)? How will multiple ownership drainages fit into these analyses? Will documents be prepared and available for public review and comment?

- 4 There is potential for resource conflicts to occur on portions of the CNF, for example because important fish habitat areas are in some instances surrounded by grazing allotments, lands designated as suitable for timber harvest, or lands likely to receive mineral exploration/development interest. Area analyses would be appropriate to perform for any area in which development or resource use is contemplated near important aquatic resources or other sensitive habitats. We believe that area analyses should generally receive public review as draft EAs or EISs, depending upon the resource conflict potential of the projects.

Air Quality

The DEIS and Plan indicate that 2.25 million board feet per year of fuelwood will be offered from the CNF. The documents also imply that air quality degradation in local communities due to wood smoke may be offset by decrease in slash burning needs on the Forest. However, shifting slash disposal from burning on-site to the same volume of use in woodstoves can increase the net air quality impacts for several reasons.

(Page 6, paragraph 1) Yes, monitoring of significant mining projects will be sufficient to protect water quality.

(Page 6, paragraph 2) Environmental Analysis will be conducted for timber harvesting on large drainage areas. They are also being done for grazing allotments which cover large areas. Objectives for all resources are developed for these areas so accumulative impacts can be assessed. This information can also be used for other project proposals in the area.

Area analysis will be conducted where issues indicate the need to evaluate cumulative effects of linked actions.

(Page 6, paragraph 3) The regular N.E.P.A. process is applied on an area large enough to assess accumulative impacts.

(Page 6, paragraph 4) The Forest Service N.E.P.A. process does not provide for "Draft Environmental Assessments". Public comments are solicited on proposed actions. When an environmental assessment is prepared it can be made available to the public for review before the decision notice is prepared.



RESPONSE

1 First the timing of burning is changed so that it occurs when colder air and temperature inversions are more likely. The location of burning is also changed from generally higher in altitude, more favorable to dispersion, and removed from other air pollution sources to likely occurring at lower elevations, in less dispersive conditions, and in proximity to other sources of pollution. Next, the potential impacts may be of a different nature in that slash burning usually occurs in remote locations and is thus primarily a visibility issue, use in woodstoves is more likely to also be a human health concern since people are more directly exposed to particulates. Smoke particles emitted from incomplete combustion of wood are small enough to penetrate deep into the lower respiratory tract when inhaled, these particles may have relatively high concentrations of compounds that are known and suspected carcinogens. The FEIS and Plan should more accurately address air quality impacts in consideration of these points.

2 Forest land managers have a unique opportunity to advance the public's education regarding fuelwood use and air pollution. This is because unique access to the woodburning public is provided through the permit process. Pamphlets discussing the association between woodstoves, air pollution, and health concerns, or providing tips on efficient woodstove operation, for example, could be distributed with each wood cutting permit issued. If appropriate literature is not readily available, we would be happy to provide examples that are being used elsewhere.

Herbicide Use

3 The DEIS and Plan do not evaluate the impacts of potential herbicide use in the noxious weed control program. Will such use be evaluated with site specific EA or EIS? We would appreciate being involved in the review of any evaluations of herbicide use on the CNF.

Monitoring Plan

4 At various places throughout the DEIS and Plan, comments are made which emphasize that monitoring is an essential aspect of the planning and implementation of activities on the CNF (e.g., pages III-2 and IV-2 in the proposed Plan). We agree with these statements. The Monitoring and Evaluation Program discussed in the proposed Plan (Chapter V) includes appropriate and laudable goals. It should be expanded in the Final Plan in order to show the Forest Service's capability to adequately meet those goals.

5 In general, the monitoring plan appears to address information that is necessary to determine whether activities that will occur on the CNF will occur as planned and evaluated in the EIS and Plan. However, more specifics need to be included in this chapter regarding monitoring the environmental impacts of new or ongoing activities, and recovery from effects of past activities. Environmental monitoring should emphasize the standards that CNF activities must meet (whether federal, state, or those adopted in Chapter V of the Plan).

6 The monitoring program outlined in the proposed Plan should be expanded to include more specific discussion of how monitoring information will be used. For example, for any particular activity, what sort of "further evaluation" could be performed and what types of "change in management direction" would be possible? If a multi-year timber contract were at issue, could changes be implemented immediately? If multi-year contracts cannot be modified, we would

(Page 7, paragraph 1) We agree with your discussion about the timing of burning. The wood stove issue is outside of our authority.

(Page 7, paragraph 2) This is outside the scope of the Plan.

(Page 7, paragraph 3) The Intermountain Region is currently preparing an EIS, which will address the issues raised through our public involvement process. Management direction and the use of pesticides identified in the EIS, will be integrated into our Forest Plan. Site specific applications will be evaluated following NEPA procedures. A copy of the Regional EIS has been sent to you for comments. You will also be notified when we begin our Forest analysis.

(Page 7, paragraph 4) We have made the commitment to follow the monitoring plan and will implement needed changes in management as they are identified.

(Page 7, paragraph 5) Specific monitoring requirements will be developed on a site by site or project by project basis.

(Page 7, paragraph 6) See statement in the Forest Plan, page V-4 B.

**RESPONSE**

1 suggest that the Forest Service consider offering timber sales or issuing grazing permits that are of shorter duration in areas where a significant chance of resource conflict exists (such as near anadromous fish spawning areas). Also, how will monitoring activities be prioritized? For what percentage of critical fish streams will sediment and stream channel stability be measured, and what would be the intensity of this monitoring?

2 On page V-12, reference is made to an "approved Forest Water Quality Monitoring Plan." This, and any other specific monitoring programs already in place or planned, should be added to or outlined in Chapter V. We believe that doing so would address many of the questions put forth above.

3 Under Fish and Wildlife monitoring on page V-9, monitoring for "MIS population trends," a 20 percent change in population is the proposed criterion which would necessitate further evaluation. This item does not specifically exclude anadromous fish, it should do so, because a 20 percent reduction in population for species already below the minimum viable level is inconsistent with the goals and objectives of the Plan, it would represent "serious injury" and would not be acceptable.

4 Regarding minerals (page V-13), it is stated that the adequacy of lease and operating plan requirements to meet multiple resource needs will be evaluated, how this evaluation would be performed is unclear. We believe that it would require fairly specific "before, during, and after" monitoring of resources, habitats, and water quality. Such evaluations should be performed for some representative mineral exploration and development activities, and for all minerals activities with a significant potential for conflicting with other important resources (such as critical fish habitat). Along these lines, we are concerned that, under measurement frequency, "Evaluate One" is listed. Would this cover the entire planning period?

5 Similar considerations regarding specificity, frequency, and priority should be given to all items in the monitoring plan.

6 The adequacy of the monitoring plan for environmental impacts is the cornerstone for EPA's ability to determine whether activities proposed for CNF lands adjacent to critical aquatic resources, for example, can be achieved without significant environmental degradation. We recognize that the type of monitoring we suggest might not be possible for the Forest Service to undertake in conjunction with each activity on the CNF. We would encourage a Forest Service-led effort at coordinating the work of all agencies, tribes, and other groups who may monitor specific impacts on CNF lands. To the extent that methods and parameters can be agreed upon and sampling stations and timing be coordinated, a forestwide data base can be developed that can be effectively used for decisionmaking. Until such coordinated monitoring occurs, the Forest Service can still maximize the usefulness of its own efforts by focusing its environmental monitoring on activities and in areas which are most likely to result in significant resource conflicts. For example, we would not suggest undertaking major monitoring efforts in undeveloped drainages that are so important to fish species of special concern that the drainages have been deferred or excluded from the timber harvest base. Similarly, where other resources of concern do not occur or are not highly sensitive, the highest degree of monitoring would not be required. Monitoring should play its key role where planned activities could be in direct conflict with other important resources.

(Page 8, paragraph 1) Monitoring needs will be determined on a case by case basis. Priority and intensity will be set based on need and funding level.

(Page 8, paragraph 2) Broad level direction is set in the Plan. Detailed action plans will be revised to comply with the Forest Plan and are included by references.

(Page 8, paragraph 3) We have identified a 10 to 15 percent change in populations as a point where habitat on the Forest would be assessed to determine if our management is a significant factor in the decline.

(Page 8, paragraph 4) Measuring frequency has been changed to annually.

(Page 8, paragraph 5) See paragraph 1 above.

(Page 8, paragraph 6) There is no baseline monitoring. We are monitoring representative resource activities to determine effectiveness of best management practices. Our primary monitoring is in areas with potential significant resource conflicts.

We are confident that the Final Plan will provide adequate consideration of these points, we know the CNF staff recognizes the importance of monitoring to implementing the Forest Plan, and to ensuring that resource conflicts are avoided to the maximum extent possible

#### Other Specific Comments

1 DEIS, Chapter II Section D (Comparison of Alternatives) Riparian resources are not separately discussed, nor effects of different alternatives compared, except within Table II-11. To present a clear comparison, and to be consistent with other sections in the DEIS & Plan, a separate subheading and discussion for Riparian Management would be useful

2 DEIS, p III-11. Reasons for selection of Management Indicator Species (MIS) for aquatic animals were not provided. The FEIS should include these reasons, and expand the discussion somewhat to better explain how each of these species will be monitored and evaluated. For example, steelhead trout and chinook salmon should be discussed and treated separately in the final documents because the status of their populations differs significantly. Is this also true for the resident fish listed? As for macroinvertebrate MIS, they are not discussed in the DEIS or Plan at all. What are they separate indicators of, and how will they be monitored? The monitoring program in the Final Plan should separately discuss each MIS (These comments apply to the proposed Plan, page II-11, as well)

3 DEIS, p III-12. Key Habitats These should be mapped or otherwise identified for each MIS

4 DEIS, p IV-32 Table IV-11 should show the watershed improvement backlog (in acres) for comparison among alternatives. Is it indeed 2000 acres total, as the table implies? The general areas most in need of improvement should be mapped or identified. Since eliminating this backlog is "essential for reducing sediment and improving water quality and watershed condition," the FEIS should discuss why the needed improvements cannot be completed for 20 years. The possibility of ongoing activities adding to this backlog should also be addressed here

5 DEIS, p IV-33 We are glad to see that harvest activities on the CNF are planned using actual sediment data as opposed to relying exclusively on the sediment yield model. As the DEIS recognized, forest-wide sediment predictions do not reflect whether effects in individual drainages are acceptable (although such predictions are useful for generally comparing alternatives). Forest-wide averaging is, of course, inappropriate when discussing meeting standards. Is the y-axis of Figure IV-2 meant to read 0.1 percent, etc.? We expect that 10 percent, etc., was intended

6 Plan, p III-14 Goals and Objectives of Other Agencies and Landowners We are glad that this section was included. It should help the public to identify some of the opportunities and problems involved with managing the CNF. Tribal concerns/goals should be listed here as well

7 Plan, p IV-4 The General Aquatic Wildlife Survey (Goal 3, Objective 2) should be described somewhere in the final documents. Also, under Range, the specific goal and objectives regarding riparian area management should be presented

#### **RESPONSE**

(Page 9, paragraph 1) Environmental impacts on riparian areas along with mitigation measures are discussed in Chapter IV of the EIS.

(Page 9, paragraph 2) See page 1, paragraph 4 of your comments.

(Page 9, paragraph 3) This information is mapped on 7 1/2 minute orthophotoquads. They are part of the planning files and are available for review at the Forest Supervisor's office.

(Page 9, paragraph 4) The watershed backlog is programmed over 20 years based on obtainable funding levels.

(Page 9, paragraph 5) The y-axis of Figure IV-2 does read 0.1 percent, etc. As explained in the text (EIS, IV-32), the sediment yield values are much lower than would naturally occur at a critical reach because the sediment yields are projected Forest-wide. Consequently, the expected sediment levels such as 10 percent, etc., over natural in a watershed setting are diminished when related to total Forest output.

(Page 9, paragraph 6) Tribal concerns have been added.

(Page 9, paragraph 7) General Aquatic Wildlife Survey is defined in the Glossary.

1 Plan, p IV-6 Goal 3, Objective 2 Is Garden Creek the only community water supply watershed on the CNF? Also, the management prescriptions that provide the necessary protection for domestic water supplies and assure compliance with the Interim Primary Drinking Standards should be specified in the Final Plan

2 Plan, p IV-12 Are improvements resulting from BPA projects on the CNF included in the discussions of habitat improvement efforts presented elsewhere in the DEIS and Plan? BPA projects should be clearly identified as they are intended as mitigation for effects on anadromous fish that occur "downstream," off CNF lands, and should therefore not enter into evaluations of habitat impacts that occur on the Forest

3 Plan, p IV-16 We suggest that "averaging" be deleted in Standard 4g

4 Plan, p IV-16 The Watershed Condition Inventory referenced should be included with or summarized in the FEIS or Final Plan as a part of the existing condition descriptions discussed above

5 Plan, p IV-20 The Order II and Order III inventories referenced should be described in the final documents

6 Plan, p IV-24 Regarding maintenance of minimum instream flows below diversions, are seasonal flushing or bankfull flows required by the Forest Service in Special Use permits for hydropower projects? Of course, the sediment yield and fish response models assume natural flow conditions and would not be directly applicable to diversion projects that do not provide for flushing flows

7 Plan, p IV-28 The road construction guideline regarding design speed should be reworded to eliminate "compromise " The design speed will be determined by the speed the terrain will permit within the necessary environmental constraints

# RESPONSE

(Page 10, paragraph 1) Garden Creek is the only municipal watershed on the Forest. Compliance Standards & Guidelines have been added.

(Page 10, paragraph 2) No BPA projects have been done on the Challis National Forest. They will only be used to enhance existing habitat and not for mitigation on the Forest activities.

(Page 10, paragraph 3) Averaging has been deleted.

(Page 10, paragraph 4) See response above.

(Page 10, paragraph 5) These are described under soil survey in the Glossary.

(Page 10, paragraph 6) Seasonal flushing or bankfull flows are required with all hydroelectric projects special uses.

(Page 10, paragraph 7) The statement was reworded.



U S DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
REGION TEN  
Room 312 Mohawk Building  
708 S. W. Third Avenue  
Portland, Oregon 97204

October 11, 1985  
IN REPLY REFER TO  
HPP-010.3

**RESPONSE**

Idaho Highway Routes 93 and 75 pass through the area but do not cross any National Forest lands administered by the Challis National Forest.

It is the policy of the Forest Service to work with State and other Federal agencies in response to requests for rights-of-way. This is a nationwide Forest Service policy and does not need to be restated in the Plan.

Mr. Gordon Reid, Forest Planner  
Challis National Forest  
Forest Service Building  
P.O. Box 404  
Challis, ID 83226

Dear Mr. Reid:

Federal Highway Administration, Region 10, has reviewed the draft environmental impact statement for the Challis National Forest Land and Resource Management Plan and offers the following comments for your consideration:

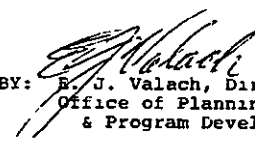
Idaho highway routes 93 and 75, which are on the Federal-aid highway system, are within Challis National Forest. Quite often such highways in National Forest areas do not have defined right-of-way. To make highway improvements with FHWA funds on any of the above routes, or any Forest Highway System routes which may use any lands designated as recreation, requires a determination by FHWA that there is no other feasible and prudent alternative than the selected proposal. Without an adequately defined right-of-way, this has, in similar situations, caused considerable delay in project implementation and increased taxpayer expense.

We suggest the final EIS acknowledge that when right-of-way for Federal-aid highway routes or forest highway routes are not defined, a management effort will be made to work out such details with the government officials having operating responsibilities for that route.

Ideally, in any area designated recreation by you, the designated right-of-way should be of sufficient width to allow bridge replacements, roadway widening, or elimination of safety hazards such as bad curves. Roadway improvements within a defined corridor designated for highway use do not require a 4(f) determination. NEPA action will apply to all highway improvements.

Sincerely,

M. Eldon Green  
Regional Administrator

BY:   
R. J. Valach, Director  
Office of Planning  
& Program Development

VI-134



IN REPLY  
REFER TO

## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Shoshone District Office  
400 West F Street  
Shoshone Idaho 83352

1797

October 11, 1985

Jack C. Griswold, Forest Supervisor  
Challis National Forest  
P O. Box 404  
Challis, ID 83226

Dear Mr. Griswold

We have reviewed your draft Environmental Impact Statement and Proposed Land and Resource Management Plan. Your staff has assembled a fine plan and should be commended.

Management of the Public Lands adjacent to Management Area 25, Antelope, is guided by our Sun Valley Management Framework Plan (MFP) approved in December of 1981. We found nothing in your draft plan that would interfere with implementation of the Sun Valley MFP. I understand that the official Departmental comment on your draft plan is "no comment." However, I have included the following information as a means of interagency coordination. You may find this information useful in formulating your final plan.

The Friedman Creek Wilderness Study Area (WSA) is adjacent to the south end of Management Area 25, Antelope. The draft Wilderness EIS for the Sun Valley Planning Unit released in 1982 recommended the WSA nonsuitable for wilderness designation. This recommendation would be consistent with your proposal for the Antelope Management Area. The final Wilderness EIS that includes this WSA is currently under preparation.

If you have any questions about this information please give me a call.

Sincerely,

*Charles J. Haszler*  
Charles J. Haszler,  
District Manager

RESPONSE

Thank you for your comment. The Final EIS and Forest Plan is unchanged in this area.

VI-135



## United States Department of the Interior

### OFFICE OF THE SECRETARY

PACIFIC NORTHWEST REGION

500 N.E. Multnomah Street Suite 1692 Portland Oregon 97232

November 4, 1985

ER 85/1165

Mr. Jack C. Griswold  
Forest Supervisor  
Challis National Forest  
Challis, Idaho 83226

Dear Mr. Griswold,

We have reviewed the Draft Environmental Statement (DES) and Land Management Plan for the Challis National Forest, Idaho (ER 85/1165) and offer the following comments for your consideration:

#### Minerals Resources

We believe the DES document to be deficient with regard to minerals. On page xi, minerals do not receive the most favorable management under the preferred alternative or the current alternative. The minerals sections on pages xi, ii-131, and iii-23 explore the effect of the alternatives on minerals through the amount of land formally withdrawn from mineral entry through the establishment of wilderness. In no section of the report are management policies of access or operating permit restrictions acknowledged. Enclosed is a table copied from the Beaverhead National Forest Revised DEIS. Are there any restrictions on operations by the Challis Forest that would compare with categories B and C on the enclosed table?

On page ii-7 it is indicated that the forest is doing a complete inventory of its cultural resources, many of which are mines or mining-related items. Nowhere in the DEIS is an inventory of known mineral resources mentioned. The closest attempt to addressing that point is the listing of the potential for oil and gas by acres within management units on pages iv-24 through iv-29. For locatable minerals, nothing exist with the exception of a brief comment on page iii-2 of the Forest Plan.

Most forest plans presently have tables and maps that compare acres of high-medium-low locatable mineral potential with the acres available under various management criteria. Enclosed are example tables of these comparisons from the Beaverhead and Helena National Forest DEISs. We strongly suggest that comparable tables be included in a revised DEIS.

The text of the report lacks tables and specificity on acreage of potential (particularly locatable minerals) and possible operating restrictions. We suggest the Challis Forest personnel review DEISs from Region One. We believe the Beaverhead, Helena, and Deer Lodge DEISs are especially good examples to consider.

### RESPONSE

(Page 1, paragraph 2) The Forest Service manages for multiple uses. No resource receives full emphasis (most favorable management) Forest-wide.

For all lands not withdrawn from mineral entry, locatable mineral operators have a statutory right of reasonable access. Reasonableness is determined on a case by case basis and is based on the type of operation proposed, previous work, size and timing of operation, location, existing access as well as other resource values. Details of access, operations and needed reclamation are extremely variable and can only be adequately addressed in a project environmental analysis. One operation that does not meet the requirements of reasonableness may be perceived as highly restricted; while another well planned reasonable operation at the same location may be virtually unrestricted. Tables similar to those mentioned were considered. EIS table III-6 and figure III-2 were added to display mineral potential by management area; however, no attempt is made to display this by level of restriction because restriction is a function of the type of operation.

(Page 1, paragraph 3-4) This is part of the detailed information contained in the Analysis of the Management Situation that is available for review in Challis National Forest offices. This document contains maps identifying mineral potential and locations of mining claims on the Forest. General maps and tables displaying potential for both locatable minerals and oil and gas are in EIS, III-31-33.

(Page 1, paragraph 5) Restrictions are determined for specific projects and are a function of project proposal and location. A project adjacent to anadromous fish streams or on an unstable slope will normally require greater mitigation measures and reclamation than a similar project on a less sensitive site. Also please refer to responses above.

**RESPONSE**

Fish and Wildlife Resources

- 1 Comments concerning Section 7 of the Endangered Species Act are being forwarded directly to the Forest Service under separate cover.

A major concern of the Fish and Wildlife Service (FWS) is how proposed activities may affect the spawning, incubation, and rearing habitat of anadromous fishes. Habitats of chinook salmon and steelhead trout have been identified by the FWS as Resource Category I under the Service Mitigation Policy (Fed. Reg. 46(15), January 23, 1981). These habitats are of high value for those species and are unique and irreplaceable on a national and ecoregion basis. The mitigation goal for Resource Category I habitats is no loss of existing habitat value. The FWS recommends that all losses of existing habitat be prevented.

- 2 Given the millions of ratepayer dollars presently being funded to protect, mitigate, and enhance fish and wildlife resources under the Northwest Power Planning Council's Columbia River Basin Fish and Wildlife Program, the FWS encourages the Forest Service to insure that their proposed actions are consistent with these efforts. This will help to insure that overall habitat enhancement under the Fish and Wildlife Program is not negated by habitat loss or degradation under authorized federal actions elsewhere.

Soil, Water, and Air

- 4 Monitoring programs should provide for periodic monitoring of potable water provided for the public.

Indian Affairs

- 5 No mention is made of the fact that the Challis National Forest is aboriginal territory for the Shoshone-Bannock Tribes. Because of this the Tribes have significant treaty rights under the 1968 Treaty of Fort Bridger, Article IV. (Copy of Treaty is enclosed.) Enclosed is a map of the Challis National Forest (east half, Challis and Lost River Range Districts) with the northwest boundary of the 1968 Treaty area marked.

- 6 The Bureau of Indian Affairs (BIA) has no knowledge of a formal consultation having taken place with the Tribes concerning past or planned activities in this regard. This consultation is not only logical, it is clear that Indian Tribes are Tribal Governments because they retain all respects of their original sovereignty not otherwise given up or taken away by Congress. The President has recognized that tribal organizations are government rather than interest groups and that the administration will deal with Indian Tribes on a government-to-government basis. The BIA suggests both the plan and final statement be revised to include such a formal consultation process and to consider the beneficial results thereof.

Specific Comments DES Appendices

II Consultation with Others - Page A-2, 2nd Paragraph

It is correct that "there are no Indian reservations within the boundaries of the Challis National Forest." However, this should include that the Fort Bridger Treaty of 1868

(Page 2, paragraph 1) We have received your comments.

(Page 2, paragraph 2) Chapter II of the EIS compares the effect of alternatives on habitat capability for anadromous fisheries.

The EIS table IV-7 compares habitat capability. Alternative 11 (the Plan) has anadromous fish habitat capability above the existing level and has the second highest level of habitat capability for anadromous fish.

(Page 2, paragraph 3) We have clarified the Forest's intentions to cooperate with the Northwest Power Planning Council's Columbia River Basin Fish and Wildlife Program and have added an objective to wildlife and Fish, Goal 5.

(Page 2, paragraph 4) Our regulations mandate that potable water systems will be monitored, or facilities will not be opened.

(Page 2, paragraph 5) The final EIS and Forest Plan has acknowledged native American treaty rights of the Shoshone Bannock and the lower Columbia River Tribes. The Forest is committed to maintaining a high level of wildlife and fish in support of their Treaty rights.

(Page 2, paragraph 6) The formal consultation process, as directed in CFR 219.7, has been included in this chapter of the FEIS.



- 1 recognizes the rights of the Shoshone-Bannock Tribes of the Fort Hall Reservation in all of southeast Idaho, including portions of the Challis National Forest.

The above referenced paragraph states that, "Personal contacts were made with the Fort Hall Reservation to solicit their input for the plan and conform to conditions stated in the treaties." The United States Federal Court interpreted the tribal rights to include "not only fishing but also the right to have the environment upon which the fish depend protected from degradation", (United States v. Washington - Phase II, Civil No. 9213, W.D., Wa. decided September 25, 1980). The fishing rights of the Nez Perce Tribes, as well as the rights of three other tribes in the Columbia River were affirmed in United States v. Oregon - Civil No. 68-513. Since the Forest Service's proposed action may affect fishing subject to these tribal rights, it must be evaluated relative to the Federal trust responsibility for the protection of the Indian fishing rights. Since the Salmon River Basin is one of the primary spawning and smolt production areas for the Columbia River fisheries and the Nez Perce Tribe of Idaho was not consulted directly, it can only be construed that the Federal trust responsibility has not been fully exercised. As stated in NANCE v. ENVIRONMENTAL PROTECTION AGENCY, U.S. Court of Appeals, Ninth Circuit, decided May 18, 1981, 7. Indians-6, "Trust obligation owed by the United States to Indians must be exercised according to the strictest fiduciary standards.", and 8. Indians-2, "Any federal government action is subject to the United States' fiduciary responsibility toward the Indian tribes." The Proposed Land Resource Management Plan for the Challis National Forest is such an action.

#### Specific Comments-Proposed Land Resource Management Plan

##### Chapter IV

- 3 Page IV-4, Goal 5, Objective 2 - Change to read, "In cooperation with the Idaho Department of Fish and Game, maintain instream flows necessary to support goals stated in Objective 1."
- 4 Page IV-4, Goal 5 - Add "Objective 3", to read "Protect riparian habitat and water quality through use of management B.M.P.'s"
- 5 Page IV-5, Goal 5 - Add Objective 2 to read "Riparian protective B.M.P.s in place by end of first decade."
- 6 Page IV-6, Goal 1, states "Provide maximum land base for minerals and energy prospecting, leasing, and development through conservative use of overly restrictive surface use stipulations and constraining management direction." The following Goal 2, states "Ensure that locatable, common variety, and energy minerals are developed in environmentally acceptable ways and in concert with other resources and in compliance with current laws and regulations." Without a definition of "conservative use of overly restrictive surface use stipulations and management direction.", Goal 1 and Goal 2 appear to present a conflict in terms. Delete Goal 1.
- 7 Page IV-9, Goal 3, Objective 1, delete "Emphasize", change to read, "Enforce compliance in the administration of special use permits"
- 8 Page IV-9, 11. Facilities, Goal 2, Objective 1, change to read "... in order to ensure safety, provide a maintainable road system and protect water quality."

#### RESPONSE

- (Page 3, paragraph 1) We have acknowledged native American rights in the final EIS and Forest Plan.
- (Page 3, paragraph 2) See response to paragraph 5, Page 2.
- (Page 3, paragraph 3) We have reworded the objective to include maintaining instream flows necessary to support State population objectives.
- (Page 3, paragraph 4) See Plan, IV-6, Soil & Water Goal 2; objective 3.
- (Page 3, paragraph 5) We have rewritten goal 2.
- (Page 3, paragraph 6) See changes in goals. Goal 1 is intended to keep areas of mineral withdrawals to the minimum needed to protect other facilities (campgrounds, administrative sites, etc.) and eliminate stipulations that do not serve a real resource protection need.
- (Page 3, paragraph 7) Enforcement is part of emphasizing compliance.
- (Page 3, paragraph 8) The statement was changed.

RESPONSE
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1 Page IV-9, 11. Facilities, Goal 2, Objective 3, change to read "construction of new roads will be to standard necessary to serve identified needs and protect resources, with emphasis on water quality."

2 Page IV-12, Wildlife and Fish, 2c., change to read "Prohibit activities that will, ...."

3 Page IV-12, Wildlife and Fish, 2e., change to read "...by livestock and other activities "

4 Page IV-20, 5. Soil, Water, and Air, Item 1, change to read "Filing on water rights will be done prior to the actual construction of the development."

5 Page IV-20, 6. Minerals, a. Resource Protection, 1), change to read "Enforce orderly exploration and development of mineral and energy resources "

6 Page IV-21, 6. Minerals, e. Contamination Control, 1), change sentence #1 to read "...contaminants treated in a manner that will not..., change sentence #2 to read "All waste storage areas shall be adequately fenced..." The words "disposed of" and "disposal", as used in item 1), place the U.S. Government in the position of managing a multitude of small hazardous waste sites that fall within the operator's responsibilities.

7 Page IV-22, 6. Minerals, e. Contamination Control add item 5) to read "Prior to abandonment or long-term absence from any operation the operator will remove contaminants, solid and liquid wastes and any evidence thereof and provide the Administrative Officer proof of deposition at a licensed disposal facility."

8 Page IV-22, f. General Program Guidelines, 1), change sentence #3 to end "...in the Plan and EIS if the applicant has provided an adequate site-specific environmental supporting document."

9 Page IV-24, Lands, a. Special Uses, 1), change to read "Give priority to permits needed to protect public health, safety, and provide community service." Records indicate that Idaho Power Company has filed a Motion for Intervention with FERC on a minimum of 18 small hydroelectric proposals in Idaho. At least one of the motions was based on the fact that the power was not needed. Msrs. Roy Hemmingway and Don Godard testified before the Oregon State Legislature's Joint Committee on Water Policy during April 1985. These members of the Northwest Power Planning Council stated that "the region will not need new hydroelectric power projects until well into the 21st century. Moreover, it would be much more cost-effective and demand-effective to spend hydro tax credits, state small scale energy loan funds, and utility ratepayer dollars promoting conservation rather than expanding the region's hydro potential." The above information was taken from an editorial appearing in the Friday, April 19, 1985, edition of the Portland, Oregon, Oregonian. Based on these considerations, placing hydropower permits in a "priority" status would be difficult, if not impossible, to justify. This is especially true when coupled with the adverse impacts and risk placed on the resource base.

10 Page IV-24, 7. Lands, a. Special Uses, add item 8) to read "Issue no permits whose execution would cause or allow adverse impacts on the natural function of anadromous and/or resident fisheries or riparian habitat."

11 Page IV-28, c. Road Management, item 7, change to read "Do not allow sidecase or eroded materials from road construction or maintenance to enter a stream channel."

(Page 4, paragraph 1) Emphasis was added.

(Page 4, paragraph 2) We disagree. Managements options are greater if we have the opportunity to mitigate activities.

(Page 4, paragraph 3) Correction was made.

(Page 4, paragraph 4) Unfortunately, this cannot be followed in all cases. There are times water developments are exploratory in nature and actual flow determinations are not possible until project completion.

(Page 4, paragraph 5) We have changed to "require".

(Page 4, paragraph 6) Correction was made.

(Page 4, paragraph 7) Standard was added.

(Page 4, paragraph 8) We disagree. It is our intent that the FEIS and Forest Plan will suffice along with lease stipulations therein for issuing oil and gas leases and most permits for geophysical exploration. Applications to Drill (APDs) will require additional environmental analysis.

(Page 4, paragraph 9) The statement will remain unchanged. The Forest Service has 60 days to respond to the Federal Energy Regulatory Commission for application for Hydroelectric Development, so priority must be given to the related special use permit applications. The Forest Service does not evaluate the need for additional hydropower projects, this is one of the functions of the Federal Energy Regulatory Commission. The Forest Service is only concerned with the effect of the proposal on the Forest environment.

(Page 4, paragraph 10) We have established sediment constraints and other Fishery and Soil and Water guidelines which will reduce impacts to anadromous and/or resident fisheries or riparian habitat. These requirements will be included in all special use permits that are issued for areas where they apply.

(Page 4, paragraph 11) Inserting the word "eroded" makes the sentence less clear.

## RESPONSE

- 1 Page IV-28, d. Road Construction, 2) Location and Design, change sentence #4 to read "A vegetative buffer strip..."

- 2 Page IV-30, 11. Riparian, item e., change to read "Establish forage utilization at levels which will yield 90 percent inherent bank stability where streams or other bodies of water are involved."

- 3 Page IV-30, 11. Riparian, item f., change to read "Prevent livestock concentrations..."

- 4 Page IV-30, 11. Riparian, item g., change to read "Do not locate developments in wetlands or floodplains"

- 5 Page IV-30, 11. Riparian, item h., change to read "...away from riparian or streamside areas."

- 6 Page IV-30, 11. Riparian, item i., change to read "Restrict camping along streams and within 100 feet of lakes in problem areas."

- 7 Page IV-30, 11. Riparian, item j., change to read "Restrict recreational stock in identified problem areas."

- 8 Page IV-31, 11. Riparian, item k., change sentence #3 to read "...within 50 feet of streambanks and within 100 feet of lake or wetland perimeters"

- 9 Page IV-33, d. Cultural Resources, sentence #3, change to read "These sites will be avoided, and will thus add to the total number of unevaluated cultural resource sites on the Forest."

- 10 Page IV-33, d. Cultural Resources, paragraph 4, this section should be rewritten to provide assurance that the U.S. Forest Service will comply with cultural resource laws and regulations.

- 11 Page IV-41, 5. Soil and Water, paragraph 1, add sentence #6 to read "Soil and water quality degradation resultant of mining activities will be eliminated."

- 12 Page IV-41, 5. Soil and Water, Lands, paragraph 2, sentence #1, change to read "Permits will be administered to ensure permit compliance."

- 13 Page IV-41, 5. Soil and Water, Lands, paragraph 2, sentence #2, change to read "New applications for energy related mineral projects will take priority over other."

- 14 In Chapter IV, 25 Management Areas are identified and Management Directions have been written for each one, along with Standards and Guides, pages IV-45-190. While many of the Management Directions and Standards and Guides addressed cultural resources, many did not. A preliminary examination of this section indicates that a total of 1,502,606 acres falls in the latter category. In view of the fact that the total Forest lies within Aboriginal Indian lands, this is not acceptable.

### Wilderness

- 15 It would be helpful to include a map which delineates the Borah Peak Wilderness, the

(Page 5, paragraph 1) The buffer strip may not always be vegetation. In some places it could be rock talus slope.

(Page 5, paragraph 2) The "trend toward" is needed for streams or other water bodies which do not currently meet the desired criteria. Within the 10 year period, it may be impossible to obtain 90% inherent bank stability for all areas on the Forest.

(Page 5, paragraph 3) Your suggestion would be impossible to enforce.

(Page 5, paragraph 4) This standard is within policy and allows flexibility. The option not to develop always exists.

(Page 5, paragraph 5) Mountainous areas are highly intersected by riparian areas, especially streams. There are situations where it is impractical or impossible to avoid some riparian areas. This is not a serious problem on the Challis NF since we only have two sheep stock driveways.

(Page 5, paragraph 6-7) Rather than restrict, or limit, recreational livestock use and camping in riparian areas (even problem areas), Forest-wide, we choose to manage area by area. If significant resource damage begins to occur in an area, we can prohibit, limit, or take whatever action is necessary to eliminate the problem, i.e. restrictions on recreational livestock in the wilderness. We have reworded item "i." to read, "Control recreational stock in identified problem areas."

(Page 5, paragraph 8) We disagree. We want the option to clean up blown-down or disease infested trees within the 50-100 foot area.

(Page 5, paragraph 9) Prehistoric sites will be avoided, but otherwise will receive no special protection/mitigation, except as the need becomes apparent. In cases where significant sites are adversely affected through neglect, the Forest will seek comments from the Advisory Council on Historic Preservation; following section 106 of the National Historic Preservation Act of 1966.

(Page 5, paragraph 10) The Forest Service is required to comply with cultural resource laws & regulations. It is not necessary to document assurance that we will comply with laws & regulations governing our activities.

(Page 5, paragraph 11) This is inappropriate. "Degradation" may occur, but will not be allowed to fall below acceptable standards defined in our plan.

(Page 5, paragraph 12) Change was made.

(Page 5, paragraph 13) We disagree. New applications for energy related projects will have priority over others, including minerals.

(Page 5, paragraph 14) Forest Management Goals and Forest-wide Management Direction, Standards and Guidelines apply to the total Forest. Additional specific direction is contained in individual management area discussions.

(Page 5, paragraph 15) The FEIS and Plan pertains to management of Challis National Forest System Lands only. To include a map showing the BLM's, WSA's would be an additional cost, and may add additional confusion to the public.

- 1 Boulder/White Cloud WSA and where the BLM's Burnt Creek, Borah Peak, Jerry Peak, and Jerry Peak West WSAs adjoin
- 2 Page C-79, paragraph 5, BLM's Burnt Peak WSA should read Burnt Creek WSA.

We appreciate the opportunity to review and comment on the Draft Environmental Statement and Management Plan.

Sincerely,

  
Charles S. Polityka  
Regional Environmental Officer

Enclosures

RESPONSE

(Page 6, paragraph 2) Correction was made.



United States  
Department of the Interior

Fish and Wildlife Service

Lloyd 500 Building, Suite 1692  
500 N.E. Multnomah Street  
Portland, Oregon 97232

In Reply Refer To: AFA-SE Your Reference:

November 7, 1985

RESPONSE

(Page 1, paragraph 1-3) We agree, in a broad level plan it is difficult to analyze many site specific effects because of the lack of site specifics (project level). We can only analyze the potential effects based on the level of data present.

Mr. J.S. Tixier  
Regional Forester  
U.S. Forest Service  
324 25th Street  
Ogden, Utah 84401

Subject Formal Endangered Species Consultation, Challis  
National Forest Plan (1-4-85-F-42)

Dear Mr. Tixier:

This is the Fish and Wildlife Service's (FWS) biological opinion in response to your June 5, 1985, request for formal consultation on the proposed Challis National Forest Plan and the subsequent impacts on the bald eagle (Haliaeetus leucocephalus) peregrine falcon (Falco peregrinus) and gray wolf (Canis lupus). Because we concur with your biological assessment that the plan will not affect the bald eagle or peregrine falcon, the major scope of this opinion will deal with the gray wolf. The complex nature of the proposed Forest Plan has made it difficult for the FWS to analyze all potential site specific and cumulative impacts. We have reviewed the proposal in accordance with the Section 7 Interagency Cooperation Regulations (50 CFR 402, 43FR 870) and the Endangered Species Act of 1973 (ESA), as amended. This Biological Opinion refers only to the potential effects of the Plan on threatened and endangered species and not the overall environmental or economical acceptability of the proposed action.

On August 30, 1985, we completed our review of the Forest Plan the DEIS, and Biological Assessment (BA - Appendix G) that you provided to us with your consultation request, as well as additional information obtained by us or already available in our files. In the course of this review, the following people were contacted and contributed additional information used in this opinion.

Jerry Hagen, Challis National Forest  
Alice W-Smith, Challis National Forest  
Timm Kaminski, Montana Cooperative Wildlife Research Unit  
Butch Welch, Idaho Department of Fish and Game  
Jack Conley, Idaho Department of Fish and Game

A list of documents used in this consultation is included as Appendix I

VI-162

## BIOLOGICAL OPINION

## RESPONSE

1 It is our biological opinion that implementation of the Challis National Forest Plan (Plan), submitted to our office on June 26, 1985, and subsequently discussed with members of your staff, and others, is not likely to jeopardize the continued existence of the gray wolf. Background information on your proposed Plan and biological information pertinent to this determination follow. Further informal or formal consultation will be needed on project specific cases as the Forest implements the Plan.

(Page 2, paragraph 1) We appreciate your concurrence that the Plan will not jeopardize the continued existence of the Gray Wolf.

(Page 2, paragraph 2-3) Comments noted.

## PROJECT DESCRIPTION

2 The proposed Plan sets forth Forest-wide goals and objectives, land use allocations, management area prescriptions, standards and guidelines, and monitoring and evaluation requirements to establish direction for management of the Challis NF over the next 50 years. The Plan will be revised on a 10 to 15 year cycle. The Plan is based on Preferred Alternative 11, which is a modification of the Forest's share of the 1980 Resources Planning Act (RPA) program. It includes a recommendation of wilderness areas and a less intensive timber management program than proposed in the 1980 RPA program. A stated goal of the Plan is to provide habitat to ensure viability and recovery of Threatened and Endangered and Forest Service Sensitive plants and animals.

## SPECIES ACCOUNT

3 One hundred years ago, wolves roamed over vast areas of the Great Plains and forests of North America, including most of the state of Idaho (Goldman 1944). During the latter half of the 19th century, buffalo hunters, settlers, and others decimated the buffalo herds and other ungulates that provided prey for wolves roaming the northern Rocky Mountains (Northern Rocky Mountain Wolf Draft Revised Recovery Plan, 1983). Along with the decline in buffalo and other prey, came an increase in livestock, which some wolves began to include in their diets. Stockmen and government trappers began an intensive campaign to eradicate the wolf. By 1930, wolves were essentially gone from the west. The last of these animals were believed to have been extirpated from the mountainous regions of Idaho in the late 1930's. Because a 99 percent reduction in wolf distribution has occurred in the contiguous United States within the past 100 years (Jorgensen 1970), the Northern Rocky Mountain wolf was listed as endangered

in 1973 under the Endangered Species Act. In 1978, the entire wolf species throughout the lower 48 states was listed as endangered, except in Minnesota where the last viable wolf population in the contiguous 48 states was listed as threatened.

VI-14A  
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The Northern Rocky Mountain Wolf (NRMW) Recovery Plan was approved by the FWS in 1980. The primary objective of the plan called for securing and maintaining, where feasible, viable populations of wolves within their former range. The central Idaho area, encompassing two wilderness areas and adjacent national forest lands (including Challis N.F. lands), is one of three areas selected as having potential for its recovery. Reports of wolves have persisted in central Idaho from the early 1940's to the present (Kaminski and Hansen 1984).

On the Challis NF, 22 of 31 reports of wolves received since 1974 were rated as probable (Kaminski and Hansen 1984). Nineteen of the 22 probable reports since 1974 have involved single animals, while the other three reports referred to pairs. Based on color differences described in probable reports and widespread existence of wolf observations including three reports of pairs (1980-82), apparently three to six wolves have periodically ranged over the Challis NF during the past ten years (Kaminski and Hansen 1984).

#### ANALYSIS OF IMPACTS

As the proposed Challis National Forest Plan is implemented, the FWS believes that most impacts on the gray wolf will be the result of increased human activity across the forest, and the subsequent increase in the potential for human caused wolf mortality.

Timber harvest is projected to increase from 3 million board feet (MMBF) in decade one to 7 MMBF by decade five. Roads constructed into previously roadless areas will increase the amount of activity (grazing, mining, recreation) and disturbance in areas previously providing secure cover for wolves and their prey. Because activities (timber harvest) in roadless areas are only projected through 1990, long term impacts of Plan implementation on the gray wolf are hard to determine.

Kaminski and Hansen (1984) identify areas around the Seafoam Resource Station, Cape Horn Summit, Loon Creek, and the Yankee Fork of the Salmon River as important to wolves on the Challis NF at the present. All of these areas are adjacent to or lie within the Frank Church--River of No Return Wilderness (FCRNRW). The importance of the west side of the Challis Forest is influenced greatly by ungulate wintering areas along the Middle Fork of the Salmon River and major tributaries including Rapid River, Loon Creek and Camas Creek. Management strategies in key wolf areas were discussed during a September, 1984, field trip involving FWS and Challis NF personnel.

#### RESPONSE

(Page 3, paragraph 1-2) Comments noted.

(Page 3, paragraph 3-5) The Plan covers management for the next 10-15 years. Planned management will provide for increases in the wolf prey base. We feel that the Frank Church--River of No Return Wilderness and the Cape Horn area is the most important area for wolf recovery during the period covered by the plan. Yankee Fork may be important for future recovery.

1 A key to wolf recovery in central Idaho is the maintenance of large blocks of contiguous roadless or near roadless areas. The FCRNRW and Selway - Bitterroot Wilderness form the core of the wolf recovery area

2 Because the Seafoam (2), Marsh Creek (3), Valley Creek (4), Basin Creek (5), and Yankee Fork (6) management areas (zones) are adjacent or close to the Idaho wilderness areas, they are key to wolf recovery in Idaho. Increased human activity in these five management areas will have the most potential to adversely impact the gray wolf as the proposed plan is implemented

3 A stated management prescription in the Seafoam (2), Marsh Creek (3), Valley Creek (4) and Basin Creek (5) management areas is to emphasize management of Threatened and Endangered Species where appropriate. Although the BA prepared for the gray wolf mentions that portions of the Yankee Fork management area should consider wolf recovery during land use activities, the Plan does not mention any kind of Threatened and Endangered Species emphasis for this area (Plan IV-72). We feel this should be stated under the management prescriptions for the Yankee Fork (6) management area

4 With the understanding that the Challis NF will follow management recommendations in the gray wolf BA proposed for the FCRNRW, the Seafoam, Marsh Creek, and Valley Creek management areas, and portions of Basin Creek and Yankee Fork management areas, implementation of the proposed Plan should have minimal impacts on the gray wolf. However, because long term impacts on the gray wolf from implementation of the proposed plan are difficult to identify at this time, further formal or informal consultation with the FWS will be required on project specific cases

#### Cumulative Effects

5 Cumulative effects are those impacts of future state and private actions that are reasonably certain to occur prior to completion of the subject federal action. A non-federal action is reasonably certain to occur if the action requires the approval of a state or local resource or land use control agency, and such agencies have essentially approved the action. Activities that do not require local agency approval must be essentially ready to proceed

6 There are no State land school inholdings in this forest to our knowledge. A few small private ranches and mining inholdings are found on the Challis NF, and could cumulatively affect gray wolves in the future due to increased human related activities. However, future plans in these areas are not well known at this time.

#### **RESPONSE**

(Page 4, paragraph 1-4) In addition to the goal stated in the Plan to ensure the recovery and viability of T&E species, habitat will be maintained in the areas referenced to allow for increase in the prey base for the wolf. We have added the statement to Management Areas 5 and 6 that "Future wolf recovery needs will be considered and provided for, as needed, on all proposed project evaluations".

(Page 4, paragraph 5-6) Comments noted.



## BIOLOGICAL OPINION

It is our biological opinion that implementation of the Challis National Forest Plan, submitted to our office on June 5, 1985, and subsequently discussed with members of your staff and others, is not likely to jeopardize the continued existence of the gray wolf. However, for recovery of this species, we stress the importance of including our Conservation Recommendations in future management direction of the Challis NF

## CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the ESA requires Federal agencies, in consultation with the FWS, to utilize their authorities to carry out programs for the conservation of listed species. A goal of this Forest Plan is to provide habitat to ensure viability and recovery of Threatened and Endangered plants and animals (Plan IV-3)

Because of the precarious nature of the current wolf population in Idaho, and because the Challis NF is a part of the central Idaho wolf recovery area, we offer the following conservation recommendations for the continued conservation of the wolf in central Idaho. That the Forest

A. Include the management recommendations provided in the gray wolf BA as Standards in the Challis Forest Plan. At a minimum, these Standards should provide management direction for the Seafoam (2), Marsh Creek (3), Valley Creek (4) management areas and portions of the Basin Creek (5) and Yankee Fork (6) management areas north and west of the main Yankee Fork of the Salmon River. Further formal or informal consultation with the FWS will be necessary on project specific cases in these areas. The management recommendations from the BA (Appendix G) follow

### Range Management

1. Maintain non-use of vacant allotments adjacent to wolf habitat areas as possible.
2. Identify alternate allotments to transfer use in case of conflicts in key wolf habitat when possible
3. Consult informally with FWS on allotment management plan updates, livestock class changes (e.g., sheep to cattle), or grazing period extensions
4. Inform permittees and their riders or herders of the possible presence of wolves and their endangered status. Emphasize that it is illegal to kill wolves in Idaho
5. Recommend weekly monitoring of the distribution of cattle

## RESPONSE

(Page 5, paragraph 1) Comment noted.

(Page 5, paragraph 2 through Page 8, paragraph 4) We will consider conservation recommendations in preparation of the NEPA documents and as part of the analysis process on a site specific basis.

6. Encourage permittees to follow husbandry programs that do not result in cows calving or sheep lambing during summer grazing period. Very young calves or cow calving may invite wolf predation losses.

7. Remove or destroy livestock carcasses to avoid potential habituation of wolves to livestock as food.

8. Livestock should not graze elk calving or nursery areas from May 15 to July 15.

9. Establish utilization standards for livestock on key ungulate ranges to provide adequate forage for increasing ungulate populations.

10. Livestock should not graze ungulate winter range from November 15 to April 15.

#### TIMBER AND ROAD MANAGEMENT

1. Maintain or improve elk habitat effectiveness to at least 75% of optimum. Use elk habitat guidelines to determine effectiveness and manage habitat properly

2. Maintain and enforce seasonal or year-long road closures where appropriate.

3. Avoid activity within one mile of ungulate calving/lawning or nursery areas, and known or suspected wolf homesites from March 15 to July 15.

4. Avoid activity near ungulate migration routes and grazing areas or suspected wolf homesites during migratory periods (September 15 to January 15).

5. Maintain 100 yard buffer between cutting units, and/or roads near riparian areas in drainage bottoms and meadow complexes.

6. Design cutting units in an irregular shape to reduce sight distances.

7. Where feasible, lay out roads to reduce sight distances.

#### WILDLIFE HABITAT MANAGEMENT

1. Use K-V dollars to conserve or improve wolf and prey habitats

A. Enforce road management plan.

B. Close old roads and seed as needed

C. Inform and educate the public in key areas through

1. Newspaper articles

2. Talks to school children or other interested groups.

3. Interpretive signs

D. Improve riparian areas.

E. Improve beaver habitat with aspen or willow plantings.

#### MINERALS MANAGEMENT

1. Encourage information and education of miners and their employees about wolf ecology and the status of wolves as an endangered species.

2. Coordinate with miners to avoid conflicts at critical times in key wolf habitats

3. Evaluate both short and long term effects of potential developments on key wolf habitats

4. When feasible, lay out roads as recommended in the preceding Timber and Road Management Section such that sight distances are minimized.

5. Follow recommendations of the preceding Timber and Road Management Section on timber sales which occur due to mining activity.

#### RECREATION MANAGEMENT

1. Inform and educate users about wolf ecology and the endangered status of the wolf

A. Present information to local groups interested in the wolf For example

1. Gun clubs, hunter associations

2. Hunter safety

3. School children

B. Add a clause to outfitter and guide special use permits about wolves so that outfitters know

1 of potential wolf presence in their area,

2. that killing wolves is illegal because of their endangered status,

3. to report sightings to this office, and

4. to contact this office for further information.

2. Close ungulate winter range with potential wolf activity to snow machines

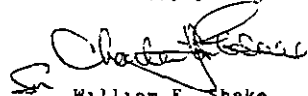
3. Locate any new trails away from key wolf use areas, if their presence becomes known

4. Close trails and roads that are not designated roads to motorized vehicles

B. With respect to the bald eagle and peregrine falcon, follow management guidelines in the BA prepared by Challis National Forest personnel. These guidelines should be incorporated as standards stated more directly. For example, the phrase "Forest managers should consider peregrines" needs to be changed to "Forest managers will consider peregrines". In addition, stipulate that a site specific bald eagle nest management plan be developed which maximizes the continued productivity of that site. The plan should follow general guidelines established in the draft Pacific States Bald Eagle Recovery Plan (U.S. Fish and Wildlife Service 1984) and be developed within two years after discovery.

This concludes formal consultation on this project. If the proposal is significantly modified in a manner not discussed above or if new information becomes available on listed species or impacts to listed species, reinitiation of formal consultation is required. We would appreciate notification of your intent in light of this Opinion.

Sincerely yours,



William F. Shake  
Assistant Regional Director  
Federal Assistance

## RESPONSE

(Page 5, paragraph 2 through Page 8, paragraph 4) We will consider conservation recommendations in preparation of the NEPA documents and as part of the analysis process on a site specific basis.

(Page 8, paragraph 5-6) As above, we will utilize the management guidelines as identified in the "Biological Assessment" for the Bald Eagle and Peregrine Falcon as part of the analysis process and in preparation of the NEPA documents on a site specific basis.

We will change the word should to will.

We will develop and implement a site specific Bald Eagle nest management plan when it is known we have such sites on National Forest System lands within the Forest boundary.

Enclosures



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**

ENVIRONMENTAL & TECHNICAL SERVICES DIVISION  
847 NE 18th AVENUE SUITE 350  
PORTLAND OREGON 97232 2279  
(503) 230 5400

October 28, 1985

F/NWR5.733

**RESPONSE**

Items identified as General Comments are addressed in the Specific Comments.

Mr. Jack C. Griswold  
Forest Supervisor  
Challis National Forest  
Challis, Idaho 83226

Re: Challis National Forest Plan DEIS

Dear Mr. Griswold

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement (DEIS) on the Challis National Forest Plan. Our review has concentrated on the technical information as it relates to anadromous fish and broad policy aspects of the DEIS.

General Comments

The Challis National Forest has dealt effectively with an extremely complex task. Alternative 11 appears to be a reasonable course of action. We do, however, wish to suggest some points of clarification and present thoughts that should be addressed in future planning efforts.

We suggest that the document contain more specific information and/or references to substantiate the summary values listed for anadromous fish. As an example numerous tables and a portion of the text refer to anadromous fish in terms of dollar value per pound, WFUDS', or pounds of fish. These values should be listed as numbers of anadromous fish by species to allow a more meaningful evaluation. The Plan and DEIS list anadromous fish goals for the Forest. It is unclear whether the Forest has adopted the State of Idaho's Anadromous Fish goals (1984 to 1990) as their own or whether the Forest has conducted its own surveys and determined these to be reasonable targets within their own management system. Without a description of the key anadromous fish streams, the species present, estimated numbers present and minimum viable populations vs. population potential, evaluation of the DEIS's projected goals is not possible.

We would suggest, if the data is available, that the information suggested above be included in the final EIS or as a supplemental DEIS. If the data is not available then a strong commitment to collect and analyze the data should be inserted in the plan. Without the base data or a commitment to obtain and analyze the data (in the near term) we believe it would be very difficult for the Forest to manage toward or realistically meet the goals and objectives as specified in the Plan and DEIS



## RESPONSE

NMFS believes the planning effort is a continuing process which is upgraded and modified as new technology or administrative/legal changes occur. It is probable that current land use demands on the Forest, not directly associated with timber harvest, will increase and that their impact will become increasingly significant. Future planning efforts should address such issues as the impact of mining (recreational or commercial) on fish, a firm economic value for anadromous fish, and special management practices (sediment traps, etc.) designed to reduce impacts of both timber harvest and mining activities on anadromous fish. Factors such as small hydro development, mining, and other forest land uses need to receive more discussion and be broader elements in future planning processes.

We offer the following specific comments on the DEIS.

### Specific Comments

Summary, Page VIII The second paragraph, top of page VIII, makes the statement that salmon and steelhead are important within the Columbia River drainage. In recent years, with the passage of the Northwest Power Planning Act, the chain of court decisions regarding Indian Treaty rights and the recently negotiated Salmon Treaty with Canada, salmon have acquired both a national and international importance. We would suggest the statement be modified to reflect the National and International importance of this resource.

Page II-9 Section 5, Item 3, states "Biological potentials were determined for each Forest resource". We would suggest that the potential for anadromous fish be listed by species and general geographic area or major river/tributary. If the information fits more appropriately in the supporting documents a reference to that source should be included in the DEIS.

Page II-19 The value for "Anadromous Commercial Fishing" is listed as \$2.45 per pound. It is unclear whether this value refers to chinook only or includes commercially caught steelhead (Indian fishery). The total value of the commercial salmon resource listed in various parts of the DEIS would be a product of estimated numbers of salmon (and steelhead?) produced on the Forest times the average weight for that species and run segment times the listed per pound value. A reference as to the source of the summary numbers listed in the DEIS or the calculations used to arrive at the numbers would help verify the values given.

Page II-87 A series of general statements are made under the "Wildlife and Fish" section relating to the Forest's intent to meet Idaho Department of Fish and Game's objectives for fish and game. These statements explain that habitat capacity for anadromous fish will be maintained and improved and that anadromous fish would have the potential to increase due to mitigation on Columbia River dams, increase production from

(Page 2, paragraph 2) See change in statement.

Change reads--"The Forest administers spawning and rearing habitat for salmon and steelhead that is important in the Columbia River Drainage. This resource has also gained national and international importance with passage of the Northwest Power Planning Act, the court decisions regarding Indian treaty rights and the recently negotiated Salmon Treaty with Canada".

(Page 2, paragraph 3) The AMS, which is available at Challis Forest offices, shows values for anadromous fish by management area and forest files break this down by species for each management area.

(Page 2, paragraph 4) The \$2.45/pound value was provided by the Resources Planning Act and was applied to both salmon and steelhead that were produced from forest habitat that might be caught in a commercial fisheries. Specifics on formulas used are found in forest files.

(Page 2, paragraph 5) See paragraph 3 above and the change on EIS II-88 "\_\_\_\_\_ potential to increase because of mitigation at Columbia River dams, increased hatchery production and improved overall coordination through the Northwest Power Planning Act."

hatcheries and improved (agency) coordination. We would suggest two improvements to this section

- 1 The objectives should be listed by species and river or major tributary, including habitat capacity by species.
2. Broaden the statement in this section, pertaining to "potential to increase," to define the Forest's proposed actions for habitat protection or enhancement and relating these actions to specific management areas.

The long term stability of the anadromous fish resource will depend on the protection and management of the major blocks of habitat as well as fish passage, harvest management, and hatchery production.

Page II-90 The table lists "Anadromous Fish Commercial" and "Anadromous Fish Sport" It is not possible to separate species or derive numbers of fish from this approach. We would suggest using common values (preferably numbers of fish) by species when profiling trends or describing populations This concern and the concern listed under our Page II-19 comments would also apply to pages II-102, II-113, III-13 and IV-55.

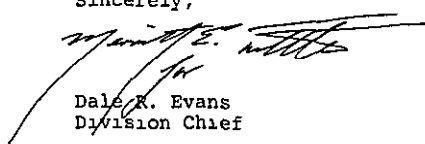
Page II-94 The first paragraph under "Alternative 11" states that "Anadromous fisheries and mineral benefits would increase." Past history suggests that in a number of instances, these two factors have been inversely related. With close and very specific controls, this may not be the case in the future. However, in light of the discussion on pages III-23 through III-26 and Page IV-23, an explanation of the relationship allowing both to increase simultaneously would help clarify the basis for the conclusion.

Page III-16 The first four statements on this page lists general objectives for anadromous fish. The DEIS states that the Idaho Department of Fish and Game Plan does not list specific numbers We would suggest you refer to Idaho "Anadromous Fish Management Plan 1984 to 1990" which does specify population levels. We believe the Forest has the opportunity, by assessing available habitat, to compute projected populations levels by species and area. Without target objectives tied to available habitat, evaluations of program success is not possible

If you have any questions on our comments or would like more information on the points discussed. Please contact Mr Rollie Montagne of my staff at (503) 230-5425

Your continuing coordination efforts are appreciated

Sincerely,

  
Dale R. Evans  
Division Chief

## RESPONSE

(Page 3, paragraph 1) Comment noted.

(Page 3, paragraph 2) See response to page 2 paragraph 3.

(Page 3, paragraph 3) Anadromous fish benefits barring some unforeseen calamity, will increase even if mining increases because existing habitat is significantly under-used and there is heavy emphasis on rebuilding the runs (i.e. NWPPA, Indian Treaty Rights Issue, Sport and Commercial Fisheries, programs at dams and new hatcheries coming on line).

(Page 3, paragraph 4) The Idaho Department of Fish and Game Plan for "Anadromous Fish Management for 1985-1990" does not have fish objective numbers that can be related to specific streams on the Challis National Forest. Their numbers are for drainage areas that in many cases include private, state, BLM and other forest lands. The Challis National Forest is presently working with the Idaho Dept. of Fish and Game on this problem and hope to have more detailed objectives for future planning efforts.



## Department of Energy

Bonneville Power Administration  
P O Box 3621  
Portland, Oregon 97208

November 15, 1985

In reply refer to SJ

Mr. Jack Griswold, Supervisor  
Challis National Forest  
USDA Forest Service  
Forest Service Building  
PO Box 404  
Challis, Idaho 83226

Dear Mr. Griswold:

Our Office of Engineering and Construction has reviewed the Draft Environmental Impact Statement (EIS) on the Challis National Forest Proposed Land and Resource Management Plan, and they offer the following comments.

### Proposed Land Resource Management Plan

1. The Management Plan is incomplete, as it does not address designated transmission corridors or corridor windows. Avoidance and exclusion areas are mentioned only to the extent that they are a constraint in a given management area. We recommend that:
  - o The Management Plan goals (Chapter IV-A) should include a corridor planning goal. This goal should emphasize the direction being given by the Forest Service at both the Washington, DC, and Regional Office levels in response to the requirements of the Federal Land Policy and Management Act of 1976
  - o A management area should be established to specifically address existing utility and transportation corridors and long-range corridor windows.
2. The Plan should provide management direction on communication facilities and hydromet sites.
3. Also, the Plan should provide management direction on any renewable energy resources found on the Forest, such as hydroelectric, small hydroelectric, geothermal, biomass, or wind.

### Maps

- 5 Both the Plan and EIS maps should show existing transmission corridors and corridor windows as specific management areas.

### RESPONSE

(Page 1, paragraph 2) Management direction has been added to "Cooperate with and assist in evaluation of transportation and utility corridor proposals when specific proposals are received. Ensure that both the needs of the proponent and potential effects on other resources are given adequate consideration."

Appendix D to the Forest Plan discusses current utility rights-of-way on the Forest. Because these all supply small needs of on Forest consumers and are not used for transmission across Forest, corridors were not designated in these locations. Windows are discussed in general terms because specific corridor proposals have not been made.

(Page 1, paragraph 3) Management direction, standards and guidelines for individual management areas with existing or probable communications facilities provide direction. The Plan recognizes the importance of stream flow monitoring. We will continue to cooperate with State and other Federal agencies in the establishment and continuing operation of stream and snow monitoring facilities on the Forest as needed.

(Page 1, paragraph 4) Direction for small hydroelectric proposals has been added. No interest has been expressed in developing the other types of energy resources mentioned.

(Page 1, paragraph 5) No transmission corridors or specific corridor windows were designated in the Plan or EIS.

Draft EIS

1. Any existing transmission corridors on the Challis National Forest should be designated in the EIS
2. We feel that the discussion of corridors in Appendix D of the EIS does not adequately address Bonneville Power Administration's (BPA's) or the Western Utility Group's concerns on retention of long-range energy corridors for future use. It is our position that corridor windows should be reserved as constrained areas.

The 1977 Long-Range East-West Corridor Study (by BPA and the Forest Service) determined that there were only seven technically feasible east-west corridors through the Rocky Mountain Range. Since the study, many land use changes have affected these corridors. The enclosed table identifies the corridors and their present status. You will note that only five corridors remain. Of the five, Corridors III and VII are presently restricted by roadless area study classification and potential wilderness designation, Corridor II is currently under construction for a major 500-kV transmission line, and the two remaining, Corridors V and VI, require use of corridor segments on the Challis National Forest.

3. Not being able to use the Salmon River or Snake River Plain Corridors (V and VI), which cross the Challis National Forest, could critically reduce the number of cross-mountain corridors to only one that is not presently threatened (Corridor II). At \$2 million a mile for a high capacity transmission line (or perhaps even more for coal slurry, oil or gas pipeline), detours would be extremely expensive. Greatly increased line lengths, due to detours, and the extensive use of the remaining corridors, could significantly increase environmental impacts and cause project delays. Such limitations would substantially reduce the West's strategic options for handling long-range energy requirements. Reducing the number of available corridors could mean that each corridor would have to accommodate greater transmission capacity. This could lead to reduced reliability of service or more severe impacts such as outages.
4. We recommend that corridor windows be designated in the EIS and that the EIS present an analysis of the effect of management plan alternatives on long-range corridor windows as well as on existing rights-of-way. The effects of maintaining corridor windows as management areas should be analyzed, and, conversely, the effects of foreclosure of windows due to land use designation should also be analyzed. It would be useful if this information, along with information on other important issues, were presented in the EIS in summary form as a decisionmaking aid.

5. 3. We recommend that corridor windows be designated in the EIS and that the EIS present an analysis of the effect of management plan alternatives on long-range corridor windows as well as on existing rights-of-way. The effects of maintaining corridor windows as management areas should be analyzed, and, conversely, the effects of foreclosure of windows due to land use designation should also be analyzed. It would be useful if this information, along with information on other important issues, were presented in the EIS in summary form as a decisionmaking aid.

6. 4. We suggest that the EIS address the effects of different management alternatives on renewable energy resources and communication facilities.

Preferred Alternative

7. 1. We feel we cannot support Alternative 11, even though it appears to have less environmental impact than some of the other alternatives, because it fails to make provision for existing or potential energy transmission corridors.

8. Members of our Division of Land Resources, Office of Engineering and Construction, would like to meet with you to discuss their concerns. They will contact you directly. In the meantime, if you have questions on these comments, please call Tim Murray at FTS 429-3298, or 503-230-3298.

Sincerely,

  
Anthony R. Morrell  
Environmental Manager

RESPONSE

(Page 2, paragraph 1) There are no existing transmission corridors on the Challis National Forest.

(Page 2, paragraph 2-4) We have recognized preliminary BPA and other groups' interest in possibly developing additional transmission capabilities in the future. We believe that our general discussion of future needs as well as constraints associated with windows is adequate at the present time.

(Page 2, paragraph 5) We recognize that in the future there may be a national need to construct major energy transmission facilities that cross Idaho between Montana and the Pacific Northwest. Other facilities will also be required to interconnect existing and future facilities. Some of the alternatives to meet these needs may include routes across the Challis National Forest. At the time specific proposals are made, whether or not facilities are sited on the Challis National Forest will depend on a separate EIS which will evaluate the various alternatives and associated impacts. Consideration of the management direction contained in this Forest Plan and EIS will be part of the process. If necessary the Forest Plan can be amended as outlined in the planning regulations.

(Page 2, paragraph 6) We believe that the present discussion is adequate now.

(Page 2, paragraph 7-8) See responses above.





# STATE OF IDAHO

DEPARTMENT OF HEALTH  
AND WELFARE

DIVISION OF ENVIRONMENT  
Statehouse  
Boise Idaho 83720

October 29, 1985

Jack C Griswold, Forest Supervisor  
Challis National Forest  
P O Box 404  
Challis, Idaho 83226

Dear Mr Griswold

We have reviewed the Proposed Land and Resource Management Plan for the Challis National Forest and the draft EIS and have the following comments  
1 In relation to State water and air quality standards We have examined the draft Plan in relation to the impacts of timber harvesting, mining, and grazing on beneficial uses

## WATER QUALITY & FISHERIES INFORMATION

2 The Idaho Water Quality Standards and Wastewater Treatment Requirements (1985) require protection of existing beneficial uses of State waters The beneficial use which has the highest potential to be impacted by Forest activities is cold water biota and salmonid spawning Therefore, we have examined the draft Plan closely from the standpoint of protection of fisheries habitat

3 Forest-wide goals and standards for fish and wildlife are described in Chapter IV In addition, Management Direction and Standards and Guides are listed for each management area There are a number of general statements regarding water quality and fisheries habitat These statements generally indicate an increase in the population of indicator species and an improvement in habitat Unfortunately there is insufficient information presented in the Plan and EIS to understand how the Forest arrived at these conclusions

## RESPONSE

(Page 1, paragraph 3) As explained in the Environmental Consequences section of the Draft Environmental Impact Statement (DEIS), improved conditions in habitat and water quality can be expected to occur as a result of emphasis placed on range, water, and fisheries improvement programs. In conjunction with an intensive improvement program, a broad spectrum of standards and guidelines have been established in Chapter IV of the plan to minimize management induced impacts on the resources.

We acknowledge that improvement trends are dependent upon adequate funding for scheduled projects. Despite possible periods of low funding for resource improvements projects, the management intent is to maintain the resource emphasis addressed in the Forest Plan. So as funds are reduced, resources with emphasis will be funded to a level that will maintain a budget priority over other resources. We welcome a review of future budget programming, relative to the plan direction.

Jack C Griswold  
October 29, 1985  
Page 2

#### RESPONSE

(Page 2, paragraph 1) We believe that the final documents provide information that is adequate to analyze the proposed action.

(Page 2, paragraph 2-3) General stream habitat quality was displayed in the initial Analysis of Management Situation (AM's) package. More detailed information concerning specific stream segments and associated indicator species can be obtained from the Forest Fisheries Biologist. Likewise, percent fine sediment levels are available through the Fisheries Biologist for only a limited number of watersheds on the Forest.

Since there are program limitations on identifying all project locations and schedules in a general planning package, more emphasis was placed on strengthening the Standards and Guidelines section of the plan for application on future site-specific projects. It is not the intent of the Plan to list site specific data, such as percent fine sediment, or to describe technical methodologies. The DEIS is as specific as the available data and analysis capabilities allow it to be. More specific information will be included in subsequent environmental analysis and project plans.

To evaluate the Plan in relation to protection of fisheries as a beneficial use of water, additional information needs to be included in the final Plan and EIS

To understand the effect of the proposed Plan on fisheries habitat the existing stream habitat quality needs to be displayed. Without this information it is impossible to understand what effect the Plan will have on fisheries as a beneficial use. This should include

- 1 Identification of specific watersheds or stream segments in each management area. This would correspond to the planning unit size used in the Forest model, probably third to fourth order drainages
- 2 Designation of the indicator species for the watershed
- 3 The existing watershed condition of these unit watersheds. Since the Forest standard refers to percent fine sediment, this parameter should be listed for each watershed or stream segment. The quality and completeness of this data or other habitat measures should be displayed

Given this information, the effect (either improvement or degradation) of the proposed Plan and other alternatives should be clearly displayed. In the present draft this information is scattered throughout the EIS and is incomplete. The discussion on Page 11-135 of the EIS regarding the effect of alternatives on sediment and water quality is extremely vague. There is no way to understand the magnitude of potential impacts or improvements based on the EIS. The requested information could be easily displayed in table form in the Plan with detailed information shown in an appendix or made available to interested parties by request.

#### WATER QUALITY - FISHERIES STANDARDS

Standards for water quality and fisheries are listed in Chapter IV. The standard which relates to sediment and water quality is:

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- c prohibit or mitigate activities that will, or have the potential to, increase sediment in spawning gravels 2 percent over existing levels or to a maximum of 30 percent

1 This is an important standard since it relates directly to interpretation of State Water Quality Standards with respect to prevention of serious injury to a beneficial use. The rationale for developing the specific percentages in the standard and the way that it will be used should be fully explained in the Plan as discussed below.

2 The R1-R4 "Guide for Predicting Salmonid Responses To Sediment Yields In Idaho Batholith Watersheds" shows curves for Percent Fry Emergence versus Percent Fine Sediment. Inspection of these curves indicates the threshold level for steelhead trout occurs at approximately 20 percent fines. At 30 percent fines the curve shows a drastic reduction in fry emergence. The curve for chinook salmon is less distinct, but also shows a threshold at 20 to 25 percent fines. If the Forest has collected data which modifies these curves it should be discussed and referenced. Without an explanation, selecting the 30 percent level appears to be arbitrary and without basis.

3 From the brief narrative standard it is not clear what is meant by existing level and how the 2 percent limit will be used. Does existing level refer to the baseline at the time of the Plan (i.e., 1985), or to the existing level, before an activity is evaluated? It appears that the standard would allow streams that are now below the 30 percent level to rise to 30 percent fines as each activity is evaluated. This should not be the intent, and should be clarified in the final Plan.

4 Special regard for interpretation of this standard should be given to anadromous fishery streams. The goal and intent of the Forest should be to assist efforts at restoration and enhancement of this important resource, rather than to allow further degradation down to some limit.

#### RESPONSE

(Page 3, paragraph 1, through Page 4, paragraph 2) The 30% fine sediment level is an upper limit, with the real constraints being the 2% limit on increase over existing. Fry emergence is based on sediment levels in the redds and not in the stream in general. Unpublished research has shown that redd building by steelhead and salmon is quite effective in cleaning fines from gravel. A redd created in a stream with 30% fines could easily have less than 25% fines and provide adequate fry emergence.

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October 29, 1985  
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1 There should also be an indication in the Plan to revise the standard as warranted by better information. As more research is completed on this subject and better monitoring tools are devised a different standard may be appropriate.

2 To summarize, we find the approach to defining the standard is reasonable, however, we have some concern over the specific numerical standard and feel it needs to be better justified and documented in the final Plan.

#### DOMESTIC WATER SUPPLY

3 The risk of impacting domestic water supplies from Forest management activities has not been addressed in the draft Forest Plan. Although the number of systems which depend on surface water from the Challis National Forest may be small, this issue should be addressed.

4 Sediment is the primary pollutant of concern associated with Forest management activities. Excess sediment in raw water decreases the effectiveness of treatment which may result in an unnecessary economic burden on the community and increased risk to public health. Increased emphasis has been placed on achievement and enforcement of minimum standards for public water supply systems in Idaho due to the federal Safe Drinking Water Act.

5 The final Forest Plan should list public water supply watersheds on the Forest and identify management goals and standards which are in compliance with the Idaho Regulations for Public Drinking Water Systems (1985). We will be happy to work with you in identifying these public water supplies prior to drafting the final Plan.

#### MINING

Management direction for minerals is listed in each Management area. In addition to addressing specific areas we believe there is a need to address

#### RESPONSE

(Page 4, paragraph 3-5) Only one public supply watershed exists on the Challis National Forest. During a four year monitoring period, water data collected in the Garden Creek municipal watershed showed excellent water quality. Water quality monitoring will resume in the near future because management direction has changed. We will need to coordinate with your office to review the management goals and standards for Garden Creek Management (Unit 13). Also, a storage reservoir was breached recently which may affect the sediment load of the stream by reducing sediment retention. The reservoir had acted as a catchment basin for delivered sediment from unstable areas located upstream.

Other public water supply systems consist of small spring developments and hand-pump wells which supply drinking water to campgrounds and guard stations on the Forest. All drinking water systems open to the public are in compliance with the Idaho Regulations for Public Drinking Water Systems, including the required periodic bacteriological and chemical evaluations.

Jack C Griswold  
October 29, 1985  
Page 5

## RESPONSE

(Page 5, paragraph 1) The Forestwide direction applies to all areas. Direction in individual management areas is additional direction specific to that management area. Additional information about mines on the Forest is available at Challis National Forest offices.

(Page 5, paragraph 2) We believe that the monitoring program is adequate for the activity occurring on the Forest.

(Page 5, paragraph 3-4) The referenced Forest Water Quality Monitoring Plan is too lengthy to be included in the Forest Plan, but will be available for review by your office when it is updated this spring. We agree that the monitoring system should provide accurate data to determine the effectiveness of watershed protection measures. Your input into this process would be appreciated, particularly regarding your ideas on quality control.

(Page 5, paragraph 5) The existing monitoring plan was prepared with the direction of the "R4-Technical Guide for preparing Water Quality Plans". If you are not familiar with this document, a copy is available through our office for your review.

the overall impacts of mining in the final Forest Plan and describe the procedure which the Forest uses to protect water quality. We are concerned that the present procedure is fragmented and does not address the cumulative impacts of mining in a watershed. This should include a complete inventory of abandoned and active mines which pose an environmental impact and a list of needs for reclamation.

## MONITORING

Monitoring and evaluation are briefly summarized in Chapter V of the draft Plan. The brief treatment of water quality monitoring in the table indicates that little detail on this important aspect of the Plan has been put together.

The table refers to an approved Forest Water Quality Monitoring Plan. Is this document available for review as part of the Plan? If so, we would like to review the document and provide input.

The monitoring plan should be approved as part of the Forest Plan. The monitoring system should provide data with sufficient precision and accuracy to allow the manager and the public to determine if the Forest standards as well as State Water Quality Standards are being met throughout the life of the Forest Plan.

Existing and past National Forest monitoring that we are familiar with has been incomplete in documenting if Forest management activities are impacting or protecting water quality. This has been documented in a US Forest Service report for the Northern Region, Summary Report-Watershed Policy and Program Review, January 1984. We believe that this evaluation applies equally to the Intermountain Region. This report contains recommendations which should be considered in developing a monitoring plan.

The Forest planning process provides an excellent opportunity to critically examine the Forest's water quality monitoring program and associated

budget Monitoring needs to be considered an integral part of the management program and funded accordingly The monitoring plan should address the water quality impacts from mining, timber harvest, and grazing, and include evaluation of impacts on fisheries habitat and domestic water supply

The sentence on Page V-4 in the draft Plan regarding precision confuses the meaning of precision and accuracy Precision and accuracy are separate descriptors of data quality It is important that the Forest describe the data quality of environmental measures that will be sampled, including specific procedures which will be used to measure precision and accuracy It is this type of ambiguity which causes the public to doubt that standards and guidelines will be met during implementation of the Plan A well planned and funded monitoring program will help alleviate these problems

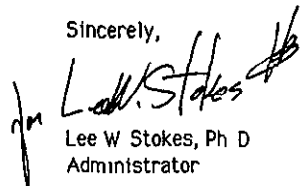
#### AIR QUALITY

The draft Plan and EIS meet the requirements of the Rules and Regulations for the Control of Air Pollution in Idaho (March 12, 1985) and the Idaho State Implementation Plan However, we recommend that the final Plan address the following additional air quality issues

- 1 The air quality impacts from prescribed burning activities resulting from unplanned ignitions should be discussed
- 2 To reflect current Air Quality Bureau regulations, the Plan/EIS should state that the Forest will coordinate with the Air Quality Bureau on the development of a "Smoke Management Plan for Prescribed Burning in Idaho" and will abide by the Plan when it is implemented
- 3 The protection of air quality values, including visibility, in Class I areas should be addressed

We appreciate the opportunity to review the proposed Forest Plan and draft EIS Our intention is to provide constructive comments which will assist you in developing the final Plan In finalizing the Plan, please contact Steve Bauer, 334-4250, regarding the issues identified above which will require coordination between our agencies

Sincerely,

  
Lee W Stokes, Ph D  
Administrator

#### RESPONSE

(Page 6, paragraph 1) We believe that the Forest Water Quality monitoring plan does address potential water quality impacts from management activities such as mining, timber, range, and recreation. Macroinvertebrate analysis has been incorporated into the water quality monitoring program since 1978 and has proven to be a valuable tool in evaluating impacts to water quality.

(Page 6, paragraph 2) Comment noted.

(Page 6, paragraph 3) Preplanned areas will be allowed to burn only when specific prescription conditions are met. These conditions will vary by area. When a fire is discovered, an evaluation will be made to determine if the prescribed conditions exist. If prescribed conditions do not exist, suppression action will be taken. Impact on air quality is one of the prescription conditions that will be evaluated.

The Forest is receptive to coordinating with the Air Quality Bureau on the development of a "Smoke Management Plan for Prescribed Burning in Idaho". Once the plan is agreed upon by both parties and is implemented, it will become part of the Forest management policy.

A management objective has been added to address the protection of air quality values in the Plan.



October 11, 1985

Mr. Jack Griswold  
Supervisor  
Challis National Forest  
Box 247  
Challis, ID 83226

Re: Draft Forest Plan and DEIS

Dear Jack,

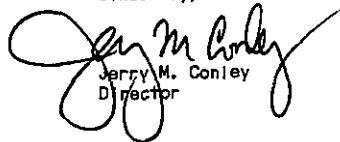
We appreciate the opportunity to review these important documents and provide our input on behalf of the fish and wildlife resources.

CNF is to be commended for producing a generally readable, understandable document. You did an excellent job of identifying issues. Your emphasis on the important fish and wildlife resources on CNF is commendable.

We do have some concerns regarding data used, interpretations and implementation. IDFG's specific comments are enclosed. Please seriously consider our suggestions. I believe our suggestions will improve your documents and benefit fish and wildlife without any adverse effects on other forest users.

Thank you for this opportunity for input into the management decisions on CNF.

Sincerely,



Jerry M. Conley  
Director

JMC:CNH:tiv

Enclosure

#### INTRODUCTION

Our comments on the Proposed Land and Resource Management Plan (RMP) and the Draft Environmental Impact Statement (DEIS) are divided into four sections. Under General Comments and Major Concerns, Idaho Department of Fish and Game (IDFG or we) elaborates on areas which we believe must be more adequately addressed by the Challis National Forest (CNF or you) in the final documents. In the next section we provide specific comments, by page number, for the Summary, DEIS, Appendices, and RMP, respectively. Third, we list some errors we found. Finally, we reemphasize some points and conclude with some recommendations that we believe can be implemented with substantial benefits to fish and wildlife and the associated recreation without any detrimental impact on other resources.

In general, we think CNF did an excellent job of identifying the major issues and putting together a RMP and DEIS that addressed those issues. Please take our comments as being constructive in nature and be assured that we appreciate this opportunity, and previous ones as well, to provide input into your planning process. We believe the close working relationship between IDFG and CNF personnel in the past is a major reason why we can generally support the RMP, with some modifications.

Your presentation is generally clear and understandable. In particular, we appreciated the fact that you included a substantial section on standards and guidelines, a detailed schedule of activities and monitoring requirements. Inclusion of graphs, summary tables and an index was a significant aid to our reviewers. The "summary" was very useful to ancillary reviewers and for quick reference to salient points.

IDFG reviewed the Summary, DEIS, Appendices and RMP in that order; but we concentrated on the RMP. Our "Specific Comments" are presented in this same order below. Generally, we tried to avoid duplication in our comments by mentioning a point the first time we encountered, or noticed, it and not repeating that point when subsequently encountered. The exception to this is the Summary which we read first primarily for information. This means that many of our Specific Comments on the DEIS also apply to the appropriate section of the Appendices and/or RMP where there is repetition between documents. We did not cross-reference these comments.

IDFG recognizes the complexity of the task involved in developing these documents and understands that they must be relatively general in nature. We hope CNF recognizes that IDFG is, therefore, unable to respond in detail regarding habitat conditions and proposed treatments or uses which influence these habitats. Thus, IDFG must reserve most of our comments on specific impacts on fish and wildlife until specific proposals, in the form of project EAs, are developed by CNF.

We also request a meeting with CNF staff prior to your developing the final EIS and Plan. Such a meeting would allow our two agencies to explore and answer, in detail, the concerns we have expressed below as well as CNF's response to those concerns. We may have misunderstood some things you propose. Or, we may have missed catching some important point. The size and complexity of the DEIS and RMP make it impossible for our reviewers to have "captured" everything. For example, the Index indicates that range is mentioned on 76 pages, roads on 43 pages, riparian areas on 28 pages, and wildlife and fish on over 100 pages.

#### GENERAL COMMENTS AND MAJOR CONCERNS

2 The goals and direction outlined in the RMP, as they apply to wildlife and fisheries, are good. Your recognition of the impacts that roading, sediment and riparian management can have on wildlife and fisheries is encouraging and we commend CNF for incorporating those concerns. In particular, the goal of meeting state water quality standards is excellent.

3 If CNF can indeed meet the goals and objectives outlined for these resources, a significant benefit to fisheries and wildlife will occur. We are concerned, however, that the goals may not be realistic because of budget prospects and other concerns we express below.

#### Lack of Specifics

4 Evaluation of CNF's proposals in the RMP was, at best, very difficult because of a lack of specifics. Rather than belabor the point, we mention only a few salient examples.

5 First, management areas are very large. How the prescriptions and/or proposed actions lie on these large areas is basically impossible to determine because they are not mapped. (One exception is your Wilderness proposal).

6 Second, you reference development and/or use of BMPs in several places. No specifics are provided beyond this general reference.

7 Third, the range management portions of the DEIS and RMP are most notable for what they do not say. There is no breakdown of the present condition of the range resources on CNF and no direction on how AUMs will be distributed between domestic livestock and wildlife. Without the missing information, we can learn little of how CNF intends to allocate the range resource and the condition of the range. The direction is to increase AUMs of livestock use as information indicates ranges improve. What part of the increase in AUMs will go to wildlife and what part to livestock? There are no S&Gs for livestock use on key wildlife winter ranges. There is no map showing suitable and unsuitable ranges.

8 Fourth, data are noticeably absent throughout the documents.

#### RESPONSE

(Page 2, paragraph 3) See response to page 3, paragraph 2-4 of your letter.

(Page 2, paragraph 4) The DEIS is as specific as the data we have allows it to be. The more specific information will be in the project work plans.

(Page 2, paragraph 5) Management Prescriptions apply to management areas which are large in size. The exact location of proposed actions or activities in a management area have not been mapped.

(Page 2, paragraph 6) Best Management Practices are being developed.

(Page 2, paragraph 7) We do not have current range conditions for all allotments. Plan II-20 summarizes our present range condition information. We provide for wildlife habitat and forage needs on an allotment by allotment basis. The allotment interdisciplinary team determines specific objectives to meet soil and water, vegetation, wildlife and other resource needs based on range and other information available. See also Range & Wildlife S&G's and objectives. A maximum of 50% utilization of grasses will be allowed on key elk winter ranges, until specific use rates are developed in allotment management plans. Range analysis suitability maps (2"/mile) were completed for all livestock allotments. At the time of the survey the majority of allotments (if not all) were under season long grazing and only reflects the suitability under that system of grazing.

(Page 2, paragraph 8) Summaries of existing land inventory information are included in the documents. More detailed information, such as the analysis of the management situation, is incorporated by reference.



## RESPONSE

Last, many of our "Specific Comments" relate directly to the lack of specifics in the DEIS and RMP.

### Budgets vs. Goals

Some of the anticipated benefits to fisheries and wildlife are attributed to habitat improvement projects which will require an increase in funding. In addition, maintaining fish and wildlife habitats is partially dependent on mitigative measures and road maintenance and closures which cost money.

Because you receive line-item budgets, you could have funds to implement the timber or road construction or range program but not the fish and wildlife programs. CNF clearly recognizes this possibility when you state that "... differences between the appropriated funds and the planned costs of achieving the Forest Plan... may adjust the implementation schedule." (II-140, DEIS).

IDFG believes CNF will have substantial difficulty obtaining the budget necessary to carry out the RMP. You clearly recognize that budgets could significantly alter your implementation schedule and your ability to meet goals and objectives (V-16, RMP). The budgeting process could essentially kill your most well-intentioned efforts to coordinate resource management and to reduce the impacts of other programs on fish and wildlife. Therefore, we believe a "variation" criteria should be added for budgets on page V-6 (RMP). IDFG recommends  $\pm 5$  percent, by line item, in any 2 years.

### Semi-Primitive Prescription

This prescription provides many of the benefits of wilderness (security areas, reservoir populations, roadless hunting and fishing opportunity) without some of the detriments (restricting habitat improvements). We believe your "Goal 7: Undeveloped Emphasis" (B-24, DEIS) is such a prescription. However, it was very difficult to determine how this prescription, or any other, will be applied on the ground. IDFG believes that much of the unroaded portion of CNF should remain unroaded but not be classified as Wilderness. We urge you to add shading to the Preferred Alternative Map to designate which areas will remain roadless. We also request that you meet with our Salmon Office personnel to identify areas which should be managed under this prescription because of their fish and wildlife values.

### Roads and Road Management

Roads and the management of them are an important factor on CNF. Roads are a concern to IDFG because of the increase in standards (reconstruction) projected and because of entries into areas that are currently roadless.

Our four main concerns regarding roads and road management on CNF are (1) sediment production as it relates to fish habitat, (2) loss of security for T&E species, (3) decreased elk, and to a lesser extent

(Page 3, paragraphs 2-4) We realize that budget levels will probably vary from year to year. A general discussion of the budgeting process and Plan implementation is contained on page II-141 of the Draft Environmental Impact Statement and page V-1 of the Proposed Land and Resource Management Plan. As explained there, if differences occur between the planned costs and the appropriated funds the Forest Supervisor may adjust the implementation schedule. These adjustments in the schedule will impact the intensity or degree of management activities rather than the acres to be managed. The areas scheduled to produce goods and services will not change but the timing and quantity of the production may be adjusted. These adjustments are considered to be within the scope of the Plan and would not require preparation of a new EIS.

In many cases, the level of a planned activity could change without affecting outputs from the Forest. One example would be road or trail maintenance that could vary without affecting the number of recreation visitor days, although the ease of travel might be affected. Depending both on funding levels and purchaser interest, the rate at which scheduled timber sales are advertised could be increased or decreased.

By adjusting intensity of management and rate at which some activities occur, most outputs would meet the projected averages for this 10-15 year plan.

(Page 3, paragraph 5) The Coordinated Allocation Choice "Undeveloped Emphasis", (Goal 7) will be applied to portions of Management Areas 14 and 20. The term, General Management Prescriptions, has been changed. They are Coordinated Allocation Choices that were used in FORPLAN to develop Alternatives. Most of every unroaded and undeveloped area will remain as it is.

deer, habitat effectiveness, and (4) loss of security areas (i.e., increased vulnerability) for big game which could cause population declines and will reduce WFUDs that can be provided.

IDFG is concerned about the impacts of roads on future big game hunting opportunity in CNF. Less secure habitats provide less hunting opportunity per animal. Roads are a major factor of habitat security. IDFG has repeatedly found it necessary to restrict hunting opportunity as vulnerability is increased by added road access. Security is a critical factor in determining habitat effectiveness and the kinds and amounts of consumptive recreation that the herds can provide.

Because of this concern, we request that CNF implement a more aggressive road management program to ensure that improved access does not detrimentally impact fish and wildlife. Also, we recommend that CNF and IDFG enter into a cooperative access management program on CNF. Such a cooperative program should be based upon:

1. Designing roads for single-purpose use unless a need for other uses is clearly shown. Such roads would never be open for general use. This prescription would be especially applicable to areas being entered for the first time.
2. Area closures if #1 is not possible. Such closures should be year-round and "permanent".
3. Seasonal closures if #2 is not possible. Such closures should be designed to reduce sediment and provide security during critical times (calving, hunting season, when roadbeds are soft, etc.).
4. A strong education program to explain that closures make it possible to reduce resource damage and achieve multiple outputs.
5. A clear willingness to enforce violations of closures.

IDFG believes the goal of access management should be "No increase in the density of open roads on CNF".

#### Economic Values

It is essential that all economic values (11-19, DEIS) used by CNF be equitable. If equitability is not achieved, decisions on resource tradeoffs will be biased because PNV is a decision criterion. IDFG believes that the values you have applied to fish and wildlife resources are low, while those applied to timber and range are high, for several reasons.

First, we are very pleased that you used a non-game economic value. However, as explained below for game species, this value is low.

Second, the base value of \$4/RVD you use is about half of the \$8/RVD cited by Loomis and Sorg.

#### RESPONSE

(Page 4, paragraphs 1-2) We feel that we will be able to maintain a nonmotorized opportunity and protect wildlife and fish habitat and big game security through Standards and Guidelines for timber, ORV's and road management. Also, see Object 6 under facilities.

(Page 4, paragraph 3) 1) Some roads are built for a single purpose use and not open to the public. Some examples are some mining roads, some timber roads, and some special use roads. The determination of what a road is to be used for, is the result of a project environmental analysis.

2) See Plan, IV-27, c.4.

3) See Plan, IV-27, c.4.

4) See Plan, IV-27, c.6.

5) Stronger Standards and Guidelines have been included in the Plan which are intended to provide better enforcement of road closures and of road-use violations.

This goal would be inconsistent with other management goals for the preferred alternative.

(Page 4, paragraph 8) See response page 4, paragraph 1-2 of your letter. PNV was not a decision criteria.

(Page 4, paragraph 9) Comment noted.

(Page 4, paragraph 10) See response page 5, paragraph 1-2 of your letter.

## RESPONSE

- 1 Third, you use a value for fuelwood that is about twice the cost of a permit but \$14.06/AUM when you get less than \$1.40/AUM (factor of 10).

2 Fourth, IDFG urges that CNF use the economic values established by the recently completed Idaho study. These values are \$50/WFUD for deer hunting, \$60/WFUD for elk hunting, \$85/WFUD for small game and \$64/WFUD for fishing. Details are available from Lou Nelson in our Boise office at 334-2920.

3 Fifth, the stumpage values you use may be inappropriate in light of the substantial decrease in prices recently. This decrease is probably due in part to the changes made in the mortgage loan industry in 1981--changes that are "permanent".

4 Sixth, relying on PNV estimates as a decision criteria may not be reliable as you recognize (B-42, DEIS).

5 Seventh, assuming non-elastic prices (B-30, DEIS) could introduce relative biases because commodity outputs tend to demonstrate price elasticity to a greater extent than do "amenity" resources.

6 IDFG believes that FORPLAN outputs would be different and emphasize fish and wildlife more if these problems with the economic analysis you used were corrected. Also, the importance of the contribution of recreation, fish and wildlife to PNV would be even more dramatic than your reference in the second paragraph of page 11-9, DEIS, or than is shown by Table 11-6 (11-91, DEIS). You recognize serious problems with your economic analysis (e.g. B-42 and 43) but it is still an important decision criterion and, in spite of the problems, should be done as correctly as possible.

### FORPLAN

7 We have already expressed some concern about the economic values used in FORPLAN. IDFG has other concerns about the appropriateness of the model.

8 You placed a large number of constraints on FORPLAN. But, apparently the only constraints which varied among alternatives were those for wilderness, timber and budget (B-123, DEIS). This could have made it impossible to arrive at an optimum solution or realistic benchmark. (We also note that no benchmark was run for maximum fish and wildlife). Thus, it is possible that the final solutions would not vary much among alternatives. If so, the constraints applied rather than the objectives stated for that alternative could be what determined the final "solution".

9 On balance, IDFG would not be surprised to find that the FORPLAN outputs bear little resemblance to reality. This concern is the primary reason we did not dwell on projected outputs as much as on standards, prescriptions, goals, schedules, etc. of the RMP and DEIS.

(Page 5, paragraph 1) The economic data used in the Plan is based on the value of the use and not the amount collected or returned to the Treasury. There are uses like wildlife or wilderness where high values were used, but no money is returned to the Treasury.

(Page 5, paragraph 2) At the time of our FORPLAN runs, these new values had not been formalized. Therefore, RPA values were used.

(Page 5, paragraph 3) The Challis National Forest utilized the information available on Forest to determine stumpage values. During the alternative evaluation process, the Forest did take this problem (the value of timber now and in the future compared to what it historically had been) into account. Within the first decade, FORPLAN suggests economical timber harvesting could occur above the 3 MMBF/year level yet timber harvest schedules were held at the current level within our preferred alternative. We feel there presently is a balance, which the timber industry demand reflects, as low level harvest occurring from the Challis National Forest. This supports a small local demand and virtually no regional demand. Until demand for timber products from this Forest increase, it is doubtful increases in timber sale scheduling will occur. This will continue to be reevaluated every ten years.

(Page 5, paragraph 4) PNV was not used as a decision criteria.

(Page 5, paragraph 5) The Challis National Forest used prices and values available at the time we developed our alternatives and these may not reflect today's prices or trends.

(Page 5, paragraph 6) See responses above.

(Page 5, paragraphs 8-9) The constraints listed on pages B-123 and 124 relate only to alternatives. Pages B-59 thru 81 discuss benchmark constraints. We believe the FORPLAN alternative and benchmark solutions provided valuable input during the alternative development and evaluation process. We fully understand that FORPLAN is not a perfect resource allocation model, if there is such a thing, and that portions of our model are probably flawed. Nevertheless it was used to assist us in our process to compare a variety of management strategies. It did not provide the Forest's final solution in whole. Constraints applied to each FORPLAN run were important in determining the run solution as was the objective.

### Wilderness Recommendations

On May 18, 1984, the Idaho Fish and Game Commission passed a motion detailing their support for wilderness areas in Idaho. A letter from the IDFG Director to the CNF Supervisor, dated November 21, 1984, reaffirms this position concerning these critical fish and/or wildlife habitats.

2 The criterion used by the Commission in choosing areas to recommend for wilderness classification was conservative. They recommended only those areas where wilderness was deemed the only way to meet IDFG management objectives for the animals occupying these critical areas.

3 The Commission's recommendation included roadless areas 06-012 (Borah Peak), 06-915 (Hanson Lakes) and 06-921 (Pioneer Mountains). It is not essential that these areas receive official Wilderness classification, only that they remain in a roadless condition. Therefore, we have evaluated the alternatives on the basis of whether you propose development in these areas. On this basis, IDFG can support Alternative 11 with the modifications suggested here. We would prefer that 06-915 be recommended for Wilderness but no development is minimally acceptable. We recommend that the Borah Peak proposal be increased to include all of the currently undeveloped area (in particular, we do not understand your rationale for excluding the small strip along the southwest boundary nor the areas on the northeast corner.) All of 06-921 between Star Hope Creek and Wildhorse Creek should be Wilderness.

### Standards and Guidelines

4 IDFG was very pleased that CNF included a detailed section on standards and guidelines (S&G). These S&Gs, along with the monitoring program outlined, are generally good. However, we were disappointed that many were badly weakened by the use of qualifiers (essentially, where possible, etc.). We strongly urge CNF to edit such qualifiers out of the final documents.

5 Many of the S&Gs refer to improving or maintaining wildlife habitats but don't indicate where or how this will be accomplished--they sound good but no real direction or commitment is made. We found the recreation, timber and range guidelines to be specific and quantified, this was not true for wildlife. (An example from IV-181, RMP, will suffice to illustrate the point. You say "Allow for fish habitat improvement" when, to be consistent with the recreation directions above, you should say "Improve fish habitat.") We do not feel this is because of a lack of quantifiable S&Gs for wildlife, many are available for sage grouse and elk, for example.

6 We noted many significant differences in S&Gs between adjoining national forests relating to riparian management. It seems apparent that Regional and Inter-Regional guidelines need to be established within the Forest Service for riparian management. It makes little

### RESPONSE

(Page 6, paragraphs 1-2) Comments noted.

(Page 6, paragraph 3) Roadless Area - 06-915 - The only planned project is 32 acres of wildlife habitat improvement.

Roadless Area - 06-012 - Some additions have been made (see map). The south west boundary was put above the water diversion structures, transmission pipes and ditches and access routes to these areas which are needed for maintenance. It also excludes the area easily traversed by off road vehicles which makes the boundary easier to administer.

Roadless Area - 06-021 - Some additions have been made in these areas (see map).

(Page 6, paragraph 4) The qualifiers have been eliminated.

(Page 6, paragraph 5) Several Standards and Guidelines have been clarified and strengthened.

(Page 6, paragraph 6) We have added Management Direction to the Plan to provide for development of more specific Riparian Habitat Standards and Guidelines which will be coordinated with adjacent Forests.

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sense to us to have different goals for stream bank stability (for example) in the same drainage just because two different national forests are involved.

#### Stream and Riparian Classification

IDFG believes CNF should adopt a stream and riparian classification system to protect the important fish and wildlife resources associated with these systems. Certain streams are more important than others and should be treated accordingly. Without a classification system, it is impossible for IDFG to really understand how well your RMP will meet the needs of these systems. Also, it is impossible for CNF or IDFG to determine if "serious injury" will occur without a classification system. Thus, your statement that "Water quality would meet State standards under all alternatives." (11-135, DEIS) cannot be evaluated and/or supported.

IDFG in cooperation with USFS and others is currently classifying all streams in Idaho under a BPA contract. This effort will be completed in late 1985. We hope you will endorse and use the results of this cooperative effort to guide CNF's management in the future.

#### Regenerating Forests

IDFG has some serious questions regarding the prospects of CNF being able to get adequate regeneration, especially of Douglas-fir, on much of CNF, but especially in the drier sites. IDFG personnel are familiar with several examples of past failures. We request that CNF proceed very cautiously.

#### Fire Management

Fires, both natural and man-caused, play an important role in the ecosystems on CNF. Policies and philosophies of CNF regarding fire suppression and rehabilitation will have a major effect upon the future condition of CNF. IDFG believes CNF should explain, in more detail, how they plan to manage wildfires and escaped controlled burns. We request that wildlife seeding mixes be included when rehabilitating such fires. IDFG also requests acreages burned by unplanned fires be deducted from acreages of similar habitat subsequently scheduled for controlled burns or other treatments. This philosophy of substitution is especially important in sagebrush habitats.

#### Best Management Practices (BMP)

You mention BMPs in several places.

IDFG cautions that use of BMPs in no way guarantees that RMP goals or state water quality standards will be met. We are willing to work with CNF to develop a stream classification system which will interface with the proposed Serious Injury Guidelines of Idaho Department of Health and Welfare.

### **RESPONSE**

(Page 7, paragraph 1-2) Forest Service has a stream classification system for fisheries called the GAWS (General Aquatic Wildlife System) program. Riparian classification for central Idaho is currently evolving through several studies, the most important of which was done by Muttz and Quiroz on the South Fork of the Salmon River. Also the study by Tuey and Jenson in the Stanley Basin area is helping to refine our methodologies. The Challis National Forest is in the initial stages of conducting Forest-wide Soil and Water Resource Inventories. Incorporated within these processes will be a riparian area classification scheme. Currently, the Fish and Wildlife Service methodology of riparian classification is being considered. The Forest would appreciate working with IDFG to develop an acceptable methodology.

(Page 7, paragraph 3) Comment noted.

(Page 7, paragraph 4) The primary objective in rehabilitating wildfires is to protect watersheds from unnatural soil erosion. A statement has been added to fire management standards and guides which states, "Ensure wildlife seed mixes are considered when rehabilitating wildfire".  
2) Natural fire occurrences are considered in meeting our objectives.

(Page 7, paragraph 5) The Forest streams presently meet state water quality standards. Our Management Standards and Guidelines and Best Management Practices should ensure that we will continue to meet state standards as well as meeting our water quality goals.

The Ninth Circuit Court of Appeals, in Northwest Indian Cemetery Protective Association vs. Peterson (CA No. 83-2225), found that "Adherence to the BMPs does not automatically assure compliance (with water quality standards)." We believe that CNF should examine this decision in detail to ensure that their intended use of, reliance on, and reference to BMPs is in keeping with this decision.

We also urge you to make sure your RMP and DEIS address mitigative measures adequately to comply with said decision. They ruled that the EIS "...must analyze the mitigative measures in detail. . ." and must explain "...how effective the measures would be."

Likewise, have you adequately addressed cumulative impacts? They ruled that the Blue Creek EIS didn't adequately address cumulative effects because "...the effects were judged as 'average' increases in sediment over a period of years." If we interpret your RMP correctly, CNF also places considerable emphasis on averaging.

Finally, does your sediment model, or other impact estimates, consider the impacts of catastrophic failures or events? The court found that "...risks must be revealed if they appear substantial. . . (and) failure to disclose such risks in the EISs renders them inadequate."

#### Sales Below Cost

IDFG is indirectly concerned about this general subject because such sales are often on poorer timber sites (slower recovery, less benefit to wildlife from overstory removal, etc.), in steeper areas (more chance for erosion and mass failure), in current roadless areas (improved access, loss of security areas), etc.

However, IDFG believes that CNF should carefully examine this issue in light of the recent decision by Deputy Assistant Secretary MacCleery which orders a rewrite of management plans for the San Juan, Grand Mesa-Uncompahgre and Gunnison National Forests because "...the plans provide inadequate economic justification for selling timber at deficit prices." Does the CNF DEIS and RMP comply with this decision?

#### Categorical Exclusions

IDFG urges CNF to make auster use of categorical exclusions rather than the rather liberal use you appear to propose on page V-1, RMP. We believe the liberal use you have allowed for is inappropriate because (1) of possible cumulative effects, (2) of a lack of good inventory and other data for some resources, (3) the DEIS and RMP provide primarily general and/or philosophical guidance rather than specifics, (4) you do not adequately cover existing condition and trend of rangelands, and (5) it is very difficult to tell how the proposals in the RMP will "lie on the ground" since so few specifics are included.

### **RESPONSE**

(Page 8, paragraph 1) See previous response.

(Page 8, paragraph 2) Mitigation measures identified in the Plan will be monitored to insure that they are meeting their intent. The Plan provides management direction, standards and guidelines for establishing mitigation. The details for site specific activities will be evaluated in environmental analysis and included in project plans.

(Page 8, paragraph 3) The plan is broad in scope. Details are addressed at the project level.

(Page 8, paragraph 4) This is outlined in the scope of the Plan.

(Page 8, paragraph 5) We must manage habitat today for objectives that may not be reached for 50-100 years. Our management direction is to concentrate our timber management activities on the most productive and economic sites.

(Page 8, paragraph 6) Goal 1 for timber says that we will provide volume to support local mills or approx. 3.0 MMBF per year. Cost was not our primary consideration. If local demand drops, we can reduce the volumes offered for sale.

(Page 8, paragraph 7) If issues and/or concerns are raised on a project that are not covered adequately by the Plan, an Environmental Analysis will be made, and the project modified if necessary.

### Range of Outputs

You state that CNF is required, under ". . . Washington Office Guidelines. . ." (11-3, DEIS) to develop ". . . alternatives that. . . reflect a broad range of resource outputs. . ." (11-4). However, the range of outputs among alternatives for some resources is definitely not broad. For example, there is only an 8 percent difference between the high and low outputs for WFUDs. In contrast, Alt. 2 proposes 20 times the timber harvest of Alt. 7, clearly a broad range.

### SPECIFIC COMMENTS

#### Summary

- 2 9: We suggest you include the allocated and actual use AUM numbers in this discussion.
- 3 14. The values given on the last two lines of this table are the actual figures, not the differences from Alt. 1 as the heading states.
- 4 15: Section G should also address the adverse effects of increased use on wildlife security, the probability that IDFG regulations will have to become more restrictive to compensate for increased human activity, and the increased chances for conflict among users as use levels increase.
- 5 25: Under 3. Goal 1, shouldn't CNF have objectives for the other 2 T&E species?
- 6 25: The reference to IDFG plans in the next to last line should be changed. We recommend omitting the date. At the least, the dates should be changed to be current, i.e., 1986-90.
- 7 27: The wording of #7. Goal 1 implies that minerals have top priority on CNF rather than being integrated with other uses as per issue #1 (pg. 18).

#### Draft Environmental Impact Statement (DEIS)

- 8 11-1: You have a conflict between statements in the next to last paragraph. The first sentence states that "Non-priced components. . . contribute to NPB. . .". However, sentence #3 states "These components do not contribute to NPB. . .".
- 9 11-4. Why were "Resource benchmarks" developed for only 3 outputs (timber, grazing, wilderness) but not for others (fish, wildlife, recreation)?
- 10 11-7. In the last sentence of #g., you have reversed the order of reference to PVC and PNW from the previous comparisons. Such inconsistencies unnecessarily complicate the reviewer's job.
- 11 11-16: Your Wilderness recommendations seem low considering the high PNW of this benchmark.

### RESPONSE

(Page 9, paragraph 1) The range of outputs of some resources are not broad because some outputs were constrained very little by other resources in the FORPLAN RUNS and some outputs are beyond our control. i.e. WFUDs are controlled by leisure time, income etc, etc.

(Page 9, paragraph 2) We agree. AUM's have been added.

(Page 9, paragraph 3) Correction was made.

(Page 9, paragraph 4) Correction was made.

(Page 9, paragraph 5) The Challis National Forest will follow management guidelines for the Bald Eagle and Peregrine Falcon developed in the biological assessments (see Appendix G).

(Page 9, paragraph 6) Correction was made.

(Page 9, paragraph 7) Correction was made.

(Page 9, paragraph 8) Correction was made.

(Page 9, paragraph 9) We were not required to. Also, because most MIS populations are so far below potential habitat capacity, changes in other resource outputs had little effect on predicted populations. With little predicted change, benchmarks were not needed.

(Page 9, paragraph 10) Comment noted.

(Page 9, paragraph 11) Comment noted.

1 11-19. IDFG commends CNF for placing a value on non-game resource use (nature study).

2 11-25 Under the "Range" discussion you should clarify how the increased forage production would be attained to offset the impacts on riparian zones, wilderness and other resource values.

3 11-28 In paragraph 2, sentence 2 states that all reconstruction will be completed by year 30. However, the next sentence notes "some reconstruction" in the last decades.

4 11-30 IDFG recommends that CNF include PNV, PVC, and PVB at the end of this table as you did for the benchmarks (11-11 thru 17).

5 11-32 In the last paragraph, how can "MIS. . . be maintained. . ." when " . . . wildlife habitat capability would decrease. . . "?

6 11-33. How can WFUDs increase significantly over 50 years when wildlife habitat "capability" would decrease (11-32), as would water quality and soil productivity (bottom of 11-33)? Why will coordination efforts with timber, range and minerals not be met? The rationale should be included.

7 11-44. Is there baseline data for riparian habitat so improvements, if they occur, can be quantified? There is no mention of including riparian improvements or protection in new allotment management plans.

8 11-62. How can you offer less timber under a "constrained" budget than you can under a "reduced" budget (~25 percent) (see Alt. 6)?

9 11-62. You state that range activities would be the same as Alt. 4 but the AUM levels are higher in Alt. 4 than in Alt. 7.

10 11-79. With an "unconstrained budget" why can't you also intensify wildlife habitat management (paragraph #1)?

11 11-87. We think the direction for the Range program (11-44) should be more definite. For example, completion of the 28 AMPs should have a timetable not " . . . as time permits." Also, CNF should clearly indicate what they will do to improve riparian condition and trend not just say it " . . . should slowly improve. . . ".

12 11-87. We note that, after the first ten years, timber harvest is projected to increase significantly through the fifth decade. Road construction/reconstruction follows a similar pattern. There is no rationale provided for the increase and potential conflicts with other resources are likely. Given the admitted low quality timber on CNF, the problems with regenerating Douglas-fir and the potential for much higher PNV from wildlife/recreation activities, we question the logic of increased timber harvest under the preferred alternative.

## RESPONSE

(Page 10, paragraph 2) Increase in forage production (AM's) will be attained through; 1) vegetative manipulation practices such as burning or herbicide; 2) structural improvements (fencing, water development) to make unused or light use areas more available and; 3) general improvement of range forage condition.

(Page 10, paragraph 3) The Plan only addresses the first 10 years. Road reconstruction will be updated at this time.

(Page 10, paragraph 4) These are not discounted tables. See tables II-7A (DEIS)

(Page 10, paragraph 5-6) Currently most of our big game populations are substantially below the potential habitat capability. Game populations are below carrying capacity in many areas. There will continue to be population increases in the future even though our habitat capability will not change much and in some cases may slightly decrease in quality. We foresee a continued increase in WFUD's on the Forest especially with increasing populations of hunted species.

(Page 10, paragraph 7) 1) Very little baseline data for riparian habitat is available at present. The Plan provides direction to inventory, monitor and evaluate physical and biological conditions within riparian communities. This information can be used in future planning processes. 2) Allotment management plans are developed on an individual allotment basis. They are developed within the scope, direction and guidelines of the Forest Management Plan. Riparian areas will be specifically addressed in each allotment management plan. An interdisciplinary team, which includes the wildlife discipline, will be used to formulate alternatives and trade-offs associated with each alternative and recommend specific management objectives for the allotment resources.

(Page 10, paragraph 8) The emphasis of each alternative is different. In addition to changes in budget and timber, emphasis of other components change.

(Page 10, paragraph 9) Actual use was used in the analysis of the Alternatives. There is little difference between the two alternatives. In permitted AUM's there is a two thousand AUM difference.

(Page 10, paragraph 10) Alternative 10 was designed to continue the current trend of goods and services, except that timber and range management would be intensified. Thus wildlife can not be emphasized above current trend.

(Page 10, paragraph 11) 1) Schedule for completing AMP's is in Appendix B. 2) Site management direction will be developed by an interdisciplinary team as individual range allotment plans are updated or developed.

(Page 10, paragraph 12) The Plan only addresses the first 10 years. Timber harvest schedule and road projections will be updated at this time.



## RESPONSE

1 11-88 Sediment yield will increase as a result of new management activities and sediment at old sources will be reduced. Why not use the same technology to reduce sediment at new source sites as well as old?

2 11-88 IDFG suggest that you add a paragraph summarizing the recent (1980-85) "happenings" in large minerals projects on CNF.

3 11-88: IDFG supports your proposal to recommend 9 new RNAs.

4 11-89: In paragraph 1, you state that man-caused fires would ". . . continue at past levels . . ." (sentence 1) and ". . . Increase as number of forest users increase." (sentence 2). This contradiction should be eliminated. As the last sentence shows, it could be quite important whether there is or isn't an increase.

5 11-90 This table shows an increase in allotted AUMs beginning in the first decade and continuing through Decade 5. This may lead to a direct conflict with fish and wildlife values. If this increase is related to expected improvements in range management you need to explain how this will be accomplished and quantify the expected improvements. The major grazing-wildlife problem areas are riparian zones, wet meadows and winter ranges. We have yet to see a demonstration on CNF of significant long-term improvements in range conditions short of fencing out key areas, which is costly and generally opposed by permittees.

6 11-91. The benefits from wildlife and fisheries are more than double the combined timber, range and minerals values. This is a significant statistic and should determine CNF's direction through the planning period.

7 11-93: Why do wildlife costs, but not benefits, increase under Alt. 3?

8 11-115 How can fish habitat capability increase and water quality improve when sediment also increases?

9 11-122. IDFG is pleased that CNF clearly states that economics is "(t)he biggest restriction to the management of timber . . .". Why do the economics improve in latter decades?

10 11-128. It is noted that range administration funding would decrease under the Preferred Alternative at the same time increases in AUMs will occur. Won't an increase in funding be needed for allotment administration to assure proper use levels under increased grazing? Why will range condition be maintained or decrease under Alt. 3 if AUMs are reduced? It seems more likely that decreased use would result in improved range condition. Should paragraph 6 read ". . . estimated actual use. . ." rather than ". . . estimated permitted use. . .?"

11 11-129 Range Administration costs for Alt. 8 substantially exceed those for Alt. 3. However, Alt. 8 indicates a 14 percent decline in AUMs versus a decline of only 6 percent for Alt. 3. Why?

(Page 11, paragraph 1) Similar technology to reduce sediment at new source sites will in fact be applied, but due to a greater erosion potential at a newly disturbed site versus an old site, it allows for a greater chance for sediment to reach a drainage.

(Page 11, paragraph 2) See III-29 FEIS and AMS.

(Page 11, paragraph 3) Comment noted.

(Page 11, paragraph 4) The contradiction has been corrected.

(Page 11, paragraph 5) There are no increases in the first decade. Projections past the first 10 yrs. are estimates based on improved management and projects.

(Page 11, paragraph 6) The Plan places increased emphasis on Wildlife and Fish.

(Page 11, paragraph 7) An increase in habitat improvement projects (cost) would increase habitat quality but would not necessarily result in increased wildlife numbers or wildlife user days (benefits).

(Page 11, paragraph 8) The sediment levels that appear in the EIS show the potential for production among alternatives. So when water quality improves and sediment increases together, as in the RPA alternative, more funds will be available for improvement, administration, and construction mitigation which will probably reduce the sediment output below the projected level.

(Page 11, paragraph 9) The statement has been clarified. See page II-123 of the FEIS.

(Page 11, paragraph 10) There is no increase in permitted AUM's during the ten year planning period, added administration costs are increased above the present level (See EIS, II,129-130). Reduced AUM's does not necessarily translate into improved range condition. The majority of the range in less than satisfactory (less than fair) condition occurs on areas most preferred by livestock. In most situations it is management rather than AUM's that causes the problems. Alt. #3 has the least dollars for administration. Paragraph 6 was changed.

(Page 11, paragraph 11) Alternative 8 gives greater emphasis to range administration.

RESPONSE
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1 11-135: If sediment yields are expected to increase under Alt. 11 (paragraph 4), how can water quality improve (paragraph 1)?.

2 11-138: Bighorn sheep and elk habitat needs would not be met under Alt. 3. Because Alt. 3 calls for lower levels of livestock grazing and the diets of elk, bighorns and cows overlap considerably, this does not seem reasonable.

3 111-10: Habitat changes are very likely to occur in sagebrush/bunchgrass associations because of "improvement" projects. An indicator species dependent on these habitats (e.g. sage sparrow, sage grouse) should be selected. Further, you failed to select an indicator species that might reflect habitat changes in riparian zones, despite concerns over these valuable and highly visible areas. What is wet sagebrush/grass? Wet sagebrush usually means dead sagebrush. The red squirrel occurs in a wide variety of habitats and is not necessarily dependent on climax communities. Under #b.4., you should also note that bighorn sheep are associated with lower elevation, bunchgrass and bunchgrass/mountain mahogany types especially during winter. See also page 111-11 at c.1)c).

4 111-11: IDFG supports your chosen aquatic MIS. Dolly varden trout are now called bull trout. You should either change the name or list both, one parenthetically.

5 111-11: We applaud the inclusion of plants in the MIS list primarily because effects upon them are often easier to monitor than are effects upon vertebrates. However, we wonder why you did not include any "forest" plants. In most, if not all cases, sagebrush is not indicative of seral range conditions. There is an abundance of literature to support the contention that sagebrush is a climax species (Daubenmire 1968, 1978; Hironaka et al. 1983; Tisdale and Hironaka 1981, Hall 1973; and others). We are not aware of any good evidence to support the notion that sagebrush is a seral species.

6 111-12: The implication under #2)a) and b) that climax coniferous forest is not deer or elk habitat is untrue. This type provides important thermal cover and is often heavily used as bedding areas, especially during July-September.

7 111-13: The table indicates that red squirrel populations are not tracked, but on page 111-10 you said that population objectives and populations can be established and tracked for Management Indicator species. This inconsistency should be corrected. Although we have restricted hunting on some mountain goat populations, we doubt that they are below MVP levels on a forest-wide basis.

8 111-14: What percentage of the riparian area has been improved, and to what degree has the area improved? This information would be helpful in determining if the effects of Alt. 11 would significantly increase the percentage of improved riparian habitat.

(Page 12, paragraph 1) See response to Page 11, paragraph 8 of your letter.

(Page 12, paragraph 2) Correction was made.

(Page 12, paragraph 3) The selection of MIS was made using the selection criteria identified in the summary of the AMS (Chapter III of the Forest Plan). An important factor considered was that the species populations and habitat could be technically monitored. We feel our selection of MIS meets the criteria listed.

We do not have the various riparian habitats identified or mapped. It would serve no purpose to identify an MIS without first identifying and mapping the riparian habitat.

"Wet sagebrush" is a PACA type. The definition is identified in the "Glossary" Chapter VII of the EIS.

Red Squirrel is considered a primary prey species for Goshawks and Pine Marten on the Challis. It is also indicative of mature conifers. Granted, there may be better indicators of "Climax Forest" or "Old Growth", but with the Forest's "Old Growth" situation, we feel Red Squirrel will be adequate for the intent and purpose.

Bighorn sheep rarely occupy dry sagebrush/grass on the Challis. Where they do occupy dry sagebrush/grass it is in association with rock scree; most of which occurs on the BLM.

(Page 12, paragraph 4) The name has been changed to Bull Trout.

(Page 12, paragraph 5) 1) We did not include any Forest plants because we feel our animal MIS are sufficient.

2) We agree with your statement about sagebrush being a "Climax" species. Depending on the subspecies, there is only an estimated 10-20% sagebrush canopy cover in a climax stand. In many of our stands, sagebrush cover is twice that level, therefore we referred to it as a disclimax. The section has been rewritten.

(Page 12, paragraph 6) Mature conifer stands were not necessarily classified as "climax coniferous forest". The habitat types you describe were classified as "savanna forest, spruce-fir/forest or seral coniferous forest". One of the assumptions of the wildlife data base is that the animal spends 90% of its life occupying that habitat. If this assumption had not been made, it would have been impossible to delineate habitat which is most preferred by the species and require special management emphasis.

(Page 12, paragraph 7) You have misread the statement. The statement reads: "They are species for which populations and habitat objectives can be established, and will be tracked as indicators of habitat capability." Red squirrel habitat or "climax coniferous forest" will be tracked as acres of habitat.

(Page 12, paragraph 8) This information is not available.

1 111-14: IDFG believes CNF should expand paragraph 2 to include a discussion of the tradeoffs involved in harvesting climax forests. That is, you should clearly state that some species of animals will benefit while others will be harmed.

2 111-15: IDFG supports your referencing our planning documents. We request that the final EIS be updated by referencing the 1986-90 versions which will all be finalized by January 1986. You have not referenced our Anadromous Fish Plan which has specific production goals. We would be glad to go over this plan with you so our goals can be incorporated in the RMP.

3 111-17 The first paragraph of #h. needs clarification. Hunting and fishing licenses are not limited. The numbers of non-resident deer and elk tags IDFG sells are limited as are numbers of permits to hunt certain species and/or areas.

4 111-18: You should include a table showing the current condition (i.e. poor, fair, good) of ranges on CNF. It is impossible for a reviewer to get the "big picture" of the current condition of CNF's rangelands. You should also present a graph showing trends in range condition if this information is available. The descriptions of management area also lack these data, making it difficult to decide if the proposed management fits the current situation (range conditions).

5 111-19 How much of the riparian ecosystem has been inventoried and classified? The percentages provided would be more meaningful if we knew how much of the riparian zones were included. The next to last paragraph indicates that riparian problems will continue because technical knowledge is lacking to solve the problems. This statement detracts from the extensive work being done by Bill Platts of the USFS Intermountain Forest and Range Experiment Station, as well as other agency and university researchers. It seems to us that most riparian problems can be solved with existing technology but it is expensive (e.g. electric fencing) and a commitment to shift funds and/or reduce grazing must be made to solve the problems.

6 111-19. Although there is good data to indicate past grazing practices influenced sagebrush/grass communities by decreasing the amount of grass (Anderson and Holte 1981), there is little conclusive evidence to suggest that past grazing practices increased the density of sagebrush (Tisdale and Hironaka 1981). Unless you can back up your statement, it should be dropped or modified.

7 111-22: The discussion of Douglas-fir regeneration problems on CNF is an important issue because it affects important wildlife habitats. We have noted similar problems with regenerating Douglas-fir on adjacent National Forests and often lodgepole pine is planted after Douglas-fir falls to regenerate. We believe these lodgepole pine stands provide inferior habitats for elk as well as being less desirable to the timber industry (see Regenerating Forests under General Comments).

8 111-32. It is not clear whether grazing is considered an appropriate use of the proposed RNAs. Will grazing continue on these areas if they are selected?

## RESPONSE

(Page 13, paragraph 1) In our original Analysis of Management Situation (AMS) (6/15/82) we included a discussion of the trade-offs of MIS with management objectives. The AMS is available for review at the Forest Service Supervisor's Office.

(Page 13, paragraph 2) Changes were made.

(Page 13, paragraph 3) Changes were made.

(Page 13, paragraph 4) Our present range condition information is summarized on Plan II-20. Allocation of AUMs by allotment is in Plan Appendix B. Allocations are based on carrying capacity of an allotment, not on the basis of range condition. Allotment management plans set the management direction for the allotment, including specific areas of concern (poor condition range). We don't have extensive current data showing trends in range condition.

(Page 13, paragraph 5) Only one or two drainages have been inventoried. Change has been made.

(Page 13, paragraph 6) We disagree. A Review of the Ecological Literature, Bulletin #33, May, 1981 page 19, (Tisdale and Hironaka), clearly states just the opposite.

(Page 13, paragraph 7) Douglas-fir is a shade tolerant species which will regenerate under a lodgepole overstory. Past regeneration failures of Douglas-fir are being successfully regenerated with lodgepole pine as a nurse crop for natural establishment of Douglas-fir (See Page II-21). Lodgepole also meets our cover objectives.

(Page 13, paragraph 8) This will be determined in the establishment report. Grazing may occur in some RNAs.

1 IV-3: CNF should also mention that wildlife are also impacted by intensive use at developed sites and that, short of restricting human use, such impacts cannot be mitigated.

2 IV-4: As mentioned under Roads and Road Management above, IDFG urges CNF to be less liberal with their "Open to Wheeled Vehicles" acreage.

3 IV-8 The quality of the wilderness experience could vary depending on the alternative chosen because more area available would reduce concentrations, thus increase quality.

4 IV-9 Why is it assumed that demand for timber will increase to meet the supply offered? That has not been the case in recent years.

5 IV-12. IDFG commends CNF for clearly justifying why the "tentatively suitable timber base" was reduced to a "proposed suitable timber base".

6 IV-14. Why was Alt. 11 the only one to use clearcutting during the 1st and 2nd decades?

7 IV-15: We recommend you reword the last sentence in paragraph 4 to allow for permanent fencing to protect riparian areas.

8 IV-17 We do not understand how CNF can increase the capability for red squirrels by 10 percent. They are a MIS of mature conifers (111-10), CNF's forested areas are currently predominately mature (111-21), and you propose to increase timber harvest thus slightly reduce acreage of mature conifers.

9 IV-17: It is not clear why the habitat capability for mountain goat and bighorn sheep is below 100 under the proposed alternative. What effects are you expecting that would reduce the habitat capability?

10 IV-18. There is no mention of any program for habitat improvements in Alt. 11. Where will most of the improvement occur, riparian, range, forest, etc?

11 IV-18/19 You state that riparian areas will be managed at the highest level for fish and wildlife under Alt. 3, 4, 10 and 11. Then on IV-36 there is no mention in Alt. 11 of riparian areas receiving any benefits. Which statement is correct?

12 IV-18/19. In the last paragraph you state that under Alt. 3 riparian areas will be managed at the highest level (emphasis added). On page IV-15 (second paragraph) you state that under Alt. 2 and 3 riparian conditions will be maintained or decline. Which is the correct statement?

13 IV-22: Since livestock management is a more "active" program on CNF than timber management, we believe the discussion here should place more emphasis of the effects of range management practices (brush treatment, grazing systems, seeding mixes, etc.).

## RESPONSE

(Page 14, paragraph 1) Addition was made.

(Page 14, paragraph 2) Some roads are built for a single purpose use and not open to the public. Some examples are some mining roads, some timber roads, and some special use roads. The determination of what a road is to be used for, is the result of a project environmental assessment.

(Page 14, paragraph 3) This statement has been revised.

(Page 14, paragraph 4) This has been deleted.

(Page 14, paragraph 5) Comment noted.

(Page 14, paragraph 6) Because the acres are so minimal, they were not developed until the preferred was chosen.

(Page 14, paragraph 7) We agree. This has been done.

(Page 14, paragraph 8) Old growth will increase by 10%.

(Page 14, paragraph 9) The fifty year projections are based on a projected increase in mining roads and associated human activities along with an increase in motorized trails which will decrease habitat capability slightly below today's level.

(Page 14, paragraph 10) See statement added on FEIS IV-18. See table IV-9 FEIS.

(Page 14, paragraph 11) Revised in Plan.

(Page 14, paragraph 12) Revised in Plan to Alternative #2 only.

(Page 14, paragraph 13) A statement has been added concerning grazing systems and sagebrush treatment. There are no extensive seeding projects planned.

IV-22: Given the statement in the first paragraph, it is pretty hard to accept "diversity" as a justification for cutting timber. However, we fully agree that natural processes will play the most important role in affecting forest diversity over time. We fully support your program to implement "let-burn" policies.

IV-23: Some explanation of how fish habitat capability can increase (IV-17) in spite of expected increases in sediment production from mining (effect #1) would seem necessary.

IV-30: You mention all alternatives except #11 under #6.b.

IV-31: Again, it is not clear if grazing will be allowed in RNAs.

IV-32: The threshold for detrimental effect on fry emergence does not allow for a buffer for potential problems that may arise. A more realistic goal would be 20-25 percent to allow a buffer. In the areas that are below the 30 percent (20-25 percent) sediment yield threshold, increase in sediment should not be more than 1 percent and there should be no increase in drainages that contain anadromous species. Your statement that "... fry emergence significantly diminishes when the fine sediment by depth approaches 30 percent. ..." (emphasis added) suggests that you should operate below this level. Again, IDFG cannot support anything above a 25 percent threshold.

IV-33: In paragraph 5 you state that water quality will improve under Alt. 3, 4, 7, 10 and 11. How can this be when Alt. 11 predicts an increase in sediment yield (IV-34)?

IV-34: CNF's selection of the alternative with the third highest sediment yield raises some questions regarding your commitment to water quality and fisheries resources.

IV-37: IDFG supports your intention to develop plans for the use of "... naturally ignited prescribed fire in the ..." FC-RNRW. We strongly urge CNF to provide for the use of "man ignited prescribed fire" where necessary to maintain ecosystems. Past suppression has created some unnatural situations and it seems appropriate to use "man ignited fire" to compensate for the effects of past fire suppression by man.

IV-41: In paragraph 5, you should also note that roading areas can have a major impact upon animal security, therefore, the restrictions of seasons IDFG must authorize and the kind and number of WFUDs the resource can provide.

IV-43: Fishing activity can have a significant impact on businesses but it is not among the list in paragraph 4.

IV-43: Although we do not take exception with the statements in paragraph 5, IDFG believes CNF should note that "... recreational and amenity uses. ..." are more important nationally because alternate area for production of timber and game are more abundant than those for, as an example, roadless elk hunting and anadromous fish production.

## RESPONSE

(Page 15, paragraph 1) We agree. On III-16 we are not adjusting timber harvest, but simply saying that where we harvest timber, vegetative and animal diversity will increase.

(Page 15, paragraph 2) Site specific increases in sediment from mining should be offset by onsite mitigation and decreases in other areas due to improved management techniques and sediment reducing projects. This should result in an increase in overall habitat capability.

(Page 15, paragraph 3) Alternative 11 is added to the last group.

(Page 15, paragraph 4) Light grazing occurs in some of the proposed RNA's. Whether or not this continues, will be decided in the Committee's establishment report, after consultation with all involved parties.

(Page 15, paragraph 5) Anadromous fisheries are heavily emphasized in four management areas (1,3,4,5) and are emphasized along with other resources in four others (6,7,8,9). We are also emphasizing the anadromous fish resource through the goals and objectives and standards and guidelines.

The Forest agrees and is committed to maintaining or improving the sport fisheries resource.

The Forest agrees and the Plan under goals and objectives indicates the need for improved fish habitat management. The Forest-wide standards and guidelines gives general direction on how to improve management with specifics shown under individual management area prescriptions and guidelines.

(Page 15, paragraph 6) See response to page 11, paragraph 8 of your letter.

(Page 15, paragraph 7) The commitment to water quality is demonstrated in the support given to a progressive water quality monitoring program in the Plan. Specific standards and guidelines are established in the Plan which set sediment threshold limits that may affect earth disturbing activities.

(Page 15, paragraph 8) The Fire Management Plan for the Frank Church--River of No Return Wilderness has been completed and approved. It contains these provisions.

(Page 15, paragraph 9) Increased road construction/reconstruction and associated human use will increase big game security need. Where elk security needs are not adequate, new roads may be closed.

(Page 15, paragraph 10) Addition was made.

(Page 15, paragraph 11) Comment noted.

IV-58 In paragraph 3, it seems inappropriate to consider activities not pursued "...because of land capability constraints..." as irreversible and irretrievable commitments. The rest of this section appropriately addresses commitments because of conducting some action

IV-58 and 59. The last sentence on IV-58 says that activities "...would reduce..." roadless area acreage by the following amount within the next decade." But, the figures given on IV-59 are acreages which remain roadless, not area reductions.

IV-59 IDFG urges CNF to expand section G to include a discussion of the effects of increased human use on wildlife harassment levels, security areas, and a possible reduction in WFUDs provided if IDFG has to implement more restrictive seasons to compensate for these impacts.

#### Appendices to DEIS

4 A-0. A master table of contents to this volume would be helpful

5 B-8 Statements 3 and 4 under Alt 3 are contradictory.

B-9. Why were you less specific in describing adjustments made to the final FORPLAN run for the Preferred Alternative than for other alternatives? IDFG believes the same specificity should have been applied to each alternative. If there is justification for a difference, it seems more detail should be provided for Alt. 11.

B-13. Why did you have outputs for sediment from timber harvest and road maintenance but none for road construction/reconstruction?

B-15: Why are there 4 low (S5, S7, S8, S9) sediment groups?

B-34: Why isn't there a multiplier for WFUDs or other outputs?

B-35 and 36. The model used to predict sediment yields and the effect on anadromous fish accounts for the effects of road building, timbering, mining and grazing on an individual basis. At the present time this model does not predict the combined effects of all these sources of sediment. This is another reason for lowering the sediment yield maximum to 20-25 percent

B-41 As you recognize, and as we point out under V-9 below, averaging can create serious "problems".

B-130: It is unfortunate that you focused discussion "...mainly on economic trade-offs..." because you, rightfully, previously spent a substantial amount of space down-playing the reliability of the economic analysis, especially PNV.

C-77. You should indicate, on this map, the portion (116,000 acres) being recommended for Wilderness. Same comment applies to pages C-120 and C-128.

C-130 Paragraph 6 mentions mountain grouse but there is no such species.

#### RESPONSE

(Page 16, paragraph 1) We agree. Paragraph was deleted.

(Page 16, paragraph 2) Correction was made.

(Page 16, paragraph 3) See response to page 15, paragraph 9 of your letter.

(Page 16, paragraph 4) A master Table of Content has been added.

(Page 16, paragraph 5) Change was made.

(Page 16, paragraph 6) Change was made.

(Page 16, paragraph 7) Projected sediment outputs included road construction/reconstruction activities. This explains the higher sediment output projected for alternatives that schedule higher levels of construction/reconstruction.

(Page 16, paragraph 8) These low sediment groups were developed for different geographic areas on the forest but they all used the same value.

(Page 16, paragraph 9) At the present, the Forest does not have the capability of modeling sediment associated with grazing activities. Until this is developed, the Forest will have difficulty in projecting an accurate account of sediment production by model alone.

(Page 16, paragraph 10-12) Comments noted.

(Page 16, paragraph 13) This is shown on the Selected Alternative Map.

(Page 16, paragraph 14) Correction was made.

- 1 G-0. This cover page does not mention the wolf although Part B covers the wolf.

Proposed Land and Resource Management Plan (RMP)

- 2 II-35: Under research needs you might mention the ongoing cooperative USFS-BLM-IDFG elk study in Herd Creek.

- 3 II-35: You should add "Correct wildlife/other resource conflicts with emphasis upon key wildlife habitats." to #2.

- 4 II-35: You might add, under #3, "bring allotments in line with capacity", along with improving administration.

- 5 II-37: Why have fish and wildlife been omitted?

- 6 III-1: The statement under ISSUE #2 that "Following the evaluation process, specific management direction will be implemented." implies nothing will be done prior to that. You should correct this.

- 7 III-2: IDFG urges CNF to add a paragraph to #3 which addresses the issue of road management vs. wildlife security areas and types and amount of consumptive WFUDs that can be provided under various levels of road closures.

- 8 III-13: What is the minimum viable population level?

- 9 IV-1. "Goal", as used here, does not have the same meaning as "Goal" on page B-23, DEIS. The "goals" in Appendix B are really "prescriptions" and should be referred to as such to avoid confusion here.

- 10 IV-3. The goals given here for fish and wildlife habitat improvement do not match outputs given elsewhere (e.g., page 16, Summary or V-2, RMP). Earlier totals were 689 acres and 19 structures. The totals here are 680 acres and 20 structures. If we added figures correctly, the totals derived from pages IV-192 thru 216 are 675 acres and 20 structures per year.

- 11 IV-4: Goal #4 is an admirable one but lacking details. Could you list some objectives so the reader can look for specific programs proposed to meet these objectives? We suggest one objective might be to identify and map important wildlife habitats (such as key elk summer ranges) so that forest managers/wildlife biologists can monitor the effects of management programs on these habitats.

- 12 IV-4. IDFG urges CNF to add a goal (#6) which states "Develop and implement a cooperative road management program to protect and/or improve fish and wildlife habitat and to maintain non-motorized WFUD opportunity." (see Roads and Road Management under General Comments above). Maybe this should be Goal #4 under Facilities on IV-10.

**RESPONSE**

(Page 17, paragraph 1) The cover page has been corrected.

(Page 17, paragraph 2) This section refers to future needs not on-going studies.

(Page 17, paragraph 3) Statement has been added.

(Page 17, paragraph 4) Statement has been added.

(Page 17, paragraph 5) Only selected outputs were displayed.

(Page 17, paragraph 6) Change has been made.

(Page 17, paragraph 7) See response to page 4, paragraph 1 and 2 of your letter.

(Page 17, paragraph 8) MVP is defined in the Glossary. Minimum Viable Population levels by species are shown on page II-132 of the Plan.

(Page 17, paragraph 9) The coordinated Allocation Choices heading in Appendix B was clarified.

(Page 17, paragraph 10) Correction was made. See page IV-4 of the Plan and tables.

(Page 17, paragraph 11) Wildlife habitat inventories are meant to define these key areas etc. See wildlife goal 3.

(Page 17, paragraph 12) A road management program will be developed for specific areas as needed to manage and protect all resources. The Idaho Department of Fish and Game will be included in this process. See Forest Plan, Goal 2, Objective 6 page IV-10 and the response to page 4 paragraph 1 and 2 of your letter.

IV-4: You should also add a goal to follow wildlife habitat guidelines. Under it, you should specifically mention the elk, sage grouse and antelope guidelines.

IV-5 Goal #6 should be reworded so that adequate forage/space is maintained for elk. The objective should be to provide forage and suitable displacement areas for elk.

IV-6: Goal #1 for Minerals indicates this resource has the top priority on CNF. This management direction could be in direct conflict with several other resource groups and users. The goal should be reworded.

IV-6. Objective #3 of Goal #2 should require, not just encourage, ongoing reclamation work.

IV-10+. We find the Forest-wide Management Direction, Standards and Guidelines section difficult to interpret as written. While we recognize many of the important wildlife/fishery topics relate to grazing and timber activities, the reader would be better served to have the relevant S&Gs summarized in one place even if it means they are duplicated elsewhere.

IV-12: In #c, we suggest you delete "mitigate", these activities should be prohibited.

IV-12. We recommend you add a S&G which addresses the problem of domestic sheep-bighorn sheep disease transmission. Will CNF take an active role in trying to reduce opportunities for disease transmission in existing or potential bighorn habitats?

IV-12: We question whether an ID team is needed as suggested in #1. This should read "Where snowmobiling use conflicts with winter big game habitat, this activity will be eliminated".

IV-14. IDFG commends CNF for referencing species guidelines. (You should include the antelope guidelines, also.) However, we think reference to these guidelines should be made under "Wildlife and Fish" and that you should change "...will be used as guides." (#y) to "...will be adopted as part of CNF's guidelines."

IV-14. Aren't there utilization guidelines outside of riparian areas? There should be, especially on key wildlife areas such as winter ranges, rearing areas, etc.

IV-14. The utilization rate in riparian zones seems quite high, particularly if it occurred on a key elk winter range. We suggest no more than 20 to 30 percent of new leader production.

IV-15: For #k, see IV-14 above. As you have stated it, CNF's commitment to integrating timber and elk management is quite weak.

IV-15. Under #n, we urge you to establish a minimum density as well as a minimum height. Alternately, we suggest you use Thomas' definition of hiding cover.

## RESPONSE

(Page 18, paragraph 1) See Management Direction Standards and Guidelines, Wildlife page IV-14 of the Plan.

(Page 18, paragraph 2) Goal 6 as worded, provides for adequate forage/space and suitable displacement areas for elk, providing the allotment or allotments are capable of providing that option.

(Page 18, paragraph 3) We have reworded the goal. There was no intention to imply that mineral activity has absolute priority, however locatable mineral activity is a statutory right. The intention is to eliminate unneeded mineral withdrawals as well as arbitrary and capricious restrictions.

(Page 18, paragraph 4) For some operations it is not possible to begin reclamation work until the mining is completed. This must be addressed on a case by case basis.

(Page 18, paragraph 5) We disagree; all Standards and Guidelines are to be used, therefore, it is not necessary to duplicate them by subject.

(Page 18, paragraph 6) We disagree, many times potential sediment levels from a proposed activity can be reduced to acceptable levels through mitigation measures.

(Page 18, paragraph 7) We have added an additional Standard & Guideline, (o), which addresses this concern.

(Page 18, paragraph 8) Elimination of an activity is one alternative to resolving the problem. There are others which we may want to pursue.

(Page 18, paragraph 9) They are now included in the wildlife section.

(Page 18, paragraph 10) Utilization standards or proper use criteria will be determined on a site by site basis and contained in the allotment management plans.

(Page 18, paragraph 11) The 50% utilization rate for new leader growth is the maximum use level. The portion allowed for livestock and for wildlife will be determined by an interdisciplinary team and contained in the Allotment Management Plan.

(Page 18, paragraph 12) We disagree.

(Page 18, paragraph 13) We will use "sight distance" in place of minimum density and minimum height.



1 IV-15: Forty acre clearcuts are larger than those recommended in the Elk Habitat Relations for Central Idaho, which supposedly will be used as a "guide". This is a bothersome inconsistency.

2 IV-16 There appears to be a conflict between #m on page IV-15 and #r on this page. Which has priority?

3 IV-17: IDFG does not see how anadromous populations under Alt. 11 can increase more than under any other alternative when habitat improves under Alt. 3, 4, 7, 8, 9, 10 and 11 at the same rate, slowly, and is supplemented by the same amount of mitigation in every alternative. More specific information is needed for each alternative so the reviewer can follow your conclusions.

4 IV-17 Could you define "timber land" vs. "around openings" (#z)?

5 IV-27. IDFG strongly supports, and will actively cooperate in implementing, #c.6) on road closures.

6 IV-30 IDFG is pleased that CNF has set "Riparian" apart as a separate section.

7 IV-30. Allowing up to 50 percent utilization of streamside vegetation offers insufficient protection for fish and wildlife habitats. We recommend you allow removal of no more than 25 percent of the overhanging vegetation.

8 IV-30. You should specify a rate of improvement rather than allowing "trends" toward 90 percent. Moving from 10 percent to 15 percent bank stability, might not be an acceptable rate of improvement.

9 IV-30. What are "problem areas" in #1 and #j?

10 IV-44: This map does not identify MA #24. (The Preferred Alternative Map does).

11 IV-45+. You are inconsistent in your reference to "Soil and Water". It is referred to as "Soil and Water" or "Soil and Watershed" or "Watershed".

12 IV-45+ In general, we find throughout the descriptions of wildlife species that mountain lion and black bear are mentioned only occasionally, yet their distribution is ubiquitous in forested habitats. Game birds are also mentioned infrequently, yet they are economically important wildlife in several management areas.

13 IV-55: There are few, if any, bighorn sheep in MA 3 (or MA 4 or 5). Although you state that MA 3 will remain essentially unchanged, we think the "management" of 5,175 acres of timber is a substantial land altering activity.

14 IV-56 You should emphasize protection of riparian/wet meadow zones, as this is an important area for anadromous fish and big game.

## RESPONSE

(Page 19, paragraph 1) The Elk Habitat Relations for Central Idaho does not define the maximum size of a clear cut. It defines distances from cover which we will consider in laying the sale out.

(Page 19, paragraph 2) Direction to utilize logging slash for firewood purposes is given in r. Direction to leave some logging slash to provide for wildlife cover is given in m. The statements are not in conflict.

(Page 19, paragraph 3) Anadromous fish increase more under alternative 3 than any other alternative. Alternative 11 shows the second greatest increase because of the emphasis on soil and water restoration projects and a high level of fishery investment.

(Page 19, paragraph 4) Timber lands are timber stands. Around opening is the edge of a timber stand.

(Page 19, paragraph 5) We appreciate your support in managing and enforcing road closure policy.

(Page 19, paragraph 6) Comment noted.

(Page 19, paragraph 7) That standard has been dropped. Utilization standards will be determined on a case by case basis.

(Page 19, paragraph 8) The "trend toward" is needed for streams or other water bodies which do not currently meet the desired criteria. Within the 10 year period, it may be impossible to obtain 90% inherent bank stability for all areas on the forest.

(Page 19, paragraph 9) "Problem areas" are those areas where unacceptable disturbance or damage is occurring.

(Page 19, paragraph 10) This map is provided as a quick general reference for reader convenience. Because of the map scale it is not practical to show Management Area 24.

(Page 19, paragraph 11) We have made the necessary corrections to "Soil & Water".

(Page 19, paragraph 12) These descriptions are used to informally establish a descriptive setting about the Management Area for the reader. It is not intended to establish a species list or clarify importance.

(Page 19, paragraph 13) We have corrected the statement referencing bighorn sheep. There are only 300 acres of commercial timber programmed for harvest in the 10 year period. The desired future condition not only takes this into account but also looks at the total effects of all resource activities. We feel this Management Area will remain virtually unchanged.

(Page 19, paragraph 14) A statement has been added to emphasize improvement of riparian areas and wet meadows.

1 IV-57. Does "eliminate non-winter travel from wet meadows" mean the  
 1 Knapp Creek road will be closed below the major meadow complexes? If  
 so, where?

2 IV-58. Referencing the FRES strategy in Appendix B tells the reviewer  
 little about management direction. This area is important to elk and  
 should be managed accordingly. Our 1986-90 elk management plan calls  
 for a slight increase for elk in game management unit 36.

3 IV-58: We will cooperate in evaluating potential moose habitat but  
 these areas will probably be low on the statewide priority list for  
 transplants as stock is limited and other areas already identified have  
 higher priority.

4 IV-59. At least 80 percent of overhanging streamside vegetation should  
 be retained on key anadromous streams. Utilization should not exceed  
 30 percent in the adjacent riparian areas.

5 IV-74. We doubt that your major emphasis on habitat work should be on  
 mountain goat ranges. There are few development activities that impact  
 goat habitats. Your emphasis on the Yankee Fork management unit should  
 be to identify elk-livestock conflict areas and resolve these through  
 better livestock distribution.

6 IV-75. Although you say riparian management will be emphasized, there  
 are no S&Gs listed.

7 IV-79: Under "Desired Future Conditions" we find the statement  
 regarding wildlife replacing livestock to be unwarranted. Why would  
 this be a concern only in this management area? If your management  
 practices are truly balanced, this should not be a problem in any  
 management area.

8 IV-81. We suggest that management direction #1 should be to maintain  
 or improve (emphasis added) wet meadows, etc. Perhaps another goal  
 should be to identify and map key sage grouse seasonal ranges so these  
 areas can be avoided in treatment projects. We also suggest you  
 include a management direction dealing with CNF's position on  
 reintroduction of bighorn sheep into historical habitats.

9 IV-81. Why will it take until 1996 to develop a long-range burning  
 plan?

10 IV-81: We suggest a goal of maintaining 80 percent of overhanging  
 streamside cover on key streams (identify with IDFG input).

11 IV-81: Improvement of stream banks should probably be rated on bank  
 stability, i.e. stream bank stability will not be reduced by more than  
 "X" percent.

12 IV-81: We are not sure what sagebrush/grass cover ratios are. Are you  
 referring to sagebrush canopy coverage? Here is an ideal location for  
 adopting the Sage Grouse Workshop Guidelines, as the East Fork  
 management area is one of your most important sage grouse areas.

## RESPONSE

(Page 20, paragraph 1) Specifically there are no plans to close the Knapp  
 Creek road. There are areas which are receiving unacceptable resource  
 degradation. The intent of specifically identifying management direction to  
 eliminate nonwinter travel from wet meadows is to identify and resolve  
 conflicts that are currently occurring.

(Page 20, paragraph 2) We agree. A definition of the FRES strategies have been  
 added to the Glossary of the EIS. This should help the reviewer understand  
 generally how the livestock will be managed. The specific details are  
 contained in the Allotment Management Plan. A statement has been added to  
 Management Area #3 direction, to emphasize improvement of riparian areas and  
 wet meadows. That should be very beneficial to the elk.

(Page 20, paragraph 3) Of all areas evaluated on the Forest, Cape Horn  
 possesses one of the highest capability indexes for moose. Our intent is not  
 to make comparison in relation to the statewide priority list.

(Page 20, paragraph 4) The amount of overhanging bank vegetation cannot be  
 realistically set Forest-wide, but must be determined on a site by site basis.

(Page 20, paragraph 5) There is no emphasis on management of goat habitat  
 improvement.

(Page 20, paragraph 6) There are no site specific Standards and Guidelines but  
 the Forest-wide Riparian Standards & Guidelines will be applied.

(Page 20, paragraph 7) We disagree. Our statement is a commitment to maintain  
 a balance of uses.

(Page 20, paragraph 8) Changes were made to address these points (see Plan  
 IV-85).

(Page 20, paragraph 9) This was a typo, we have changed this to 1988.

(Page 20, paragraph 10) See response to page 20 paragraph 4 above.

(Page 20, paragraph 11) Stream bank morphology is so variable across the  
 Forest that it would be difficult to apply a percentage. Refer to Riparian  
 Standard & Guideline "e".

(Page 20, paragraph 12) It is the amount of sagebrush canopy to openings.  
 Sage Grouse Workshop Guidelines will be used as guides.

1 IV-84 Wildlife is not addressed under desired future conditions.

2 IV-86. It seems that inventorying habitats and identifying improvement needs are two different items. You don't need to identify improvements until you have determined if improvements are necessary.

3 IV-91. Your statement that you will refer (emphasis added) to elk habitat guidelines demonstrates a lack of commitment. You should use "follow" or "adhere to". An important elk herd is found in this management area and the grazing plan implemented recently should be closely monitored to ensure adequate forage and space if provided for these elk.

4 IV-104. Maintaining 75 percent stream overhanging vegetation might be a better goal in this area because of the importance of recreation. What are "major" areas?

5 IV-106. What does "further emphasis" mean in reference to timber sales/mineral activities within the North Fork (Big Lost?) drainage? This is an important wildlife area and we may have concerns with development activities here.

6 IV-107. Star Hope Creek provides a good fishery and both creeks have high quality riparian. They should not be sacrificed for mineral development, as this suggests.

7 IV-110. The area has both scenic value and archaeological sites.

8 IV-112. IDFG has no plans to transplant sage grouse into this area.

9 IV-115. There is no mention of bighorn sheep in this management area--they are found here.

10 IV-117: What stocking program is referred to?

11 IV-117. We believe it will be very difficult to improve the quality of big game seasonal habitats with the current level of livestock use on the Garden Creek allotment.

12 IV-119. Management Direction under minerals seems to contradict your direction for maintaining high water quality.

13 IV-121. In paragraph 8 you give the impression that mule deer are scarce in this area. They are not.

14 IV-122. Under Wildlife and Fish, the last sentence should be stronger. We recommend "encourage increases in bighorn sheep. . ." rather than "accommodate increases. . .".

15 IV-128. Our terminology is "big game management Unit", not "Herd Unit". We have no plans to transplant sage grouse into this area.

16 IV-129. Change "Refine big game. ." to "Define and protect big game. ." and eliminate "as needed".

## RESPONSE

(Page 21, paragraph 1) We have added a statement addressing the desired future condition of wildlife and fish.

(Page 21, paragraph 2) We agree. This statement does not imply anything else.

(Page 21, paragraph 3) Elk Habitat Guidelines will be used as guidelines.

(Page 21, paragraph 4) See response to your page 20, paragraph 10.

(Page 21, paragraph 5) This means that any ongoing or future timber sales and mining activities will receive higher priority by the soil and watershed resources for monitoring and inventory.

(Page 21, paragraph 6) We do not sacrifice one resource for another, we manage.

(Page 21, paragraph 7) We have added this information.

(Page 21, paragraph 8) We have deleted Sage grouse.

(Page 21, paragraph 9) We have included bighorn sheep.

(Page 21, paragraph 10) We have deleted the statement.

(Page 21, paragraph 11) We agree. The monitoring system now in place will determine whether we are achieving our objectives. If objectives cannot be met through improved administration, livestock distribution, or range condition problems persist, livestock reductions will have to be made.

(Page 21, paragraph 12) We have only recognized the mineral potential of the area, realizing it may someday be mined and discouraging investments of other resources that may be lost when it occurs. Any mineral activity would be required to protect or mitigate impacts to the municipal water supply.

(Page 21, paragraph 13) We have changed the wording.

(Page 21, paragraph 14) We have changed the wording to encouraged.

(Page 21, paragraph 15) We have changed the wording.

(Page 21, paragraph 16) The statement has been changed.

1 IV-135. We suggest you add a statement that you will work cooperatively with IDFG to minimize contact between bighorn sheep and domestic sheep in this area to reduce potential disease transmission problems.

2 IV-136. How much range is currently in poor condition? You can have an upward trend but the range can still remain in poor condition. CNF should commit to improving the range to fair or good condition.

3 IV-141. There seems to be a contradiction in your general management direction (maintain wildlife habitat) and your direction under Wildlife and Fish (improve habitat productivity). We hope CNF will improve habitat conditions, particularly for elk, as this area contains an increasing elk herd (Willow Creek summit) that is visible and important to the public.

4 IV-143. How will you mitigate livestock-wildlife conflicts (paragraph 5)?

5 IV-150. We suggest you eliminate the reference to ptarmigan and chukar partridge stocking. We have evaluated the north Lemhi range and found the area unsuitable for ptarmigan. We would appreciate your cooperation on monitoring the existing populations of chukars.

6 IV-158. The statement regarding domestic sheep/bighorn sheep priorities is misleading. IDFG has never requested the removal of domestic sheep from any existing allotment so bighorns could be re-established. All reintroduction attempts are made in areas where contact between the two species would be minimal. A more positive statement on your commitment to re-establishment of bighorns in historic habitat on CNF seems in order.

7 IV-163. We believe you should list maintenance or improvement of wildlife habitats as a high priority in the opening statement. Your own statement on page IV-162 points out the importance of this area as a "...very popular deer and elk hunting area" (emphasis added). It also contains important bighorn sheep habitats, and, as you are aware, sheep management in Morgan Creek has been a locally sensitive issue in the past.

8 IV-164. You should specify how you will resolve vehicle/wildlife conflicts.

9 IV-164. There is no mention of the important elk calving/summer/fall ranges in upper Morgan Creek. How will timber harvest be coordinated with big game needs?

10 IV-165. You state more access will be created for fuelwood gathering. Will there be seasonal restrictions? Access management as it relates to big game harvest is a major concern of IDFG.

11 IV-198. Is the "150" figure missing under range improvement burning, 1992, an error or is no treatment planned that year?

## RESPONSE

(Page 22, paragraph 1) See new Wildlife Standard and Guidelines o, page IV-14 of the Plan.

(Page 22, paragraph 2) See information added to EIS III-21.

(Page 22, paragraph 3) The statement in the general management direction has been changed to "emphasize maintenance or improvement".

(Page 22, paragraph 4) Specific mitigation for livestock/wildlife conflicts will be determined on a case by case basis.

(Page 22, paragraph 5) The management direction has been changed as you have suggested.

(Page 22, paragraph 6) True, Idaho Dept. of Fish and Game has never requested the removal of domestic sheep for Bighorns. However, there is a concern in the livestock industry that when we allow a reintroduction of Bighorn sheep adjacent to a domestic sheep allotment that it will lead to the eventual loss of that sheep allotment. The statement addresses that concern.

(Page 22, paragraph 7) We have changed emphasis in Morgan Creek to include wildlife and fish.

(Page 22, paragraph 8) We will determine how to resolve vehicle/wildlife conflict on a case by case basis.

(Page 22, paragraph 9) The Forest will coordinate big game needs with timber harvest through various guideline documents, such as the Elk Habitat Relationships for Central Idaho. The Forest Plan objectives, standards and guides, and prescriptions as well as professional judgement from wildlife biologists will be used.

(Page 22, paragraph 10) Fuelwood access roads, like many roads on the Forest, may have seasonal closures to meet watershed or wildlife needs.

(Page 22, paragraph 11) Yes, the table has been corrected.

## RESPONSE

1 IV-217: It would have been most helpful to have acres and MBF in the "Action Schedule" tables on the preceding pages.

2 IV-218 thru 221: At least, the miles of reconstruction should have been included in the "Action Schedule" tables.

3 V-5: It would seem appropriate to describe the possible outcome of "further evaluation". How easily and/or quickly can a non-conforming activity be modified or stopped? Who will do the evaluation? What recourse does the damaged interest have?

4 V-6: Because a 5-year measuring frequency provides only one opportunity for corrective action during this planning cycle (10 years), we urge CNF to change frequency for A07 to  $\leq 3$  years.

5 V-7: See V-6 re A01.

6 V-9: Your variation statement for C01 will be essentially impossible to violate. IDFG could detect and document a 20 percent change. However, it would be virtually impossible to prove that such change was due to habitat changes on CNF. Therefore, we request that you delete "Due to change in habitat on National Forest System Lands."

7 V-9: See V-6 re C01a.

8 V-9. IDFG believes that reporting periods should not exceed 5 years for the reason given in V-6 above.

9 V-9: The "variation" for C01a is unacceptable because a decline in habitat conditions on <10 percent of CNF could severely impact wildlife populations if that decline occurred in critical areas. This is a case where Forest-wide averaging could cause serious local problems. In certain critical habitats a "no decline" criterion should be applied. In other habitats a -5 percent, and, in yet others, a -10 percent criterion would be acceptable. As with stream classification mentioned earlier, certain areas are more important than others and CNF should recognize this in their monitoring program.

10 V-9: Under C01c, your monitoring program appears to violate the concept of MIS. The fate of the MIS is supposed to be what is monitored to detect how well management of its habitat is meeting objectives. But here you propose to monitor percent in old growth to determine how well you are meeting old growth goals. The squirrel does not even enter the picture. What you really have designed is a system to use old growth to try to monitor squirrel populations.

11 V-10: IDFG urges you to change "if trend is down." to "if trend is down or below good and static."

12 V-10: See V-6 and V-9 (immediately above) re the first entry.

13 V-10: See V-9 re 436 and E02.

(Page 23, paragraph 1) We believe that the additional information presented on this table justifies displaying timber harvest separately.

(Page 23, paragraph 2) The "Planned Transportation Reconstruction of Arterial, Collector, and Local Roads, Chapter IV of the Forest Plan, identifies miles of reconstruction.

(Page 23, paragraph 3) It would be difficult to define in all circumstances how fast the non-conforming activity could be stopped. Technically, we are not managing for, nor will we allow non-conforming activities.

The Forest Service is responsible, but cooperating agencies and the public will assist in the evaluation.

(Page 23, paragraph 4) It is highly doubtful that a shorter frequency would be sensitive enough to determine a variation which would cause a change in management direction.

(Page 23, paragraph 5) If significant increases in ORV use occur the measurements will be made more frequently.

(Page 23, paragraph 6) We assume you will assist us in this determination. We feel this is an important concept in our monitoring program and therefore do not wish to delete this variation.

(Page 23, paragraph 7) We have changed to: "Decline in habitat on 10 percent of the Management Area".

(Page 23, paragraph 8) We do not believe that in all cases we will be able to tell changes in habitat conditions in less than 8 year intervals.

(Page 23, paragraph 9) See response to paragraph 7 above.

(Page 23, paragraph 10) We strongly disagree that our monitoring program violates the concept of MIS. In reference to tracking old growth, we are using acres instead of populations because; 1) our management will invariably be increasing old growth in place of decreasing it, and 2) we are concerned whether within the next 10 years we are going to affect old growth positively or negatively. The primary importance in tracking old growth in the FORPLAN model was to monitor changes in 150 years of timber harvest and constrain the model from violating the minimum viable populations (MVP) of species dependent on "old growth" or what we have classified as "Climax Coniferous Forest".

(Page 23, paragraph 11) We have changed to read, "If trend is down or if condition is poor and trend is static".

(Page 23, paragraph 12) Most timber sale contracts last 3-5 years. We do not believe a shorter reporting period will provide any greater validity to the monitoring process.

(Page 23, paragraph 13) See response to paragraph 4 above.

1 V-11. In the last column of E07, it would seem to be just as appropriate to reevaluate if >10 percent of unsuitable lands were incorrectly identified. Therefore, we suggest you omit the word "suitable" from this entry.

2 V-12. The last entry does not provide a frequency. Rather, in that space, it gives "where" Somewhere you should define which reaches, how they will be selected, etc.

3 C-1 Elsewhere, you have called them "Management Areas" not "Zones".

#### ERRORS

We did not make any attempt to peruse the documents for errors. However, several were noted and are offered below to aid CNF in revising these documents. They are listed by document, page number and location on that page.

<u>Page</u>	<u>Location</u>	<u>Error</u>
<u>SUMMARY</u>		
21	#11, line 1	115,000 to 115,000
31	B, line 3	they to They
32	C.1.b.	Dispersed to Dispersed
<u>DEIS</u>		
11-21	line 26	extend to extent
11-26	line 12	no ) after WFUD's
11-57	line 2	823,555 to 823,255
11-93	line 6	form to from
11-138	#1, Column 1	no ) after recreation
111-11	c 1)b)	blank line missing after entry
111-16	last line	Wildlife and Fish to Fish and Wildlife
111-18	#4, line 8	grazing, to grazing
IV-31	#f, line 2	will proposed to will <u>be</u> proposed
IV-36	10 & 11 lines up	result the to result <u>in</u> the
IV-36	6 lines up	of to on
IV-44 & 45	Table IV-14	most values in this table have + or - in front of them <u>but some do not</u>

#### RESPONSE

(Page 24, paragraph 1) Timber inventories will not be conducted in areas that are identified as unsuitable for timber harvest.

(Page 24, paragraph 2) The reaches to be monitored are identified in the State Water Quality Monitoring Plan, available for review at the Forest Supervisors Office. The State is considered a part of the yearly review process.

(Page 24, paragraph 3) We have corrected.

(Page 24, paragraph 4, page 26, line 13) We have made these corrections.

VIII-7	line 11, last column	129, <u>u</u> to 129,
<u>APPENDICES</u>		
A-5	line 10	resourceuses to resource_uses
B-2	Step 4	paragraph split in half
B-5	b., line 2	<u>on</u> to <u>or</u>
B-7	3 lines up	<u>the</u> FORPLAN to FORPLAN
B-9	4 lines up	Program to Program
B-35	#2, line 9	estimated <u>of</u> to estimated
B-41	D., line 6	<u>this</u> data to <u>these</u> data
B-83	11 lines up	rquired to <u>required</u>
B-124	Alt. #9	Internal separation line missing
B-127	last line	<u>G</u> enerally to Generally
B-129	14 lines up	WFVD to WFUD
C-10	last line	. <u>u</u> to .
C-57	3 lines up	<u>un</u> available to available
C-77	page	map is upside down
C-96	line 3	06- <u>5</u> 15 to 06- <u>9</u> 15
C-130	line 22	<u>m</u> ountain to mountain
C-131	10 lines up	+111,702 to +111,702
C-133	last line	C-133, <u>u</u> to C-133
D-2	middle	paragraph 3 and 4 are identical
G-14	"Pedersen"	second line not indented
<u>RMP</u>		
II-35	#H	shouldn't be indented
III-4	#11, line 2	115,000 to 115,000
IV-4	Goal 5, Obj. 2	<u>g</u> ame to <u>G</u> ame
IV-12	3.c.	2209.22, <u>u</u> to 2209.22.

RESPONSE
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IV-13	k-1	no space between these entries
IV-16	p	with to <u>within</u>
IV-22	4)(4)	for and to for <sub>2</sub> and
IV-26	h, line 1	contact to <u>contract</u>
IV-39	center	(MBF) to (MMBF) ?
IV-39	Rt. figure	extra 3.0 on left
IV-119	"Lands"	should follow G06
IV-135	C01	Game BLM to Game <u>and</u> BLM
IV-217	center	totals given are incorrect should be 5,360 and 27,300
IV-218	paragraph 2	sentences 3, 4 and 5 are the same
V-8	B03, column #2	omit conditions
V-9	line 1	IH to <u>MIH</u>
V-9	b.	blank line missing between b & c

CONCLUSIONS

Alternative 3 represents the mix of forest activities which benefits wildlife most (we disagree with your assessment of this alternative). This Alternative, if coupled with a maintenance of current levels of grazing and timber harvest, would de-emphasize commodity resources in favor of those resources (wildlife, fish, recreation) which most CNF users probably prefer and which contribute most to PNW. We request that you give Alt. 3 strong consideration during your review.

We can support Alternative 11, however, if CNF makes the changes we have recommended. We presume the projected increases in AUMs and MMBF after Decade 1 can be addressed in the next round of Forest planning. We believe you have not adequately reflected the dollar outputs of wildlife/fish/recreation in comparison with commodity products (timber, mining, domestic stock) in your management direction. The standards and guidelines for wildlife are weak and do not represent a high level of commitment to the wildlife resource. In general, you have struck a good balance between wilderness and unroaded management but we would like to see a semi-primitive classification applied to several areas we feel are important "quality" big game security/hunting areas.

(Page 26, paragraph 1) Comment noted

(Page 26, paragraph 2) The Plan is for a 10 year period.

We used the best information available at the time our FORPLAN model was run.

We believe our Standards & Guidelines are flexible and give strong, on the ground direction.

We have included a semiprimitive, nonmotorized prescription.



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1 You need to make a stronger commitment to road management. You should develop or adopt a stream and riparian classification system. Your fine sediment threshold should be below 30 percent. You should change the economic values assigned to the different resources to achieve equitability. You should correct the many inconsistencies and contradictory statements. You should provide much more information and be specific.

2 Lastly, and maybe most importantly, you should give all resources equal billing rather than treating minerals as "top dog". (Statements on page 27, Summary; RMP, IV-6, Minerals, Goal #1; RMP, IV-107 bottom of page and elsewhere indicate that minerals received preferential consideration.)

#### LITERATURE CITED

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- Hall, F.C. 1973. Plant communities of the Blue Mountains in eastern Oregon southeastern Washington. USDA Forest Serv. Pacific NW Region R6 Area Guide 3-1. 62 pp.
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- Tisdale, E.W. and M. Hironaka. 1981. The sagebrush-grass region: a review the ecological literature. *Forest, Wildl. and Range Exp. Sta. Bull. No. 33.* Univ. of Idaho, Moscow. 31 pp.

R9PC180TV

#### RESPONSE

(Page 27, paragraph 1) We have added stronger language to road management.

We will initiate a riparian classification process.

We disagree that the sediment threshold should be below 30%.

Wildlife & Fish ran the model in optimizing PNV.

Inconsistencies and contradictory statements have been corrected.

Our Forest Plan and EIS is as specific as data will permit.

(Page 27, paragraph 2) See response to page 18, paragraph 3 of this letter.

# The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION  
PHONE (208) 785-2080  
Land Use Commission (208) 238-3826



LAND USE COMMISSION  
P O BOX 306  
FORT HALL IDAHO 83203  
August 23, 1985

Forest Supervisor  
Challis National Forest  
P.O. Box 404  
Challis, ID 83226

RE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE CHALLIS  
NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN

Dear Forest Supervisor

The Shoshone-Bannock Tribes need additional time to review the EIS for the Challis National Forest and R M P. In our preliminary review of the draft document, the Tribes were not specifically identified as being impacted. The Tribes have significant treaty rights under the 1868 Treaty of Fort Bridger, Article 4, guarantees the continuation of traditional tribal use rights on land outside the original Fort Hall Indian Reservation.

"... the [the Tribes shall have the right to hunt the unoccupied lands of the United States so long as the game may be found thereon, and so long as peace exists among the whites and Indian on the borders of the hunting districts." 15 Stat 674, II Kappler 1021 (emphasis added)

The Tribes have significant interests in the development and management of this region in their aboriginal occupancy area, particularly the mixed band, Lemhi (Shoshone-Bannock, and Sheep-eaters) which have become part of the Shoshone-Bannock Tribes, who have been moved to Fort Hall in 1906. Yet, have retained their aboriginal rights to use this area for hunting (fish and game). The term "hunting" in Shoshone also means fishing or "to hunt for fish"

Forest Supervisor - Challis National Forest  
August 23, 1985  
Pg 2

The Shoshone-Bannock Tribes have significant issues, and concerns to be addressed, including, management opportunities for the Challis National Forest. We wish to add the following questions to your list of issues to be addressed

The questions are

- 1 "To what extent will Forest Service address the Tribe's 1868 treaty rights?"
2. To what levels will treaty rights be managed for
  - a Wildlife enhancement and protection
  - b Anadromous fisheries enhancement and protection
  - c Trout and other fresh water fish enhancement and protection
  - d Non-game species, such as, eagles
  - e Gathering rights.
3. To what extent will your management alternatives address the Shoshone-Bannock Tribe's treaty rights?

## Alternatives

Alternatives 2,5, and 6 market emphasis would not be in the best interest of protecting and enhancing the Tribe's treaty rights

Alternative 3 and 4 would help to continue the Tribes use of its off-reservation treaty rights, provided the Tribes are included in planning process through coordination of concerns for treaty rights protection

Alternative 8 - Manage Wilderness and Amenity emphasis would help protect the Tribes interest in protecting the wildlife, land, from further environmental damage. The Tribes can support Alternative 8.

Alternative 9 - High Wilderness - May affect the Tribe's treaty rights use for fisheries and enhancement of increasing capability of fish habitat

Alternative 10 is not in the interest of the Tribes and does not enhance or protect their treaty rights. With its emphasis on timber and range management

Alternative 11 - The Tribes can live with the preferred alternative provided they are included in the planning process as an affected interest with significant concerns

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Forest Supervisor - Challis National Forest  
August 23, 1985  
Pg. 3

Alternatives emphasizing minerals exploration, timber harvesting, and grazing uses are contrary to the Tribe's treaty rights and concerns

Alternatives emphasizing the development of water for energy development or production of hydro-power are contrary to the use and protection of the Tribe's treaty rights for fisheries, both resident and anadromous fish

Alternatives restricting minerals activities would help to maintain the Tribes treaty rights for continued use of fish and wildlife resources

The Tribes have a significant long term interest (in excess of 150 years into the future) in this region of Idaho. The Tribes need to be included in the planning process of the forest service to early identify their concerns, in order to have them addressed in the future plans, impacting their use rights

The Shoshone-Bannock Tribe's Land Use Commission and Land Use Department welcome the opportunity to provide additional comments, and review of future plans and EIS's. We want to receive the final EIS when it's complete. We also request to remain on your permanent mailing list

Sincerely,

  
Kenneth M. Jimbana  
Land Use Director

cc Fort Hall Business Council  
BIA

#### RESPONSE

The Forest Plan recognizes the 1868 Fort Bridger Treaty and the rights provided to the Native American Indians for hunting, fishing, and gathering of plants, roots, and other material.

It provides for improving the quality of wildlife and fish habitat to better meet the treaty rights of the Shoshone-Bannock Tribes. The actual numbers of fish and animals are controlled to a large extent by hunting and fishing regulations. The Plan provides for the habitat needs of game and non-game species.

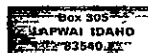
Meeting the treaty rights of the Shoshone-Bannock Tribe is provided for in all alternatives.

We appreciate your analysis of the potential effects of each alternative on the Tribes treaty rights.

881-1A

Nez Perce

TRIBAL EXECUTIVE COMMITTEE



(208) 843 2253

7 October, 1985

Mr Jack Griswald  
Forest Supervisor  
Challis National Forest  
Forest Service Building  
P O Box 404  
Challis, Idaho 83226

Dear Mr Griswald

The Nez Perce Tribe appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and the proposed Challis National Forest Plan. This plan is important to the Tribe because, by treaty, we retain fishing rights which will be affected by land uses around the Salmon River basin. The DEIS indicates that the Challis National Forest contains spawning and rearing habitat for Columbia River basin stocks of anadromous fish. These stocks, of course, comprise our treaty fisheries.

Treaty rights and federal Indian trust obligations are well recognized by the federal courts. Unfortunately, the DEIS fails to consider any effects of the various alternative plans on the Nez Perce Tribe. For example, there is no discussion or evaluation of tribal ceremonial, subsistence and commercial fisheries. These fisheries are vitally dependent upon habitat protection in the Salmon River headwaters, yet the DEIS totally neglects the real social, cultural and economic impacts of the forest management plan. This violates NEPA and the federal trust obligation.

Recently, the United States District Court for the District of Montana found that an EIS formulated without adequate consideration of social, cultural and economic impacts on an affected Indian community was a violation of NEPA and the federal Indian trust responsibility. We refer you to the case of The Northern Cheyenne Tribe v. Donald Hodel, Secretary of Interior, CV 82-116-BLG (D Mont 05/28/85).

Specific comments follow

Very truly yours,

Herman Reuben, Chairman

cc file  
JHR smc

RESPONSE

The Forest Plan recognizes the Treaty Rights of the American Indian and provides for habitat that should provide increases in anadromous fish populations to meet the treaty rights of the Columbia River Tribes.

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## CHALLIS NATIONAL FOREST PLAN REVIEW

### (FISHERIES COMMENTS)

The Nez Perce Tribe has reviewed the Draft Environmental Impact Statement and the Proposed Forest Management Plan for the Challis National Forest. The Tribe understands the Proposed Plan to be the preferred choice among the numerous alternatives developed within the timber production constraints imposed as "givens" by the National Forest Management Act using assigned resource values and various algorithms chosen by USFS personnel. The Tribe appreciates the effort which has gone into the development of the Plan and commends the Challis National Forest for the concern and respect which its staff has shown for anadromous and resident fish and their habitats in the development of the Plan.

The Nez Perce Tribe is concerned with all activities which may alter the status of streams within the range of Columbia River anadromous fish. The wild runs of both steelhead and chinook salmon are now at critical levels where environmental impacts could greatly reduce their ability to maintain their reproductive status. The anadromous fisheries on the Salmon River is a major concern for the Nez Perce Tribe in terms of protecting and enhancing the runs and providing for the ceremonial and subsistence needs of its people. The anadromous fisheries habitat has been altered in the upper Salmon River drainage by past developmental activities. Planned mitigation will undoubtedly improve the habitat potential (if necessary funding is available), but increased roading, timber harvesting, livestock grazing and mining will prevent or delay the achievement of self-perpetuating and harvestable production levels. Therefore management directions for undeveloped areas, riparian areas and anadromous streams are increasingly important to the Tribe to provide the spawning and rearing habitat necessary for the production of wild runs and a harvestable supply of anadromous fish.

In reviewing the documents, the Tribe concentrated its efforts on the Salmon River drainage which supports the anadromous fisheries on the Forest. The Tribe is concerned over the Plan's vulnerability to future budget cutbacks, which might prevent its implementation and management directives in relation to riparian areas, fisheries and water quality. The Tribe feels that the following comments should be examined for incorporation into the Plan as they would better protect and enhance the fisheries resources and their habitats.

## BUDGET

A major concern deals with an adequate budget to properly implement the Proposed Plan. Considering the current economy, present budget cutting measures in the federal government and the possibility of every forest requesting an increased budget to implement forest plan, there is some doubt whether the required budget will be appropriated every year. In order to properly implement the Plan, funding for fish and water quality mitigation and fish habitat improvement (for past practices and annual maintenance) need to be available every year. Usually, budget cuts affect fisheries and water quality resources more than timber-oriented activities. In years of inadequate funding, the budgets for development-oriented activities should be adjusted to meet fisheries and water quality goals and objectives.

The forest-wide management direction identified research needs to improve and update the Forest Plan. Research involving fisheries, water quality and other resources is needed to "fine tune" and improve on the models and increase the database. Budget cuts will definitely prevent the Forest from achieving an effective long-term management plan.

Monitoring, which is a basic component of the Forest Plan, essentially shows if the Forest is meeting its planned goals and objectives. Budget cuts affecting the monitoring of any past, ongoing or planned activities would not adequately protect the fish/water quality resources. Therefore, the Tribe strongly recommends that monitoring and evaluation of the Forest Plan be adequately funded to protect and enhance the fisheries resources.

## GENERAL

The Tribe questions the ability of the Forest to maintain or increase the quality and quantity of fisheries habitat. The Forest states that mitigation and enhancement will help achieve these projections. The Tribe notes that complete funding for mitigation and enhancement measures is questionable and results of such mitigation and enhancement techniques may only offset the impacts of development oriented activities. The forest-wide management standards which permit spawning habitat degradation by allowing the sediment yield to approach the threshold is unacceptable. The Tribe recommends that all critical anadromous spawning habitat be protected from further degradation and enhanced wherever necessary to assure optimum spawning conditions for anadromous fish.

## RIPARIAN

The Tribe is very concerned over the continued deterioration of the riparian areas especially along anadromous streams. The Tribe notes the Forest proposes changes in the current grazing management directives for anadromous fisheries protection, but concedes to livestock interest by allowing moderate grazing.

## RESPONSE

Page 3, paragraph 1: Management direction, standards, and guidelines will be followed at all budget levels. This should ensure the protection and enhancement of water quality and fish habitat maintenance or improvements.

Page 3, paragraph 2: Data base will be collected and management direction will be implemented, however with reduced budgets it will take longer to achieve our goals and objectives.

Page 3, paragraph 3: Monitoring of water quality and fisheries will continue at all budget levels. However, the intensity may be reduced on less critical areas.

Page 3, paragraph 4: Threshold limits only allow for sediment to increase 2 percent above the existing levels.

Page 3, paragraph 5: See response to page 4, paragraph 2 of the EPA letter.

along Class 1 streams. Considering the present condition of the riparian habitat along anadromous streams and the critical condition of the wild anadromous fish runs, the Tribe recommends

- 1) Riparian areas along Class 1 streams that have not been subject to past grazing practices or are not being currently grazed be classified nongrazing areas
- 2) Riparian areas along Class 1 streams currently being grazed and adjacent to critical anadromous spawning and rearing habitat be classified nongrazing areas
- 3) The grazing intensity on remaining riparian areas (Class 1 streams) be reduced to enhance the anadromous fisheries.

The Proposed Plan allows for several types of harvesting practices in riparian areas. Even though the standards require designing timber harvest activities to protect or enhance riparian-dependent resources, the Forest needs to restrain excessive harvesting and roading in riparian areas. Reduction of basal area from timber harvest in riparian areas should be limited to 25 percent to minimize effects on stream cover and temperature. If conditions require roads parallel to streams, a buffer strip of 100 feet wide should be required between the road and stream. This buffer strip should be protected from harvesting and not be prescribed in road management plans as the mitigation of road runoff.

## RESPONSE

Page 4, paragraph 1: Specifics of grazing management along anadromous fish streams will be developed by an interdisciplinary team in the Allotment Management Plan and Environmental Assessment. Grazing will not be allowed to degrade anadromous fish habitat.

Page 4, paragraph 2: Management direction, standards and guidelines direct that timber harvest in riparian areas be done to maintain riparian vegetation in as diverse and vigorous condition as possible. They also direct road locations avoid riparian areas where possible. Road design standards provides for buffer strips between roads and streams of 50-feet, plus four times the percent of sideslopes.

Our present practice is keeping roads out of the riparian area and little, if any, harvest in them will continue.

JOHN V EVANS  
GOVERNOR



OFFICE OF THE GOVERNOR

STATE CAPITOL  
BOISE 83720

November 8, 1985

Mr Jack Griswold, Supervisor  
Challis National Forest  
Box 247  
Challis, ID 83226

Dear Mr Griswold

I appreciate the opportunity to be involved in the Challis National Forest's planning process and to make recommendations to ensure greater protection for Idaho's natural resources. Several state agencies have likewise reviewed your draft plan and I have enclosed their comments for your serious consideration.

I have not endorsed any of the alternatives presented, primarily because the Plan lacks well-defined and mapped forest-wide management prescriptions. The preferred alternative, being a modified version of the commodity-driven RPA program, does not provide a balanced multiple-use program for the next decade. Alternative #3, supported by conservationists and identified by the Department of Fish and Game as best for fish and wildlife, unfortunately does not provide for the full range of recreational uses anticipated on the Forest. It appears that a "Public Use Emphasis" alternative similar to your neighboring Sawtooth National Forest, would best satisfy all concerned.

In my comments, I have itemized several elements needed to improve your draft plan.

- 1) Wilderness recommendations should be expanded, especially your proposal for the White Clouds-Boulder Area.
- 2) Semi-primitive areas which emphasize dispersed recreation should be defined, established and mapped, ideally with non-motorized and motorized units distinguished.
- 3) The timber program should be moderated with a fixed timber harvest level maintained into future decades. Suitable and unsuitable timberlands need to be identified and mapped.
- 4) Recreation and wildlife should be acknowledged as outputs of primary importance, with commodity uses maintained at current levels into future decades.
- 5) Watershed protection and water quality concerns should be better addressed in the final plan with specific streams identified for improvement and monitoring.
- 6) Information missing from the plan and inconsistencies in data need to be addressed in a timely manner to ensure broad public understanding and support of the final Challis Plan.

Mr Jack Griswold  
November 8, 1985  
Page 2

The National Forest Management Act clearly requires our National Forests to abide by multiple use and sustained yield concepts--and to be cost-effective in doing so. Given the resource and budget limitations which currently constrain commodity outputs on the Challis, it is important to recognize and support a firm public use emphasis in the final plan.

My best to you and your staff as you proceed in these critical planning efforts.

Sincerely,

A handwritten signature of John V. Evans in dark ink, written over a light-colored background.

JOHN V EVANS  
GOVERNOR

JVE jjp

cc Director Jerry Conley, Idaho Department of Fish and Game  
Dr Lee Stokes, Division of Environment  
Idaho Department of Health and Welfare

VI-193



COMMENTS FROM  
GOVERNOR JOHN V. EVANS  
STATE OF IDAHO

2

1 Wilderness for Future Generations

The White Clouds-Boulder wilderness proposal of 6,000 acres is far less than needed to complete this premiere Idaho wilderness. I recommend including all 40,000 acres contained within the RARE II study area and urge you to extend the boundaries to include the East and West Forks of Herd Creek up to Lake Basin and the entire East Pass Creek drainage. This area contains outstanding wildlife and anadromous fish habitat and is most worthy of receiving wilderness designation. I support your proposals for the Pioneer Mountains and Borah Peak Wilderness as they closely parallel those I have previously supported. I have noted that the Department of Fish and Game suggests some border adjustments in both areas, but there is insufficient information in the plan to determine which boundaries are best.

2) Semi-Primitive Area Recommendations

I have long supported the designation of semi-primitive recreation areas on all National Forests in Idaho. Although many parts of the Challis Forest will be managed for dispersed recreation, the exact acreages have not been identified or mapped. Semi-primitive prescriptions are essential on the Challis because higher present net values are realized when acreages are assigned to wilderness and dispersed recreation.

The following areas should receive semi-primitive prescriptions and should remain roadless:

North Lemhi (preferably non-motorized)  
Hanson Lakes (non-motorized)  
Diamond Peak (mixed use)  
Pahsimeroi Mountains (mixed use)  
Smiley Mountain Area (mixed use)

Forests throughout Idaho need to coordinate their plans in order to better define the semi-primitive prescription. The Targhee and Sawtooth National Forests both have motorized as well as non-motorized semi-primitive areas. Each semi-primitive area should be evaluated for sensitive resources or existing primitive use which may preclude use of motorized vehicles. In all cases, semi-primitive areas should receive a dispersed recreation emphasis to include hunting, fishing, camping, hiking and nature study.

3) Timber Management

The Challis National Forest is not a major timber-producing forest and therefore, timber management should not be as high a priority as in other Idaho forests. While a 3 mmcf annual sale quantity may be feasible, I question whether the higher levels proposed for future decades will be cost efficient or even desirable given current and anticipated demand in this region. The plan discusses the difficulty in regenerating Douglas fir on the dry soils found on the Challis, yet significant cut of Douglas fir is proposed. Legally, each harvested stand must be regenerated within five years, hence, the feasibility of Douglas fir harvests may be questionable.

As forested areas are fully inventoried, I assume the 95,916 acres found suitable in all respects will be mapped and placed in a proper management prescription. The remaining 244,692 acres of tentatively suitable forest land which apparently cannot meet economic efficiency requirements (p iv-36) should be considered for minimum level management, unless higher values dictate a different prescription. Again, these cost inefficient areas should be mapped.

4) Recreation and Wildlife Concerns

I am asking the Challis National Forest to acknowledge its primary importance as a recreation resource and plan accordingly. I support efforts such as interpreting the Borah earthquake and the Custer mining town to help forest visitors better appreciate Idaho's natural and cultural heritage. Likewise, I encourage development of campsites to fully accommodate anticipated user demand. With anadromous fish runs making a dramatic comeback to the Salmon River system, it is incumbent on the Challis Forest to provide for increasing numbers of fishermen and tourists to the region.

As economic development efforts are successful in Eastern Idaho, greater numbers of residents will seek dispersed recreation opportunities. I support your plans to increase and maintain a diversity of trails for these forest users, and encourage you to plan for visitor information facilities and area guides.

Although it is commendable to recognize the importance of traditional forest uses, the plan's emphasis on commodity outputs in mining, grazing and timber needs to be balanced with greater emphasis in providing for outdoor recreation opportunity. Grazing and mineral activities on the Challis National Forest should be maintained at current levels, with caution exercised in identified riparian areas. I support range improvements and effective mining regulations to protect our sensitive stream habitats.

I encourage the Challis National Forest to work closely with the Idaho Department of Fish and Game in ensuring healthy wildlife and fish populations for our growing number of Idaho and non-resident sportsmen. Cooperative road closures, range monitoring and habitat protection will ensure a viable wildlife resource on the Challis. Several inconsistencies are pointed out in the Department of Fish and Game comments (attached), and I urge you to give utmost consideration to their recommendations.

5) Watershed Protection and Water Quality

The Department of Health and Welfare, Division of Environment, has noted a lack of information related to fisheries protection and general water quality. I urge the planners to identify specific watersheds or stream segments in each management area and specify the condition of each. Once this baseline data is known and displayed, the public can better determine the impact certain proposed activities will have on each stream. Also, a comprehensive monitoring plan is needed as part of the final plan.

6) Timely Completion of the Final Plan

I urge the planners to work diligently in compiling the information needed to complete the plan. State agencies and individuals have pointed out inconsistencies and lack of supporting data in your goals, objectives and standards. While I agree with most goals set for the Forest, I, too, am uneasy with how mitigation measures and habitat/range improvements will be accomplished. Recognizing the reality of budget constraints, the Forest must be prepared to fairly implement all components of the Management Plan.

Local communities are depending heavily on the outcome of this planning process. Those planning for long-term investments need to know what outputs are projected for the Forest and where the management emphasis will be. I encourage you and your staff to work towards resolving user conflicts, thereby enabling the Challis Plan to be completed on schedule.

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# RESPONSE

We have reviewed both the Pioneer Mountains and Boulder-White Clouds wilderness proposals and expanded them somewhat. We have included a recreation prescription for the North Lemhi and the South Lemhi, which calls for a semiprimitive non-motorized recreation experience.

Allowable harvest quantity for the first decade will average three million board feet per year. This is in harmony with the traditional market needs to provide for local industries in our area. The volumes indicated for the second, third, fourth and fifth decades will be reassessed in the next planning cycle, and will be based on better resource information. These volumes could decrease based on the needs of local markets as well as the availability of suitable timber.

Our preferred alternative strikes a good balance between commodity and amenity uses. Recreation values such as camping, hiking, boating, fishing, and hunting are very important, and are provided for in the preferred alternative. The Challis National Forest has beautiful scenery and excellent opportunities for outdoor recreation and there is no intent that commodity uses will supersede those.

Our water quality monitoring is designed to provide maximum benefits for fish and fishery habitat. As the anadromous fish hatchery program and native fish increase the returns to Idaho, we are dedicated to providing quality habitat for those fish for spawning and rearing. Our management practices which affect water quality, are of most importance.

We understand your concern about information which appears to be missing from the Plan or that you feel is somewhat inadequately mapped based on lack of resource information. We agree that more data could have been collected, but we do not believe that it was needed for making this decision. It is our intent through the first decade under the Plan to improve our inventory information so that the update of the Plan will be simpler, much easier to understand, and more site-specific as far as inventory information is concerned. We feel, however, that the level of information was sufficient for decisions made in the Plan.

RICHARD H. STALLINGS  
2D DISTRICT IDAHO

1233 LONGWORTH BUILDING  
WASHINGTON, DC 20515  
(202) 225-5531

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

November 15, 1985

COMMITTEE ON  
AGRICULTURE  
COMMITTEE ON  
SCIENCE AND TECHNOLOGY  
SELECT COMMITTEE  
ON AGING

Mr. Jack Griswold  
PAGE 2  
November 15, 1985

Mr. Jack Griswold  
Supervisor  
Challis National Forest  
Box 247  
Challis, Idaho 83226

Dear Jack:

I appreciate this opportunity to share my views on the Challis National Forest Draft EIS and Land and Resource Management Plan. I found this document to be a comprehensive inventory of the unique and varied resource values on the Challis Forest. You and your staff are to be commended for your fine efforts in this planning process.

I have heard from more than 200 concerned Idaho citizens regarding this Plan--the majority of whom support Alternative #3 or a nonmarket emphasis for the Forest. I can appreciate their concerns as quality backcountry experiences are limited and are constantly diminishing. I am, however, reluctant to endorse this or any of the other alternatives presented in the Plan, but would urge you and your staff to consider modifications to your preferred Alternative #11 that will better reflect an evolving emphasis on fish, wildlife, water quality, improved range management and dispersed recreation.

I would like to offer several comments on specific management prescriptions contained in the Plan.

1. White Cloud-Boulder Mountains

Of foremost concern to me is your very small wilderness recommendation for the White Cloud-Boulder Mountains on the Challis Forest. I have recommended that approximately 202,050 acres on the Sawtooth N.F. be considered for wilderness and would suggest that an additional 40,000 acres already inventoried under the RARE II process be considered on the Challis. I understand that there are several factors that must be considered the least of which is your ability to manage and enforce wilderness boundaries and maintain existing livestock grazing allotments in the RARE II area. I would stress that anadromous fisheries that spawn in these areas be given highest priority in your prescription.

Let me stress here that I am not opposed to the continuation of livestock grazing in these areas. As we have discussed this past summer, I am very supportive of grazing on public lands, but I also believe this legitimate use must be balanced with careful stewardship of our critically important riparian habitat. I am concerned that this habitat be greatly improved in the areas of East Pass Creek and West and East Forks of Herd Creek. For this reason I have suggested these areas be considered for wilderness

protection. I would be interested in discussing other options for these particular areas if equally effective management prescriptions can be identified and are generally accepted by the public.

2. Pioneer Mountains and Borah Peak Wilderness

I support your wilderness recommendations for 38,000 acres in the Pioneer Mountains on the Challis side (61,981 acres on the Sawtooth N.F.) and 116,000 acres for Borah Peak. These areas clearly possess the pristine backcountry qualities which merit special management consideration. You are also to be commended for your efforts to provide quality nonmotorized and motorized recreation opportunities in the Pioneer Mountains. As you know, the Borah Peak unit contains Idaho's highest mountain peak and supports a valuable wildlife population including bighorn sheep, mountain goat, elk, deer and antelope. This is a very unique area in that it is a subalpine unit superimposed on high desert environment with little or no transitional zone. These wilderness additions should provide a much needed boost to the local economy of Mackay in terms of increased tourist and recreation dollars.

3. Other Semi-Primitive Areas

I support maintaining several semi-primitive areas in their natural, unroaded state for the present and provide for future reconsideration of such areas for possible wilderness designation.

--North Lemhi

The North Lemhi offer some of the best and most diversified wildlife habitat on the Forest, supporting grey wolf, black bear, bighorn sheep, mountain goat, elk, deer and eagles. From all accounts this area would be an ideal candidate for wilderness consideration and in fact was identified as such in the RARE II process. I would suggest that your roadless management prescription for this area be carefully reviewed to ensure that these wildlife resources are given priority over other management approaches.

--Pahsimeroi Mountains

The Pahsimeroi Mountains also support critical wildlife habitat which makes this a popular off-road hunting area. Your prescription for multiple-use management can be supported with a few qualifications and those would be that particular timber sales (Water Trough sale) be carefully scrutinized for cost-effectiveness and suitability. I would suggest this area be managed as semi-primitive with a clear delineation between motorized and nonmotorized uses. Sensitive resource areas should be further identified for possible future wilderness review.

--Other Areas

Other areas that should be managed as semi-primitive with an

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Mr. Jack Griswold  
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emphasis on dispersed hunting, fishing, camping, hiking and nature study include:  
Hanson Lakes--non-motorized  
Diamond Peak--multiple use  
Smiley Mountain Area--multiple use  
King Mountain--nonmotorized

#### 4. Recreation

I applaud your plans to cooperate with the BLM in the establishment of a Borah Quake National Natural Area with interpretive services. I also strongly support renewed interest in developing and maintaining a diversified trail system including the nomination of Big Hat Creek Trail as a National Recreation Trail. As the budget permits, I would encourage you to construct more facilities to reduce potential conflicts between user groups.

#### 5. Commodity Outputs

I generally support your recommendation for maintaining commodity outputs at or near 1980 RPA levels for the first decade. Emphasis should be on classifying and clearly identifying lands suitable and unsuitable for timber production. Specific information should be made available for public review concerning sale locations, economics and road building plans.

A high priority should also be placed on improvements in overall range management with a particular focus on accelerated recovery of riparian habitat that is so vitally important to anadromous fish spawning. Equally important to fish and wildlife protection will be specific mining reforms that will require more stringent mitigation measures; bonds covering the true full cost of reclamation; and the removal and safe disposal of all toxic and hazardous wastes.

In conclusion, I believe that this Plan represents a rare opportunity for the State and the Nation to elevate in priority the protection of our fish, wildlife, recreational and scenic values of our public forests. As more and more of the American landscape is developed, areas like our Challis National Forest with its towering peaks and pristine high country lakes will become even more valuable to the country as a whole.

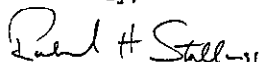
I am also sensitive to the need for maintaining a healthy, diversified economy in Idaho that is based on sustained commodity outputs including grazing, timber and mining and a robust tourism and outdoor recreation industry. I truly believe that a balance between environmental preservation and resource development can be attained on the Challis National Forest and I pledge my support in working with you, Governor Evans and the people of Idaho to meet these needs. As a member of Congress, I will also be working

Mr. Jack Griswold  
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November 15, 1985

closely with USDA and the appropriation committees here in Congress to ensure that this Plan is given high priority in funding and final implementation.

Again, I appreciate this opportunity to comment on the Challis National Forest Land and Resource Management Plan and look forward to working with you and your staff on the implementation of this Plan.

Sincerely,

  
Richard H. Stallings  
Member of Congress

RHS/k

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**RESPONSE**

We have had considerable interest in adding more wilderness areas into our recommended alternative. We have reviewed the Pioneer Mountains and the Boulder-White Clouds areas and have added some additional acreage to those, although we have not added as much as some of the wilderness advocate organizations would have liked.

We have looked at the North Lemhi and the South Lemhi and have developed a recreation prescription which calls for semiprimitive non-motorized recreation experience. This does allow for some travel corridors which go through those areas and cross over to the Lemhi River side. The major portion of this mountain range is protected from motorized use.

The Forest Plan provides a good balance, both in commodity and amenity uses. We feel that the Forest Plan meets the local commodity needs while providing a wide variety of amenities outputs. At the time of Plan revision, after approximately ten to fifteen years we will reassess the Forest management situation as well as needs and desires for activities and outputs. During the intervening years we intend to collect better resource information which will be more detailed and site-specific.



State Senator  
Legislative District No. 31  
ANN RYDALCH

10-18-85

Dear Mr. Griswold,

I would like to formally  
register that I object to any  
additional wilderness area being

set aside in your Forest Service Plan.  
Unless I'm mistaken, there are <sup>only</sup> 1600 miles  
of trail in the 2,534,085 acres of the Challis  
National Forest. Of these 1600 trail miles, 800 are  
in the wilderness area and are thus closed  
to motorized users.

I firmly believe many Idaho residents  
do not understand that wilderness means  
"locked up." In fact Mr. Griswold, how can  
Forest Service Plans keep increasing  
wilderness areas just on their own. Who  
oversees that and okays that? I thought  
it had to be taken to the people.

Thank you for your consideration  
of this formal complaint.

Sincerely, Senator Ann Rydalch

#### RESPONSE

We appreciate your concern about the addition of more wilderness. The Challis National Forest presently has approximately 750,000 acres of the Frank Church—River of No Return Wilderness, but we do have another 1.3 million acres of basically roadless or unroaded areas. There has been a great deal of interest expressed to either designate this as wilderness, or to keep in an undeveloped condition. Our preferred alternative does both. We are recommending 48,000 acres plus wilderness in the Pioneer Mountains. We are recommending 34,000 acres in the Boulder-White Clouds area. Both of these areas also cross over onto the Sawtooth National Forest, where similar wilderness recommendations are being made. We are recommending about 119,000 acres of the Borah Peak area, between Double Springs Pass and Pass Creek for wilderness designation. This is a total 201,000 acres of recommended wilderness. The remainder of the undeveloped area, which is over one million acres, is not recommended for wilderness designation.

The Forest Service does not designate wilderness. We made recommendations for wilderness through our planning process but only the Congress of the United States has the power and authority to designate wilderness, so the Forest planning process is just one step in the overall process for wilderness designation. The final decision on designation of additional Wilderness in Idaho and on the Challis National Forest rests with Congress which will ultimately decide this land management issue.



## COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

2705 East Burnside Street, Suite 114, Portland Oregon 97214

Telephone (503) 238-0667

October 24, 1985

Mr. J.S. Tixier  
Regional Forester  
Intermountain Region  
Federal Office Building  
324 25th Street  
Ogden, Utah 84401

Dear Mr. Tixier,

The Columbia River Inter-Tribal Fish Commission appreciates this opportunity to comment on the Draft Environmental Impact Statement (DEIS) and the proposed Challis National Forest Plan. The Commission is composed of the Fish and Wildlife Committees of the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes and Bands of the Yakima Indian Nation, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Nez Perce Tribe. These four tribes have rights reserved by treaty to take fish that pass their usual and accustomed fishing places. Among these fish are the anadromous species that originate in the Challis National Forest.

### The Nature of the Treaty Right

The tribes' right to take fish that pass their usual and accustomed places is a right confirmed by numerous court decisions. See e.g. Sohappy v. Smith, 302 F.Supp. 899 (D. Or. 1969), aff'd, 529 F.2d. 570 (9th Cir. 1976); Washington v. Washington State Commercial Passenger Fishing Vessel Ass'n, 443 U.S. 658 (1979) (Passenger Fishing Vessel). In addition to binding state governments, See Passenger Fishing Vessel 443 U.S. at 682 and n.25, the treaties are also binding on private citizens. See e.g. United States v. Winans, 198 U.S. 371 (1905), and of course the federal government. Passenger Fishing Vessel, 443 U.S. at 682; See also Confederated Tribes of the Umatilla Reservation v. Alexander, 440 F. Supp. 553 (D. Or. 1977). Absent specific authorization by Congress, Indian treaty rights cannot be abrogated. Id., citing Menominee Tribe v. United States, 391 U.S. 404, 413 (1968).).

In Passenger Fishing Vessel, the Court painstakingly examined the circumstances surrounding the negotiation of the treaties in an attempt to divine the parties' long-term intentions. The Supreme Court emphasized that Governor Stevens

invited the Tribes to rely on the United States' good faith efforts to protect their right to a fisheries livelihood. Stevens specifically told the tribes: "This paper [the treaty] secures your fish." Id. at 667 n.11. During the treaty negotiations, "the Governor's promises that the treaties would protect that source of food and commerce were crucial in obtaining the Indians' assent." Id. at 676 (emphasis added). As the Supreme Court stressed:

It is absolutely clear, as Governor Stevens himself said, that neither he nor the Indians intended that the latter "should be excluded from their ancient fisheries," . . . and it is accordingly inconceivable that either party deliberately agreed to authorize future settlers to crowd the Indians out of any meaningful use of their accustomed places to fish.

Id. The Supreme Court also mentioned that the treaty guaranty of "the right of taking fish" was meaningful only if fish were available for the taking. Id. at 678 (emphasis added).

The 130 years since the treaties were signed have witnessed a truly startling number of methods by which the quantity of fish available for the taking could be reduced -- if not decimated. The courts have responded to these threats to the treaty right by declaring a policy that the treaty right cannot be defeated by technology or other methods not anticipated by the treaty signatories. For example, in United States v. Winans, 198 U.S. 371 (1905), the defendant constructed a fish wheel (a device capable of destroying an entire run of fish) and excluded the Indians from one of their usual and accustomed fishing places. Commenting on the effects of improved fishing devices, the Court noted that:

wheel fishing is one of the civilized man's methods, as legitimate as the substitution of the modern harvester for the ancient sickle and flail . . . It needs no argument to show that the superiority of a combined harvester over the ancient sickle neither increased nor decreased rights to the use of land held in common. In the actual taking of fish white men may not be confined to a spear or crude net, but it does not follow that they may construct and use a device which gives them exclusive possession of the fishing places, as it is admitted a fish wheel does.

Id. at 382. Thus, although improved technology may be brought to bear on the fishery, that technology cannot be allowed to imperil the rights secured to the parties to the treaty.

This result was reaffirmed by the Supreme Court in Passenger Fishing Vessel. There the Court declared that "[n]on-treaty fishermen may not rely on property law concepts, devices such as the fish wheel, license fees, or general regulations to deprive the Indians of a fair share of the relevant runs of anadromous

fish in the case area." Passenger Fishing Vessel, 443 U.S. at 684. The Court's intent is clear: absent specific treaty abrogation legislation from Congress, (Menominee Tribe v. United States, 391 U.S. 404, 413 (1968)), no one may use any method to deprive treaty fishermen of their fair share of the anadromous fish.

#### Federal Duty to Protect Subject Matter of Treaties

In addition to their obligation to not destroy Indian treaty rights without specific Congressional action, federal agencies must use their authority to safeguard that which is the subject matter of federal treaties. In Kittitas Reclamation District v. Sunnyside Valley Irrigation District, Nos. 80-3505, 81-3002, 81-3068, 81-3069 (9th Cir. June 14, 1985), the Ninth Circuit affirmed a district court order to operate a Yakima water project in a manner that would preserve spring chinook salmon redds. Federal project operators had originally sought to reduce water releases in order to store water for the next irrigation season. The proposed flow reductions would have left the redds high and dry. Testimony at the district court hearing indicated that the proposed water storage would be possible if twelve redds were transplanted or if berms were constructed. Id. Slip op. at 7. However, the district court judge was "unsure of the effect of these measures, so he continued the watermaster's authority to release water as necessary." Id. Expressly declining to decide the scope of the Yakima Indian Nation's treaty fishing rights, Id. at n.5, the Ninth Circuit found that the district court judge had fashioned a reasonable remedy. Id.

The message in Kittitas is clear. Federal agencies are obligated to exercise their authorities in a manner that will protect -- not degrade -- the habitat needed to support anadromous fish. In addition, when addressing anadromous fish habitat needs, various measures may be utilized, but the final choice turns not on traditional notions of agency expertise, but on the biological needs of the fish.

#### Magnitude of Fisheries Reserved by Treaty

The Forest Service's duty to protect and enhance anadromous fish habitat does not cease once a fish run becomes viable. The tribes did not reserve a right to take a few fish from a meager run struggling for survival. Some might argue that the Columbia River treaty tribes reserved the right to continue harvesting that number of fish that they had traditionally harvested. Obviously, that harvest level is impossible given the contemporary depleted fisheries. The Supreme Court has held that both Indian and non-Indian fishermen possess a right, "secured by

treaty, to take a fair share of the available fish." Passenger Fishing Vessel, 443 U.S. at 684-85. The Court determined that Indian harvest allocation should not exceed 50% of the harvestable fish. Id. at 685-86. The Court then declared:

It bears repeating, however, that the 50% figure imposes a maximum but not a minimum allocation . . . [T]he central principle here must be that Indian treaty rights to a natural resource that once was thoroughly exclusively exploited by the Indians secures so much as, but no more than, is necessary to provide the Indians with a livelihood -- that is to say, a moderate living. Accordingly, while the maximum possible allocation to the Indians is fixed at 50%, the minimum is not; the latter will, upon proper submissions to the district court, be modified in response to changing circumstances. Id. at 686-87.

Perhaps the reason why this "moderate living standard" unearthed by the Supreme Court has not proven to be a truly thorny problem in Pacific Northwest fisheries management is because no one can reasonably contend that the Indians' harvest presently yields a moderate living. This fact was implicitly acknowledged by the Supreme Court in Passenger Fishing Vessel when it stated that the 50% ceiling on the Indians' harvest allocation was necessary "to prevent their needs from exhausting the entire resource and thereby frustrating the treaty right of 'all [other] citizens of the territory.'" Id. at 686.

Regardless of what the term "moderate living standard" means, it will eventually be defined by the judiciary -- not a federal agency. See Id. at 687. As discussed earlier, the Ninth Circuit has already determined that federal agencies must refrain from taking actions that will reduce the number of fish in a depleted run. See Kittitas, slip op. at 7. Nor does this duty cease when an anadromous fish run manages to increase its numbers beyond the dangerous level of minimum viability. In United States v. Adair, 723 F.2d 1394 (9th Cir. 1984), the Ninth Circuit stated that:

Implicit in this "moderate living" standard is the conclusion that Indian tribes are not generally entitled to the same level of exclusive use and exploitation of a natural resource that they enjoyed at the time that they entered into the treaty reserving their interest in the resource, unless, of course, no lesser level will supply them with a moderate living. Id. at 1415 (emphasis added).

Here the Ninth Circuit has indicated that the Klamaths must be allowed to achieve their "moderate living." No one knows what that is. The court explicitly stated the possibility that the "moderate living standard" may only be achieved by allowing the tribe to enjoy the "same level of exclusive use and exploitation" it had at the time the treaty was concluded. Id. The purport of



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this holding is clear. Federal agencies owe a duty to refrain from activities that will interfere with the fulfillment of treaty rights. Moreover, this duty cannot be performed by engaging in an "accommodation" or "balancing" process between Indian treaty rights and a competing economic interest such as timber harvest. Any such "accommodation" reached by the Forest Service would amount to a de facto abrogation of Indian treaty rights. In the context of forest management, unless the Forest Service can demonstrate that the tribes' treaty rights are presently being fulfilled, it cannot justify approving activities in the forests that will cause further degradation of anadromous fish habitat

#### The National Forest Management Act Mandates Coordination

The Forest Service is only one of the many entities involved in the complex interactions that have caused the diminution of anadromous fish runs to their present state. Columbia River hydroelectric development and other downstream problems have done grievous harm to the basin's fish runs. While the Forest Service can rightfully blame downstream problems for much of the harm inflicted on anadromous fish, such blame does not obviate the Forest Service's responsibility to protect anadromous fish and the need for all parties with management authority that affects these fish to work together to improve the fishery resource.

In dealing with anadromous fish, the Forest Service must look beyond the boundaries of a given national forest. Columbia River stocks of anadromous fish migrate as far inland as the Bitterroot National Forest and as far north as Alaska. As the Pacific Northwest has come to realize, the anadromous fish runs can only be restored if state, federal, and tribal land, water, and wildlife managers adopt a coordinated "gravel-to-gravel" management approach to this valuable and mobile renewable resource.

This approach is reflected by the Northwest Power Planning Council's Columbia River Basin Fish and Wildlife Program. The Fish and Wildlife Program, mandated by the Pacific Northwest Electric Power Planning and Conservation Act, encompasses the Columbia River and its tributaries and will be financed by Pacific Northwest ratepayers. This comprehensive protection, mitigation, and enhancement effort was not even mentioned in the DEIS or proposed plan. Nor were the increased fish returns made possible by the recently concluded United States/Canada Salmon Interception Treaty mentioned in either document.

These efforts, along with the Salmon and Steelhead Enhancement Act, have changed the complexion of fisheries management in the Columbia Basin. The success of both the Salmon Interception Treaty and the Fish and Wildlife Program turn upon maximizing utilization of the anadromous fish habitat in Columbia River tributaries. A large percentage of these tributaries run

through national forests. The Forest Service must acknowledge its responsibilities to act in concert with these policies. The Forest Service cannot make a reasoned decision with respect to anadromous fish habitat if it does not factor these activities into its decision-making process. The Pacific Northwest cannot afford to spend money enhancing fisheries that are simultaneously being degraded by timber harvest and road-building.

Forest Service coordination with Pacific Northwest fisheries enhancement activities is not only sound policy, it is also required by law. Forest Service regulations declare that a review of state, federal, and tribal planning and land use activities shall be included in the forest plan EIS. See 36 C.F.R. < 219.7 (a)-(c) (1984). In addition, the regulations provide that this review shall consider the objectives of federal, state, local, and tribal governments, inter-related impacts of these plans, and a decision by the Forest Service on how each forest plan shall address these inter-related impacts. Id. at (c)(1)-(4). Among the objectives of state and tribal governments are the fish production plans currently being formulated under the auspices of United States v. Oregon. The Challis National Forest DEIS and proposed plan do not reflect consideration of these processes.

#### Anadromous Fish Assessment

As a consequence of its federal mandate to protect, mitigate, and enhance fish and wildlife while assuring the Pacific Northwest an adequate and economical power supply, the Northwest Power Planning Council is currently estimating the location and extent of anadromous fish in the Columbia Basin. This assessment will:

estimate the resource value by characterizing the productivity of each stream reach. Productivity is defined to be comprised of three factors: smolt production, migration use and upstream geography which may, through sedimentation, affect downstream anadromous fish areas. This study will quantify the smolt productivity of each stream reach. Migration will be accounted for by including in any estimate of smolt production for an individual stream reach upstream productivity as well, i.e., the productivity will accumulate as one moves down a stream. Stream reaches upstream of anadromous fish areas which have the potential to adversely affect downstream use will be identified quantitatively.

See Northwest Power Planning Council, Proposed Work Plan Pacific Northwest Hydro Assessment Study (August 1, 1984) at 3. The results of this study, scheduled for release in Spring 1986, will provide the most current and comprehensive examination of Columbia Basin anadromous fish production capability available.

This study will be used to identify areas and stream reaches that, due to their value to fish, should be protected from hydroelectric development. It would be wasteful and expensive indeed to invest money in habitat enhancement and protection only to have those efforts smothered by sediment generated by logging and roadbuilding. The Forest Service and anadromous fish managers from federal, state, and tribal governments should coordinate to make sure that the information generated by this study will foster the most judicious resource utilization possible.

#### Cumulative Impacts

There are 16 national forests in the Columbia basin that produce anadromous fish. These are: the Clearwater, Nezperce, Bitterroot, Boise, Challis, Payette, Salmon, Sawtooth, Umatilla, Wallowa-Whitman, Mount Hood, Malheur, Ochoco, Gifford Pinchot, Okanogan, and Wenatchee. All of them are going through the forest planning process. Approximately 50-70% of all remaining anadromous fish habitat is contained in these forests. Events on these forests will have a profound impact on the anadromous fish resource that is vital to the welfare and existence of the four treaty tribes.

Unfortunately, the Forest Service does not seem to realize that each forest is an important cog in the machine that will either revive the fish runs or slowly log, road, graze, or mine them into oblivion. To adequately assess the environmental impacts of its actions as required by NEPA, the Forest Service must study and disclose the cumulative impacts of all 16 forest plans listed above on the Columbia River anadromous fish runs and the four Columbia River treaty tribes. It is simply not adequate for each forest to merely look at the impacts of its activities within the borders of the forest or in the surrounding communities and counties. Fish production precluded by activities within each forest and in conjunction with other forests affects not only surrounding communities, but also downstream Indian tribes and other fishers both inriver and in the ocean.

#### Mitigation

The Forest Service has often relied upon mitigation in the hope that mitigation will compensate for the damage inflicted on fish habitat by timber harvest. However:

Mitigation of fish habitat losses is often presented as a panacea and substitute for maintenance of habitat quality. The concept of "fisheries mitigation" is more myth than substance. It seldom materializes and when it

does, it only partially compensates for substantial losses. There is no history of fisheries budgets sufficient to mitigate substantial losses of quality habitat. Recent and projected budget trends indicate a status quo situation.

See Espinosa, Background Paper Fisheries Resources Analysis of the Management Situation Clearwater National Forest (undated) at 56-57 (emphasis in text). The Commission is unfortunately acutely aware of the vagaries and inadequacies of fisheries mitigation. Thus, we are extremely skeptical of vague promises of best management practices and the implementation of standards and guidelines.

Given the importance of the anadromous fish resource, very little reliance should be placed on mitigation measures that do not have a proven record of effectiveness. The Forest Service must be careful to not ask more of a mitigation technique than it can give. New or untested mitigation techniques should be thoroughly evaluated before being widely used and relied on. Monitoring should be vigilant, stringent, and should include all entities that are involved in the management of anadromous fish. Finally, mitigation methods should be chosen on the basis of the protection they will provide the fishery resource, not how much they will affect the cost/benefit analysis of commodity resources such as timber, range, and mineral extraction. See e.g. Pacific Power & Light Co., Opinion No. 381-A, 30 F.P.C. 499 (1963), aff'd in part, rev'd in part on other grounds, 333 F.2d 689 (9th Cir. 1964), cert. denied, 379 U.S. 969 (1965) (where it is declared that it is the policy of other federal agencies to require complete recompense for fisheries damage.) The DEIS should be revised to include analyses of known mitigation techniques. See e.g. DEIS at II-2 and B-120, citing 40 C.F.R. Section 1502.14 (1984). These analyses should include evaluations of effectiveness, standards for application, and any other information that might be of aid in deciding whether a given mitigation technique is appropriate. The Commission will be happy to contribute its expertise towards evaluating the use of various mitigation methods on a case-by-case basis.

### Trust Responsibility

The trust responsibility is that special relationship between the United States and Indian tribes that originated in Cherokee Nation v. Georgia, 30 U.S.(5 Pet.) 1 (1831) where the Supreme Court described Indian tribes as "domestic dependent nations" and declared that "their relation to the United States resembles that of a ward to his guardian." Id. at 17. This relationship is part of the very fabric of federal Indian law and it imposes stringent fiduciary standards of conduct on federal agencies in their dealings with Indian tribes. See United States v. Creek Nation, 295 U.S. 103 (1935). See also Northern Cheyenne Tribe v. Hodel, Civ. No. 82-116-BLG (D. Mont. May 28, 1985) at 23.

In Northern Cheyenne Tribe, the court declared that "a federal agency's trust obligation to a tribe extends to actions it takes off a reservation that uniquely impact tribal members or property on a reservation." Id. at 27. In an attempt to save its coal leasing EIS from invalidation, the Secretary of the Interior alleged that there was no specific statute or treaty that required the Department to consider the impacts of coal leasing on the tribe as an entity. Id. The Secretary also alleged that his decision to lease the coal was in the "national interest" and "vital to the nation's energy future." Id. at 29. The court declared that:

The Secretary's conflicting responsibilities and federal actions taken in the "national interest," however, do not relieve him of his trust obligations. To the contrary, identifying and fulfilling the trust responsibility is even more important in situations such as the present case where an agency's conflicting goals and responsibilities combined with political pressure asserted by non-Indians can lead federal agencies to compromise or ignore Indian rights.

Id. at 29-30 (citations omitted). Similarly, the Forest Service must not allow its obligations to the Columbia River treaty tribes to become lost in its concern for the local ranching families. It must accord the treaty right special consideration and scrupulous safeguards. Unfortunately, the DEIS did not devote this consideration to the tribes' interests. See e.g. DEIS at IV-42-47, where the Forest Service evaluated the cultural needs of such diverse groups as ranchers/farmers, recreation users, outfitters and guides, miners, local businessmen, and loggers/millworkers, but not a word about Indians.

Perhaps because none of the treaty tribes' reservations lie within the Challis National Forest's "zone of interest," See DEIS at III-4, effects of forest management activities on the tribes were not considered. However, as discussed earlier, management activities that affect anadromous fish production also affect the

### RESPONSE

"The right of taking fish, at all usual and accustomed grounds and stations, is further secured to said Indians, in common with all citizens of the territory" as stated in the treaties. The courts have not provided definitive guidance on the nature or extent of the treaty fishing rights, but the following is a brief description of what two courts have said in this area:

1. In UNITED STATES V. WASHINGTON, 506 F.SUPP. 187 (D. WASH 1980), The District Court concluded that implicitly incorporated in the Treaties' fishing clause is the right to have the fishery habitat protected from man-caused despoliation. On appeal, the Court of Appeals for the Ninth Circuit concluded the treaty right did not require an absolute right of environmental protection, but the states, the United States, and the Tribes each have an obligation to take reasonable steps commensurate with the resources and abilities of each to preserve and enhance the fishery. UNITED STATES V. WASHINGTON, 694 F.2D 1374 (9TH CIR 1983). On rehearing, however, the Court of Appeals vacated this opinion, concluding it was inappropriate to issue an opinion until there were concrete facts presented in the context of a particular dispute.

2. In NORTHWEST INDIAN CEMETERY PROTECTIVE ASSOCIATION V. PETERSON, 565 F.SUPP 586 (D.N.D. CAL 1983), the District Court concluded that certain Forest Service decisions would significantly decrease the quantity of anadromous fish in portions of the Klamath River flowing through the Hoopa Valley Indian Reservation and that this was a breach of the defendants' trust responsibility for these resources. On appeal, the court of Appeals for the Ninth Circuit vacated this part of the judgment, stating it would be inappropriate to decide the scope of the Hoopa Valley Indians' treaty right since they were not a party to the action.

However, we do not think it is reasonable to conclude that the treaty right prohibits all activities which adversely affect fish habitat. Such an interpretation would preclude all management activities and some recreation activities. Our interpretation of the litigation, so far, is that each party should act reasonably and that no one should act in a manner that significantly degrades the habitat. What is 'significant' is subject to interpretation. However, we do not believe the level of impacts projected for the activities proposed by, and permitted under, the proposed Forest Plan alternatives have a significant adverse effect on fish habitat.

Furthermore, it is important to note that impacts, such as from grazing, are generally very difficult, if even possible, to measure. Also, the adverse effects projected from Forest activities are maximum effects. Implementation of standards and guidelines and careful project planning will likely reduce the adverse effects from activities occurring on the Forest below that projected. Therefore, we do not believe the proposed alternatives will violate the treaty right.

tribes' exercise of their treaty rights See e.g. DEIS at IV-51, where it states that "[a]lternatives favoring production of anadromous fish may provide additional downstream benefits to Native Americans dependent on commercial anadromous fisheries." The Forest Service owes a duty to not only discuss the effects of forest management activities on the tribes, but also a duty to safeguard resources of crucial importance to the tribes. This duty is not fulfilled by actions which sanction degradation of fish habitat needed to re-build the Columbia River runs. Thus the "zone of interest" analysis does not adequately assess the impacts of changes in resource outputs since it excludes areas and peoples that utilize forest outputs.

#### Fish Habitat Potential

1 The DEIS fails to clearly define the nature and extent of anadromous fish habitat in the forest. At Table IV-7, present habitat is declared to have a habitat capability index of 100. In addition, maximum habitat potential is stated to have an index of 140, while the habitat capability index needed to sustain a minimum viable population is declared to be 40. Decisionmakers need to know why present habitat is so much lower than maximum habitat potential. Is it because of past management activities? If so, how will the preferred alternative not result in more of the same degradation? It appears that massive degradation of fish habitat is permissible.

2 In contrast, the interests of local ranching operations are extremely well protected. One of the reasons that alternative 3 was not chosen as the preferred alternative is that it results in a reduction in grazing. This reduction, from 113,000 AUMs to 106,000 AUMs is miniscule in comparison to what is deemed acceptable for fish habitat, yet the DEIS makes the unsupported claim that alternative 3 "would probably force a few family ranch operations out of business and/or cause an economic hardship on several ranching operations." DEIS at II-38. Yet, the DEIS does not recognize the economic dislocations to Indian and non-Indian fishermen and their families caused by fisheries reductions due to Forest Service land management practices. Had fish and fishermen received this same solicitude over the years, Columbia River anadromous fish runs would be flourishing indeed.

3 Implementation of the preferred alternative is supposed to eventually result in a habitat capability index of 120. This is 20 above the present and 20 below that amount of habitat required to reach maximum population potential. What does that mean in numbers of fish? Why does the preferred alternative fail to maximize anadromous fish population?

4 It would be very helpful if the Forest Service would explain the above figures in relation to those listed in the DEIS at III-13. There the minimum viable population of anadromous fish, depicted in "M Lbs.," is 22.14, while the 1981 population is

#### RESPONSE

Page 10, paragraph 1: We agree, there should have been a discussion on the effects of Forest management on the Indian tribes affected by our management decisions. It has been added.

Page 10, paragraph 2: Maximum habitat potential was arrived at by estimating what fish habitat capability would have been under natural, unspoiled conditions. Existing potential is an estimate based on the cumulative impacts of many years of road building, timber harvest, mining and grazing that were not necessarily done with modern conservation measures in mind. Under the proposed Plan, it is projected that improved management techniques, better administration and improvement projects will restore habitat capability to something approaching 90 percent of natural potential.

Page 10, paragraph 3: The DEIS did not recognize the economic dislocation to Indian and non-Indian fishermen due to Forest Service land management practices, because there is none. In all alternatives habitat capability is maintained far above that which is presently being used. Low fish populations are primarily a result of problems associated with lower Columbia River dams and not Forest management.

Page 10, paragraph 4: This means, for the reasons given above, that in general, Forest habitat can only produce 85-90 percent of the fish that natural conditions would have produced. To exceed this, hatchery augmentation will be needed.

## RESPONSE

Page 11, paragraph 1: Existing habitat capability is estimated to be only 15 to 20 percent below what is attainable. Existing populations are many times below what is possible with the current habitat capability due primarily to downstream impacts. See answers above.

Page 11, paragraph 2: Section J (EIS and Plan Content) of the responses to public comments discusses the range of alternatives.

Page 11, paragraph 3 & page 12, paragraph 1: True. Ninety percent of the maximum potential is the highest reasonably attainable level.

listed as 22.6. The perilous proximity of fish populations to the minimum viable standard is underscored by the fact that the table states that there exists habitat to support 592.1 M Lbs. These figures appear to indicate a strong need to protect and enhance fish populations. Yet the Forest Service plans to do little in this regard, instead relying on the efforts of other entities: "Habitat capability for anadromous and resident fish would be maintained or will improve slowly. The numbers of anadromous fish would have the potential to increase because of mitigation at Columbia River dams, increased hatchery production, and improved overall coordination through the Northwest Power Planning Act." See DEIS at II-87. (However, increased hatchery production and mitigation pursuant to the Northwest Power Planning Act can only be used to mitigate for hydroelectric impacts. See Pacific Northwest Electric Power Planning and Conservation Act at Section 4(h)(10)(A)). The quoted language appears to be mere "boilerplate." Alternative 10 has identical language, DEIS at II-80; as does Alternative 7, DEIS at II-62; and the No-Action alternative, DEIS at II-26. Alternatives 3 and 4 change the wording so far as to say that habitat will improve slowly, DEIS at II-39 and 44, while the remaining alternatives contemplate either mere maintenance or actual reductions in habitat capability. The Forest Service's own figures show that fish populations are dangerously near the minimum viable standard, a standard that may not violate the minimum strictures of the NFMA, but which, as discussed earlier, does violence to the tribes' treaty rights. The Forest Service cannot satisfy its legal duties to the tribes to prevent further deterioration of habitat due to forest management by relying on actions to be taken by other entities. See Citizens Against Toxic Sprays v. Bergland, 428 F. Supp. 908, 927 (D. Or. 1977).

### Formulation of Alternatives

Although the number of alternatives (11) offered in the DEIS might, at first blush, indicate that a broad array of options are available, that is not the case. The alternatives differ little. For example, a high level of range outputs appears to be a hard constraint on the Challis National Forest Alternative 3, also known as the non-market emphasis alternative, will yield from 114,000-108,000 AUMs over the planning period. As noted earlier, this grazing level would allegedly threaten some ranching operations. The no-action alternative contemplates grazing levels of 115,000-114,000 AUMs over the planning period. This will apparently not threaten some ranching operations. The market emphasis alternative yields 116,000-124,000 AUMs and the preferred alternative projects 115,000-117,000 AUMs. Comparatively speaking, there is relatively little difference between the alternatives. Moreover, range outputs do very well under the constrained (-25%) budget alternative with a constant level of 115,000 AUMs.

In contrast, none of the alternatives envisions maximizing

- 1 fish habitat. And even the alternative which one would think would maximize fish habitat (non-market emphasis) fails to do so. This failure may be due to the somewhat perverse inclusion of extensive road reconstruction. In fact, the "non-market emphasis" alternative promotes more road reconstruction than either the market emphasis alternative or the preferred alternative. It is difficult to escape the feeling that the non-market emphasis alternative was deliberately "adjusted" in order that it would not appear significantly better for fish than other alternatives.

#### Roadless Areas

- 2 It is impossible to determine from the roadless area analysis the number of fish and the amount of habitat to be effected by the management planning designations. Instead, the DEIS limits itself to uninformative statements such as "None," DEIS at C-28, or "Moderately Adverse," DEIS at C-40, in discussing potential effects on fish habitat capability. Moreover, it is difficult to understand why the above "moderately adverse" effects are permissible for future management of the Squaw Creek roadless area. Given the marginal state of forest fish populations, is it prudent to allow further habitat degradation in areas which effect critical anadromous fish stream reaches? See DEIS at C-37.

- 3 Another troublesome aspect of the proposed designations for roadless areas is that habitat for the endangered bald eagle does not appear to be adequately protected. Although the Lemhi Creek roadless area sustains a fishery that "is part of an integral food chain which ultimately supports the endangered bald eagle as well as other unlisted mammalian and avian predators," See DEIS at C-25, it is not recommended for wilderness. This is particularly interesting given that the Endangered Species Act requires special consideration of the needs of bald eagles. The Challis National Forest's biological assessment of the bald eagle declares that the U.S. Fish and Wildlife Service shall be consulted if a project effects bald eagle food availability or feeding areas. The assessment summary states that "[i]f increased livestock use avoids loss of anadromous fish habitat, this planned management should have no effect on either Peregrine falcons or Bald eagles." DEIS at G-3. It will be interesting to see if this approach accords with the Fish and Wildlife Service's views on endangered species habitat management.

- 4 That fish protection does not seem to be a primary goal in the roadless area designation process is further confirmed by the management decisions for the Pioneer Mountains and Boulder/White Clouds roadless areas. Despite partial recommendation for wilderness, adverse effects on fish habitat capability are contemplated. The roadless area analysis needs to be revised to show exactly what the impacts are on fish habitat and why it is that these impacts are permissible in the face of the legal

#### RESPONSE

Page 12, paragraph 1: The non-market alternative was not deliberately adjusted as you suggest. Road reconstruction was at a relatively high level under this alternative in support of the increased emphasis on recreation. It is probable that some increase in sediment could occur during the actual reconstruction work. However because reconstruction work will correct existing problems and improve maintainability of the existing road system the amount of sediment eroded from the road system would be lower after the reconstruction occurs.

Page 12, paragraph 2: The tables in Appendix C of the DEIS were put together during the early stages of the planning process and do not necessarily reflect standards and guides and management direction developed later in the process. Because of this and not having specific information on where activities would take place, the impacts to soil productivity, water quality and fish habitat capability were estimated to be greater than they are now felt to be. See updated tables in Appendix C. The qualitative terms were used because it wasn't possible to quantify actual effects without having specific information.

Page 12, paragraph 3: The table on C-28 indicates that the Lemhi Range Roadless Area will essentially be managed the same for the Bald eagles under Alternative 11 as under wilderness.

Page 12, paragraph 4: There are no expected impacts to fish habitat in the Boulder-White Clouds Roadless Area. See updated Appendix C of the DEIS.

requirements delineated earlier in these comments.

#### Budgeting

1 The Challis National Forest uses budgeting as a way of determining management intensity. DEIS at B-21. For example, under the constrained budget alternative, range outputs (115,000 AUMs) appear utterly unaffected whereas watershed conditions would decline, riparian conditions would deteriorate, many water quality problems would not be mitigated, and even maintenance needs would not be met. DEIS at II-57. The preferred alternative also suffers. "Major site specific proposals for oil and gas exploration and development would require adjustment of the Forest program budget, special Regional appropriations, or funding from the proponent." DEIS at II-88.

2 The Forest has chosen its "management intensities" and once again it appears that those resources other than range will suffer. The Commission suggests that watershed, riparian, and water quality needs, which have traditionally suffered from funding shortages, should receive greater emphasis.

#### Timber Resource Land Suitability

3 The NFMA regulations require that lands be identified that are not suited for timber production. Lands may be identified as unsuitable for timber production because, among other things, the "[t]echnology is not available to ensure timber production from the land without irreversible resource damage to soils productivity, or watershed conditions," or because "[t]here is not reasonable assurance that such lands can be adequately restocked as provided in section 219.27(c)(3) [within five years]." See 36 C.F.R. Section 219.14(a)(2)-(3) (1984).

4 Unfortunately, the DEIS does not discuss the issue of what timber production will result in irreversible resource damage. Instead, this is referenced to the Analysis of the Management Situation document. This is inadequate. This vital discussion needs to be included with the DEIS. Without it, a decisionmaker cannot determine whether forest timber harvest plans are in compliance with law. In addition, "irreversible damage" needs to be defined in a manner that protects those resources dependent upon stable productive soils and healthy watersheds. For example, "irreversible harm" to watersheds must take into account the lifecycle and genetic background of anadromous fish.

5 The DEIS appears to be very cognizant of the problems involved with below-cost timber sales. The Commission is encouraged by this awareness of economics. The DEIS referred to the problem that "[r]oad building costs, even for minimum standard roads, are a significant problem on the Forest." DEIS at A-10.

#### RESPONSE

Page 13, paragraph 1: Forest budget is one aspect of each alternative. The various alternatives were developed with different combinations of activities, outputs and budgets in order to insure that a wide range of combinations were considered. Within the constraints placed on each alternative the FORPLAN model attempted to optimize PNW. Improved administration in timber, range or minerals produces positive benefits to watershed or wildlife. Often these benefits are greater for wildlife habitat or watershed than those that would be realized by a direct equal investment within the wildlife and watershed program.

Page 13, paragraph 2: Watershed, riparian and water quality needs are emphasized throughout the Plan. See the Goals and Objectives, Standards and Guidelines and the Management Direction.

Page 13, paragraph 3, 4, 5: The Challis National Forest does not plan to harvest timber on lands that would cause irreversible damage to other resources.

The Commission hopes that the Forest Service will look at road costs, not in terms of the viability of timber sales, but instead in terms of the needs of other forest resources.

#### Hydroelectric Applications

The Secretary of Agriculture has an important role to play in the licensing of hydroelectric projects that will be located in national forests. Section 4(e) of the Federal Power Act, 16 U.S.C. Section 797(e) (1982) declares that the Federal Energy Regulatory Commission is authorized:

To issue licenses ..for the purpose of constructing dams.. or other project works.. upon any part of the public lands and reservations of the United States.. Provided, that licenses shall be issued within any reservation only after a finding by the Commission that the license will not interfere or be inconsistent with the purpose for which such reservation was created or acquired, and shall be subject to and contain such conditions as the Secretary of the department under whose jurisdiction such reservation falls shall deem necessary for the adequate protection and utilization of such reservations....

It is the Forest Service's duty to impose terms and conditions that will assure adequate protection for national forest lands from the harms resulting from hydroelectric development. See Escondido Mutual Water Company v. La Jolla and Rincon Bands of Mission Indians, 104 S. Ct. 2105, 2114-15 (1983). Consideration of necessary terms and conditions should be a part of each Forest's planning process.

#### RESPONSE

Page 14, paragraph 1: That is one consideration when considering road construction.

Page 14, paragraph 2-4: Hydroelectric projects are handled through the special use permit process. Terms and considerations for these permits are contained in the Forest Service Manuals. Special considerations such as minimum instream flow requirements are resolved in response to a project specific proposal through an interdisciplinary Environmental Analysis.



The three land use practices that have high potential for reducing anadromous fisheries, inhibiting building of wildlife stocks, erosion of land, siltation of streambeds and destruction of habitat are grazing, timber harvesting, and mining. If these activities continue current or greater levels then it becomes the job of intensive management to protect other resources from degradation and hopefully to improve renewable resources. It is very questionable whether enough mitigation measures can be used to overcome widespread watershed disturbance. The purpose of monitoring under this scenario is to determine whether habitat destruction is approaching pre-established levels of "acceptable" damage. The possibility of future degradation resulting from current output levels is not covered by simple monitoring. Classification systems are extremely useful in determining which areas are not apt to be detrimentally affected in the future from present activities. As an example, the maximum incidence of land mass failures often occurs as much as 7 to 10 years after logging. Monitoring sediment levels after clearcutting would say little about the wisdom of cutting certain land units.

#### Analysis of the Preferred Alternative

The preferred alternative (11) emphasizes maintenance of timber, grazing, and mining activity near present levels over the next decade with scheduled, small increases thereafter. Non-commodity outputs generally remain constant. The ability of the plan to achieve its goals will be discussed under major resource headings.

#### Range

We are concerned about range habitat maintenance for a variety of reasons, including effects on fisheries, wildlife, and native plants. Establishment of an upward trend as a guideline for range conditions sounds like a worthy ideal. However, if range condition is already severely degenerated, a slow upward trend may unnecessarily delay essential relief to dependent fisheries and wildlife. It would be helpful to see a clear classification of stream types, present state of range bordering these streams, past levels of AUM's, and efforts made to improve range, present prescriptions and anticipated benefits. Only by this examination can we determine whether upward trends are apt to be slow or fast, prolonging or speeding recovery. The use of range by cattle is a widespread disturbance to the majority of the management areas. Intensity varies from unit to unit. For example, very high densities occur in the Copper Basin area while no grazing occurs in the Seafoam management area. In order for a meaningful evaluation of range use to be made there must be considerably more information available. Such information includes:

- 4 (1) maps of the distribution of AUM's on watersheds plus numbers of deer and elk utilizing the same areas in seasons corresponding to cattle use and after cattle are withdrawn

#### RESPONSE

Page 15, paragraph 1: Because of the low level of activities that will occur on the Challis National Forest we believe that the type and intensity of monitoring outlined in the Plan is adequate.

Page 15, paragraph 2: All non-commodity outputs increase in the preferred alternative.

Page 15, paragraph 3: It was not reasonable to put all of this information into the DEIS and the Plan. Availability of this information is discussed below.

Page 15, paragraph 4: Allotment maps are available in Forest offices and AM's are shown in Appendix B of the Plan (Range FRES strategy and outputs). Deer and elk utilization compared to livestock varies from year to year and area to area based on use patterns and weather.

- 1 (2) corresponding maps of fish distributions
- 2 (3) lists of the major ranching operations and AUM use by each
- 3 (4) location of key elk habitat areas- eg. habitat by season, calving grounds, nursery areas
- 4 (5) maps of vegetation types, extent and present condition of range lands.

The state of knowledge of competition between cattle and elk may not be extensive (G-8) but it is reasonable to assume competition is important, considering that cattle consume food used by both deer and elk. It seems that wildlife have a disproportionately small share of forage but contribute more to PNV than cattle even with the inflated grazing fee used. One wonders what the impact is on big game from cattle feeding on wet meadows. Are cattle removed soon enough from ranges for significant pre-winter regrowth to occur? What is the quality/quantity of forage then remaining for elk? How significant is the contribution by ranchers into maintaining wintering elk and deer herds on their private property?

It is a disturbing practice to value cattle grazing at \$14.06/AUM (EIS-II-19) when the Forest Service really only receives \$1.35/AUM. This deprives the CNF of important revenues to operate, eliminates benefit to the U.S. Treasury, and encourages range abuse. A valid quantitative comparison of resource benefits cannot be made with this degree of bias toward range. This bias is also evidenced by the fact that the number of AUM's does not vary more than 9% under the range of alternatives given. This indicates that grazing level is a hard constraint although it was not identified as a constraint in Table B-8. Range use is already at near capacity and is scheduled to be increased (B-7). Reduction in grazing in alternative 3 is only 6% over 5 decades. In comparison with other alternatives, alt. 3 is listed as having the greatest negative impact on the local community (EIS-IV-49) but elsewhere it was noted that none of the alternatives would significantly impact the local community (EIS-IV-47). It is questionable whether budgets are large enough and stable enough to effectively manage herds which are at grazing capacity levels without resorting to fencing. The tradeoffs between incremental increases in AUM (with associated extra management efforts and range improvements) vs. loss of wildlife and fish production, was not adequately presented. Rather, the relationships become lost when levels and trends of other resources are changed and the balanced sheets are examined as a whole. In general with natural systems, trying to maximize something like AUM's results in lower return per unit effort and increasing damage to other systems. The optimal AUM level is not necessarily the maximum.

It was stated that there will be an emphasis on allotments with grazing plans (IV-13, item f). What does this imply? How many allotments have plans? Has range inventory been done on

## RESPONSE

Page 16, paragraph 1: This information is available at Forest offices.

Page 16, paragraph 2: Knowing who the permittees are and their permitted AM's is not necessary to evaluate the alternatives. This information is available at the Forest Supervisor's Office.

Page 16, paragraph 3: This information is not complete for the Forest, but a substantial amount is available at Forest offices.

Page 16, paragraph 4: This information is available at Forest offices.

Page 16, paragraph 5: There is little regrowth on the ranges after livestock are removed. The amount and quality of forage remaining for elk after the grazing season varies depending on use patterns, weather and annual production. There are also thousands of acres of forage that are not grazed by livestock. Ample forage is available to meet the needs of present and planned elk populations.

Page 16, paragraph 6: The various resources on the Forests were compared based on their values, not on their return to the Treasury. You are correct that range AM's are valued higher than the actual return to the Federal Treasury. If only returns were considered as you suggest, the values for many activities and outputs such as WFUD's and Wilderness RVD's would be zero. There are no planned increases in livestock during the ten year planning period. Based on current IDF&G population projections, wildlife and fish needs will be met.

other plans so that proper levels of grazing are established? Does money for improvement go only to allotments with plans. How many allotments require cost sharing for improvements? What is the range FRES strategy and how do intensive vs. extensive range management work? What is the difference between range and watershed improvement? What is being done to protect sensitive plants from grazing since many of these are located in grazing areas?

Several questions relative to cooperation with other groups arise. What kind of coordination with BLM and private landowners can be achieved in managing range? And how does this relate to maintenance of wildlife? To what extent is Forest wildlife dependent on off-forest areas and is this a critical limitation to their success? If range improvements are made will any of this benefit wildlife or will the additional production be consumed by cattle?

Timber

The Challis Forest is not a large producer of sawtimber due to its generally low rainfall and unproductive soils. Recent timber harvest has been about 3 MMBF, (EIS-viii) but only one alternative was presented which was not able to meet demand (EIS-IV-9). Alternative 3 was among those satisfying demand but was rejected. Why does the preferred alternative have escalating volume of timber offered. No rationale was given for this. Since future demand cannot be predicted isn't it better to compare alternatives on the basis of equal demand.

Much of the timber in the CNF is stunted with 150 year old Douglas fir having 10" DBH (EIS-III-22). High grade stands have been largely cut (A-10) and remaining high quality stands are spatially isolated and require expensive road construction in steep terrain. Much of this timber is extremely tapered and is not desirable as sawtimber in local mills. In addition, regeneration of the preferred species is difficult if not impossible. Under these conditions it seems that the trees often have more value in scenic quality and as stabilizers of steep slopes. It is unclear whether assessment of tentative forest base was made considering more factors than slope steepness (EIS-IV-12). Was the soil type also considered or would it be considered only before planning a cut (EIS-IV-15)? Since soil surveys are not extensively done for the forest, it appears that the size of the timber base which can economically be harvested is unknown. How is this uncertainty dealt with in economic planning for the forest? Wouldn't a different direction be more reasonable if all the limitations of tree harvesting were evident at the outset. Many predicted effects of timber harvest on considered the preferred alternative show moderate or severe impacts on site productivity. The total reduction in soil productivity averaged over the entire forest is stated to be 2% or less (EIS-IV-33). The acreage cut is also 2% or less. It appears that whenever cutting is permitted soil productivity loss is apt to occur. Sustained yield on a site basis is apt to be a

## RESPONSE

Page 17, paragraph 1: Some allotments have had management plans developed and intensive management systems initiated. Money has been expended on the development of these allotments and specific management objectives and monitoring requirements established. Our emphasis on these allotments is to ensure that the management plans are being followed and management objectives are met. Range inventory has been done on all allotments. Management plans have been completed on 45 allotments. The remaining 31 are scheduled to be completed by 1995. Range improvement money is spent primarily on allotments with management plans. Range improvements on all allotments require cost sharing by the permittee.

See Appendix B of the Plan for definitions of Range FRES Strategy.

Range and watershed improvement are synonymous when the project improves vegetative cover. However, some range improvements are structures like fences, water developments, etc. Watershed structural improvements are terraces, waterbars, riprapping streambanks, etc.

We believe that the standards and guidelines contained in the Forest Plan, the monitoring and evaluation program, our establishment of several research natural areas and our mandated management of federally classified plant species adequately addresses the comments received.

Page 17, paragraph 2: Allotment management is coordinated between Forest, BLM and private landowners where appropriate. Wildlife needs are built in to the Management Plans.

Several big game species, especially antelope and deer, are dependent on public lands managed by the Bureau of Land Management for their critical winter range needs. In some areas this definitely can be a limitation to their success on the Forest.

Range improvements quite often benefit wildlife.

Page 17, paragraph 3: The preferred alternative does not show escalating timber harvest in the first ten years for which the Plan is written. The projections for later decades given in the EIS are only intended to indicate the capability for activities to occur in those decades if that alternative is followed during the first decade.

Page 17, paragraph 4: See Appendix B, page B-17 through 19 for a discussion of how Forest land was designated capable, available, and suitable for timber harvest. Tables IV-4 and IV-5 display suitable acres on the Forest by alternative. Your interpretation of the 2% or less loss in soil productivity does not equate with the approximately 2% of the Forest where timber harvest will occur. As stated in the EIS the loss in soil productivity results primarily from existing facilities, campgrounds and roads.

meaningless concept due to soil production loss and inability to regenerate trees. The forest relies on regeneration of lodgepole on harsh sites (EIS-III-22) but lodgepole is not as valuable as Douglas fir and may not have equal quality as habitat for wildlife. A goal of forest management for CNF is to enhance timber diversity (EIS-IV-15). When only Douglas fir or lodgepole are regenerated there is little diversity provided.

It is stated that timber sales will generally be at base rates (EIS-III-22). Does this imply "at cost" or will "below cost sales" be allowed? Considering the debate over this practice, it should be made clear what the economics of timber harvesting in this forest are. Instead of just saying that maintenance is adequate or inadequate in an alternative, the specific calculations of expected revenues, road and site restoration costs and road maintenance through the next rotation associated with logging should be presented more clearly. It would be helpful to understand how funds are generated to maintain roads and to revegetate land after harvest. If no K-V funds are available for rehabilitation after cutting as in below cost sales (see attached paper), does this hinder meeting obligations to revegetate within 5 years. What is the maximum variability in funding for habitat restoration work? Certain roads should be maintained exclusively for logging as suggested by IDFG. This provides secure areas for wildlife, reduced erosion from traffic and also does not allow the expansive road system to be justified by tourist use when there is no need for this activity.

#### Fisheries

Columbia River salmon and steelhead were identified by the U.S. Fish and Wildlife Service as the most pressing problem facing them. The Forest Service makes a commitment to coordinate activities with other agencies (eg. U.S.FWS, BLM)(RMP-IV-86) to achieve fish and wildlife goals. These are excellent ambitions for the CNF, a forest with 15.5% of anadromous fish habitat in Idaho (A3). The CNF also generates 4.7 times more revenue from fishing, wildlife, recreation and wilderness than from timber, grazing and mining combined. This ratio could be even more balanced in favor of non-commodity outputs if grazing is computed using actual grazing fees. Considering the overwhelming importance of these non-commodity outputs and the fact that demand for these is probably greater than supply (EIS-III-16), it is strange that a non-commodity emphasis is not chosen as the preferred alternative.

Even though it is stated that the goal is to support anadromous and resident fish populations (RMP-IV-12), this statement seems hollow with heightened activities in timber, grazing and mining. Lack of commitment to this is reflected in statements such as "protect anadromous spawning areas where feasible" (RMP-IV-12). If protection is not feasible, then grazing should not be allowed. In addition, is there any study which indicates that no significant damage occurs to fisheries by

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Page 18, paragraph 1: In some areas where Douglas-fir was clearcut in the past on harsh sites, lodgepole pine is being used as a 'nurse crop' for Douglas-fir.

Page 18, paragraph 2: No timber sale can be sold below base rate. Base rate insures that enough money is collected to regenerate the sale area and return 50 cents per thousand board feet to the Treasury.

A deficit sale simply indicates that under particular market conditions the costs for the average operator may not allow him to make a profit on the harvesting and processing of the trees included in a particular sale. The sale is offered for competitive bids. Forest Service competitive sale procedures assure that the public receives the market value of the timber.

Expected revenues may vary greatly because of current value and demand for timber.

Road cost can only be determined on a sale by sale basis.

Roads used only for logging are maintained by the timber purchaser during harvest. Any maintenance required for wood harvest, planting, etc. is paid for by appropriate road maintenance funds.

The maximum variability in funding for habitat restoration work has not been determined.

Page 18, paragraph 3: The selection of the preferred alternative was based on criteria relating to the issues and concerns developed from our public involvement process.

Page 18, paragraph 4: There are no planned increases in timber harvest and grazing in the next ten years. Mining intensity is difficult to predict. The standards and guides have been strengthened with phrases like 'where feasible' being removed.

## RESPONSE

1 allowing 10% degradation of banks and 50% removal of new leaders. How will state water quality standards be maintained when cattle produce sediment and bacteria loads in streams? Are municipal water sources protected from this type of activity?

2 When streams with only resident fish are given reduced importance status how will their numbers be expected to increase? Damage to resident fisheries seems unwise in light of the high benefits derived from them.

3 The emphasis on riparian zones as a sensitive area is well-justified. However, the watershed is often treated as an entity separate from drainage systems. For example, a directive is to emphasize fish habitat to reduce sediment (RMP-IV-68). Habitat modifications or riparian modifications are meaningless in a poor watershed. Riparian protection does not filter out all effects of forest and range malpractice. Eroded soils can still be delivered to channels by a variety of methods.

4 Habitat improvement is an essential element in rebuilding fisheries. It is difficult to evaluate potential effectiveness of proposed levels of habitat improvements without knowing current states of streams and associated range and forest land. Stream classification may help in understanding the dependence of natural habitat quality and quantity on watershed class and present condition. What are the current habitat conditions in anadromous streams? Are stream conditions a result of past practices or are they reflective of natural conditions? Has habitat improvement been shown to be effective under existing levels of competing uses? What is considered to be an improvement structure -- is it a boulder, a gabion, etc? A reader has little means to evaluate whether 30 structures is something significant. Possibly 30 structures are no better than 10 if other factors such as heavy siltation are present. This criticism is applicable to streams such as Yankee Fork where many competing uses occur. The directive is to maintain existing habitat. Is this level high or low.

5 Each of the 25 management areas had a different mixture of directives. With so many management areas and different types of planned activities it was difficult to determine whether there is an overall plan to attack problems. It was stated that streams have priorities. Are some streams index streams for others in monitoring programs? What is the classification system. Are there consistent directives and monitoring programs for all separate classes of streams. As an example, in Thompson Creek, an anadromous stream, maintenance of fish habitat is not mentioned but it is mentioned for others.

### Sediment

Sedimentation of stream channels is associated with the level of timber, grazing and mining activities. The R1-R4 sediment model (see Appendix for further coverage) has been

Page 19, paragraph 1: Professional judgment was used to make the inference that maintaining 90 percent of inherent bank stability would not allow significant damage to the aquatic environment. The 50 percent removal of new leaders is based on maintaining vigor of the shrubs, not a criteria for maintaining fish habitat.

If State water quality standards are being violated, then appropriate actions will be taken to solve the problem. Municipal watersheds will be protected from negative impacts from this type of activity.

Page 19, paragraph 2: The Forest has not reduced emphasis on resident trout streams. The Goals and Objectives, Standards and Guides, and Management Direction apply to resident fish as well as anadromous.

Page 19, paragraph 3: We agree that good condition riparian areas do not solve the problems of watersheds in poor condition. There are only a few small areas on the Challis National Forest that are in poor watershed condition.

Page 19, paragraph 4: Current fish habitat conditions range from poor to excellent depending on the stream or stream reach. Existing stream conditions are a result of all types of influences, both man-induced as well as natural. Habitat improvement has been shown to be effective. Boulders, gabions, fences, log dams, and deflectors are all considered to be structures. Some structures have more value to fish enhancement than others under specific conditions. The Forest action schedule did not identify specific types of structures.

Page 19, paragraph 5: No index streams have been identified. Generally, each major drainage on the Forest will be individually monitored at some level of intensity, based on the amount of activity and the importance of the fishery. Presently, no classification for fishery streams has been adopted by the Forest. The consistent directive for fisheries on the Forest is to maintain at least existing habitat conditions and improve where needed. The prescription for Thompson Creek (Plan IV-90) gives direction to improve anadromous fish habitat. See addition to Management Directions and Standards and Guides on IV-91.

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proposed as a means of estimating natural sedimentation rates plus the increment resulting from tree harvest, road building and fires. The effects of grazing are apparently covered separately using the modified Soil Loss Equation. Is mining covered by the same equation even though pollution from these sites may be point and non-point sources. It was not explained fully whether all these sources were considered for their cumulative effects only within a management unit or throughout the Salmon basin. How do activities on the Forest relate to activities on BLM and private land and to resultant water and habitat quality downstream in the Salmon system. Many of the reaches in the main Salmon are or were important for spawning and rearing of anadromous fish.

The use of the sediment models to predict mean natural levels gives no insight into natural variability. Under natural conditions fish may survive periodic floods and episodes of massive sediment movement well. Under forest management (ie adding impacts of grazing, timber, mining) mean annual sedimentation rate might rise by 10% but there is no assurance that extreme values would be a simple 10% over natural extremes. This implies that both mean and amplitude of effects can be raised under management. The practice of averaging heightened sediment yields in managed areas out over surrounding unmanaged areas hides the fact that significant and lasting damage is being done. The impact of high sediment loads may not be confined to management unit of origin but could be transported downstream considerable distances. The length of time needed for recovery of bed sediment to natural levels can be great. The allowance of up to 30% increase of sediment over natural is excessive for fish stocks which are generally at the margin of viability. The margin of error allowed by such a guideline is minimal.

2 Monitoring frequency was unspecified but if it is infrequent, there is little opportunity to modify behavior in timely fashion to avert damage. In the case of logging, if it requires 4 years to cut trees on a plot and monitoring is done every 2 years it would be too late to halt much of the damage even if effects are all evident immediately. What is the level of sensitivity of the sediment model for detecting change. Many effects of logging and associated road building only become evident long after construction and harvest activities have ceased. There is a directive to monitor sediment in anadromous streams and important resident streams (RMP-IV-12). Which streams are these? Is there a program for maintenance and restoration in coordination with BLM and private landowners? What is the present and potential extent of anadromous fish usage in these streams and are there channel reaches downstream of Forest Service lands which presently limit habitat utilization? The monitoring of anadromous streams appears to be rather limited. For example, it was not indicated whether sediment monitoring on Squaw Creek is planned (RMP-IV-91). And while there is a program planned for Marsh Creek, there is none for Valley Creek (RMP-IV-63). What is the rationale for the monitoring program?

Riparian

Page 20, paragraph 1: Mining impacts can be modeled using the R1-R4 sediment model. Cumulative effects were only looked at within a management area. At this time, all the Forest can do is manage its land based on Forest Service standards and guides, and maintain water quality that meets or exceeds State standards. There is no coordinated program to assess cumulative impacts to fisheries from all different ownerships at this time.

Page 20, paragraph 2. The 30 percent sediment threshold is a point at which we will not allow any new activities to take place in a drainage unless it can be shown that the activity will not increase sediment or could even reduce it. The 2 percent constraint is the guideline that will stop major sediment increases from management activities from occurring. A sediment level in any stream cannot be increased more than 2 percent over existing levels (i.e., if existing is 22 percent then maximum level is 24 percent). Existing levels of sediment (<1/4") have and will be determined by core samples. Future monitoring will be done using core samples or by newer methods if they are more reliable. Impacts of proposed activities will be determined using the R1-R4 model and monitoring will be done as needed to validate the results and refine the model. Major streams in the following Management Areas will be monitored for sediment: 3, 4, 5, 6, 7, 8, 9, 11, 14, 21, 22, and 23. Other streams may be monitored depending on proposed activities.

There is no coordinated program between BLM and private landowners. Present use of anadromous fish habitat on the Forest is probably less than 10 percent of potential. The AM's, which is available at Forest offices, gives estimates for each Management Area.

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Page 21, paragraph 1: The riparian guidelines that referred to "50% to 80%" retention of streamside cover has been dropped and this will now be determined on a case-by-case based on resource needs.

Page 21, paragraph 2: This means that due to the inherent problems in managing activities in these narrow, steep valley bottoms, that special considerations such as you mentioned, may be needed. It is not possible to be allotment-specific in this broad level of planning.

Page 21, paragraph 3: In Alternative 3 management and administration are also reduced which would potentially allow for deterioration of riparian areas. Anadromous fish production could still increase significantly due to existing numbers being so far below habitat capability. Herd Creek does not have a forage level set at 60 percent. Water troughs in areas away from streams can improve distribution and reduce riparian impacts.

Page 21, paragraph 4: The existing habitat effectiveness for elk within the proposed recovery area exceeds the minimum requirements. With the predicted increases in elk and deer numbers shown in Table IV-8 on page IV-19 of the DEIS, we don't see how you can make this statement.

Protection of riparian zones is of great importance in management of streams and has been extensively treated in the DEIS. Although technical knowledge may not be entirely adequate for understanding riparian dynamics (EIS-III-19), the source of the problem is generally evident. Status quo does not need to be maintained just because all information is not available. Stream cover is important and allowing up to 50% removal may be detrimental. Adoption of conservative standards is better than universally applying "maximum allowable" standards.

What does it mean when an "emphasis" is given to protection of riparian types in V-shaped drainages with side slopes >45% (RMP-IV-31)? Does this imply more frequent inspection, different forage removal standards, lower AUM's, reduced use etc? Management direction is often too vague to understand what sorts of protection is to be given. Tables showing specific treatments on each allotment would be needed.

Some other questions concerning riparian zone exist. How is it that riparian conditions deteriorate under alternative 3 (11) with reduced AUM and greater fish production? Considering the value of Herd Creek to anadromous runs why is grazing so intensive here and why is a 60% riparian forage level set as a standard (RMP-IV-81). Has it been demonstrated what effect watering troughs without fencing have on changing cattle distributions and preventing riparian damage.

### Wildlife

Wildlife is projected to improve under alternatives 3, 10, and 11 due to habitat improvements. If the goal is to maintain 75% habitat effectiveness for elk (G-11), what is the present state. Even though choices of alternatives largely hinge on which can support the highest resource levels, the increases in game for alternatives 3, 10, and 11 are very modest. Is it possible that other outputs were not varied enough to see a significant change in game levels. With the continued demand for game, the minor increases shown for the next five decades are probably insufficient. Also in the model these gains hinge on the availability of range or forest land improvement funds. If timber sales are below cost there are no K-V funds available for these improvements and presumably then sales even slightly above cost would be insufficient to provide real benefits. If there is a commitment to restoring the habitat of threatened and endangered (T+E) species such as the gray wolf, and their existence hinges on sufficient deer and elk prey which in turn depend on good quality range and riparian areas (G-12), it seems that increased efforts are needed to restrict competition between cattle and wildlife. This same reasoning applies to the bald eagle. It is stated that the bald eagle which presently uses the forest only occasionally. It depends on sufficient fish resources in larger streams for a food base. If fish numbers do not decline, no effect on eagles is predicted (G-3). However, if fish numbers are below critical level, even small increases in

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fish may result in no change in eagle numbers. Riparian improvements will not be made until it is seen that eagles are using the forest (G-1). The catch is that use may not be possible unless the improvements are made first. It is no problem to meet the direction to maintain or increase T+E species when they scarcely can survive in the forest under present conditions. Has it been shown that wolves and intensive grazing are compatible? Most of your critical wolf areas also receive considerable grazing pressure.

### Soils

2 Apparently detailed knowledge of soil types for individual small basins at the scale of timber cut size is not available forest wide. How does this lack of information constrain planning? Can timber plans be made sufficiently well in the absence of such data. Why are the data available in the AMS on sedimentation rates not summarized including maps of unstable soils? Stable and unstable soils are said to be highly intermingled (EIS-III-33). How is this dealt with relative to logging and road building? What are Order II vs III soil inventories? Are these studies done before logging or roading is started? How is natural soil productivity evaluated for an area and how are changes measured. Is soil productivity change due to cattle use accounted for?

### Minerals

3 What is the present state of the Forest relative to mining activity? Are old mines continuing sources of pollution? What types and levels of pollution are attributable to active mines? How frequent is monitoring and does monitoring continue even after mine closure? How are cumulative effects of mining, grazing and timber assessed and how is responsibility for control apportioned? With the intense mining on Squaw Creek and Thompson Creek (G-5) why is there no stated monitoring program for Squaw Creek (RMP-IV-91) and no maintenance of fish habitat for Thompson Creek (RMP-IV-86)? These streams also have high levels of grazing. How will anadromous runs be maintained there? What is being done to restore Panther Creek and other streams which have had serious mining damage

### Economic Analysis

4 Even though the purpose of Forest planning is to select a set of outputs with the highest PNV, an economic efficiency analysis cannot be completed because of lack of ability to assign values to certain outputs (EIS-II-86). There seem to be 3 types of outputs considered-- priced commodity and non-commodity outputs and non-priced outputs. There is some confusion about the category for some outputs. That is, some wilderness attributes are valued because of their relation to enhancement or

Page 22, paragraph 1: We disagree. Present anadromous habitat capability far exceeds existing population levels. Fish populations that could support more Bald eagles, could and will increase even if habitat is not improved. It has not been shown that wolves and grazing are compatible.

Page 22, paragraph 2: The Forest has been broadly inventoried by landtype. This general information was adequate for preparation of the Forest Plan. A detailed Soil Resource Inventory is in progress and is programmed for completion by the end of the second decade and will provide more detailed data for future planning efforts. The Forest Plan identifies timber volumes to be harvested in large management areas. At the time specific timber sales are proposed, the soils within the proposed sale will be evaluated and interpretation/mitigation measures developed. We do not believe information on sedimentation rates is essential to understanding the Forest Plan. The information is available at the Forest Supervisor's office. Prior to project implementation appropriate soils evaluation is made to determine needed constraints and mitigation measures. Soil surveys of different orders are discussed in the glossary. Soils evaluations are done prior to most soil disturbing activities on the Forest. Natural soil productivity (see Glossary for definition) for a site is determined by reference to a similar site that is in an essentially undisturbed condition. Changes in soil productivity at a specific site are determined by comparison with conditions at this reference site. Methodology has not been developed to fully display effects of grazing, the modified Universal Soil Loss Equation was used to display general grazing effect. Because of this concern we have placed added emphasis on developing Goals and Objectives, Standards and Guidelines, and monitoring related to grazing activities.

Page 22, paragraph 3: Mining activity on the Forest is discussed on II-27 in the Plan. Old mines can be sources of pollution. The list of potential pollutants is extensive but the Forest and other regulatory agencies are managing mining operations to not allow harmful levels of pollutants to reach waterways. Monitoring frequency is based on the activity and in some instances may last beyond the life of the project. Effects of activities will be individually assessed and then grouped to determine cumulative effects. The Forest Plan page IV-98 addresses monitoring, also see earlier reference to Thompson Creek. Habitat capability will not be reduced and will probably improve due to the Goals and Objectives, Standards and Guides, and Management Direction in the Plan. Panther Creek is on the Salmon National Forest.

Page 22, paragraph 4: Maximizing PNV is not the purpose of Forest planning. The preferred alternative is judged to maximize Net Public Benefit (NPB) for the reasons discussed in Chapters II and IV of the EIS and in the Record of Decision. You are correct in recognizing that both quantifiable and nonquantifiable factors are included in NPB. Our discussion on B-119 was responsible for at least part of the confusion, several important errors have been corrected.



recreation or fish and wildlife. Other attributes are more difficult to value. It is not made especially clear how non-priced outputs or semi-quantitative rationales for management have affected the selection process or the mixture of inputs to a FORPLAN run. On page B-19 it is noted that non-priced components contribute to PNV and also that they do not contribute. The PNV of alternative 3 and 11 are very similar (B-47). With slightly lower but sufficient levels of timber and grazing in alt. 3 and better fish and wildlife conditions it is difficult to see why alternative 3 (non-commodity) is not a better direction.

#### Water quality

Achievement of state water quality standards is a hard constraint on forest management. It is questionable though whether techniques for mitigation are effective enough to allow increased soil disturbing activities.

A forest wide effort to measure instream flows is planned (RMP-IV-19). Will this methodology only measure present surface flows. Will diversions of water be considered. Will reduction in surface flow due to channel disturbance by cattle be considered? This activity can result in changes in surface flow due to soil compaction and evaporative losses of water from channel widening and riparian cover reduction.

How will water yield be increased in these basins (C-55)? Efforts to increase water yield are not always successful. Reduction in vegetation density to increase yields may lead to increase erosion on these soils.

#### Summary

Forest Planning is an important process which lays the foundation for the future condition of forest land. The CNF has a large area of wilderness land and serves public interest primarily through its recreational values. Since many of the recreational values are intangible it is easy to justify enhanced protection of this resource in lieu of maximizing commodity outputs such as timber, minerals and cattle. It appears that some new attempts to direct Forest operation should be made. Among these are:

- (1) Allow no timber sales below cost
- (2) Make sure that adequate funds for reforestation, range and habitat improvement, and watershed improvement are available by including this in the cost of using the CNF lands
- (3) Charge a rate for forage closer to current market rates. Possibly make allowances for winter maintenance of wildlife by

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Page 23, paragraph 1. See response to page 18 paragraph 3 of your letter.

Page 23, paragraph 2. As discussed previously no significant increases in soil disturbing Forest management activities will occur during the 10 to 15 year planning period. Increased monitoring and improved mitigation associated with soil disturbing activities will result in less effects in the future than have occurred in the past.

Page 23, paragraph 3. The methodology used for instream flow quantification is not limited to only measuring present flows. Expected flows are developed for ungaged drainages using flow duration characteristics of nearby gaged streams in a dimensionless form. Actual instream flow needs are determined through regression techniques on channel characteristics, regardless of active or planned diversions.

The concern of reduced surface flow due to channel disturbance by cattle is valid. Since there are no provisions to consider the effects of grazing activity on evaporative and seepage losses under the current instream methodology, it will be incorporated into the channel stability inventory program so potential problem reaches can be identified.

Page 23, paragraph 4: This statement has been removed from C-55 because our management of vegetation is not expected to be of great enough magnitude to significantly affect water yield.

ranchers.

(4) Emphasize development of watershed and stream classification systems. Such a system is proposed by the IDFG. By this means it may be determined what natural conditions are for stream bed gravels, banks, riparian zone, and biological potential for classes of streams. On a watershed level zones of erosional processes, forest production etc. could be established and could be better matched to management prescriptions. Also management of ecosystems across broader areas could be more feasible. Presently there is a large emphasis on management ending at the edge of a particular unit

Many of the comments presented here are an attempt to seek additional information as well as try to highlight areas of potential problems. We have pointed out many places in which calculation of economic costs and benefits is potentially in error. If selection of alternatives and direction for the CNF for decades to come is really based on the output of FORPLAN, then many of the components of the model should be re-evaluated in light of our comments. If the management direction was largely qualitatively determined, then evaluation of plans must focus on adequacy of protection of the ecosystems in question

Throughout these comments we have attempted to present attitudes and concerns reflective of our desire to see a more balanced approach to forest management. It is our belief that many resource-use conflicts could be avoided through establishment of a more extensive on-site monitoring effort than is now available. Such monitoring would provide needed information in a timely manner and also serve to foresee and even prevent potential conflicts. In our view, such an effort might include personnel from the Forest Service, EPA, Idaho Department of Fish and Game, and the Nez Perce Tribe. We view an adequate monitoring program as being equally important as the activities being monitored, not as a mere adjunct that can be discarded at the first sign of budgetary strife. It is from such intensive monitoring that we can learn what works and what doesn't, and what the real effects of our various actions in the forest are. We view it as being sufficiently important to constrain implementation of activities which cannot be monitored.

The Commission appreciates this opportunity to participate in the forest planning process. We will continue to maintain our active role in promoting increased anadromous fish production in the Columbia Basin. We hope that a meeting between Commission and Forest Service staff can be arranged so that mutual concerns can be discussed in greater detail in a setting that will also promote greater trust and understanding among us

If you would like further information regarding our interpretations of SNF plans, please feel free to contact any of our staff, Jim Weber (policy assistant), Alex Heindel (biologist), or Dale McCullough (biologist) at (503)-238-0667

Sincerely,



S. Timothy Wapato  
Executive Director

Literature Cited