

# IDAHO NATURAL RESOURCES LEGAL FOUNDATION, INC.

To Restore Preserve and Protect

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## IDAHO NATURAL RESOURCES COMMENTS

ON

### SALMON NATIONAL FOREST PLAN

1. No land disturbing activities should be permitted on soils susceptible to mass failure from road construction and other disturbances. The statute, 16 U.S.C. §1604(g)(3)(E) requires the promulgation of guidelines for land management plans such as the proposed Salmon National Forest Plan which insure that timber will be harvested from National Forest System land only where soil, slope or other watershed conditions will not be irreversibly damaged and where protection is provided for streams, stream banks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat. The plan does not provide the assurance required. The history of the Forest Service operations in Idaho is filled with episodes in which the Idaho Batholith or other equally unstable land has been disturbed and there have been "blowouts" which have severely damaged the watershed and water



Edwin W. Stockly

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Modeling technique, on the Salmon National Forest have involved the use of local soil, geologic, climatic, topographic, hydrologic and fishery habitat data which has modified regional models to more closely represent local conditions.

Forest monitoring programs will continuously evaluate all model outputs, utilizing locally collected information, such as fishery habitat conditions. Because of variability of all natural system, all modeling data will be used as indicators of magnitude of effects, and not absolute decision making tools. Onsite reviews and professional judgment will continue to be an integral part of evaluating impacts of land management activities on resources within the National Forest.

The EIS presents the cumulative effects of alternatives on a Forest-wide basis and for the planning period. During plan implementation it may be necessary to evaluate cumulative impacts on small portions of the Forest, such as a drainage, if this is an issue.

The regeneration periods in the management area prescriptions are an average for an area that will receive various treatments. Where advanced regeneration is available or planting is planned, the regeneration period is short (0-5 years), however, in some cases natural regeneration takes longer and the final removal cut must be delayed. The "NFMA Regulations" (36 CFR 219) state that "when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way as to assure that the technology and knowledge exists to adequately restock the lands within 5 years after final harvest." The initial cut in the shelterwood and seed tree methods is normally made to encourage prompt regeneration, however, the removal cut must often be delayed more than 5 years to ensure that there will be adequate regeneration after this final harvest. This delayed final harvest to await regeneration was used in our POPPLAN model harvest projections and is consistent with the Regulations. Recent stocking surveys have verified that adequate regeneration can be obtained with the shelterwood method.

We believe that we have complied with NEPA and the Forest Service regulations in developing the DEIS and the Plan.

Although the term "integrated pest management" is not always used, the concept is built into the General Forest Direction and into timber management prescriptions. Refer in the Draft Plan to pages III-3, 4; IV-2, IV-33 through 35, IV-38; IV-47, and IV-74 through 78. Insect and disease considerations were a major factor in the development of the Timber Prescriptions 5A-5C.

Within appropriated funding, noxious weeds will be controlled as needed to protect and enhance the value of other resources. The objective is to treat a sufficient amount of acreage to ensure the eradication of new infestations, prevent the spread of existing infestations to adjacent lands, and gradually eliminate existing infestations. Integrated Pest Management (IPM), the concept of using interdisciplinary expertise to plan for and implement a control program using a combination of biological, mechanical, chemical, and preventive management will be emphasized.





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quality. It is clear that the building of roads and the cutting of trees on soils susceptible to mass failure risks the valuable resources that the statute was enacted to protect. Forest Service regulations, 36 C.F.R. §219.14(a) requires that land be identified as not suited for timber production if technology is not available to insure timber production from the land without irreversible resource damage to soil productivity or watershed conditions. (The regulations appear to be faulty in that they do not seem to require the provision of protection for streams, stream banks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat.) In any event, in this respect the Salmon National Forest plan violates Forest Service regulations and the statute because it does not clearly provide the required assurance against the building of roads and the cutting of trees on the highly erodible soils. All such soils should be classified as unsuitable for timber production.

2 Worst case analysis. The Council on Environmental Quality Regulations require a worst case analysis where the data are incomplete or where there is scientific uncertainty. It is clear that using computer programs to derive estimates of sediment to be added to the water is using incomplete data. The same is true for using computer models to determine the reaction of fish to sediment. For example, the "Guide for Predicting Salmonid Response to Sediment

Our noxious weed program is covered by a programmatic regional environmental impact statement and worst case analysis. This is supplemented by site specific environmental assessments, work plans, and plans and monitoring plans. Another potential herbicide use is for site preparation for tree regeneration. Operational use for site preparation is currently prohibited. If the prohibition is lifted, any proposed operational use would be covered in the same manner as noxious weeds.

Considerable controversy has developed regarding the use of economic values in Forest planning. The controversy can be explained, in large part, by uncertainty. Uncertainty will continue to plague analysis so long as humans attempt to plan for the future and evaluate investment opportunities.

Region 4 recommends the use of timber prices bracketing reasonable expectations. For example, most Forests in the Pacific developed timber prices based on data from the 1970's. In addition, some Forests have developed prices based on data from the 1980's. The two sets of prices bracket a representative high and low period with regard to average timber price expectations to be used in Forest Planning. Since prices for the "non-market goods" are set by administrative fiat, there are no reference points from which to develop highs and lows. The uncertainty associated with the nonmarket values is therefore greater, perhaps, than with the market values. Region 4 adopted the 1980 RPA values (or prices) for the nonmarket goods for use in Forest Planning after due consideration of several sets of possible values. Water values and range values were given special dispensation where more site specific data was available. Therefore, associated prices for water and range may differ locally from the 1980 RPA prices.

No direction exists regarding the use of "values" in evaluating the merits and demerits of each resource program as contrasted to the other resource programs. Prices are used, however, in conjunction with cost estimates to draw inferences with regard to the efficiency of a given program. The price and cost estimates are indicators. As such they must be considered in context. They represent but a few of the many indicators used in analyzing and evaluating the total environmental, social, and economic impacts of each alternative.

NFMA does not specifically require that plans include an "uneven-aged" management alternative, but rather that (1) for clearcutting, it is determined to be the optimum method, "and for other such cuts" it is determined to be appropriate to meet the objectives and requirements of the relevant land management plan [Sec. 6(g)(3)(F)(i)], and that (2) harvest methods designed to regenerate even-aged stands of timber will be used only after interdisciplinary review of the potential environmental, biological, esthetic, engineering, and economic impacts of each advertised alternative has been made, as well as the consistency of the sale with the multiple uses of the general area [Sec. 6(g)(3)(F)(ii)].

The selection of appropriate silvicultural harvest methods generally can only be made on a stand and site basis to assure that, to the maximum extent possible, applicable biological (both biotic and abiotic) and

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Yield in Idaho Batholith Watershed" (Stowell, et al., 1983) states. "Model outputs are reasonable estimates and not absolute numbers of high statistical precision. The results obtained are to be used in combination sound biological judgment." p.6. Again, "The limitations and assumptions about the model are clearly documented because the authors wish to avoid its misuse. The model by itself, will not make decisions nor will it establish standards, objectives or guidelines. The process is strictly an assessment tool to assist and form decision making. While the model provides an objective and possible trackable process that can be used to improve the quality of environmental assessments, users should test their model results to be sure they are reasonably accurate." p.3. There should be worst case analyses covering the amount of sediment sent into the water (the worst case is the loss of the resident fish populations); the effect of the roads and cattle on elk (the worst case is the loss of the elk population), the lack of the funds to be made available (the worst case is the failure of the various programs to be funded). What is really required is the clear understanding of NEPA procedures and the regulations and a good faith attempt to abide by them. The regulations and procedures do not require the cessation of progress. They do require that the decision maker be as fully informed as possible on the environmental consequences of proposed actions before making the decision to adopt the action.

3 Cumulative actions. 40 CFR §1508.25(a)(2) requires "Cumulative actions, which when viewed with other proposed actions have

economic concerns, and the specific onsite management requirements of all other associated resources, uses, and activities are identified and met. In fact, the references to "each advertised sale" and to "the sale" in NEPA Sec 6 (g)(3)(F)(ii) would seem to support the intention that such analyses be made on a site specific basis. For this reason, the detailed analysis of any alternative limiting silvicultural practices to either uneven-aged or even-aged management without recognizing project specific management needs and objectives, which would contribute to the identification of an "optimum" harvest method, would be neither reasonable nor practical.

As directed by the Assistant Secretary of Agriculture and in compliance with 36 Code of Federal Regulations 219.17 (36 CFR 219.17) published in the Federal Register on April 18, 1983, roadless areas on the Salmon National Forest were re-evaluated during the Forest Planning Process for possible wilderness recommendation. Each roadless area was described as to its environmental, wilderness and resource attributes and evaluated against all Forest Plan Alternatives to identify impacts to wilderness characteristics and environmental consequences of wilderness/nonwilderness designation. Criteria used for evaluating roadless areas were developed based on the 9th Circuit Court ruling of *California vs. Block*.

Deputy Assistant Secretary MacCleary's decision, regarding the Colorado Forests, required that the planning documents be revised to include adequate information concerning the economic implications of the various alternatives and that the record of decision explain clearly why the selected alternative is felt to maximize net public benefits. We believe that the Salmon National Forest planning documents adequately address the economic implications of the alternatives. Reasons for selecting the preferred alternative are documented in the record of decision.

Presentation of sedimentation levels in the Forest Plan are listed as averages for large areas, over an extensive period of time, however, as explained on page B-24 of the appendix to the Draft EIS, the supporting data used to calculate these values were developed in a way which minimized the opportunity for certain watersheds to sustain sediment levels in excess of those defined in the fisheries goals. All sediment data presented for each 10-year period does not represent an average for the decade. Instead, a modelling process was developed that assumed two large, concentrated sediment entries would occur in an area during the 10 years. Consequently, the watershed would likely experience two peak sediment periods, following each large construction period. In other words, the values presented represent what is estimated to be a peak sediment rate during the year following each construction phase. So the decade sedimentation rate listed in the support papers is really the peak value estimated to occur for 1 year, followed by 4 years of significantly lower sedimentation rates. Therefore, for each decade, the values calculated for each planning area would occur only 2 out of each 10 years.

In Table S-1, on page S-7, the sediment levels presented are not yearly averages, as stated below the table, but instead are an average of 5 decades of peak values from each of the 11 planning study areas (called





Edwin W. Stockly

cumulatively significantly impacts. . . should therefore be discussed in the same impact statement."

a) Any timber sale which removes a substantial percentage of the standing trees will change the pattern and timing of water runoff. As more and more of a stream drainage is subjected to timber sales of this nature, the entire flow pattern of the stream will change. The DEIS does not contain a thorough discussion of these potentially adverse impacts.

b) Manipulation of forest vegetation through timber management activities directly impacts animal communities. The availability of certain habitats will affect species which are dependent on them. Therefore, over time, as the availability of certain timber condition classes changes, the diversity and abundance of wildlife species will change. There is no discussion of the potential environmental, biological, esthetic, and economic consequences of such changes. What wildlife species are at risk? Even that most fundamental question is left unanswered.

4 There is no assurance that lands from which timber has been cut can be adequately restocked within five years after harvest. The statute, 16 U.S.C §1604(g)(3)(E)(ii), requires that the plan "insure that timber will be harvested from National Forest system lands only where there is assurance that such lands can be adequately restocked within five years after harvest..." On page E-26 the prescription for 5A High TM (base TM) calls for an average regeneration period of one decade. The management prescriptions for 5B

geographic areas in the planning process) The actual average yearly sedimentation rates are significantly lower than those presented in the table

In Table IV-WS2 and IV-WS3, on page IV-41 of the DEIS, again the data presented are not yearly averages, but are averages of all peak values anticipated in each specific decade, for each alternative. For example, in Table IV-WS3, Alternative 12, the table presents a value of 18 percent (of natural, for decade 3). This value represents an average of peak (2 out of 10 year levels) for each of 11 different watersheds and planning areas. These values range from 4 percent to 25 percent. Again, these figures are shown to demonstrate relative differences between alternatives. Sediment rates have been limited in all alternatives so that the fisheries goals for that alternative are met in all years. In most years, however, fisheries goals may be exceeded, due to sedimentation rates being considerably lower than the peak year levels which were constrained to meet these goals.

In response to your question regarding limiting sediment delivery (DEIS-II-9), the Plan will limit sedimentation of streams through the use of mitigative measures, and cumulative assessment of land management activities, which will, in turn limit the density of watershed disturbance.

Cumulative sedimentation modelling has been used throughout the Forest Planning process for larger watershed areas. During project level reviews, this modelling process is used to examine the cumulative effects within the smaller watersheds affected by the specific sale and road proposal.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thought.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor





medium TM and 5C low TM call for regeneration periods of less than two decades (page E-33) for 5B and over twenty years (page E-39) for 5C. It should be noted that these are averages, so that in some instances regeneration could take much longer. This is in violation of the statute and the regulations (36 CFR §219.14(3) and §219.27(c)(3)).

5. Failure to comply with NEPA and the regulations. The DEIS and the plan generally are not in compliance with NEPA and the regulations.

6. The Forest Plan should contain an integrated pest management program. 36 C.F.R. §219.27(a)(3) 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. In this context, the word "pest" includes noxious weeds. It should be noted that the use of herbicides or pesticides requires more extensive environmental analysis which are more

appropriate for a separate EIS. It may be that the region will prepare a programmatic, region-wide EIS for some pest management (noxious weeds). If this is the case, the plan should indicate that the regional EIS will control in case of conflict.

7. More reliable figures should be used for the value of fish, game and other non-timber outputs. It is clear from reading Appendix B to the DEIS that the choices made in many instances are a function of the reliability of the dollar amounts used in the analysis. It seems clear that the dollar value set on various non-timber outputs, such as recreational activities, are inaccurate. See "The Contribution of Outfitting and Guiding to the Idaho Economy: Summary Report" by James M. Lansche, Jr., a summary of the findings reached in his thesis submitted to Idaho State University for his master of business education degree. The figures contained in this summary, and in the full thesis, indicate that the values used in the plan are low by as much as a factor of ten or more. This casts considerable doubt on the validity of all the calculations used in the analysis. There is also some question as to the validity of the value used for timber output, which may reflect higher historic values than are obtainable on today's market. Every effort should be made to use accurate figures from the most reliable sources possible and to let the results fall where they may.

8. There is no adequate discussion of the adverse environmental affects from clearcutting. Appendix E contains a

justification for using clearcutting, shelterwood and other regeneration cuts. But there is no discussion, either in Appendix E or elsewhere, of the adverse environmental affects from clearcutting. Principal among these is the danger of infestations of noxious weeds. Both the clearcutting and the road building compact the land and make it most suitable for noxious weed invasion. The basic rule from integrated pest management is prevention, and among other things that means so to use the land as to not invite invasions by these pests. It is clear that noxious weeds have not been a problem on the Salmon National Forest. But now that the Salmon plans to enter an intensive timber program involving many clearcuts, and in view of the fact that there are several noxious weeds in Idaho that are being transported from Forest to Forest and from recreation area to recreation area (leafy spurge is an example) every care should be taken to avoid exacerbation of this problem.

9 There is inadequate discussion of the effects of mitigation measures. Mitigation is a term that is frequently used in the DEIS, and in places mitigation measures are listed. But there is no thorough discussion of why the measures in fact mitigate against the damage that otherwise would be caused. A mere listing of mitigation measures is inadequate.

10 The evaluation of roadless areas for wilderness is not adequate. The Ninth Circuit's opinion in California v. Block, 690 F 2d 753 (1982), set forth the requirements that must be met

when an environmental impact statement evaluates a roadless area for wilderness. These requirements are not satisfied by the evaluations in the DEIS.

11. The Proposed Plan does not meet the criteria in the Assistant Secretary's decision on the San Juan and GMUG Forests Plan appeals. The Assistant Secretary's office decided these appeals recently, and the documents should be rewritten to conform.

12. The plan seems to propose violations of Idaho Water Quality Standards. First of all, the plan speaks of average habitat capability. Idaho Water Quality Standards apply to individual streams, not to a forest as a whole or to watersheds or drainages. When the plan speaks in terms of "average habitat", the clear inference is that as many as half the individual streams may be below the average, which could be a significant violation of the State Water Quality Standards. The DEIS seems to call for increases in sediment over natural of 25% in anadromous fish habitat and 85% in resident fish habitat (page IV-17). It is not understood how such sediment accretion can be described as "meet state agency goals". It is particularly worrisome, because these figures may be an average, with all the problems associated with averages.

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# American Wilderness Alliance

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Forest Supervisor  
Salmon National Forest  
Box 729  
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SUP	
LMB	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
RR/W	1 2 3 4 5 6
RQ	1 2 3 4 5 6

2 CCs TO: Jensen 4/13/86

Box 1772  
Boise, Idaho 83701  
January 9, 1986

Dear Sir:

As the Idaho Representative of the American Wilderness Alliance I wish to comment on the draft plan and proposed Land Resource Management Plan for the Salmon National Forest.

The American Wilderness Alliance is a national western-based non-profit organization whose members are dedicated to promoting the conservation and wise use of our nation's decreasing wilderness-like lands, wildlife habitat, and free flowing river resources. We believe that wilderness is part of your multiple-use principles, and besides recreation, wilderness also serves scenic, scientific, educational, conservation, and historical needs and purposes of the American people. Wilderness further protects and enhances undisturbed watersheds, wildlife habitat and plant species. The American Wilderness Alliance supports the Idaho Department of Fish and Game's laws and regulations.

Personal Interest in the Salmon National Forest. I served as a recreation planner/landscape architect on the Salmon National Forest during two assignments in the period of 1958-1961, and can vouch for this forest as being one of the most outstanding in wildland recreation, wild and scenic rivers, fisheries and wildlife, and dispersed recreation in the Rocky Mountain States. Despite its remoteness, the Salmon area is popular for big game hunting, fishing, wilderness recreation, and river running. Salmon, as well as other smaller communities such as Shoup, North Fork, and Leadore, will grow and prosper steadily based on a high quality well managed tourism and outfitting business. Any further attempts to degrade the forest scene will lessen the high graded tourism clientele.

Working Together To  
Conserve Wild America

(continued)



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Paul Fritz  
Idaho Representative  
American Wilderness Alliance  
Box 1772  
Boise, Idaho 83701

Dear Mr. Fritz

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

There are several points to make concerning your comments about the Forest Recreation Survey and developed sites. First, all the historic data available was reviewed for its applicability. Unfortunately, most of this information is of little use today. Twenty-five years of resource development has resulted in many of these sites no longer being acceptable for recreation development, and demand for developed recreation has not materialized. Also, the private landowners downriver have shown no interest or inclination to develop overnight camping facilities. Finally, our current philosophy is to provide larger sites if developed sites are needed, and to emphasize dispersed recreation in most areas.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.





Paul Fritz

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The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1. Semi-primitive motorized recreation emphasis in the head of F & L Timber Creek and associated drainages.
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to French Lake.
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek.
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages.
5. Key big game summer range in the Tobias Creek area.
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainage.
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas.
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding Wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of pole and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek area will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and present activities would preclude portions of the remaining area from Wilderness designation in the next plan revision.

The Draft Salmon National Forest Management Plan identifies within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions of the area as semi-primitive motorized, portions as semi-primitive nonmotorized, and portions as semi-primitive motorized. This is a result of the area of land being managed as semi-primitive in the Lemhi Range Roadless Area.



While serving as project leader on the Salmon National Forest Recreation Survey (for the O.R.R.C. report) in 1960-1961 there were many inventoried acreages for future demands to provide recreation sites and activities such as: camping, picnicking, potential wilderness areas, scenic overlooks, boat launching, interpretive devices, wildlife zones, cultural resources, etc. Your selected alternative #12 is sadly lacking in heeding those past recommendations made during the Salmon N.F. recreation survey. For instance, one knows that spacious available sites for camping is in short supply along the steep-walled canyons on the Salmon River from North Fork downstream to Shoup and Corn Creek. The recreation survey recommended that possibly the private land owners along Spring CK, and Indian CK, could provide the space for overnight use to relieve the pressure, especially for recreation vehicle use. Other sites on national forest lands were proposed on higher elevations (and in cooler climate) in small drainages such as Colson, Squaw and Spring Creeks. Instead, alternative 12 has emphasized the prominent single use of mostly clearcutting the remaining flats in the drainages north of the Salmon River from North Fork to Corn Creek. These timber cutting zones has degraded the big game habitat and potential living space for recreationists. There are other sad examples of disregard for recreation/tourism in your alternative 12; too numerous to mention here.

Proposed Wilderness. We wish to adopt alternative three

(3), with the following revisions:

- (a) The entire Lemhi Range, with all of its roadless areas, be classified as wilderness. This includes the lower reaches of Hayden, Eightmile, Little Timber, Big Timber and Mill CKs.
- (b) Wilderness for all the roadless areas along the Idaho-Montana border of the Beaverhead Mountains.
- (c) Wilderness for all the roadless areas along the Idaho-Montana border of the Bitterroot Mountains.

(continued)

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(d) Wilderness for all the roadless areas contiguous to the Frank Church River of No Return Wilderness and Selway-Bitterroot Wilderness Areas (including areas adjacent to West Fork Bitterroot River on the Bitterroot National Forest)

In addition, we feel that Italian Peaks, Taylor Mtn., and Goat Mtn. be managed as roadless areas.

Tourism - Recreation. The Salmon National Forest is blessed with natural beauty in its forested lands, open range country, and clean wild and scenic rivers. It should remain in unspoiled and wilderness splendor, thus adding to the economic coffers of those in the tourism, outfitting and guiding industry. A responsible program of wood products, derived from the existing timber producing base, should allow for railings, posts, firewood and some minor saw log sales - without encroaching upon the roadless and wilderness areas. More local jobs can be created with revenue gained from the Salmon National Forest through a vibrant and expanded campaign in advertising its recreation, fisheries, and wildlife resources. As one who lived in Salmon, I always felt Salmon could not compete with other communities with logging ventures (such as Missoula and St. Anthony) that have railroad access. This is evident with the closing of uneconomic mills that emerged in force from North Fork to Gibbonsville.

Anadromous Fisheries. The Salmon and Lemhi River drainages should have a stream improvement program that will provide additional benefits in recreation and sport fishing for salmon and steel head. These streams should be further restored and enhanced for natural rearing, thereby producing more steelhead and salmon each year. The new fish hatchery south of Stanley will add further benefits, and their new young fish can use additional improved streams and waters.

Corrective actions from past logging practices, overgrazing  
(continued)



Paul L. L.

The West Fork Hole Prairie Forest (established 1943) contains the Salmon and Feverhead National Forest. Wilderness designation has been extended for a portion (1,007 acres) of this area on the Pacific National Forest. Five management prescriptions will be applied to the Pacific National Forest portion.

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, north to Selway Gulch.
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area.
3. Semi-primitive motorized on designated routes only in Carpen Creek and from the French Creek drainage to Perry, Creek.
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Cold Star Gulch, and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Ferry Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment period for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the Proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within the roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Agency Creek Roadless Area Number 13512 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Two management prescriptions will be applied.

1. Emphasis on medium investment timber outputs, and
2. Emphasis on range management for domestic livestock.



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and mining washouts via clearing debris and barriers from streams will further enhance the possibility of added anadromous fisheries habitat. New projects should open additional spawning areas by constructing fishways and deep pools. Building large structures or placing huge tree trunks in streambeds to hold bedload movement and creating pools will increase fish productivity.

In conclusion, you should select a modified alternative

### # 3 emphasizing:

- \*\*\* Wilderness for the Lemhi, Bitterroot Mountains, Beaverhead Mountains, roadless adjacent to the Frank Church River of No Return Wilderness
- \*\*\* Roadless management for Italian Peaks, Taylor Mtn, and Goat Mtn.
- \*\*\* Manage anadromous fisheries to fullest extent
- \*\*\* Emphasize tourism and recreation goals, with timber as a minor use
- \*\*\* Recommend the 10 nominated areas for Research Natural Area status

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Thank you for allowing me to comment on the Salmon Forest Plan. Please send me a copy of your final action plan at your earliest convenience.

cc: Gov John Evans  
Rep. Richard Stallings

Sincerely,  
Paul Fritz  
Paul Fritz  
Idaho Representative  
American Wilderness Alliance  
Box 1772  
Boise, Id. 83701



Paul Fritz

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There was moderate public support for, but also considerable opposition to, wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. Moderate mineral potential and past mining activities indicate a high probability of continued mineral development within this area. A small acreage in the Flume Creek and Pattee Creek drainages places emphasis on management of the Lemhi and Clark National Historic Trail. During the current planning period, timber harvest is proposed in the Flume Creek and Pattee Creek drainages precluding the entire area from consideration as wilderness during the next plan revision.

The Italian Peak Roadless Area involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management (BLM) Eighteen Mile Wilderness Study Area. Portions on the Beaverhead National Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation. Five management prescriptions will be applied to the Salmon National Forest portion

- 1 Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,
2. Key big game winter range emphasis in Hawley Creek,
3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,
- 4 Range management for domestic livestock emphasis on gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages, and
5. Medium investment timber outputs in Frank Hall and Wildcat Creeks

There was moderate public support for, but also strong public opposition to wilderness designation of the Salmon National Forest portion of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. The hardrock minerals and phosphate potential of this area is high, which indicates a high probability of continued mineral development in the future. Currently, intensive range management occurs with many fences and water developments in existence. During the current planning period, continued mineral development, timber harvest and range management activities will preclude much of the Salmon portion of this area--except the Chamberlain Basin portion--from consideration as wilderness during the next plan revision.

Allan Mountain Roadless Area Number 13946 will not be recommended for wilderness designation. A management prescription of semi-primitive motorized will be applied to most of the roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was expressed. The Conference Committee Report to the Central





Paul Fritz

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Under the Wilderness Act of 1980 it is the intent of Congress that this area be managed for nonwilderness multiple use. High mineral potential and past mining activities indicate a high probability of continued mineral development in portions of the area. The Divide-Twin Creek National Recreation Trail is also located within this area. This National Recreation Trail is available for all types of trail use including motorized vehicles (trail bikes). No other activities are planned that would preclude consideration of this area for wilderness during the next Forest Plan revision.

Blue Joint Roadless Area Number 13941 (Salmon Portion) will not be recommended for wilderness designation, however, the management emphasis will be semi-primitive motorized. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. Mineral potential is low on the Salmon National Forest portion (49C acres), and no resource activities are planned which would preclude consideration of this area for wilderness during the next plan revision. Wilderness designation has been recommended for a portion of this area on the Bitterroot National Forest.

McEleny Roadless Area Number 13505 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription of anadromous fish emphasis with medium investment timber outputs will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development within this area. During the current planning period, ongoing mining activities will continue, and timber harvest is planned in Slaughterhouse Gulch, precluding the eastern half of this roadless area from consideration as wilderness during the next plan revision.

West Panther Creek Roadless Area Number 13504 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied:

1. Key big game winter range emphasis on the Panther Creek Face,
2. Emphasis on medium investment timber outputs on most of the area, and
3. Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use



Paul Fritz

purpose. High mineral potential and significant growing stock of sawtimber occur within this roadless area which can contribute significantly to Salmon National Forest outputs. During the current planning period, timber harvest activities are planned on about 65 percent of the area, predominantly in the Big Deer Creek, Little Deer Creek and Quartz Gulch drainage, precluding those portions of the area from consideration as wilderness during the next plan revision.

Little Horse Roadless Area Number 13514 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription of anadromous fish emphasis with medium investment timber outputs will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. Mineral potential is undetermined. Mining claims are located throughout the area and claim owners continue to do assessment work. Significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber outputs. During the current planning period, resource activities would occur on about 50 percent of the area, precluding that portion of the area from consideration for wilderness during the next plan revision.

Oreana Roadless Area Number 13516 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription of anadromous fish emphasis with medium investment timber outputs will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. Mineral potential for this area is undetermined and the area currently has no active mining operations. Significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber output. During the current planning period, resource activities would occur on about 65 percent of the area precluding that portion of the area from consideration for wilderness during the next plan revision.

Long Tom Roadless Area Number 13521 will not be recommended for wilderness designation. A management prescription of semi-primitive, nonmotorized recreation emphasis will be applied to the entire roadless area. Moderate public support of wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. The unit is adjacent to the Frank Church--River of No Return Wilderness and the Wild and Scenic Salmon River. Mineral potential is undetermined. No activities are predicted that would preclude consideration of this area for wilderness during the next Forest Plan revision.

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Paul Fritz

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Duck Peak Roadless Area Number 13518 will not be recommended for wilderness designation. Seven management prescriptions will be applied:

1. Anadromous fish emphasis with low investment timber outputs on a large portion of the area in Rams Creek, Duck Creek, Hammer Creek, Little Jacket Creek and Trail Creek;
2. Anadromous fish emphasis with medium investment timber outputs in Perden Creek and Beagle Creek.
3. Anadromous fish emphasis with high investment timber outputs on the Silver Creek Face,
4. Emphasis on medium investment timber outputs in Cabin Creek, Corral Creek and Fourth of July Creek,
5. Key big game winter range emphasis on the lower Panther Creek Face,
6. Key elk summer range--optimum habitat emphasis on the ridge and upper slopes between Duck Peak and Red Rock Peak; and
7. Semi-primitive nonmotorized recreation emphasis in Forge and Arvil Creeks

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and some mining activity occurs in the southwestern portion of this roadless area. Significant growing stocks of sawtimber exist on the Silver Creek Face, tributary drainages to Panther Creek and in Beagle Creek where timber management activities are occurring or planned. The remaining area provides key elk summer range, good opportunity for primitive recreation experience and production of high quality water for anadromous fish habitat in the Middle Fork Drainage. During the current planning period it is estimated that resource management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

Taylor Mountain Roadless Area Number 13505 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended that the Challis portion be designated wilderness. Five management prescriptions will be applied to the Salmon National Forest portion of this area:

1. Semi-primitive motorized recreation emphasis along the Ridge Road to Lion Lake and in Moyer Creek, Opal Creek, and Otter Creek drainages and the Hat Creek Lakes area;



Paul Fritz

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2. Key elk summer range--optimum habitat emphasis on the upper elevations of Spring Creek, Middle Fork of Hat Creek and North Fork of Hat Creek,

3. Anadromous fish emphasis with medium investment timber outputs in the headwaters area of Iron Creek,

4. Emphasis on medium investment timber outputs in Salt Creek and Woodtick Creek, and a portion of the North Fork of Hat Creek,

5. Emphasis on low investment timber outputs in Weasel Creek, Lower Opal Creek and at the high elevations around Moyer Peak.

Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple use purposes. The majority of the area provides high elevation big game summer habitat and opportunity for scenic and primitive recreation experiences. Significant growing stocks of post, pole and sawtimber occur primarily in the northern and northwestern portions of the roadless area. During the current planning period, timber management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

The Goat Mountain Roadless Area Number 13944 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized emphasis for use on approximately 90 percent of the area; and

2. Medium investment timber outputs on the Grizzly Hill/Trail Roy area. There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and an input submitted to the proposed Salmon National Forest Management Plan. High mineral potential and past mining activity indicate a high probability of continued mineral development within this area. During the current planning period, timber harvest and mineral development (if it occurs) would preclude portions of the area from wilderness consideration during the next planning period.

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area.

Three management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis on most of the area,

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2. Anadromous fish emphasis with medium investment timber output along the existing road up Canas and Castle Creeks, on the lower Silver Creek reach, and on the northern tip between the Rabbit Foot and Single Creek, and

3. Emphasis on medium investment timber outputs on the Panther Creek reach.

Modest public support for wilderness designation was generated during RAPE I, RAPE II, and more recent public comment opportunities, while considerable opposition against new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activity indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of soft, pole, and sawtimber also occur in the northern tip and along the Panther Creek reach. Loss of the recreating area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next plan revision.

Musgrove Roadless Area Number 13517 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied:

1. Key big game winter range emphasis on the Panther Creek and Porphyry Creek reaches.

2. Emphasis on medium investment timber outputs on most of the area, and

3. Emphasis on low investment timber outputs in the headwaters of Musgrove Creek and the West Fork of Blackbird Creek. Little public support for wilderness designation was generated during RAPE I, RAPE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. Past timber management activities and significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber product outputs. During the current planning period timber harvest activities are planned in Musgrove Creek that would preclude this roadless area from consideration as wilderness during the next plan revision.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a



quality wilderness experience in the Panther Creek reach of the Salmon National Forest. Selected portions of the Forest will be managed for semi-primitive recreation and nonprimitive recreational purposes. Equally important, the management plan provides for a level of low investment timber harvest consistent with the agriculture base and rural lifestyle of Idaho County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and resource sustainability. The preferred alternative was selected after consideration of all planning alternatives and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future use of the Forest.

There also seems to be a perception that the level of harvest is artificially high under the preferred alternative and cannot be produced while still meeting the statutory objectives for conservation, recreation, air, threatened and endangered species, and soil productivity. An important point is that the alternative may differ in the outputs produced, but none of them cause irreversible reductions in basic resource productivity. Maintenance of the basic productivity of the resource under our stewardship remains a constant for all alternatives.

Budgets will continue to be a concern in the coming years as funding becomes more restrictive. Habitat improvement projects could well be influenced by budget cutbacks, as will other resource activities (e.g., timber, range, recreation, etc.). Prioritization of improvement projects will include cost/accomplishment assessments as well as project social considerations. The 10-year habitat management program identified in Appendix D (page VII-D-2 to VII-D-7) is intended to be a dynamic program responsive to budget levels and habitat needs. Wildlife and fish population levels identified in the plan were not dependent upon the habitat improvement program. Coordination of wildlife/fish objectives with other resource activities was the key component in meeting population production objectives. Improvement projects can and will enhance habitat effectiveness, but other habitat management elements (i.e., inventory, monitoring and coordination) will be responsible for attainment of the population objectives.

The Forest Plan sets in motion the process of establishing Research Natural Areas. By this Plan, 10 areas were identified for protection until field verification can be made and Establishment Reports can be prepared. The Idaho Natural Area Coordination Committee has taken the lead in field verification and is assisting with Establishment Reports. As their reports are completed, we will submit them to the Chief of the Forest Service for approval.

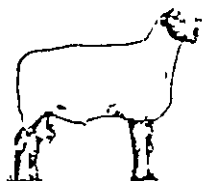
Responses like yours were helpful in preparing the final Plan. Again, thank you for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0265



# Lemhi Livestock & Wool Marketing Ass'n., Inc.

206 Courthouse Drive • Phone 756 2824

SALMON IDAHO 83467



January 10, 1986

Richard T. Hauff  
Forest Supervisor  
Salmon National Forest  
P.O. Box 729  
Salmon, Idaho 83467

Dear Sir,

The directors of this association would like to be recorded as favoring the preferred alternative in the forest plan. We feel that it is a very balanced, multiple-use approach to providing products (timber, minerals, and grazing) from forest lands while providing recreation, wildlife, and protection for anadromous fish spawning habitat.

Thank you for inviting comment.

Sincerely,

*LaMar Cockrell*

LaMar Cockrell  
President

SALMON NF

JAN 13 '86

Info	0	1	2	3	4	5	6	Action	□
SUP									
LMP	1	2	3	4	5	6			
TAF	1	2	3	4	5	6			
ELM	1	2	3	4	5	6			
RRWW	1	2	3	4	5	6			
AO	1	2	3	4	5	6			

2. CC: TO: Jensen 1/13/86



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1970

Date

LaMar Cockrell, President  
Lemhi Livestock and  
Wool Marketing Association, Inc  
206 Courthouse Drive  
Salmon, Idaho 83467

Dear Mr. Cockrell

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest. We appreciate your support of our approach to management of the Salmon National Forest.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wild Area. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



VI-212



# Sierra Club NORTHERN ROCKIES CHAPTER

0305

SALMON N F

JAN 14 '86

Info	O	Action	□
SUP			
LMP	1	2	3 4 5 6
TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
RRWW	1	2	3 4 5 6
AO	1	2	3 4 5 6

ZCC's TO [signature]

## MEMBER GROUPS

Eastern Idaho  
Middle Snake  
Pilot  
Sawtooth  
Spokane

Robert Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, ID 83461

Dear Mr. Hauff

On January 7, 1986, I mailed to you my comments on the Draft Salmon National Forest Plan. I signed the letter as if they were my personal comments. Since then, the Executive Committee of the Northern Rockies Chapter of the Sierra Club, of which I am Chairman, has decided that my comments should be considered as the Chapter's formal comments on the Plan. By this letter, I inform you that my letter of January 7, 1986, is also the formal comment of the Northern Rockies Chapter of the Sierra Club.

We are willing at any time to discuss with you the details of our problems with the draft document. If you see, we will also submit our information and alternatives to the allocations proposed in the draft. In terms of the legal inadequacies of the Plan, we are willing to discuss each inadequacy in detail and provide you with what we believe to be the minimal changes required to make the Plan legally acceptable. My comments should be considered as a general overview of what we see wrong with the Plan. We are willing to expand our discussions with you at any time.

Sincerely,

Don L. Crawford  
Chairman, N.R. Chapter 5 Club  
825 Camas  
Moscow, ID 83843



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Don L. Crawford, Chairman  
Northern Rockies Chapter Sierra Club  
825 Camas  
Moscow, Idaho 83843

Dear Mr. Crawford

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

1. Meeting State of Idaho Fish and Game Department goals for big game.
2. Meeting State of Idaho Fish and Game Department goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued



JAN 14 '86

January 7, 1986

Richard Hauff, Supervisor  
 Salmon National Forest  
 Rm 740  
 Salmon ID 83467

Dear Mr. Hauff:

Info O Action ☐

SUP

LMP 1 2 3 4 5 6

TAF 1 2 3 4 5 6

CLM 1 2 3 4 5 6

RRWW 1 2 3 4 5 6

RD 1 2 3 4 5 6

ZCC:TO: [signature]

Below are my comments on the draft Salmon National Forest Plan. Please include them in the record, and I ask you address each of my comments in the final.

This plan is clearly unacceptable. It is a one-sided proposal written for developers. It emphasizes subsidized commodity extraction that is highly destructive of more valuable wilderness, wildlife, and fishery resources. The plan recommends no wilderness, even in the Lemhi's and West Bigholes, and it recommends far too much timber harvest and roadbuilding. If this bias is not corrected, the plan will have to be appealed.

The planned timber harvest is too large and destructive of wildlife and fishery values that are worth much more than the value of the timber to be cut. Every sale planned will be a below cost, subsidized sale--a loss to the taxpayers. We can no longer afford the luxury of such subsidies. While I realize that below cost timber sales are a way of life on the Salmon, I oppose any logging in the Lemhi Mountains from Gilmore Summit to Hayden creek. I oppose the proposed sales in Alder, Deer, Big Eightmile, Mill, and Hayden creeks. These areas have tremendous nontimber values that would be sacrificed for lousy timber worth far less than the cost of logging it. It is illogical to subsidize the destruction of important wildlife, wilderness, and fishery values. I also oppose logging in the elk migration corridor between Dalonega and Sheep creeks. Such development would clearly disrupt elk migration in this area. Because of the overemphasis on logging, the road plan is also too large and destructive. The construction and reconstruction of 56 miles of roads per year is not justifiable economically and is too destructive of wildlife habitat and watersheds. The plan should also propose the closing of many roads that are to remain open.

The final plan is unacceptable if it does not recommend wilderness in the Lemhi's and West Bigholes. Other areas that I support for wilderness include the following roadless areas: Anderson, Allen, and Goat Mountain, the Italian Peaks of the Bitterroot range, and roadless areas contiguous with the Frank Church River of No Return Wilderness including the Camas creek, Duck Peak, West Panther creek, Long Tom, Little Horse, and Oreana roadless areas. It is amazing that the plan does not even recommend any of these areas for nonmotorized semi-primitive uses. In fact, the plan recommends no land for this category! As it is now the plan is inadequate in its wilderness review as required by the Ninth Circuit KARE II court decision (California vs Block).

The plan is far too destructive of elk summer range, and it ignores the management objectives of the professionals in the Idaho Department of Fish and Game. You would road 50% of this range over the life of the plan. This would devastate the Salmon elk herd and is totally unacceptable. Logging in the Lemhi's and in elk migration corridors will only accentuate the devastation.



Don L. Crawford

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in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

Timber harvest in the Lemhi Range is expected to be compatible with other resource objectives. The selected Forest Plan alternative provides for significant portions of the Lemhi Range to be managed in a manner that would exclude timber harvest and associated road construction.

Although not recommended for Wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity. Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from minerals activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of roadless designation for Allan Mountain and some areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980 the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the Frank Church--River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom and Blue Joint vicinities. The bulk of the Allan Mountain area will also be managed with a semi-primitive emphasis.

The selected Plan will designate 72,581 acres of Semi-Primitive Nonmotorized (SPNM) opportunity. This is a change from the Draft Plan. We will also designate 119,472 acres of Semi-Primitive Motorized prescription as "motorized use on designated routes". The combined changes will provide significant opportunities for visitors who want to avoid motorized users.



The level of development planned is destructive of fishery values because of the impacts it will have on watersheds. Many vital anadromous fisheries will be harmed if this plan is implemented.

One of my most severe criticisms of the plan concerns grazing. Some areas of the Salmon have become a cattle ranch for special interests over the years, and your plan would perpetuate this problem. The plan fails to resolve the conflicts between elk and cattle for both forage and for space. Much of the Salmon is already overgrazed, yet the plan would increase the amount of grazing even further. This will increase conflicts between wildlife and cattle, a severe problem that remains inadequately addressed in the plan. I urge you to read the revealing book, SACRED COWS AT THE PUBLIC TROUGH, by Denzel and Nancy Ferguson (Maverick Publications, Drawer 5007, Bend, OR 97708). Land managers on the Salmon could learn something from an open-minded reading of this book. When over 90% of key rangeland AUM's that are also needed by wildlife are allocated to cows, and at the same time rangeland is overgrazed, something is wrong. Clearly, a few ranchers are extracting an inordinate amount of personal benefit at the expense of our public lands. Currently private grazing of public lands is done at public expense and at a net loss to the taxpayers. Though this at times may be justifiable, it is never justifiable when public rangelands are destroyed by overgrazing in the process, and when other resource values are not considered adequately when rangeland allocations are made.

Finally, the plan is lacking in several basic components. Where are the maps which show important wildlife areas, suitable and unsuitable timber lands (based upon both environmental and economic analyses), and the WHERE'S the road plan? The plan is insufficient without these maps and the analyses that go with them.

Please send me a copy of the Final Plan. I hope that it is much improved over the draft.

Sincerely,

*Don L. Crawford*  
Don L. Crawford  
825 Camas  
Moscow, ID 83843



Don L. Crawford

3.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (#12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas do not contribute to the allowable sale quantity. Limited activity could occur, due to minerals development or salvage following natural disasters, however, we expect such activity to be minimal. We have also modified the selected alternative to increase the limited development areas between Lost Trail Pass and Sheep Creek.

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness, and, we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset, however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming easier and more effective each year.

There has been some confusion generated regarding the ability of the various alternatives to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the DFP, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.





Don L. Crawford

4.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan and will provide for a significant increase in elk numbers.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resources will be very short-term and in most cases limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotone's are only present in very limited quantities.

Early in the planning process KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e. commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure the adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e. amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under

VI-216



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Don L. Crawford

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this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be encouraged."

The cost of including the maps and plans, which you requested in the final Forest Plan would be prohibitive. These documents are available for your review at the Forest Supervisor's Office.

Responses like yours were helpful in preparing the final Plan. Again, thank you for taking the time to provide us with your thoughts.

Sincerely,

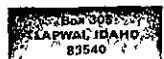
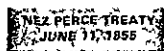
RICHARD T. HAUFF  
Forest Supervisor



FS 6200 26(7 82)

Nez Perce

TRIBAL EXECUTIVE COMMITTEE



(208) 843 2253

10 January, 1986

Mr. Richard T. Hauff, Forest Supervisor  
Salmon National Forest  
P O Box 729  
Salmon, Idaho 83467

Dear Mr. Hauff

The Nez Perce Tribe appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and the proposed Salmon 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 Salmon 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 adequately consider the effects of the proposed actions on the Nez Perce Tribe. For example, there is limited discussion or evaluation of tribal ceremonial, subsistence and commercial fisheries. These fisheries are vitally dependent upon habitat protection in the Salmon River basin.

As co-managers of the fisheries and wildlife resources within our ceded lands, the future management of the Salmon National Forest is very important to us and continued cooperation between the Forest and Tribe will help hasten the recovery of the anadromous fisheries.

Specific comments to follow

Sincerely,

*Alton P. Reuben*

J. Herman Reuben, Chairman  
Nez Perce Tribal Executive Committee

cc file

PM smc

SALMON NF

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Info O	Action
SUP	
EMP	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
RRW/W	1 2 3 4 5 6
AO	1 2 3 4 5 6

cc: TO: *[Signature]*



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to 1920

Date

Mr. J. Herman Reuben, Chairman  
Nez Perce Tribal Executive Committee  
Box 305  
Lapwai, Idaho 83540

Dear Mr. Reuben

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The Salmon National Forest fully realized that anadromous fish production from forest streams contributes to production levels associated with treaty rights of the Confederated Tribes within the Columbia River Basin. Indian treaty rights applicable to the Salmon National Forest also pertain to the Shoshone-Bannock Tribes in southeastern Idaho.

Forest management goals expressed in the Proposed Land Management Plan include identification of a goal to maintain high water quality and habitat capability sufficient to meet State species production goals for both anadromous and resident species. The numerous standards and guidelines outlined in the proposed Plan highlight the Forest intent to protect and manage aquatic habitats for high production levels. We believe maintenance of high productivity for anadromous fish will benefit Indian Tribes and treaty rights as well as other legitimate users of the fishery resource.

We appreciate your concern for Land Management on the Salmon National Forest and we welcome your involvement in the resource management process. To assist the Tribes' efforts in Land Management review, we will include you on our mailing list to receive pertinent information related to Land Management planning. We will also add language to chapter three of the Final Environmental Impact Statement which recognizes treaty rights and the importance of fisheries to Indian Tribes.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor





0312

## THE WILDERNESS SOCIETY

NORTHERN ROCKIES REGION

January 9, 1986

Richard Hauff, Supervisor  
Salmon National Forest  
PO Box 729  
Salmon, Idaho 83467

Re. Salmon NF DEIS and Land  
Use Management Plan

Dear Mr. Hauff,

The Wilderness Society finds the Salmon NF DEIS and Land Use Management Plan unacceptable. We do not believe that the information base nor the fundamental emphasis on timber production serve the public interest. This is particularly true when such production causes significant losses of other forest resources. One of the plan's greatest shortcomings is its failure to recommend a single acre of this magnificent forest for wilderness protection.

In general, the major failures of the plan in addition to the no wilderness recommendation include an unrealistic and inflated allowable timber harvest target with accompanying road construction, failure to protect the habitats of many economically advantageous wildlife and fish species, failure to provide riparian zone protection, and, failure to establish important baseline values and maps.

Roadless/Wilderness

The forest possesses some of the finest wildlands, wild rivers and wildlife in the country. Parts of the Frank Church River of No Return Wilderness, Middle Fork Salmon Wild and Scenic River, and main Salmon Wild and Scenic River are on the forest. Other areas of the forest are national treasures in terms of the rare wildlife and fish habitats, scenic value, and recreation opportunities found there, and deserve wilderness protection as well. We believe the American public would be illegally deprived of many valuable assets if Alternative #12 were approved.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

SALMON NF

JAN 14 '86

Info	0	Action	1	2	3	4	5	6
SUP								
LMP	1	2	3	4	5	6		
TAF	1	2	3	4	5	6		
ELM	1	2	3	4	5	6		
RRWW	1	2	3	4	5	6		
AO	1	2	3	4	5	6		

2ccs to [signature] 1/14

Reply to 1920

Date

Thomas S. Robinson, Regional Director  
The Wilderness Society  
Northern Rockies Region  
413 West Idaho Street, Suite 102  
Boise, Idaho 83702

Dear Mr. Robinson

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial use of water
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The Lemhi Range Roadless Area (under 13003) contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied:

1. Semi-primitive motorized recreation opportunities in the head of Big Timber Creek and associated drainages,







Thomas S. Robinson

Twelve of the roadless areas would be completely eliminated from wilderness consideration after the first decade under this plan and large portions of eight other roadless areas would be developed. Repeatedly the DEIS describes these roadless areas as scenic and wildlife treasures pointing out that they support species which don't even exist in most of the rest of the United States. What are the specific criteria that have precluded these areas from protection?

There are 830,000 roadless acres in 5,000 acre tracts on the forest and not a single acre has been recommended for wilderness by the plan. Presently, approximately 527,000 acres on the forest are roaded and an additional 224,000 acres would be developed under the plan. This would mean a 40% increase in roaded acres on the forest

We support the Wildlands Defense Coalition position with modifications to include Alternative #3 with an expanded wilderness recommendation that includes all of the Lemhi Range Roadless Area, the 5 roadless areas of the Bitterroots and the 6 roadless areas contiguous to the Frank Church River of No Return Wilderness. The Lemhi Mountains and the West Big Hole, Anderson Mountain and Allan Mountain all deserve protection for their beauty and wildlife resources. The Lemhis contain some of finest wildlife habitat in the state including bighorn sheep, mountain goats, elk, antelope and bear. It is a diverse ecosystem of glaciated peaks and basins with lower valleys and canyons. It has low timber values. Important drainages include Hayden Creek, Big Eight Mile and Alder Creek. The West Big Holes are contiguous with the West Big Holes in Montana which has been proposed for wilderness by the Beaverhead NF. We also support Anderson, Allen, and Goat Mountain, and Italian Peak roadless areas in the Bitterroot Range as wilderness. Important areas contiguous to the Frank Church River of No Return that should be protected from exploitation are Camas Creek, Duck Peak, West Panther Creek, Long Tom, Little Horse, and Oreana Roadless areas.

#### Research Natural Areas

There are ten sites on the forest recommend for RNA status by the Intermountain and Idaho Natural Areas coordinating committee and none are recommended by the plan. We support establishment of these areas as RNAs: Frog Meadows, Mill Lake, Allan Mountain, Bear Valley Creek, Colson Creek, Dome Lake, Dry Gulch-Forge Creek, Davis Canyon, Kenny Creek, and Deadwater. The plan does not justify the failure to include such recommendations.

2 Semi-primitive motorized recreation in the head of drainages from the Middle Fork of Little Timber Creek north to the head of the Snake River.

3 Semi-primitive nonmotorized recreation emphasis on the head of drainages from Bruce Canyon north to Alder Creek;

4 Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,

5. Key big game summer range in the Tobias Creek area,

6 Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the Bluff Creek/Far Creek drainages,

7 Low investment timber output emphasis in the Clifton, Boulder Lake and Nez Perce areas, and

8 Range management emphasis in the Swan Falls area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stock of pole and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek area will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next Plan revision.

The Draft Salmon National Forest Management Plan identified areas within the roadless area as semi-primitive motorized. As a result of public comment, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive nonmotorized on designated waters, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The West Big Hole Roadless Area (under 13943) contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion.

1 Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Colby Gulch,





Thomas S. Robinson

3

## Timber Volumes

The Preferred Alternative #12 does not protect the best beneficial uses of the forest including habitat, watershed, wildlife, fish, and recreation. It is driven by an unrealistic timber management plan. The forest has not harvested timber economically in recent years and we believe the plan must unequivocally prove to the public that continuing this wasteful trend serves the public or not pursue it

The proposed harvest is an average of 23.9 mmbf per year over the next 50 years, but the plan states "if current lumber market conditions continue, only 10.6 mmbf per year is expected to sell." The Douglas-fir, found mostly on the east side of the Lemhi, has a greater economic value for the habitat it provides to wildlife and fisheries than it does as mill timber. The east side of the Lemhi supports key calving areas and provides thermal cover for both elk and goats during the bitter winters. The remaining Douglas fir are found in sheltered canyons and valuable drainages where sparse moisture is trapped and fisheries thrive.

The forest has a history of offering much more timber for sale than is purchased. In 1984 alone three fourths of the timber offered had no buyers. In the four years 1981 through 1984, a total of 52.8 mmbf was offered but not sold. The average cut of the last five years is only 13.9 mmbf yet the plan proposes a timber harvest level of 21 mmbf. Justification for such imprudent management is not presented in the plan. We do not believe that the timber market will ever return to the levels seen in the mid-seventies. Such a harvest level in this forest would still not be in the public's best interest and should be prohibited unless the need is clear and the benefits outweigh the losses. Planning such as is required for this forest and which involves many irreversible tradeoffs should be conservative on the side of resource preservation. We believe that the plan must comply with the standards set forth in NEPA and the recent MacCleery ruling and show reasonableness of the economic impacts in light of resource losses. As can be seen from the amount of timber offered but not purchased, the local economy has not suffered because of lack of timber for their local mills. The rare and important roadless areas on the forest supported by conservationists for wilderness could be designated without jeopardizing the local timber economy at all. Indeed, even after the Salmon mill was closed they turned back a two-year supply of timber that could have kept the mill operating at a double shift level. We believe that the timber based economies of this area can be stabilized under Alternative #3, with modification, and that other local industries including recreation based industries can be enhanced as well.



2. Semi-primitive motorized along the mid-slope of the Forest of the Creek to Sheep Creek area;

3. Semi-primitive motorized on designated routes only in Fernan Creek and from the Freeman Creek drainage to Fernan Creek;

4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Cold Star Gulch, and

5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silvercreek and a portion of Fernan Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Timber potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual development work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next Plan revision.

The Draft Salmon National Forest Management Plan identified areas within the roadless area as semi-primitive motorized. As a result of public comment, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Pole Roadless Area.

The Anderson Mountain Roadless Area Number 13942 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized for an area adjacent to the Continental Divide, and

2. Anadromous fish emphasis with high investment timber outputs at the lower elevations.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Past mining activities indicate a high probability of continued mineral development within this area. Mineral potential, recreation values (including the Continental Divide National Scenic Trail), and significant growing stocks of sawtimber occur within this roadless area. No resource activities are planned in the upper elevations, to be managed as semi-primitive, that would preclude future consideration of this area for wilderness during the next Plan revision.



Thomas S. Robinson

4

### Timber Economics and Suitability

The plan states it will cost \$66.7 million to remove timber that will be worth \$14.9 million with a net loss of \$51.8 million. These figures are based on 1971-80 timber prices when current timber prices are lower, thus further skewing the PNV. In all alternatives considered by the DEIS, timber production costs exceed benefits. One alternative should have been developed where timber production did not lose money so that the scope and impacts of that management direction could be reviewed by the public. The Preferred Alternative #12 has the highest negative PNV over the 50 year planning cycle. Although we recognize that simply making a profit is not the central motive for forest management, we are seriously concerned that this alternative was selected. We object to this selection because the activities that cause such huge economic losses also cause huge and irreversible environmental damage. We object to the Preferred Alternative also because such economic and environmental losses are not justified in the plan.

Suitability maps were not provided that clearly show uneconomic sales, sales in the first decade, reforestation and silviculture plans, and soil stability and watershed impacts. Important statutory law requires site specific identification of lands proposed for harvesting "... only where... soil, slope, or other watershed conditions will not be irreversibly damaged" (16 USC 1604 (g)(3)(E)(iii)). Furthermore, the plan must identify unsuitable lands based on their potential for irreversible damage to other resources (36 CFR 219.14(a)(2)). The maps must identify potential landslide areas thus allowing the plan to develop "worst case" scenarios such as might result from a natural but catastrophic climatic event. Likewise, the maps should show where the transportation plan imposes on these other forest benefits. These should be developed for each alternative.

The plan should only propose management practices that are economically reasonable as required by 16 USC 1604 (k). The plan must not incorporate mitigation measures or reforestation techniques that are unlikely to be fully funded. Incorporating such measures or techniques could make a certain management practice appear acceptable yet in reality the degradation would not be corrected and the timber stands would not be regenerated. The Forest Service is responsible for presenting a realistic and reasonable picture. We do not believe this has been done especially in terms of reforestation and road closures.

Finally, the economic values of wildlife, fish and other wilderness values were not adequately represented in the economic analyses throughout the plan. The plan

Allan Mountain Roadless Area Number 13046 will not be recommended for wilderness designation. A management prescription of semi-primitive motorized will be applied to most of the roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple uses. High mineral potential and past mining activities indicate a high probability of continued mineral development in portions of the area. The Divide-Twin Creeks National Recreation Trail is also located within this area. This National Recreation Trail is available for all types of trail use including motorized vehicles (trail machines). No other activities are planned that would preclude consideration of this area for wilderness during the next Forest Plan revision.

The Italian Peak Roadless Area involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management's (BLM) Eighteen Mile Wilderness Study Area. Portions on the Beaverhead National Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation. Five management prescriptions will be applied to the Salmon National Forest portion:

- 1 Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area.
- 2 Key big game winter range emphasis in Hawley Creek.
- 3 Key elk summer range in the broad headwaters areas of Quilley Creek, Reservoir Creek, Meadow Creek, and Pocky Canyon.
- 4 Range management for domestic livestock emphasis on the gentle/moderate slopes of Crankshank, Little Bear, Big Bear, and Powderhorn drainages, and
- 5 Medium investment timber outputs in Frank Hall and Wildcat Creeks.

There was moderate public support for, but also strong public opposition to wilderness designation of the Salmon National Forest portion of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and an input submitted to the proposed Salmon National Forest management Plan. The hardrock minerals and phosphate potential of this area is high, which indicates a high probability of continued mineral development in the future. Currently, intensive range management occurs with many fences and water developments in existence. During the current planning period, continued mineral development, timber harvest and range management activities will preclude much of the Salmon portion of this area--except the Chamberlain Basin portion--from consideration as wilderness during the next Plan revision.

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lumped together all wilderness values in an inadequate narrative fashion but detailed timber values. We find this to be an inadequate review of the roadless area benefits and believe that the plan fails to meet the standards set forth by the 9th Circuit Court in ordering RARE II.

#### Reforestation

Harvesting timber from the Salmon National Forest is not only uneconomic, it amounts to timber mining. Sustained yield cannot be achieved as evidenced by the total lack of any Douglas-fir plantation that has been harvested and regenerated over the last 14 years to the degree that it would provide elk security. We challenge the forest to prove that Douglas fir can be regenerated in 5 years on like soil, slope and moisture types as are proposed for harvesting. The Lemhi Range roadless area in particular cannot, we believe, be regenerated within the parameters of economic reasonableness and available silviculture methods. Unless the forest can meet the requirement of the law under 16 USC 1604 (g)(3)(E)(iii) this situation prohibits, in our view, continued timber harvest programs.

#### Wildlife

The Preferred Alternative fails to provide habitat to sustain current populations of economically important wildlife and fisheries including elk, deer, salmon, steelhead and trout. Especially hard hit are those species dependent upon old-growth timber stands for their habitat. We believe it is unwise to reduce habitats to support minimum viable populations and thus risk the dangerously low populations that can sustain a healthy species. We do not believe that these population levels include a safety factor to ensure viability in the event of unforeseen reductions in habitat due to miscalculations or assumptions. Such a margin is required by 36 CFR 219.19. The loss of these beneficial uses of the forest is a direct loss to the public in terms of economics, recreation, and trust. Such a departure from sound management should be supported by definitive, supportive data and rationale, but these are missing. We challenge the Forest Service to provide the necessary data that would support the Preferred Plan and must adamantly object to any implementation of the Preferred Alternative without such justification.



Thomas S. Robinson

The Goat Mountain Roadless Area Number 12944 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized recreation emphasis for use on approximately 90 percent of the area, and
2. Medium investment timber outputs on the Grizzly Bull/Tribal Pay area.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and an input submitted to the proposed Salmon National Forest Management Plan. High mineral potential and past mining activities indicate a high probability of continued mineral development within this area. During the current planning period, timber harvest and minerals development (if it occurs) would preclude portions of the area from wilderness consideration during the next planning period.

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area.

Three management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis on most of the area,
2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singhuver Mines, and
3. Emphasis on medium investment timber outputs on the Panther Creek Face.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities, while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of post, pole, and sawtimber also occur in the northern tip and along the Panther Creek Face. Most of the remaining area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next Plan revision.



IDFG identified 270,500 acres as key elk summer range. These acres support 61% of the elk population on the forest. Nearly 50% of these acres will be roaded and cut within the planning cycle resulting in many popular hunting areas being lost and a dramatic decline in the elk population itself. The Dahlenega-Sheep Creek migration corridor, used twice annually by elk moving between Montana and Idaho, is threatened by the plan. In 1976 the Forest Service financed a research project that documented the high value of this elk migration corridor and that study recommended the area remain roadless. Without justification the plan would basically destroy the viability of the corridor by increasing road density and removing security to the level that elk would abandon it all together. Road density on much of the forest will double with the probable result of elk and deer populations being reduced by as much as 50 percent. The plan does not justify loss of these premier big game species especially in light of the uneconomic timber program that causes the losses. In fact, recreation, fish, wildlife and wilderness benefits consistently exceed costs in all alternatives whereas timber production costs exceed benefits in every alternative. We repeat, the Preferred Alternative would result in adverse impacts on many species of wildlife and provides no justification for the losses. This failure of the plan must be corrected.

Former Salmon NF wildlife biologist Hadley Roberts has stated that the plan's estimate of being able to maintain an elk population of over 7,000 animals is more than twice what the forest's own predictive models indicate. We refer to his comments dated November 9, 1985. Mr Roberts' analysis of this and other discrepancies is a sure signal to us that the reliability of the plan and especially of assumptions in it are suspect. Thus, we request that supporting documentation be presented that justify the timber program.

Expansion of the domestic livestock operations on the forest, including both cattle but especially domestic sheep, will directly and negatively impact the bighorn sheep population potential. It is our view that the values of bighorn sheep significantly outweigh those of domestic livestock especially since livestock operations can exist in environments that are not essential to these other species.

Old-growth dependent species will be significantly impacted since the Douglas fir that is remaining is in high demand by wildlife including grey owl, pileated woodpecker, pine marten, and wolverine.



Thomas S. Robinson

6.

Duck Peak Roadless Area Number 13518 will not be recommended for wilderness designation. Seven management prescriptions will be applied:

1. Anadromous fish emphasis with low investment timber outputs on a large portion of the area in Rams Creek, Duck Creek, Hammer Creek, Little Jacket Creek and Trail Creek,
2. Anadromous fish emphasis with medium investment timber outputs in Meadow Creek and Beagle Creek,
3. Anadromous fish emphasis with high investment timber outputs on the Silver Creek Face,
4. Emphasis on medium investment timber outputs in Cabin Creek, Corral Creek and Fourth of July Creek,
5. Key big game winter range emphasis on the lower Panther Creek Face,
6. Key elk summer range--optimum habitat emphasis on the ridge and upper slopes between Duck Peak and Red Rock Peak, and
7. Semi-primitive nonmotorized recreation emphasis in Forge and Anvil Creeks.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and some mining activity occurs in the southwestern portion of this roadless area. Significant growing stocks of sawtimber exist on the Silver Creek Face, tributary drainages to Panther Creek and in Beagle Creek where timber management activities are occurring or planned. The remaining area provides key elk summer range, good opportunity for primitive recreation experience and production of high quality water for anadromous fish habitat in the Middle Fork Drainage. During the current planning period it is estimated that resource management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next Plan revision.

West Panther Creek Roadless Area Number 13504 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied:

1. Key big game winter range emphasis on the Panther Creek Face,
2. Emphasis on medium investment timber outputs on most of the area, and
3. Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage.



## Fish &amp; Water

The plan predicts that sedimentation will stabilize at an average of 53% over natural levels in streams without anadromous fish for the first decade. Anadromous fisheries will be subject to an average of 21% above natural level sedimentation. Establishment of these levels is not justified in terms of degradation to existing beneficial uses, the fisheries themselves. In fact, these levels are presented as a standard yet elsewhere in the plan anadromous fish habitat is to be maintained at 90% or more of its inherent smolt production. Which is the case? Likewise, the EIS contradicts the 53% over natural level by stating that a sediment yield of 85% over natural level will occur. Existing baseline conditions are not presented yet they are essential in order to compare the impacts of the alternative on habitat conditions. Furthermore, forest-wide averaging of sedimentation levels clearly allows for some streams to be degraded even further than the average. The plan does not compare the economic and social losses of beneficial uses, especially fisheries, to the social and economic benefits of timber production. The IDF&G has stated that the plan could be "devastating" to the spawning potential for a stream and could "eliminate" 3-year steelhead and 2-year chinook salmon. Clearly the plan must justify these losses as required by NFMA (16 USC 1604 (g)(3)(E)(iii)) before the Preferred Alternative activities take place. Finally, the cumulative effects of activities on the forest besides timber production must be analyzed. Such analysis should be done on a drainage by drainage basis and not on forest-wide averaging, and should examine cumulative impacts from timber production, mining, grazing, ORV recreation, and any de-watering projects.

The DEIS shows that the impacts of the alternatives on anadromous fish and trout vary very little between alternatives yet the level of sedimentation varies greatly. This discrepancy needs to be clarified. When so many of the streams on the forest, such as Hayden Creek, Iron Creek, North Fork of the Salmon River, and Indian Creek, are classified as Blue Ribbon streams by the IDF&G, and are important anadromous fish spawning streams, we find it totally unreasonable that they are threatened by uneconomic timber sales.

The Salmon NF has the obligation to protect Indian fishing rights guaranteed by treaty. Anadromous spawning habitat on the Salmon NF is threatened in some streams to the point of devastation by this plan, and is thus in violation of 9th Circuit decision on Kittitas Reclamation District v Sunnyside Valley Irrigation District. The plan must bring impacts on fisheries into compliance with standards set forth by treaty rights.



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Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and significant growing stocks of sawtimber occur within this roadless area which can contribute significantly to Salmon National Forest outputs. During the current planning period, timber harvest activities are planned on about 65 percent of the area, predominantly in the Big Deer Creek, Little Deer Creek and Quartz Gulch drainages, precluding these portions of the area from consideration as wilderness during the next Plan revision.

Long Tom Roadless Area Number 13521 will not be recommended for wilderness designation. A management prescription of semi-primitive, nonmotorized recreation emphasis will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. The unit is adjacent to the Frank Church--River of No Return Wilderness and the Wild and Scenic Salmon River. Mineral potential is undetermined. No activities are predicted that would preclude consideration of this area for wilderness during the next Forest Plan revision.

Little Horse Roadless Area Number 13514 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription of anadromous fish emphasis with medium investment timber outputs will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. Mineral potential is undetermined. Mining claims are located throughout the area and claim owners continue to do assessment work. Significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber outputs. During the current planning period, resource activities would occur on about 50 percent of the area, precluding that portion of the area from consideration for wilderness during the next Plan revision.

Oreana Roadless Area Number 13516 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription of anadromous fish emphasis with medium investment timber outputs will be applied to the entire roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new Wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes.





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### Monitoring

Monitoring plans can hardly be considered adequate when baseline data is missing. Such is the case for this plan in relation to water quality, fishery production, and range condition. The plan should include specifics on calibration, project and trend monitoring, and identification and justification for parameters of percent fines and cobble embeddedness. It should address cumulative impacts from major activities and be specific about the timeliness of activity stoppage when degradation is evidenced. Finally, adequate funding levels for monitoring activities must be assured before potentially degrading activities are initiated. Such monitoring plans should be developed for the final plan.

### ROADS

The forest has 1600 miles of permanent roads and an additional 1000 miles of primitive and temporary roads. The proposed plan calls for the construction and/or reconstruction of 17 to 50 miles of roads each year depending on what page of the plan one is reading from (Plan pp. II-72 = 50 mi, plan pp. IV-94 = 22.8 mi, plan pp. IV-97 = 17 mi, and, EIS pp. S-9 36 2 mi). Such increases adversely impact wildlife and recreation resources, and have not been shown to have economic justification. Road closure techniques have not proven successful yet are depended upon as a major mitigation measure to support what we believe to be excessive and destructive timber management practices including excessive road construction.

### Grazing and Riparian Zones

Direction for conflict resolution between domestic livestock and wildlife is totally unsatisfactory. In critical winter range, forage conflicts should be resolved in favor of wildlife and livestock use eliminated. In riparian areas any conflict should be eliminated directly and resolved in favor of wildlife and fisheries. Clearly the public benefits from domestic livestock operations do not outweigh beneficial uses of fisheries and wildlife. Of the 188,000 acres determined by the forest in a recent study to be suitable for livestock grazing, 33,500 acres were considered to have conflicts between cattle and wildlife. The direction for wildlife habitat maintenance in the guidelines is contradicted by the range management objectives and should be resolved.

Mineral potential for this area is undetermined and the area currently has no active mining operations. Significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber outputs. During the current planning period, resource activities would occur on about 65 percent of the area precluding that portion of the area from consideration for wilderness during the next Plan revision.

The Forest Plan sets in motion the process of establishing Research Natural Areas. By this Plan, 10 areas were identified for protection until field verification can be made and Establishment Reports can be prepared.

The Idaho Natural Area Coordination Committee has taken the lead in field verification and is assisting with Establishment Reports.

As their reports are completed, we will submit them to the Chief of the Forest Service for approval.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. In the economic analysis, timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The allowable sale quantity of 21.1 million board feet per year will be offered only if it is expected to sell. If it becomes apparent that certain types of sales are not marketable, then the volume offered will be reduced accordingly.

Deputy Assistant Secretary MacCleary's decision, regarding the Colorado Forests, required that the planning documents be revised to include adequate information concerning the economic implications of the various alternatives and that the record of decision explain clearly why the selected alternative is felt to maximize net public benefits. We believe that the Salmon National Forest planning documents adequately address the economic implications of the alternatives. Reasons for selecting the preferred alternative are documented in the record of decision.





The damage to riparian zones by timber harvest is irreversible and the plan does not even come close to showing a regional or national need for such degradation. There should be no timber harvest in riparian zones unless such a need and economic suitability are definitively shown.

Grazing levels are high and occur in such sensitive areas that the activity continues to displace revenue generating species, elk and bighorn especially, for the benefit of domestic livestock production. It is acknowledged that most of these operations can continue only with public subsidy. The plan should analyze the economic suitability of livestock operations in terms of other forest resources that are foregone or reduced because of the operations. These operations could exist elsewhere geographically but only in environments such as those found on roadless areas of the Salmon NF can elk populations and bighorn sheep exist. Sufficient data is not presented that would justify wildlife habitat degradation in order to increase or even maintain domestic livestock operations. This significant failure of the plan should be corrected before management practices are instituted.

#### Fire

We are not satisfied that standards were established to direct fire management, especially relative to the use of bulldozers and road construction. Although we recognize the destruction forest fires cause, that destruction can be significantly less than the extent of destruction caused by the roads built to contain the fires. We would like to see standards established that examined tradeoffs including loss of habitat, access, watershed and fisheries.

#### Summary

We believe that this plan fails to meet certain legal standards mentioned throughout these comments and as such fails to provide the public with an acceptable review of the forest resources and possible management alternatives. Compliance would involve supplementing the DEIS with numerous maps and data bases, additional analysis, and additional criteria and guidelines. We support wilderness designation for approximately 452,300 acres and do not believe that the plan as presented provides any reasonable rationale for recommending none.

Thank you for this opportunity to comment on the management of such an important public resource.

Sincerely,

*Thomas S. Robinson*  
Thomas S. Robinson,  
Regional Director

Thomas S. Robinson

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We disagree with your comment that "the local economy has not suffered because of lack of timber for the local mills." While it is true that a long-term downturn in the timber market was directly and immediately responsible for the closure of the local mill by Champion International, a long-term log supply problem exists (see Demand Analysis, pp II-44, Draft Forest Plan). The proposed allowable sale quantity in the preferred alternative is 21.1 million board feet per year. During the last decade the annual sell target has been about 35 million board feet, and even at that level, mill capacity in the Salmon area exceeded volume offered. Designation of some areas proposed as wilderness would probably not affect the timber industry significantly while some of the others would have a much greater effect. We believe that the selected alternative provides the best mix of resource emphasis of the alternatives considered.

A description of the legal, physical, and biological criteria used to identify tentatively suitable lands was included in the AMS. The Salmon Forest used these procedures and guidelines for completing the suitability classification. The preparation of detailed suitable/unsuitable land stratification maps was considered to be prohibitively costly.

In developing the Forest Plan, a good deal of effort was put into the economic implications of our proposed management practices in order that we will avoid proposing activities that are either infeasible or will not provide optimum benefits for our investment. In the case of timber sale activities, we have the added assurance that mitigation measures are often covered by the collection of funds directly from the timber sale purchaser. Reforestation costs are typically built into the bare rates (minimum allowable bid rates) for the timber sale and kept in a special fund provided for through the Knutson-Vandenberg Act (46 Stat 527, as amended, 16 U.S.C. 576-576b).

As directed by the Assistant Secretary of Agriculture and in compliance with 36 Code of Federal Regulations 219.17 (36 CFR 219.17) published in the Federal Register on April 18, 1983, roadless areas on the Salmon National Forest were re-evaluated during the Forest Planning Process for possible wilderness recommendation. Each roadless area was described as to its environmental, wilderness and resource attributes and evaluated against all Forest Plan Alternatives to identify impacts to wilderness characteristics and environmental consequences of wilderness/nonwilderness designation. Criteria used for evaluating roadless areas were developed based on the 9th Circuit Court ruling of *California vs. Block*.

Examples of poor regeneration in Douglas-fir habitats can be found. Many of these are old "diameter limit cuts" where the better leave trees were cut. Many of these areas would be well regenerated if current methods had been used. Current treatments for shelterwood cuts include

1. Providing properly spaced suitable leave trees for seed and shade,
2. Providing site preparation by destroying suppressed and diseased trees that prevent a suitable stand from being established and where possible scarifying or otherwise exposing a seedbed, and







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3 Recognizing those areas that can't be regenerated (unsuitable lands) and recognizing those areas that must be planted

Due to the uncertainty of weather and seed crops, the shelterwood method does take some time, however, and many of our recent cuts are just starting to regenerate. Recent stocking surveys have verified that successful regeneration can be expected in a reasonable time when proper techniques are applied. Improved technique will result in much better establishment and growth than in the past. It will be necessary to continually monitor our regeneration efforts.

The 1978 Sikes Act Plan titled, "A Program For Fish and Wildlife Habitat On the National Forests and Grassland in Idaho," did contain a Goal to manage for existing populations. Based on the State-wide plan, each National Forest in Idaho prepared an individual Forest Sikes Act Plan which was based on the State Plan. These plans were approved in 1978 and expired in 1982. Following its expiration in 1982, the Salmon Forest did not prepare a new Sikes Act Plan, but instead directed our wildlife and fish coordination efforts into our Comprehensive Forest Land Management Plan.

Throughout our Forest Planning process we have tried to predict (through the use of models as well as professional judgment) the consequences of not only natural events, but also induced management activities on populations of wildlife and fish. A predominant constraint in this process was to ensure adequate habitat was available at all times for perpetuation of each species of wildlife.

As I am sure you are aware, habitat conditions for a diverse complex of native fauna is dynamic and constantly changing. A low seral stage, indicative of conditions following a timber sale or natural event such as a wildfire, may be conducive to some species of wildlife, whereas, climax conditions may favor others. For these reasons it becomes essentially impossible (even with no induced management activity) to maintain existing or current populations of all species of wildlife.

I can assure you, however, that the Salmon National Forest will continue to manage and monitor habitat to insure viable populations of the native fauna are maintained. Should any species become Federally listed as threatened or endangered, requirements of the Endangered Species Act of 1973 will be enforced, which dictates that "no actions will be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5).

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for



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breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire SNF. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat; however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the management areas, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the





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recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness, and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset, however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

There has been some confusion generated regarding the ability of the various alternatives of the Draft Forest Plan to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers.



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Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

Sedimentation levels for resident-only and anadromous stream sedimentation listed in the Forest Plan (DEIS IV-41 through IV-42) are not 10-year average conditions. As explained on page IV-40 and page B-24 of the appendix to the Draft EIS, a modelling process was developed that assumed 2 large concentrated road entries would occur in an area during the 10 years. Consequently, the watershed would likely experience two peak sediment periods, following each large construction period. The values used to calculate the averages presented in Table IV-WS2 and IV-WS3 represent an average of peak values from each of the 11 planning study areas (called geographic zones in the planning process). The actual average yearly sedimentation rates are significantly lower than those presented in the table.

For example, in Table IV-WS2, Alternative 12, for resident-only streams, a value of 53 percent over natural, for decade 1 is presented. This value represents an average of peaks (2 out of 10 year levels) for each of 11 different watersheds and planning areas. These peak, single-year values range from 7 percent to 85 percent for particular geographic zones, and would occur only 2 years out of each decade. In the remaining 8 years, sediment rates would be significantly lower. Again, these average figures were shown to demonstrate relative differences between alternatives. Sediment rates have been limited in all alternatives so that the fisheries goals for that alternative are met in all years. In most years, however, fisheries goals may be exceeded, due to sedimentation rates being considerably lower than the peak years' levels which were constrained to meet these goals.

The anadromous fisheries State agency goal is retention of at least 90 percent habitat capability in a stream. The stream sedimentation rate associated with this goal is 25 percent over natural or less. In resident-only streams, the fisheries State agency goal is the retention of at least 85 percent habitat capability. Sedimentation rate associated with the resident-only streams is 85 percent over natural.

Cumulative sedimentation modelling has been used throughout the Forest Planning process for larger watershed areas. During project level reviews, this modelling process is used to examine the cumulative effects within the smaller watersheds affected by the specific sale and road proposals.

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Fisheries goals will be evaluated for individual streams at the project level as well. With this level of cumulative assessment, and on-site field review, "devastating" impact to spawning potential, and "elimination" of 3-year steelhead, and 2-year chinook salmon, as you quoted, clearly would not occur.

Cumulative sedimentation from multiple-use management of a watershed will be evaluated at the watershed level as well. Before scheduled activities such as timber harvest and road construction are initiated, impacts from other ongoing or previous activities such as mining and hydropower will be quantified, through the evaluation of fishery habitat and channel conditions. If these values are shown to be significantly diminished, and a recognized downstream beneficial use is being potentially jeopardized, then activities will be rescheduled or redesigned in order to protect the downstream use.

The Salmon National Forest fully realizes that anadromous fish production from Forest streams contributes to production levels associated with treaty rights of the Confederated Tribes within the Columbia River Basin. Indian treaty rights applicable to the Salmon National Forest also pertain to the Shoshone-Bannock tribes in southeastern Idaho.

Forest management goals expressed in the Proposed Land Management Plan include identification of a goal to maintain high water quality and habitat capability sufficient to meet State species production goals for both anadromous and resident species. The numerous standards and guidelines outlined in the proposed Plan highlight the Forest's intent to protect and manage aquatic habitats for high production levels. We believe maintenance of high productivity for anadromous fish will benefit Indian tribes with treaty rights as well as other legitimate users of the fishery resource.

All anadromous fish habitats on the Forest have the potential to contribute to treaty obligations and, therefore, Forest management will be sensitive to habitat condition and capability of all anadromous streams. The fact that most habitats are currently underseeded, primarily because of off-Forest factors, did not influence decisions related to our commitment to maintaining and protecting high quality habitat. The many activities and programs presently ongoing to re-establish production levels are expected to assist in bringing Forest habitats back to high production levels. The Forest is committed to the resolution of problems associated with both on- and off-Forest influences on anadromous production and will continue to work with the involved parties (e.g., Northwest Power Planning Council, Bonneville Power Administration, U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, Indian tribes, private companies and special interest groups) to bring about the needed changes.

The monitoring requirements listed in Table V-1 are adequate for purposes of implementing the plan and meet NFMA requirements. Annual work planning is needed to determine specific monitoring requirements for that year based upon new and on-going activities. The monitoring program will be adjusted to meet these needs as well as to react to technology changes that may be forthcoming.



The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timber land. Densities vary according to the harvest system used and the location of the timber stands. The harvest system used varies depending on the type of terrain. The random scattering of mature timber stands on the Forest requires additional road miles for access.

Decisions on road location and standards are made by considering environmental effects on soil, water, wildlife, visuals and associated costs. The road standards for specific projects are developed during the project's Environmental Assessment. Basic guidelines for transportation system management can be found in the Draft Forest Plan on pages IV 65-68.

The road mileage figures in both DEIS and Plan will be displayed in a different manner to avoid the confusion that you noted in your letter. The miles of new construction will be separated from the reconstruction mileages. It is important to note that these mileages represent the maximum construction expected if all the timber sales were to sell.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

Good quality winter ranges are often considered to be the foundation of big game herds. As a land managing agency, the Forest Service is very interested in maintaining adequate winter ranges for deer and elk and habitat improvement projects are conducted yearly on many acres, however, as winter range areas continue to be developed, the problem of maintaining good quality winter ranges in adequate quantity becomes more acute. Maintaining the habitat quality of key big game winter ranges will continue to be a priority under the preferred alternative of the Forest Plan.

Reducing conflicts between big game and livestock on key big game winter ranges is also necessary if habitat quality is to be maintained. By reducing competition for forage on National Forest lands, depredation problems on private lands should be reduced.

Timber management and associated harvest is but one of the many multiple uses that can occur in forested riparian zones. Timber management activities in riparian areas will, however, be conducted in a very controlled manner consistent with protecting and maintaining other





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riparian dependent resources such as water, fish and wildlife. Standards and guidelines presented in chapter IV of the Plan are intended to provide direction adequate to protect forest riparian zones.

In the initial suppression considerations for the Plan it was felt that fire suppression could be managed through broad strategy statements without tying managers to specific tactical considerations, however, after the 1985 fire season, we feel as you do that specific standards are necessary for the use of heavy equipment on the Salmon. These standards will provide guidelines to the incident (fire) management team pertaining to line width, fire rehabilitation considerations, and firefighter safety.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor





IDAHO ALPINE CLUB  
P O BOX 2885  
IDAHO FALLS, IDAHO 83401

January 9, 1986

Richard Hauff, Supervisor  
Salmon National Forest  
P. O. Box 729  
Salmon, Idaho 83467

As a recreational group we think wildlife habitat and recreational opportunities are two of the most urgent needs of the National forests. We would like to see future management plans increase and enhance these uses by retaining and protecting the diversity and beauty of the natural forests. We think most of the old growth trees, Douglas Fir, and natural vegetation should remain even if it means less timber harvest and livestock grazing. We think spraying weeds on National Forest land harms surrounding vegetation, birds, and people, and are therefore not in favor of it.

In commenting on the proposed Salmon National Forest Land and Resource Plan and Draft Environmental Impact Statement, we wish to say we do not favor your preferred Alternative 12, because we think more change in management direction is needed. We support Alternative #3 which emphasizes non-market values such as wildlife, fish, water quality, visual quality, etc. We also like Alternatives #8 and #9, and are in favor of either one of these.

We recommend Wilderness designation for the roadless area of the Lemhi Range and the West Big Hole roadless areas.

We would like to see cattle removed from important elk habitats and damage done by overgrazing corrected by reducing AUM's of livestock grazing.

Thank you for this opportunity to comment.

SALMON N F

JAN 14 '86

Info	Q	Action	□
SNP			
LEP	1 2 3 4 5 6		
TAF	1 2 3 4 5 6		
ELM	1 2 3 4 5 6		
FR/W	1 2 3 4 5 6		
AD	1 2 3 4 5 6		

2 CC's to [signature] 1/14/86

Sincerely,

*Merle King*  
Merle King, President

*Ruth B. Doe*  
Ruth Doe, Conservation  
Coordinator



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to 1920

Date

Merle King, President  
Idaho Alpine Club  
P.O. Box 2885  
Idaho Falls, Idaho 83401

Dear Mr. King,

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.





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State law requires landowners and managers to control noxious weeds on lands they own or control. Forest Service policy is to cooperate with state and local agencies in weed control both to prevent adverse effects on National Forest lands and to reduce the threat to neighboring lands. To do this we use an approach called integrated pest management which is a combination of chemical, biological and mechanical measures. Spraying with herbicides is safe and effective in most cases. Herbicide use has been evaluated in a regional environmental impact statement, and we in turn analyze each project through NEPA procedures. Treatments follow EPA label requirements and are done by certified applicators.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,
5. Key big game summer range in the Tobias Creek area,
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness.



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potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion.

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Goilway Gulch,
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch, and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek.

There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive

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motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area. The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurable with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

There has been some confusion generated regarding the ability of the various alternatives of the Draft Forest Plan to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers.

Simply reducing the number of AUM's does not insure that "damage done by overgrazing" will be solved or reduced. Livestock distribution patterns, grazing systems, season of use and many other features of the allotment management plan can have a significant influence over the relative state-of-health of the range ecosystem. A level and intensity of grazing management is presented in the plan which provides for improving ecological range condition on those sites judged to be in low seral condition.



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Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

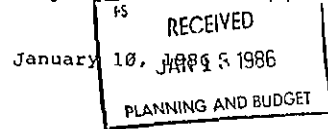
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# COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

975 SE Sandy Boulevard Suite 202 Portland Oregon 97214 Telephone (503) 238 0667



Mr J S. Tixier  
Regional Forester  
Intermountain Region  
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324 25th Street  
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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 Salmon 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 Salmon 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, United States v. Oregon, 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



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Reply to 1970

Date

Mr S Timothy Wapato, Executive Director  
Columbia River Inter-Tribal Fish Commission  
975 S E. Sandy Blvd., Suite 202  
Portland, Oregon 97214

Dear Mr. Wapato:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement (DEIS) for the Salmon National Forest. Your staff's comments were substantial, comprehensive and constructive. Many of the comments and suggestions were incorporated to strengthen the planning documents and to provide better clarification of the information in the Proposed Plan and DEIS.

## Indian Treaty Rights

The Salmon National Forest fully realizes that anadromous fish production from Forest streams contributes to production levels associated with treaty rights of the Confederated Tribes within the Columbia River basin. Indian treaty rights applicable to the Salmon National Forest also pertain to the Shoshone-Bannock tribes in southeastern Idaho. Forest management goals expressed in the Proposed Land Management Plan include identification of a goal to maintain high water quality and habitat capability sufficient to meet State species production goals for both anadromous and resident species. The numerous standards and guidelines outlined in the proposed plan highlight the Forest intent to protect and manage aquatic habitats for high production levels. We believe maintenance of high productivity for anadromous fish will benefit Indian Tribes with treaty rights as well as other legitimate users of the fishing resource.

All anadromous fish habitats on the Forest have the potential to contribute to treaty obligations and, therefore, Forest management will be sensitive to habitat condition and capability of all anadromous streams. The fact that most habitats are currently underseeded, primarily because of off-Forest factors, did not influence decisions related to our commitment to maintaining and protecting high quality habitat. The many activities and programs presently ongoing to re-establish production levels are expected to assist in bringing Forest habitats back to high production levels. The Forest is committed to the resolution of problems associated with both on- and off-Forest influences on anadromous production and will continue to work with the involved parties (i.e., Northwest Power Planning Council, Bonneville Power Administration, U.S. Fish and Wildlife Service, Idaho Department of







Mr. S. Timothy Wapato

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Fish and Game, Indian Tribes, private companies and special interest groups) to bring about the needed changes.

#### Fishery Analysis

The relationship between timber management activities within a drainage and the influence on fish habitat was modeled with sediment being the controlling factor. Two key approaches were incorporated into the analysis. The first approach was the application of the relationships presented in the "Guide for Predicting Sediment Yields from Forested Watersheds" to estimate changes in sediment delivery to streams. The second approach utilized the relationships in the "Guide for Predicting Salmonid Response to Sediment Yields in Idaho Batholith Watersheds" to estimate the influence sediment would have on fish survival. Both guides are available from the Forest Service. Sediment rates were limited in all alternatives so that fisheries goals for that alternative could be met. The nature of fishery goals are different for anadromous and resident species because of the difference in life histories and differing influences experienced. Even though each alternative had different fishery goals with respect to anadromous and resident populations, the difference between alternatives was not very great because of the life history relationships used. In order to meet the sediment restrictions associated with fishery goals, the timber production model directed activity into the more stable geologic areas of the Forest and limited the rate of access construction and acres of logging activity.

Capability will be determined by the amount of habitat available, including historical and presently unused (i.e., Upper Panther Creek drainage). The management goal to maintain habitat in a condition to produce 90 percent of capability is for all drainages, with the exception of Panther Creek. The Panther Creek drainage is presently being impacted by mine pollution. To coordinate with the Idaho Department of Fish and Game efforts to bring populations of steelhead and salmon back into the drainage, habitat in the upper drainage will be managed to meet anadromous fish production goals.

The intent of monitoring and evaluation will be to provide an assessment of the progress achieved toward meeting the goals, objectives and standards expressed in the Plan. Habitat features that will be monitored include both rearing and spawning components. We do not anticipate direct monitoring of fry and of smolt survival. Habitat conditions will be used as an indicator of management effectiveness. Sediment modeling will be an integral part of pre-project planning and the environment analysis process. There was a specific reference to the 68 percent fry survival goal for steelhead trout. Based on our review of the relationship involved, this level would equate with 21.5 percent fine sediments in the spawning gravels. It is also important to note that all sediment/fishery related standards are meant to apply to the reach of stream containing fish redds. At present, a detailed monitoring program has not been identified. Allocation of available funds can and will have an influence on the scope and intensity of monitoring and evaluation efforts. Specifics on the monitoring program will be determined during development of annual monitoring programs.



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, 763 F.2d 1032 (9th Cir. 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. at 1035. 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 not yet possible given the contemporary depleted fisheries. The Supreme Court has held that



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#### Timber Sale Economics

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

#### Community Stability

Although we know of no legal requirement to maintain community stability, there is little doubt the National Forest Management Act of 1976, National Environmental Policy Act of 1969, and subsequent implementing regulations require that this issue be considered in formulating a Forest Plan. Also implicit in the foregoing direction is that the Forest Service is responsible for evaluating alternative courses of action for their potential effects on local economies, however, we recognize that community stability or economic development cannot be ensured by the agency since the means to accomplish such a goal are not available to us. On the other hand, the Forest Service does sometimes have the ability to prevent actions which could destabilize communities or provide opportunities which could help communities reach their economic goals. The difference is between one of providing opportunities if otherwise acceptable in terms of maintaining the productive capacity of the National Forest, and actively promoting or assuming responsibility for the direction and health of a local economy.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.





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, 763 F.2d at 1035. 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"

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Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions. Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

#### Budget and Funding

The concern for future funding is also a concern for all land managers. Budgets will continue to be a concern in the coming years as funding becomes more restrictive. Habitat management activities and projects could well be influenced by budget cutbacks, as will other resource areas (i.e., timber, range, recreation, etc.). Funding from sources outside of normal budgets has been and will continue to be used. Program dependence, however, will not be encouraged. Wildlife and fish population levels identified in the plan were not dependent upon the habitat improvement program. Coordination of wildlife/fish objectives with other resource activities was the key component in meeting population production objectives. Improvement projects can and will enhance habitat effectiveness, but other habitat management elements (i.e., inventory, monitoring and coordination) will be responsible for attainment of the population objectives.

#### Water Quality and Sediment Analysis

The Salmon National Forest is actively involved with the State of Idaho Department of Health and Welfare in the development of water quality standards for non-point sources of water pollution. Currently, the Forest Service is participating in the development of State of Idaho non-point water quality standards. The non-point standards team, as mandated by Governor Evans, consists of members from the Idaho Department of Health and Welfare--Water Quality Bureau, Forest Service, Idaho Department of Lands, Idaho Department of Fish and Game, representatives of the timber industry, mining agriculture, Indian Tribes, and environmental groups.

Until the non-point water quality standards are defined, the Salmon National Forest has elected to meet the water quality goals of the Idaho Department of Fish and Game, which protects downstream beneficial uses such as anadromous streams at a 90 percent habitat level. Currently, the habitat potential on the Salmon National Forest exceeds this level.



it had at the time the treaty was concluded. Id. The purport of 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, 16 U.S.C. Section 839b (1982), encompasses the Columbia River and its tributaries and will be financed by Pacific Northwest ratepayers. This comprehensive protection, mitigation, and enhancement effort does not appear to be integrated into the DEIS or proposed plan. Nor were the increased fish returns made possible by the recently concluded United States/Canada Salmon Interception Treaty, See 16 U.S.C. Section 8396 (1985 Supp.), 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



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The Salmon National Forest has two areas which have significantly affected the water quality of about 5 percent of the water yield from the Forest. These include the chemically contaminated waters from the Blackbird Mine area, tributary to Panther Creek. The pollution is caused by acid mine drainage and by non-point sources of pollution such as waste piles and dumps in the Meadow Creek and Bucktail drainage. Much of this pollution results from past operation of the mine, and originates on private land. At the present time, the State of Idaho and owners of the Blackbird Mine are in litigation concerning the mine pollution. The Bonneville Power Administration is also involved in reclamation of the mine areas as part of their efforts to restore anadromous fisheries resources in the Columbia River Basin. Their efforts have resulted in the completion of a rehabilitation plan, designed to allow restoration of the anadromous and resident fisheries in Panther Creek. Much of the affected National Forest lands are currently under mining claims, and the Forest cannot proceed to rehabilitate the land under claim until mining operations are completed. The Salmon National Forest has maintained an active concern for resolution of this problem, and has provided technical assistance to the mine owners during the development of the Blackbird Mine Environmental Impact Statement, as well as the BPA's rehabilitation plan.

The other major source of water quality degradation is the Dump Creek drainage, tributary to the Salmon River. A low hydrologic divide between the headwaters of Dump Creek and Moose Creek has resulted in a periodic shifting of the drainage size of Dump Creek throughout geologic history, including glacial periods. In recent geologic time, the majority of the streamflow was being carried by the Moose Creek channel, and not Dump Creek. In 1897, however, major erosion problems in the Dump Creek drainage developed, apparently when miners diverted Moose Creek into the headquarters of Dump Creek. This action increased the watershed area of Dump Creek over three times. This large increase in flows caused extensive downcutting as well as massive slope failures. It is estimated that approximately 9 million cubic yards of material was transported into the Salmon River, causing damage to water quality, fisheries and stream channel stability.

In 1974, an environmental assessment was prepared to analyze various structural alternatives to reduce the excessive sedimentation of the Salmon River as well as slow the mass movement in the Dump Creek chasm. The selected alternative was to divert the upper Moose Creek watershed to the lower Moose Creek channel, thus returning the Dump Creek watershed to its original size. Included in this proposal was the construction of a diversion dam and 6,000 feet of new channel. The project was completed in November 1979. While the enormous areas of instability of the Dump Creek chasm will persist for decades, the majority of stream flow has been diverted out of the chasm, and undercutting of banks has been reduced, as well as a reduction of sediment transport.

Other water quality problems on the Salmon National Forest are minimal, mostly resulting from site specific areas of instability. These areas have been identified in the Forest Plan, and are scheduled for restoration in the preferred action.





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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, road-building, and grazing.

Major sedimentation and chemical contamination such as that which has occurred as a result of actions many decades ago at the Blackbird Mine and Dump Creek are not likely to be repeated again. The Salmon National Forest maintains a program of comprehensive interdisciplinary project reviews, and stringent enforcement of State of Idaho and Federal regulations regarding stream channel alterations, water quality and land use practices.

Regarding your comments on impacts on fish and beneficial use of water, the Forest habitat capability for anadromous is currently at 92 percent of optimum, however, due to significant underseeding of available habitat, and off-forest influences, the populations of anadromous are low. While proposed land management activities will generate sediment into anadromous streams, through proper distribution, mitigative measures, and cumulative effects analyses, habitat capability in these streams will be maintained at 90% or greater.

We agree with your characterization of our role in the process of evaluating hydropower proposals which could affect National Forest Systems Lands. The DEIS and Forest Plan contain specific guidelines for this activity. We do recognize and support the work being done by the Northwest Power Planning Council.

#### Riparian Management and Channel Stability

Riparian habitats on the Salmon National Forest are given protection consistent with direction given in the National Forest Management Act. Resource management activities will be managed in a manner consistent with protection of fishery, wildlife and water quality values. Forest-wide management direction and associated standards and guidelines regulate the types and intensities of management activities. Careful review of the management requirements will indicate that the harvest rotation schedules will allow for woody debris to play a role in the ecology of stream habitats.

#### Timber Management

The evidence that south slopes (or any area) can be regenerated is based on what is occurring naturally or from past treatments on similar stands. Some of the factors include present stocking (species, size, amount), stockability, aspect, elevation and habitat type. Past experience showed that, in fact, regeneration could not be assured on many south aspects and these areas were removed from the timber base. Much of the 285,700 acres of land in items 4 and 5 on page VII-A-1 is this type of land and is identified on map overlays. Some of the ponderosa pine on south aspect was left in the base because of the evidence of regeneration shown from many years of logging. These areas were reclassified as a ponderosa pine-xeric type with a very light harvest planned. Additional areas where regeneration cannot be assured will be reclassified as unsuitable as provided on page IV-41.

In many situations, planting on harsh sites after a first tree removal cut would speed up restocking of the cut-over stand, however, the costs associated with this practice would often render it impractical.



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 federal, state and tribal governments are the fish production plans currently being formulated under the auspices of United States v. Oregon, the Fish and Wildlife Program, and the Salmon Interception Treaty. The Salmon National Forest DEIS and proposed plan do not reflect the consideration of these processes required by the NFMA.

For example, the DEIS states that "[a]lthough not as definitive as State goals, certain other agencies, groups, and institutions have expressed a concern for maintaining a high level of fish production under all alternatives." DEIS at IV-19. These "others" include the U.S. Fish and Wildlife Service, Idaho Department of Health and Welfare, EPA, Pacific Fishery Management Council, Northwest Power Planning Council, Bonneville Power Administration, Columbia River Inter-Tribal Fish Commission, and the Shoshone-Bannock tribe. This is not accurate. Implementation of federal water quality law, binding on the Forest Service, is handled by both the EPA and the Idaho Department of Health and Welfare. And, as discussed earlier, the Columbia River treaty tribes have a property right in anadromous fish originating in the Salmon National Forest. This right is a federal right and it is a hard constraint on forest management activities. Fishery goals are not a consideration that the Forest Service can subordinate to its timber harvest goals.

#### 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 to 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



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The regeneration periods in the management area prescriptions are an average for an area that will receive various treatments. Where advanced regeneration is available or planting is planned, the regeneration period is short (0-5 years), however, in some cases natural regeneration takes longer and the final removal cut must be delayed. The "NEPA Regulations" (36 CFR 219) state that "when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way as to assure that the technology and knowledge exists to adequately restock the lands within 5 years after final harvest." The initial cut in the shelterwood and seed tree methods is normally made to encourage prompt regeneration, however, the removal cut must often be delayed more than 5 years to ensure that there will be adequate regeneration after this final harvest. This delayed final harvest to await regeneration was used in our FORPLAN model harvest projections and is consistent with the Regulations. Recent stocking surveys have verified that adequate regeneration can be obtained with the shelterwood method.

#### Range Management

The 72.9M AUM's refers to the grazing capacity of suitable range for cattle. In addition to the suitable range, there are thousands of acres of unsuitable range (unsuitable in the sense that the adaptability limits of cattle are exceeded). These areas contribute significantly to the forage and habitat needs of wildlife and, in some cases, other classes of livestock (such as sheep), but were not used to compute the grazing capacity values shown in the Plan.

In many instances the unsuitable range sites are also the key big game winter range areas. Frequently they are in good or excellent ecological range condition and produce an abundance of forage, but are classified as unsuitable because of the lack of readily available water for cattle during the summer months.

As you observed, there has been a drastic reduction in permitted AUM's over the past 50 years. For example, in 1920, the Forest permitted nearly 200 thousand AUM's of grazing, or roughly four times that projected in our Proposed Plan. This reduction in permitted AUM's has coincided with significant improvement in the art and science of grazing management, and a much higher level of allotment administration and permittee compliance. Conversely, the elk populations on the Forest has increased several fold in the past 20 years, and populations currently meet or exceed the management objectives of the Idaho Department of Fish and Game in some areas. It is interesting to note that the 11 percent of unsatisfactory condition suitable range (89 percent classified as being in satisfactory condition) occurs mainly in areas (such as the upper drainage of Big Timber Creek) where elk numbers have grown rapidly and currently are exceedingly high.

Riparian zones are indeed areas of special importance to many resources. Management concern for these areas has been expressed in National Forest Management Act direction to protect riparian zones and their dependent resources (water, fish and wildlife). Planning direction, expressed through numerous standards and guidelines, outlines management requirements associated with resource management activities necessary to protect and preserve riparian areas on the 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. Nor is it adequate for the Forest Service to baldly assert that it has assessed cumulative impacts while offering absolutely no evidence that it has made any such consideration. See e.g. DEIS at IV-38 ("The effects of timber harvest and road construction have been cumulatively assessed for all alternatives."); *Id.* at 40 ("Timber harvesting will be evaluated for cumulative water yield effects."); *Id.* at 95 ("Should a wildlife or fish population be lost due to cumulative impacts, the action may be irreversible."). 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. From the perspective of fisheries management, further weakening of spring chinook production is simply not acceptable

#### 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, implementation of standards and guidelines, and reliance on enhancement to mitigate management impacts on fish habitat. See DEIS at IV-19 ("Habitat capability gains derived in Alternatives 1, 2, 4, 5, 7, 10, and 12 [preferred alternative] would partially mitigate for negative habitat influences in specific streams and therefore may not result in net gains in capability.")

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



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Livestock grazing can and does influence the nature and condition of riparian areas. Resolution of conflicts will be completed on a site and/or project specific basis using options appropriate to the conditions and circumstances involved.

Once they are in a degraded condition, most native range sites respond very slowly to improved management. The projected 20 years to restore ecological range conditions is based on the future and maybe overly optimistic even under the best circumstances.

Long-range allotment management plans are developed for early allotments. These plans are thus supplemented with annual operating plans which are discussed with the grazing permittee each year. Failure by the permittee to comply with the annual operating plan or the terms and conditions of their permit can and does result in administrative action.

#### Wildlife and Threatened and Endangered Species

It is stated in the draft Salmon Forest Plan that "the Salmon National Forest provides habitat for three endangered species--gray wolf, peregrine falcon, bald eagle, and one threatened species--grizzly bear" (II-6 and 7). At present, the numbers for all four species are below the theoretical minimum levels necessary to support self-sustaining populations on the Forest (II-26). Theoretical maximum population levels have been calculated for all but the grizzly bear, based on available habitat and food supplies. (Target numbers are not included for the grizzly bear because the Grizzly Bear Recovery Plan does not involve recovery efforts on the Salmon National Forest). Since the Forest provides suitable habitat which is presently unoccupied, there is no need to do habitat improvement work to achieve theoretical maximum populations. However, none of the three species are known to reproduce on the Forest at present, so population increases can be expected to result largely from introductions (II-26 and 27).

Though no habitat improvement work is targeted for threatened or endangered species, neither will any action "be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5). Management recommendations outlined in the Threatened and Endangered Species Management Plan for the Salmon National Forest are included in the Standards and Guidelines for the Draft Forest Plan to guide recovery efforts for the bald eagle, peregrine falcon, and gray wolf on the Forest (IV-19).

The 1978 Sikes Act Plan titled, "A Program For Fish and Wildlife Habitat On the National Forests and Grassland in Idaho," did contain a Goal to manage for existing populations. Based on the State-wide plan, each National Forest in Idaho prepared an individual Forest Sikes Act Plan which was based on the State Plan. These plans were approved in 1978 and expired in 1982. Following its expiration in 1982, the Salmon Forest did not prepare a new Sikes Act Plan, but instead directed our wildlife and fish coordination efforts into our Comprehensive Forest Land Management Plan



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. 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. Is reliance on habitat enhancement as mitigation appropriate in the face of the current federal budget crunch? The Commission will be happy to contribute its expertise towards evaluating the use of various mitigation methods on a case-by-case basis.



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Throughout our Forest Planning process we have tried to predict (through the use of models as well as professional judgment) the consequences of not only natural events, but also induced management activities on populations of wildlife and fish. A predominant constraint in this process was to ensure adequate habitat was available at all times for perpetuation of each species of wildlife.

As I am sure you are aware, habitat conditions for a diverse complex of native fauna is dynamic and constantly changing. A low seral stage, indicative of conditions following a timber sale or natural event such as a wildfire, may be conducive to some species of wildlife; whereas, climax conditions may favor others. For these reasons it becomes essentially impossible (even with no induced management activity) to maintain existing or current populations of all species of wildlife.

I can assure you, however, that the Salmon National Forest will continue to manage and monitor habitat to insure viable populations of the native fauna are maintained. Should any species become Federally listed as threatened or endangered, requirements of the Endangered Species Act of 1973 will be enforced, which dictates that "no actions will be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5).

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat.





Trust Responsibility

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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 citizenry. It must accord the treaty right special consideration and scrupulous safeguards. Unfortunately, the DEIS did not devote this consideration to the tribes' interests.

Perhaps because none of the treaty tribes' reservations lie within the Salmon National Forest's "local area of influence," See DEIS at III-2, effects of forest management activities on the tribes were given scant consideration. In addition, the Forest Service appears to be somewhat confused as to the nature of the Columbia River treaty tribes' treaty rights. See DEIS at IV-68 ("[T]he Nez Perce have some grazing rights on the forest.") However, as discussed earlier, management activities that affect anadromous fish production also affect the tribes' exercise of their treaty rights. The Forest Service owes a duty to not only

however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

Old Growth Management

The 10 percent retention of old growth timber is a dynamic concept. At least 10 percent of existing old growth stands will remain until such time as younger stands mature into old growth. At that time, some exchange of stands would be possible and still achieve the old growth objectives

Wilderness and Roadless Area Management

The management area prescriptions that you consider to be vague in relation to ROS class are because there is no single ROS class assigned to be "managed" for in these areas. In other words, development will occur in some portions of these management areas which will result in a ROS class of Roaded Natural Pockets will remain undeveloped where SPM and SPNM opportunities will remain, but they will not be designated or managed for such as in the designated semi-primitive management areas.

As a result of public input received, not all semi-primitive management areas will be designated motorized. The final plan will include areas that are motorized on designated routes only, as well as areas that will be nonmotorized.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied



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

#### Timber Resource Land Suitability

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).

Unfortunately, the Forest Service does not seem to want to acknowledge that there are lands and waters which are simply too sensitive to allow management activities. The DEIS is bereft of any description of the process used to identify lands not suitable for timber production due to the likelihood of irreversible resource damage to soils productivity or watershed conditions. The "pie" chart at DEIS III-36, which merely states that 2.9% of the forest land is unsuitable due to possible resource damage, is utterly inadequate.

"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

The DEIS may have already attempted to define "irreversible damage" in a rather "backdoor" way.

Long-term productivity is used to describe the basic capability of the land to produce over a period greater than 50 years. The challenge of wise land use is to produce the maximum outputs in the short-term in a way that maintains long-term productivity as in the long term yield of timber.

See DEIS at IV-100. Is it purely coincidental that the "productivity regeneration time" of 50 years is the same as the planning period? This kind of standard might embrace a multitude of sins during its 50 year term. Perhaps its biggest shortcoming is hinted at by the use of the "long term yield of timber" as an example. The Multiple Use Sustained Yield Act of 1960, 16 U.S.C. Sections 528-531 (1982), codified the concept of "long term sustained yield."

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1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake;
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek;
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,
5. Key big game summer range in the Tobias Creek area,
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

To answer your questions about the designation and management of roadless, semi-primitive, and wilderness areas it will be necessary to explain what these classifications mean.

Roadless, semi-primitive, and wilderness area classifications have differing criteria for their classification and management. The criteria for inclusion into the Wilderness System has always discriminated against those areas which were heavily impacted by man's activities, including such facilities as



services" means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the land.

Id. at Section 531 (emphasis added). "Sustained yield" requires that renewable resources be productive on an annual or regular basis. Forest management that impairs annual anadromous fish production would violate this dictate. Congress did not restrict the concept of sustained yield to timber as the Forest Service seems to do.

The Forest Service appears to think that long term productivity should be defined in terms of the needs and life-span of the timber resource. However, the Forest Service is statutorily required to promote the interests of other renewable resources, i.e. fish, and thus it must safeguard the productivity of fish in terms of the biological needs of fish. The Forest Service's contention that loss of natural production can be mitigated by introduction of hatchery fish, DEIS at IV-95, is not only biologically unsound, it is also extremely self-serving. Since the Forest Service claims that it is a habitat provider and that the duty to introduce fish rests with other agencies, its approach allows it to sanction habitat degradation and concomitant fish losses without having to fund replacement fish.

#### Sales Below Cost

Over the years, fish and wildlife concerns have often been subordinated to the needs of allegedly more economically valuable, but environmentally damaging commodities such as timber harvest, irrigated agriculture, grazing, and hydroelectric power production. Thus, it is not without some ironic amusement that the Commission observes the current controversy over unprofitable timber sales. Those who have advocated resource decisionmaking primarily on the basis of short-term economic gain suddenly find themselves "hoisted on their own petard." Perhaps this role reversal will convince all those involved in natural resource decisionmaking that cost/benefit analysis is at best an "unfaithful lover" and that resource decisions are best grounded on other bases.

The Commission is not automatically opposed to "sales below cost" *per se*. What concerns us is that the DEIS contains no assurance that any of the timber sales proposed for the next 50 years will actually recover its real costs. The NFMA regulations require that the Forest Service "shall compare the direct costs of growing and harvesting trees, including capital expenditures required for timber production, to the anticipated receipts to the government...." See 36 C.F.R. Section 219.14(b) (1984). "Direct costs" are defined to "include the anticipated



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roads. For this reason there may be historic or even active mining areas within wilderness boundaries, but it should be unusual to find such an area where there was considerable mining activity and roaded access.

As you have noted, the management of mineral activities in wilderness after their designation is one of the notable exceptions to the prohibition of other motorized uses in these areas. Mineral entry was allowed until December 31, 1983, within established wilderness, and operations within wilderness under the General Mining Laws can only occur on mining claims which were valid on or before December 31, 1983, or are in wilderness areas whose enabling legislation specifically allows such use. The Forest Service is charged with the responsibility of determining the validity of such claims prior to authorizing any mining activities, and to ensure that all proposals are carried out in such a way as to preserve the wilderness values.

Roadless areas are those which were specifically identified and evaluated during the 1979 RARE II process for inclusion into the Wilderness System. The original areas may have had some historic mining areas included within their boundaries as long as there were no significant man-made developments, such as roads present.

The Forest Service was directed to re-evaluate these roadless areas for inclusion into the Wilderness System during the Forest Planning effort in 1983. Between 1979 and 1983 many of the original roadless areas were impacted by mining, timber harvest and other activities which involved construction of motorized access. In our current effort we tried to redraw the roadless boundaries to exclude these disturbances so that the remaining areas would truly be wilderness candidate areas. In this context, roadless areas which were impacted by roads or other motorized use including some mining activities, will not be considered for wilderness designation.

A semi-primitive classification is one that was developed specifically for a recreation opportunity management system called ROS, or Recreation Opportunity Spectrum. Semi-primitive areas may include mines and low standard, or primitive access roads such as jeep trails, but do not ordinarily have high standard roads or other developments except in designated corridors. They are not related to either roadless or wilderness areas although a number of the roadless areas will be managed for semi-primitive opportunities. As long as they remain semi-primitive, the Forest will not allow road construction for access or development except in the case of mineral exploration or development. Based on historic and current activity, we expect very little acreage to be impacted by minerals or energy development during the plan period.

Appendices VII-B and VII-C of the Forest Plan contain the specific Standards and Guidelines for leasable and locatable mineral management. The other resource guidelines which are contained in the Forest Plan would also be used on a case by case basis in the evaluation and approval of mineral operations. We believe that these measures would be very effective in protecting wildlife values and the Preferred Alternative described in the FEIS and Forest Plan indicates that the Salmon National Forest will meet the State of Idaho goals for fish and wildlife. These measures are not, however, designed to protect and maintain wilderness values.



investments, maintenance, operating, management, and planning costs attributable to timber production activities, including mitigation measures necessitated by the impacts of timber production. Id. at Section 219.14(b)(2) (emphasis added).

The DEIS contains no discussion of the "sales below cost" issue. However, it does contain disquieting remarks such as: "Augmentation will be at 22 percent of the total road cost. If current lumber market prices continue, only 10.6 MMBF per year [out of an allowable sale quantity of 21.1 MMBF] is expected to sell." DEIS at II-73. What is "augmentation?" Is it "sales below cost" by another name? If so, what is the justification for this hidden subsidy that is so damaging to other resources in a forest that has severe water quality problems?

The Commission is concerned that the Forest Service will respond to the "sales below cost" controversy by artificially "improving" its timber sale balance sheet by shortchanging mitigation needs. The DEIS should disclose the manner in which mitigation measures and levels of mitigation funding are chosen and applied. This information may demonstrate that the timber production envisioned by the proposed alternative fails to include all mitigation costs and is therefore even more cost ineffective than it presently appears. Bland assurances that the Forest Service will implement mitigation measures which it alone determines are necessary frustrates the policies behind both NEPA and NFMA. Both of these statutes demand disclosure, public scrutiny, and public input.

#### Community Stability

Despite the utter dearth of statutory authority, the Forest Service appears to believe that the "maintenance of community stability" is the primary constraint on forest management. In addition, "maintenance of community stability" also appears to mean perpetuation or increase in commodity outputs to the detriment of non-commodity outputs and an attempt to artificially maintain lifestyles which would not otherwise be economically feasible. In essence, the Forest Service seems to perceive its mission as being the guarantor of the local timber and range industries.

The Salmon National Forest is a national forest and should not be managed as a private woodlot for a handful of local mills. There is no indication in the DEIS what the role of the Salmon National Forest would be in conjunction with trends of surrounding private, state and federally owned land. If the trends for sustainable flow from surrounding lands are on a declining trend in the local area, the intentions of the Forest to match past levels of harvest may in the long run fail to support local mills. The Forest Service is not charged with the obligation to insure community stability. Its true mission is to ensure that the resources it controls will be productive into



Mr. S. Timothy Wapato

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Almost all roading decisions were made outside of FORPLAN because of the complex nature of modelling the roading problem. FORPLAN provided guidance concerning how much, where, when, and from which types of stands timber could be harvested while meeting the objectives of the alternative being considered.

Road mileage estimates in the Plan are based on the minimum required to access the allowable sale quantity in an economically effective manner while meeting other resource objectives. These objectives contribute to concentrating road building in the early years because timber sales must be spread out in order to properly mitigate the impacts associated with timber harvest.

We are not familiar with the term "advancing front."

Partial Retention, as well as other Visual Quality Objectives, does not relate directly to a particular ROS class. VQO's are based on the physical features of an area and the numbers and types of viewers. Since no activities are planned in semi-primitive areas, the VQO achieved will be Retention.

We appreciate your concern for land management on the Salmon National Forest, and we welcome your involvement in the resource management process. To assist the Commission in land management review, we will include your address on our mailing list to receive pertinent information related to land management planning.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-246



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perpetuity It fails that standard if it allows timber harvest that reduces the productive capacity of forest fish habitat

The Forest Service's use of the "local area of influence" (the three counties surrounding the Salmon National Forest) concept fosters the perception that the Salmon National Forest's primary duty is to the local community. It also promotes "constituency planning" instead of the statutorily required resource planning. As a result, forest outputs are evaluated on how well they satisfy the aspirations of the local populace -- not on how well they accord with responsible resource stewardship.

The Salmon National Forest has a role as a national repository of wilderness considered not just as a commodity to be used but as a resource to be retained. There is a pervasive attitude in the DEIS and Plan that only enough wilderness to match a given use level is essential. Wilderness has value as a refuge for fish and wildlife, as a vehicle for general maintenance of ecosystem character, and as an asset for the nation. Wilderness has been cast in the DEIS as a liability -- something which reduces PNV and community cohesion and increases polarization. The desire of ranchers and loggers to maintain the sense of independence from economic trends is given great respect, and the desire for wilderness is portrayed as one of simply symbolic (not practical) meaning. No comparable desire of the people of the nation to maintain their sense of well-being by having intact natural systems of substantial size is given credence.

The Salmon National Forest (SNF) has the capability to assist in the economic stability of local communities (Appendix A-21). It is acknowledged that timber utilization will likely decline from the previous two decades and businesses related to non-market resources are projected to increase (Appendix A-21, Plan IV-89). The demand for anadromous fish and big game far exceeds supply. However, the supply of roadless area for dispersed recreation is considered to be far in excess of demand. The SNF derives this conclusion on the basis of an assumption of numbers of persons per acre for a wilderness experience. This type of quantitative assumption is inappropriate when determining how much wilderness or roadless area is adequate. By this rationale one hiker may need only one acre of wilderness.

The future balance between commodity and amenity type resource use is heavily weighted in favor of commodity use. While the role of the SNF is to assure the environmental stability (sustained health of the forest ecosystem and its renewable resources), the SNF's efforts are misguided by assuming the responsibility for maintaining economic stability (status quo) in the face of "outside" economic and social trends. Recreation values have become increasingly great due to the scarcity of unroaded and wilderness areas. Single-minded perpetuation of historic timber harvest and grazing levels (let alone promoting increases) can only be accomplished by

sacrificing amenity values

#### Budget

Given the present domestic spending trends, it is extremely unlikely that the Forest Service will be able to count on receiving budgets of equal or greater amount than what it currently gets. The DEIS should include a complete explanation of how the Salmon National Forest will respond to budget cuts. Which programs will be cut and the amount of the cuts. What will be the fate of watershed improvement projects? (Will there be KV funds available for this purpose if the Salmon does not recover its timber sale costs?)

The constrained budget alternative 6 is an overly narrow response to the problem of impending domestic budget cuts. It emphasizes commodity outputs. A constrained budget alternative should be developed which emphasizes outputs other than timber and range. This alternative should propose additional wilderness. Most important of all, every alternative should approach budget constraints by emphasizing forest resource protection. The idea that resource protection should be done only when there are funds available is anathema to this approach. For example, alternative 6 includes no funding for watershed improvement projects. Thus water quality at certain sites will continue to deteriorate. DEIS at IV-39. See also DEIS at IV-43. ("Implementation and application of these [management] requirements will depend upon adequate time to make the necessary changes to allotment management plans and sufficient funds to install range improvement structures and to adequately administer grazing use.") Only when stewardship duties are accomplished should the Forest Service begin considering generating income.

Neither the plan nor the DEIS mention the role of Bonneville Power Administration funding of Fish and Wildlife Program measures on the Salmon National Forest. Without a thorough discussion of BPA funding, the public may suspect that BPA dollars are being used to displace habitat protection activities for which the Forest Service is responsible.

#### Water Quality

The Forest Service needs to consult with the Environmental Protection Agency and the Idaho Department of Health and Welfare on the water quality standards mandated by the Clean Water Act. It is the Commission's understanding that breach of Idaho's "serious injury" water quality standard occurs once habitat capability drops below 70% of full biological potential. Thus much of the Salmon would already be in violation of the Clean Water Act due to the forest's past management activities.

Consultation with the four Columbia River treaty tribes is

also necessary. As discussed earlier, Forest Service sponsored anadromous fish habitat degradation does violence to both the tribes' treaty rights and to the federal government's trust responsibility to the tribes. As co-managers of the fishery resource, the tribes strongly suggest that the Forest Service ensure that its fishery management processes are responsive to the needs of the other management entities that have an interest in Salmon National Forest anadromous fish.

The Salmon appears to have some severe water quality problems. For example, the DEIS concedes that the Forest cannot completely comply with the strictures of the Clean Water Act:

Watershed conditions are, however, currently degraded in certain areas of the Forest. Because of this, water meeting state water quality standards (in terms of percent of total Forest water yield) in decade 1 will be approximately 95 percent for all alternatives. Approximately 5 percent of the Forest water yield is influenced by chemical contaminants and serious erosion problems. These problems include heavy metal contamination of portions of Blackbird Creek and Big Deer Creek within the Panther Creek drainage, massive slope instability within the Dump Creek watershed, and numerous small degraded areas in need of watershed improvement work. It is anticipated that by the end of the second decade of the planning period, the quality of water from these problem areas will significantly improve. In all but alternative 6, the backlog of watershed improvement projects will have been completed. Considering the eventual changes in watershed conditions anticipated in these affected areas, water quality meeting state standards should approach nearly 100 percent by the end of the planning period for all alternatives.

DEIS at IV-38. In other words, if all goes well, the Forest will be in compliance with the Clean Water Act in 50 years. How did these problems occur? Whose responsibility is the heavy metal pollution and the Dump Creek erosion? The Forest Service maintains that it lacks control. "Controlling the initiation and extent of mineral extraction activities is not wholly within the administrative control of the Forest Service. For this reason, no accurate prediction can be made for how much of the soil, mineral and other resources may be irreversibly lost due to these activities." DEIS at IV-95. To what extent is this actually true? The DEIS should thoroughly detail how the Forest Service will resolve these water quality problems under all budget scenarios. In addition, it should detail methods for preventing future water quality disasters from mining. The NEPA requires that reasonable courses of action, even if outside the agency's jurisdiction, should be discussed and considered.

The DEIS properly notes that water quality requirements are

a function of impacts on fish as a beneficial use of water. DEIS at IV-15. However, shortly thereafter, a table makes the point that Forest anadromous fish are at 92% of habitat capability -- 2% higher than Idaho Department of Fish and Game goals. This does not make sense, particularly since the DEIS stated earlier that existing anadromous fish populations are below the NFMA mandated viability level. See Table III-10 at DEIS III-22. It is extremely difficult to understand how it is that the Forest Service can plan for more sediment-generating activities when its fishery resource is clinging precariously to existence at a level below that allowed by NFMA. See 36 C.F.R. Section 219.19 (1984). Moreover, as discussed earlier, even if the Forest fish populations did exist at the NFMA mandated level, this would still fail to fulfill the tribes' treaty right. Thus the Forest Service's plans for fish habitat are not in compliance with federal law.

#### DEIS Evaluation of Roadless Areas

After years of litigation and controversy over roadless area management, the analysis contained within the DEIS is still inadequate. The site specific information necessary to enable a decisionmaker to make an informed decision is lacking. For example, the description of each roadless area does not include any inventory information on fish population or the relative importance of various fish habitat locations. (Not surprisingly, the analysis does include numerical estimates of timber inventories for each area.) Thus, a decisionmaker cannot know what the effects on fish will be of choosing a particular management prescription. (Assertions that effects will be "insignificant" are inadequate.) Similarly, the public will be less able to help the Forest Service arrive at a reasoned decision if important information is not provided.

#### 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). It is also part of the Forest Service's trust responsibility to the tribes to ensure that it exercises its duty to impose terms and conditions so that the tribes' treaty rights are protected. The tribes possess considerable expertise in this area and would welcome further consultation with the Forest Service to ensure adequate protection.

The Northwest Power Planning Council is in the process of developing a list of potential hydro sites with the least potential for adverse impacts on other resources. Forest Service activities related to hydroelectric power should be coordinated with these efforts.

#### Fisheries

The resident and anadromous streams are identified (Plan IV-50) although specific habitat acres or conditions are not associated with these. The SNF plans to manage the anadromous fish habitat to supply and maintain 90% or more of the inherent smolt capability (Plan IV-20). How is this capability to be determined? What level of smolt production or historical adult escapement is used to set the "inherent" standard? Does 90% of capability refer to all potential anadromous streams or only to those with present anadromous use?

Fry survival is to remain at or above 60% for resident trout and 68% for anadromous fish. Is fry survival going to be measured directly or will a percent fine sediment standard be assigned to spawning gravels? A 68% fry survival corresponds to approximately a 30% fine sediment level based on general relationships in the Fish Response model. Is this representative of field conditions? Judging from the graph cited, 30% fine sediment in the gravel is a threshold point beyond which the reduction in survival becomes very great. This type of standard does not allow for error in measurement, reporting time, or other natural variations. In addition, the use of forest-wide averages of sediment and fish response conceal the potential for serious damage to stocks which may need protecting.

Increase in sediment as percent over natural will be

maintained below 25% for anadromous species and 85% for resident species if State goals are to be attained. The SNF classification of anadromous and resident streams is far too simple. Many resident streams could be low gradient. In this case a sediment yield 85% over natural may not lead to 60% fry survival. Likewise, an anadromous stream of 4th order is apt to be more damaged by sediment of 25% over natural than would a third order stream. Would artificial stocking of resident fish streams be used to comply with expected fish densities?

If 25% is selected as an objective level for anadromous streams, a variation of 5% above this level is allowed (Plan V-5) to be reported on a 1 to 5 year interval. Would these levels be monitored yearly; would a trend be required before reporting; would it be permissible to report on elevated sediment levels 5 years after the fact?

It would seem necessary to explain how sediment above natural for the Forest can be so precisely measured that a 5% variation can be detected. What streams would be established as monitoring points. Would this evaluation be done on the basis of 3rd, 4th or 5th order streams or simply for the Forest as a whole (i.e. monitored only in the main Salmon River)?

#### Stream Channel Stability

In the process of harvesting trees, debris accumulations will be prevented or removed to maintain channel stability. How much debris would be allowed to accumulate before removal and how soon would clean-up be required after entry into the channel? Would large woody debris be allowed to remain in the channel to improve stability; would riparian zones be managed in such a way as to provide continuous natural sources of large woody debris for structural development of the channel; will the entire riparian zone be placed on a rotation schedule? If rotation age is too short, trees will be removed before being allowed to fall into the stream to provide habitat structure.

#### Timber Harvest

Regeneration of DF and PP stands (mesic) would usually be within 20 years (Appendix E-33). Also, planting is not scheduled for small patch when assured of natural regeneration in 10 years (Plan IV-44). Usually reforestation guidelines are for 5 years after cutting. Will periods longer than 5 years be allowed if natural regeneration is planned? What evidence is there that south facing slopes can be restocked within 5 or 10 years after

any harvest method. Are there case histories with different species, exposures, soil types, etc. that can be cited. Why would planting on harsh sites after a first tree removal, not speed reforestation if the site is capable of restocking?

#### Range

The SNF has had the responsibility of managing the condition of rangeland systems for many years. The Plan describes trends in livestock AUMs on the SNF since 1959. There were 62,707 total livestock AUMs used in 1959 and 55205 AUMs projected for 1986 (Plan II-35). The projected demand of all grazing animals is 88,902 AUMs although the grazing capacity is given as 72.9 MAUM (Plan II-32). Is this 72.9 MAUM figure associated only with livestock or with all grazing animals. If this is the capacity for livestock, it appears to leave a very small fraction for wildlife grazing.

Although 89% of permittees reside in Lemhi County (Plan II-35), can a permittee simply be the tenant rancher for a large corporation? The DEIS should provide information on the frequency distribution of herd sizes (e.g., how many permittees have only 50 animals or less?). If permitted AUMs were reduced 36%, it was estimated that 5% of permittees would go out of business and 20% would be severely impacted (Plan II-33). However, a reduction in AUMs from that proposed in alternative 12 to alternative 3 is only 12.7%. This level of reduction would presumably cause considerably less effect on ranchers. Yet, it would indicate a positive effort to improve range conditions. Range forage condition is fair or poor on 48% of the suitable range and there is no trend or a downward trend in condition on 88% of the area. With the number of years given to range management by the SNF and the fact that AUMs have decreased since 1959, the lack of response in range condition can only indicate continued over grazing. We are encouraged to have faith that new techniques for managing herds will place range conditions on an upward trend, yet many questions remain unanswered. For example, (1) How will riparian zones (especially those along anadromous fish streams) be protected if stream sides are not fenced? (2) Wouldn't cattle growth or potential AUMs be larger if range conditions were rapidly restored to good or excellent rather than waiting 20 years (Plan III-3)? Possibly the SNF is not benefiting the ranchers (let alone wildlife) by allowing prolonged periods of poor range. Also the same number of cattle sold could be maintained on fewer acres if range conditions were better. (3) Under what grazing density would the highest forage production occur? At this forage production rate would the forage species composition tend to shift to undesirable species, thereby hindering cattle growth? (4) How frequently are grazing rights revoked for non-compliance with grazing prescriptions and what degree of deviation is tolerated?

#### Wildlife and T & E Species

There is a tendency to think of all amenity resources such as wildlife in commodity terms. Wildlife is protected to a high degree when it is valued by hunters and not when valued by other nature enthusiasts. That is, current populations of economically important MIS species are maintained but only minimum viable levels are maintained for other species (Plan III-3). It is convenient in some ways that elk require forest and open habitat. This becomes a rationale for creating clearcuts—Other species with more narrow habitat requirements (especially matched with extensive spatial needs) are relegated to minimum viable status. Should they become threatened, habitat modifications scheduled even for the next 50 years will make perpetuation of some of these species precarious. Even elk are not given adequate treatment except as befits timber harvest goals. Highly productive (optimum) segments of elk habitat, summer range and winter range are frequently put unnecessarily into conflict with livestock grazing.

It is stated that "no known reproducing pairs" of T and E species and no "critical habitats" are found on the SNF. Therefore, no direct habitat improvement projects are included (Plan VI-25). However, bald eagles do spend 7 out of 12 months per year on the forest (Plan II-7). The emphasis on qualifying as a year-round breeding resident does not detract from the fact that the SNF provides habitat for the bald eagle and consequently should endeavor to plan for it. Many other species were cited as being migratory. Efforts by the SNF to improve fish habitat or encourage the return of fish numbers to present habitat capacity would only tend to benefit bald eagles.

#### Soil and Sediment

The ability to plan forest activities is only as good as the understanding of the capabilities of its separate units. Although the SNF is divided into management zones, what further types of classifications are employed which direct the activities on land units? How well are livestock herd densities matched to range potential. There was little mention of the soil survey data available. How much of the forest has been surveyed? What assumptions are made in declaring a slope suitable for harvest? Is it solely on the basis of slope gradient or are other factors considered. Slope by itself is an insufficient variable in that potential for erosion or slope failure may not always be obviously related to slope. Have all sales proposed for the first decade been surveyed for soil stability? What degree of erosion potential is being allowed on proposed sales? Is it likely that the suitable forest base would be significantly



reduced from the current determination judging from the present rate of discovery of adverse soil-erosion relationships followed by elimination of sites from cutting? That is, is the ability of the forest to sustain a given cutting level apt to decline in future decades when future soil survey data are applied to exclude sites from cutting. This could be implied from the rate at which unstable soils are discovered as soil surveys progress.

Modeling of sedimentation and control of sedimentation appears to follow three main sources: (1) the R1-R4 sediment model, (2) the "state of the art" SALSED model (Plan IV-45), and (3) the Technical Guide to Erosion Control in Timber Sale Areas (Plan IV-45). How do these models interact to contribute to the estimation of sedimentation amounts and control? Although a sediment model (such as the R1-R4) may be "state of the art" in terms of being the sole model available presently which undertakes sediment modeling on such a large geographic scale, it has not been demonstrated that predictions of relative sedimentation levels by this methodology would be better than by much cruder estimates. One benefit of this model is that it does raise in relief the principal causes of sedimentation (e.g., road building). Also, we know that more road building is worse than less road building. To the extent that this concept is expressed in the model, the model is meaningful. However, compounding this type of relationship with mitigation factors, factors for geologic type, slope, etc., gives a false sense of precision. In total, without a more accurate idea of quantitative values for components of this model, there is little hope of meaningfully comparing sedimentation rates between sub-basins.

The primary difficulty with the sediment model is that it is basically untested. As such it should be only an experimental tool and not a management tool used to maximize timber harvest under the constraint of a precise, quantitative standard. After all, the model is qualitative at best. By admission of the SNF, the bed fines measured are generally higher than estimated by the model (Appendix B-26).

Much additional research on the sediment response of resident trout is needed (Plan II-31). It is our feeling that much additional field work needs to be done on the response of anadromous species to bed fines since much of the sediment model fish response information is derived from laboratory studies.

Also, much more research on the physical process of erosion on forested logged and roaded watersheds need to be done in relation to response of bed sediments. In discussions of response of bed fines in the R1-R4 model it is not clear how cause and effect is really modeled. That is, what lag times are involved in erosion and response in the channel? What is the expected rate of decline in bed fine sediment under conditions of no sediment addition from upstream? Is present bed fine sediment able to be taken as an index of present watershed sedimentation levels (e.g., the last year period) or is it really an average of cumulative effects operating over a several year period? The

general concern here is that faulty cause-effect relationships between erosion and bed sediment seem to be present because of uncertainties in the rate of response of bed sediment to management actions, the temporal scale chosen for consideration of this problem, and the degree of consideration given to cumulative effects.

A more extensive critique of the weakness of the R1-R4 sediment model is provided in the Appendix to our comments.

#### Wilderness and Roadless Area Management

The proposed plan is conspicuous in its lack of additional acres of proposed wilderness. Most other alternatives had wilderness acres set aside. If it were pre-determined that no wilderness would be allowed, more choices for treatment of roadless acres should have been provided. The FC-RONR should basically be considered as a national forest in its own right rather than being split among surrounding forests. This policy makes it always possible to project better forest-wide preservation of natural integrity or to show smaller percentages of effects of timber cutting by adding FC-RONR acres when necessary.

The importance of wilderness to maintenance of species has not been adequately treated. Retention of low site productivity old-growth acres as refuges for certain game species is not necessarily equivalent to retention of more productive old growth sites or sensitive wildlife areas. Optimum areas for wildlife and fish should be identified in relation to the intensity of management prescribed for them. Many management prescriptions are vague in their Recreation Opportunity Spectrum (ROS) treatment. For example, prescription 5a may have SPNM, SPM or RN (semi-primitive non-motorized, motorized, and natural, respectively) management. It seems that the non-motorized prescription is not really considered adequately and may be totally excluded. The heavy emphasis on roaded management, ORV emphasis on roadless areas and the lack of SPNM areas makes it incumbent on the Salmon Forest to explain why no wilderness protection is justified. Are we to take comfort from the fact that in roadless areas the integrity of mountain peaks remains "unaffected"?

The DEIS praises the wilderness values of the Lemhi roadless area--spectacular scenery; excellent wildlife and fish values; and contribution of good water quality to downstream areas. Despite the fact that it has exceptional wilderness value and was previously considered for inclusion as wilderness by the SNF under RARE-II, it is not now deemed suitable. Over the next decade plans have been formed to remove about 6 MMBF of timber from this area.

The discussion of the Lemhi Range in the Appendix (C33-C47) highlights some typical problems. We are expected to be comfortable with the idea that in roadless areas, there often will be no activity which will preclude future consideration of the area as wilderness. What seems to be happening though is that what we thought was roadless area does not coincide with new boundaries. If the SNF has plans for timber harvest in the Lemhi will this all be done in areas identified as having "existing development" or in "planned development" areas? Why do the roadless area boundaries shown on maps include areas designated as having existing or proposed future development?

You clearly cannot have timber harvest and also claim to be doing nothing which will detract from future consideration as wilderness. Are we, in actuality being offered initially a lower roadless area base so that the statement can be made that no adverse actions will occur on these acres? If the roadless area is such excellent wildlife habitat with such large population densities, why do forest managers deem it necessary to improve on nature by applying treatments?

In the proposed alternative, over 69% of the SNF is open to mineral entry with no restriction except for surface protection measures. What are these measures and how do they relate to protection of wilderness values and maintenance of wildlife values? The roadless area has many mines indicated such as the Portland mine. The statement is made that areas disturbed by mining will not be considered for wilderness? Does this mean that only semi-primitive acres can be considered for wilderness? Obviously not, as many semi-primitive areas have mines. Wilderness and proposed wilderness which is formally withdrawn is open to mineral entry subject to wilderness preservation (Plan II-51). There seems to be no restriction of the capacity to develop mines in wilderness but a ready willingness to write-off wilderness consideration for any roadless area that has mining activity. Such a policy is facially at odds with preservation of fish and wildlife habitat.

The proposed alternative could then read: wilderness character will be preserved on certain semi-primitive areas within the roadless area, unless mining developments take place which can then eliminate more acres. In addition, since development of a road network is scheduled to occur primarily during the first two decades of the planning horizon, an excessive number of acres become committed to the proposed prescriptions. This style of roading would not be feasible if the SNF were constrained to a policy of economic soundness. Timber sales plus road building are particularly heavily subsidized in the early decades. If Forplan is optimizing PNV, why does it select all the capital expenses up front in the 50 year period? Are these roading decisions made outside of Forplan? Why does the SNF not use the advancing front style of road building?

The SNF plans to retain only 34% of roadless areas outside the FC-RONR as semi-primitive (DEIS-IV-14). Of these acres the Visual Quality Objective (VQO) is to plan for retention on 18% of the acres. The remainder of the semi-primitive acres have partial retention in which man-made changes are noticeable (DEIS II-17). Is partial retention grounds for disqualification as future wilderness? The amount of SPNM classification is reported only as MRVD's. Does partial retention correspond to SPNM?

Within the acres allocated to a suitable timber base there will be 10% retained as old growth. Are these acres to remain indefinitely out of the suitable timber base or will they be cycled into the rotation plans? That is, will they remain as stationary islands or will they be "floating islands" of old growth? Although these acres are passed off as being intended for maintenance of viable populations of old growth dependent species, there is no indication whether these species would be destroyed in any harvest action or whether they could follow the floating old growth acres successfully. Maintenance of at least 10% of the growing volume as old growth (i.e. maximum rotation age of 160 years) is the only possible silvicultural alternative if one wants to be able to harvest a decade's worth of trees after the forest is totally converted to managed condition.

#### Concluding Perspective

Water is a binding agent in the Salmon Forest, connecting its animate and inanimate elements into a functioning, interdependent whole. Because it is a wellspring, it is a proper focal point for management effort.

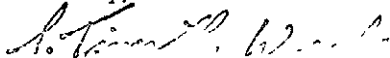
Our connection with Columbia Basin fish resources makes us constantly aware that, in reality, perpetuation of our lifestyle depends upon maintaining water quality. Our effort to assure healthy, ongoing forest ecosystems reflects our recognition that healthy forests produce good water, and that the fish we depend upon will not tolerate any less. This fact makes forest fish resources a superb indicator of forest well-being. The fish are a barometer of water quality; water quality is a barometer of ecosystem health. Maintain conditions suitable for fish and the forest will continue.

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 Heindl (biologist),  
or Dale McCullough (biologist) at (503)-238-0667.

Sincerely,



S. Timothy Wapato  
Executive Director

#### APPENDIX

Specific Comments on "Guide for Predicting Sediment Yields from Forested Watersheds" and "Guide for Predicting Salmonid Response to Sediment Yields in Idaho Batholith Watersheds"

#### INTRODUCTION

The models predicting natural and management-induced sediment yields and salmonid response to sediment constructed by the Northern and Intermountain Regions of the USDA Forest Service are, in general, worthwhile attempts to assemble many of the factors interacting in watershed systems and leading to various levels of salmonid densities and survival. The model essentially estimates natural and management-induced sediment yield based on indices of land type and hazards, fire effect, management activity (roading or logging) and mitigation type and sums the sources of erosion to get an overall erosion rate. The degree of enhancement of sedimentation over natural levels is then plugged into a set of biological equations which predict changes in substrate embeddedness and fines at depth to estimate impacts on summer/winter carrying capacities and percent survival of fry from spawning gravels. Models of this sort are useful in a variety of ways. They can serve a role in (1) decision making, (2) hypothesis generation, and (3) hypothesis testing.

As a decision making tool this model is unsuitable for providing absolute predictions of sediment and salmonid response to management as admitted by the model developers. It was assumed that the model could at least serve as a tool to assess relative impacts of management plans and mitigation procedures and to estimate relative costs. This may or may not be a reasonable assumption depending on whether the factors involved act in simple linear or additive ways.

As a tool for hypothesis generation the model would find its greatest application. The model is obviously only a first approximation, barely tested even for its standard land type. As such it could not be used to extrapolate to other lands. In its developmental phase the relationships among watershed factors assembled should be examined experimentally to assess model adequacy, sensitivity and degree of variability within a given area. New hypotheses developed from this procedure may lead to improved modeling.

It may be legitimate to export this methodology as a general framework to other regions but to apply results from the model uncritically could only lead to serious error. While it is not our intention to attack a promising framework in its developmental stages, the eagerness to wholeheartedly endorse an entirely untested model as a standard policy making tool necessitates pointing out the number of places where errors can be compounded in this model.

# DETERMINATION OF EROSION RATES

A great number of factors are used to calculate levels of erosion resulting from natural and man-induced sources. These factors will be discussed in order of their use in calculation of erosion from natural sources, fire and road related sources.

## Natural Sediment Yield

(1) Mass erosion hazard rating. This index is quite subjective and at best would give relative measures of hazard. The curve plotting mass erosion hazard rating vs. average natural sedimentation rate was established for the standard land type based on only 3 points. This is inadequate as a standard and consequently makes extrapolation additionally precarious. The range of average annual natural sedimentation rate for the standard area was stated as 10-100 T/mi<sup>2</sup>/yr purportedly dependent only on changes in hazard rating. The combined effect of hazards and man-induced activity is not known. It seems strange that for two processes considered in the model to be independent, that natural erosion is considered to be a function of mass erosion vs. mass erosion hazard rating. Even this relationship would have to vary with every increase in management activity.

(2) Option to use USLE. The US Soil Loss equation, though accepted as inadequate to represent erosion of forested lands, is presented as an alternative when better estimates are unavailable.

(3) Option to develop a relationship between hazard index and erosion for each land type. This would be a needed but extensive data collection activity.

(4) Calculation of average natural sedimentation rate. The granitic reference land type was assigned a mean erosion rate of 25 T/mi<sup>2</sup>/yr. In order to extrapolate this value to other land types we need to know:

(a) Geologic erosion factor. This term is derived from a mean surface aggregation factor. The suitability of such a factor is unsubstantiated. The coefficient of variability associated with each erosion factor is between 35 to 88%.

(b) Land unit slope factor. The average slope for a land unit is plugged into an equation to compute land unit slope factor. The relationship between slope factor and erosion is questionable. Some gentle slopes may have greater erosion potential than steep slopes depending on soil type. The relation between slope index and erosion must vary with every soil or rock type. In addition, greater mean slope can incorporate a greater variability in slope than on gentle terrain. Local erosion on the slopes steeper than average in a land unit could be a major source of sediment.

(c) Slope sediment delivery ratio. This value is estimated from a procedure in WRENSS.

(5) Sediment routing. The sediment delivered to the drainage is routed to critical reaches using coefficients derived from a plot of drainage area vs. routing coefficient. It is unclear whether this relationship was adequately experimentally derived and whether a separate relation would be applied to each different land type or cluster of land types. Even if the relationship is adequate in general it could not be applied to specified reaches which may be of great value in spawning or rearing. At best these values could represent a relationship for an entire third order channel, for example. There is no assurance that at any given drainage area one would find a given channel type (A,B,C). Drainage network structure is variable and at 10 mi<sup>2</sup> there may be a type B channel in one network and a type C in another.

## Effect of Fire on Erosion Rate

Erosion rate is computed using as a standard a high intensity burn on granitic soil consuming 40% of the vegetation with side slopes of 45%.

(1) Recovery curves. The recovery from fire is based on recovery from a 'standard' high intensity burn. This shows a dramatic decline in erosion over a five year period. In a climate typical of Idaho, extremely low summer precipitation in a year following fire could seriously slow the recovery process and lead to aggravated conditions contrary to the optimistic picture painted by a standard curve.

(2) Calculation of total fire erosion. Total erosion due to fire is calculated as natural erosion plus fire caused erosion. If an entire land unit burns, its total erosion becomes its fire erosion plus its natural erosion. It appears that natural rates are added twice unless the standard fire erosion rate already had natural rates subtracted. Even so, there is a conceptual flaw which is possibly unavoidable. If the system burns totally, it may be changed sufficiently so that a standard background natural rate does not really apply to it any more. That is, some land units could react so severely (eg hydrophobic reactions of the soil) that the soil has virtually changed type and natural rates no longer apply. In addition, it is doubtful that the scaling of high, medium and low intensity damage to land units would be the same for all land types.

(3) Fire intensity factor. There are only three classes of fire intensity. Since the major key in distinguishing high and medium intensity burns is the destruction to litter and soil A horizons, a great sampling effort would be required to adequately map a large burn. This distinction in high vs. medium burn incorporates a factor of 20 in effect.

(4) Geologic erosion factor. The effect of fire, logging and road building in leading to enhanced erosion are all considered to be fixed relative to a given soil type (geologic erosion factor). It is unlikely that a high intensity fire and clearcut

logging of a given land unit type would yield the same relative increases in sediment as they do on another land type. A new scaling of fire effects is probably necessary for each soil type.

(5) Calculation of sediment delivery. The sediment delivery is a function of slope sediment delivery ratio but this ratio is probably greater after a fire than under natural conditions

(6) Sediment routing to a reach. Channel hydraulics is a very complicated mathematical undertaking and has not been well dealt with for natural channels. Aggradation and degradation of reaches is a local phenomenon varying seasonally, yearly and with changes in management. Prediction of effects on critical spawning areas is not feasible without intensive local investigation and even then is only a pioneering investigation

#### Enhanced Erosion Due to Road Construction

(1) Standard road. Estimation of erosion from roads is based on a standard road on the Idaho batholith built in compliance with certain engineering standards. A standard road suitable for one soil type may not be suitable for another soil type. This implies that roads must be engineered so that they provide no more than a certain erosion rate from their surface area and that by concentrating water they do not enhance erosion off the road surface. If road construction varied according to soil type, erosion rates from roads could possibly be made to be in proportion to geological erosion index (assuming the validity of a single index). Otherwise the geologic erosion index by itself is insufficient to determine relative erosion from road construction

(2) Mitigation procedures. A list of mitigation procedures to be used accompanying road construction is presented. These measures are admitted by the authors to be highly variable but only mean values are to be applied. These measures are assumed to be additive to a maximum of 80% reduction in erosion. These procedures are apt to have greatly different effects or probability of success under different land types and climatic conditions. For example, it is assumed that seeding and fertilization is an effective mitigation procedure but poor germination success due to climatic anomalies, slope aspect, etc. could easily negate the benefit.

#### SALMONID RESPONSE

After calculation of the increase in erosion over natural conditions due to man's activity, one predicts salmonid response resulting from a change in habitat conditions indexed simply as substrate embeddedness and fines by depth. These habitat changes are then related to predicted changes in embryo survival, and summer/winter carrying capacity.

(1) Summer/winter carrying capacity. The regressions imported to the model to explain the relationship between fish density and embeddedness are based on very few data points. In some cases only two or three points are used and though the trends may be logical, they are far from reliable for prediction. It is uncertain, for instance, whether fish densities started at carrying capacity and then were measured the year after disturbance. Because so few points are included in each plot and the fact that the standard relationships between sediment and survival are derived from a laboratory flume study, the response may have little resemblance to natural conditions experiencing different flow regimes, disease factors, spatial organization of habitats, etc.

(2) Substrate embeddedness vs channel type. There appears to be little significant difference between channel types A and B regarding substrate embeddedness vs percentage increase over natural sediment level. Type C channels are taken to have a mean embeddedness of 25.2% at 0% increase over natural. Surely there is a great degree of variability in natural levels. Also the use of only three channel types for an area the size of the Clearwater Forest seems inadequate. Streams at 25 mi<sup>2</sup> drainage area could conceivably be greatly variable in character

#### CONCLUSION

The modeling of sediment and salmonid response to management is a worthwhile effort to lay out important variables and to begin to scale their effects and interactions on a given land type or cluster of different land types in a drainage. The model is also a useful conceptual prototype. However, the highly experimental nature of this model makes it inappropriate as a blanket management prescription, even for the standard land type for which it was created. One serious failure of the model is its lack of ability to estimate the worst case scenario. Simply considering the potential variability in each factor described above and propagating the error statistically, one calculates very high degrees of uncertainty associated with the final answers. For example, when using only 10 factors each with 100% relative error, the total relative error would be 316% at one standard deviation. Recovery from disturbance (roads, fire, logging) in the model is all based on standard responses. There is no consideration given to probabilities of anomalous climatic events nor to the variability associated with any of the factors used. Even standard methods for road construction rely on planning for 50 year storms. A heavy reliance is placed on rainfall patterns, intensities and magnitudes following a norm. Events of low frequency and high magnitude could have serious consequences when falling after a significant management activity. The failure of this to be accounted for is especially evident relative to mass failures which could become a dominant source of sediment with the combination of logging and severe storms. Erosion due to mass failure is given as the least

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understood component of the sediment model. The response of all the different land types to management activities is inadequately known. The tendency to average erosion due to mass failure over many years obscures the potentially serious impacts which could occur in any given year.

VI-256



# Lemhi Soil and Water Conservation District

P O Box 550 - Salmon, Idaho 83467 - Phone 756 2425 **0383**  
SALMON N F

JAN 15 '86

SUBJECT Resource Salmon National Forest Plan

DATE. January 10, 1986

TO Mr. Dick Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

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SUP			
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TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
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2 CC's TO J. W. N. 1/15/86

Dear Mr. Hauff

Thank you for the opportunity to review and comment on the Proposed Forest Plan for the Salmon National Forest. As the Lemhi Soil and Water Conservation District Board, we are concerned with land management issues that affect our cooperators

We feel the proposed plan is as well balanced as a plan of this scope can be, considering the complexity of issues. We think the proposed plans protect and enhance the resource base while providing for a multiple of uses at fairly intense levels.

We are particularly pleased with the range section that emphasizes continued current levels of stocking with on-going allotment planning. The continued coordination of work between Forest Service, Bureau of Land Management, State and private range owners should lead to improvement in range conditions as well as increased stocking levels.

We are also pleased to see that the Forest Service recognizes a need to collect fees from other users such as the recreationist to assist in maintenance of roads. We would suggest a toll be set up to collect from users below the North Fork Ranger Station to assist in paying for



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Salmon  
National  
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P O Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

Dennis R. Studebaker, Chairman  
Lemhi Soil and Water Conservation District  
P.O. Box 550  
Salmon, Idaho 83467

Dear Mr. Studebaker:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

Under existing legislation the Forest Service has the means to assess road maintenance costs to commercial users, e.g., outfitters and guides, timber purchasers, and mining companies. However, we do not have the authority to charge individual private users other than for very specific services such as qualified designated campgrounds. Legislation is pending in Congress that would give the Forest Service the authority to expand those services or facilities for which a fee can be charged.

Within appropriated funding, noxious weeds will be controlled as needed to protect and enhance the value of other resources. The objective is to treat a sufficient amount of acreage to ensure the eradication of new infestations, prevent the spread of existing infestations to adjacent lands, and gradually eliminate existing infestations. Integrated Pest Management





Dennis R. Studebaker

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the upkeep of the road This could be an electronically controlled toll to collect \$2.00 per vehicle

Noxious weeds are a concern to our cooperators and feel the plan's recognition of this problem will continue to bring about action to control or eliminate them on Forest Service land as a seed source for private land

We are also supportive of the balanced approach you have used with wildlife to other users It seems in the past that other users were taking a back seat to wildlife

We would also like to support your decision not to recommend any further wilderness on the forest. We think that your proposal to manage a portion of the forest as non-motorized will allow for the same resource values as wilderness, but leave them open for further evaluation as needed

The following is a general statement about riparian lands. We feel these lands are of special significance and will come to the forefront in the next few years We believe there are problems, but these need to be dealt with as part of the allotment management plans. They need to be managed as a part of the allotment and not excluded from and managed separately We hope fencing and exclusion of these lands from allotments is not a part of the forest plan.

One other item we would like to address is minimum stream flows Water

(IPM), the concept of using interdisciplinary expertise to plan for and implement a control program using a combination of biological, mechanical, chemical and preventive management will be emphasized

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas Another is the high level of interest from motorized users who would be excluded from their preferred activities Concerns about the availability of adequate timber applies and the potential future loss of water rights or reductions in livestock grazing have also been expressed

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

Riparian zones are indeed areas of special importance to many resources. Management concern for these areas has been expressed in National Forest Management Act direction to protect riparian zones and their dependent resources (water, fish and wildlife) Planning direction, expressed through numerous standards and guidelines, outlines management requirements associated with resource management activities necessary to protect and preserve riparian areas on the Forest. Multiple use activities can and do influence the nature and condition of riparian areas. Not all of these influences are detrimental, but some are, and changes in use will be necessary to comply with legal intent. Resolution of conflicts will be completed on a site and/or project specific basis using options appropriate to the conditions and circumstances involved.

Fencing is but one of many tools that may be used to meet the riparian management objectives. Use of fencing, as well as other management options, will be considered on a site specific basis. Environmental assessments will be made to evaluate all reasonable alternatives and the final decisions to resolve riparian zone management issues will consider all aspects of the specific area







Dennis R. Studebaker

3.

rights and stream flows are a very complex issue and one we hope the Forest will not get into. The Forest should not get in a position where it is trying to acquire water rights that affect the water right of downstream users.

Sincerely,

Dennis R. Studebaker, Chairman  
Lemhi Soil and Water Conservation District  
Salmon, Idaho

DRS/ras

Federal instream flows (Federal Water Rights) are claimed by the Forest Service to fulfill the responsibilities described in the Organic Administration Act of June 4, 1897, and the Multiple-Use Sustained Yield Act of 1960, as well as other legislation. The Organic Administration Act specifically states that the securing of favorable water flow is primary a purpose for establishing National Forests. Instream flows are needed for maintaining stream channel stability, providing adequate flow for the transport of sediment, and the protection of associated riparian habitat. Instream flows are also important in maintaining stream channel conditions in a way that provides downstream users with high quality water, proper distribution and timing, and protection against flooding.

Forest Service policy has been to maintain current stream conditions, and recognize State Water Rights. Long-term Forest Service policy as stated in the Final Plan will be to continue to recognize all existing water rights issued by the State of Idaho. We are also obligated to seek those Federal Water Rights (both consumptive and instream) which are needed for management of the Salmon National Forest.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0462

## Conservation &amp; Education


**MAGIC  
VALLEY  
FLY FISHERMEN**


January 12, 1986

Mr. Richard Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

Info	0	Action	<input type="checkbox"/>
SUP			
IMP	1 2 3 4 5 6		
TAF	1 2 3 4 5 6		
CLM	1 2 3 4 5 6		
RRWW	1 2 3 4 5 6		
AO	1 2 3 4 5 6		

*cc: to [unclear]*



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Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Dick Bonamarte  
Conservation Chairman  
Magic Valley Fly Fishermen

Dear Supervisor Hauff:

On behalf of the Magic Valley Fly Fishers, I would like to hereby give some input regarding the management of the forest. We are opposed to the taxpayer-subsidized timber sales, especially the plan's proposal to log key elk range. Further, we ask that bighorn sheep, elk and antelope be given priority over cattle and sheep in grazing conflicts and grazing allotments.

We support "Alternative 3", of the plan, which puts "Emphasis on non-market outputs and values such as water, fish, and wildlife, and dispersed recreation." We support continued designation for the Lemhis, West Bigholes, Anderson Mountain, and Italian Peaks to permanently protect them for hunting, fishing, camping, horsepacking, backpacking, and wildlife protection.

We oppose further degradation of trout, steelhead, and salmon streams. We support these streams being managed at 90% of potential and that cattle, sheep and logging be eliminated if and where necessary, and that past damage be repaired by those responsible for the damage. Further, we support roadless designation for Allen and Goat Mountains, Camas, West Panther, Big Deer Creek, Long Tom, Little Horse, Duck Peak, and Oreana roadless areas.

We sincerely hope that those of you working on this plan will come up with a final draft that is more serving to the public interest than the corporate greed that seems to be prevalent these days.

Very truly yours,

*Dick Bonamarte*

Dick Bonamarte  
Conservation Chairman

Dear Mr. Bonamarte:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will





Dick Bonamarte

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be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire SNF. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurable with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

The Proposed Plan presents detailed information in Chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions. Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for



Dick Bonamarte

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all fish species. This means that anadromous streams will be managed at least at 90 percent of production capability, and resident trout streams will be managed at slightly less than 90 percent of production capacity.

Logging and grazing sometimes do adversely affect the nature and condition of streamside riparian areas. Resolution of conflicts will be completed on a site specific basis using appropriate options.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of roadless designation for Allen Mountain and some areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980, the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the [Frank Church] River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom, and Blue Joint vicinities. The bulk of the Allan Mountain area will also be managed for semi-primitive unroaded opportunities.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



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# OUTDOORS UNLIMITED, INC.

Working Today to Develop The Multiple Use of Public Lands

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January 28, 1986

JAN 31 '86



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P.O. Box 729  
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Reply to 1920

Date

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Kathy Schuchman  
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Mr. Richard Hauff, Forest Supervisor  
Salmon National Forest  
P O Box 729  
Salmon, ID 83467

Re Salmon National Forest Plan - Proposed

Dear Mr. Hauff

Outdoors Unlimited is a national multiple-use organization dedicated to the management, access and wise use of all natural resources found on federal and state lands. We feel commodity uses and motorized access and recreation are in the greater interest of the general public than increasing wilderness acreage.

All the multiple uses can accommodate the other uses in an active manner, whereas wilderness, a facet of recreation, cannot accommodate all the other uses, hence limits the potential of full option resource management.

We feel the proposed Salmon Plan Alternative 12 (preferred) is the most proper alternative displayed.

Alternative 12 recommends no more wilderness. We currently have more wilderness in the Central Idaho, Southwest Montana area than can be justified or used. 8 million acres of wilderness within 200 miles of the Bitterroot National Forest is over saturation. Alternative 12 also settles the roadless area issue returning those acres back to multiple-use management. The proposed semi-primitive motorized recreation areas is a management proposal that retains management options for future resource demands.

Alternative 12 meets the soil, water, wildlife and fisheries demands while still maintaining the established commodity uses such as mining, energy, timber, grazing and developed recreation.

In the array of alternatives offered, there was none that suggested declassification of existing wilderness. It seems only proper such an alternative be offered. By offering alternatives that propose no more wilderness to extensive wilderness, the political compromise system usually increases the amount of wilderness even when no established need can be shown. Too often this nation cannot address the economic, social, environmental and political challenges we have, and we opt for the short term "harmless" addition to the wilderness system and sweep the long term problems under the "goodness" rug. It's a most human trait, but it's time we fully address the future -- food, fiber, shelter, education, job opportunities, stable communities, a balanced budget and recreation opportunities for everyone. The managed forest can provide the resource means to help satisfy the broad range of public needs and public desires.

Info O Action ☐  
SUP ☐  
LMP ☒ 1 2 3 4 5 6  
YAF ☐ 1 2 3 4 5 6  
ELM ☐ 1 2 3 4 5 6  
RRWV ☐ 1 2 3 4 5 6  
AO ☐ 1 2 3 4 5 6  
2 cc's to 1/31/86

Rem Kohrt, Trustee  
Outdoors Unlimited, Inc.  
P.O. Box 373  
Kaysville, Utah 84037

Dear Mr. Kohrt

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Wilderness is designated by an Act of Congress. An Act of Congress would be required to declassify a wilderness area. Issues and concerns relating to declassification of wilderness were not initially identified and hence an alternative was not developed. For these reasons an alternative for declassifying wilderness was not considered.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

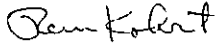


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Salmon National Forest Plan  
Page 2

The Salmon National Forest has shown a lot of good sense, balance and belief in their ability to manage in choosing Alternative 12. If you can't stand the heat and feel compelled to compromise away from Alternative 12, please put Outdoors Unlimited down as favoring Alternative 5.

Sincerely,



Rem Kohrt, Trustee

RK/be

cc Senator McClure  
Senator Symms



Rem Kohrt

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Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



P.O. Box 729  
Salmon, ID 83467

NOV 12 '85

Because elk are the premier big game species in the State of Idaho and the Salmon NF, I will begin with a discussion of this species. As you remember, in 1980 Idaho Department of Fish and Game Director Jerry Conley wrote you (and all other Idaho Forest Supervisors), requesting that you manage all of the key elk ranges in the State at 100% of potential. He defined key ranges as those that represent the most ideal habitat and can support a higher density of elk than surrounding areas. I inventoried the Salmon NF and found that a total of 270,500 acres or 20% of the Forest outside of the existing wilderness fell into this category. I also calculated that 61% of the summering elk were found on

INFO 0 ACTION 0

SUP						
EXP	1	2	3	4	5	6
ZAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RWH	1	2	3	4	5	6
AD	1	2	3	4	5	6

Jee Jensen 11/13/81

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Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all





Hadley B. Roberts

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these lands, indicating they are some of the most productive wildlife habitat on the Forest.

You say that you will be able to provide habitat for 7365 elk under this alternative. By comparing the map of the Preferred Alternative with a map of the key elk summer range, over half of the existing key elk summer range will be eliminated by roads and timber harvest during the life of this plan. All of the predictive models of the Salmon NF and other agencies indicate that your habitat capability will probably be less than half of this figure. Please furnish me a copy of your complete methodology and calculations of these erroneous figures. They are very suspect.

I would like to know your rationale for timber harvest in these areas in the first place. You certainly recognize their value because you say on page II-23 of the Plan, "Table II-5 indicates a disproportionately high percentage of animal use is occurring on the optimum lands when compared to the amount of land available." By definition, key elk summer range has up to 60% of the land in non-forested habitats which automatically reduces their timber-producing capability. That and the fact that most of them are located at high elevation (over 7000 feet) with short growing seasons, key elk summer range areas should be regarded as being among the poorest timber growing sites on the entire Salmon NF.

So, why I ask, are you deliberately creating a controversy between wildlife and timber resources? A low value resource such as timber should never be allowed to detrimentally affect the highest value wildlife habitats for any reason. This would be just as ridiculous as a prescribed burn for wildlife management purposes on a timber site producing over 100 cubic feet per acre per year.

Another matter of concern is the maintenance of the Dahlenega Creek - Sheep Creek Elk Migration Corridor. Crkovic (1976) in a FS financed research project pointed out the extreme value of this area for elk during their migration. He also recommended that the area remain roadless to protect these values. The preferred alternative map shows that key parts of Dahlenega Creek, Sheep Creek and Little Sheep Creek will be roaded and logged using a high timber prescription, completely ignoring the recommendation. Roading and logging these drainages can only result in a major catastrophe, ranging from shifts in currently used elk and deer migration trails to complete abandonment of the Sheep Creek - Silverleads Creek big game winter range.

As you have stated, the alternative does not meet IDF&G's management objectives for either elk or deer. I have not found what selection criteria you used in choosing your

wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (Semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal. The selected plan increases the amount of semi-primitive area in the Sheep Creek and Pierce Creek drainages.

The allowable sale quantity proposed in the Draft Forest Plan is 21 i million board feet per year compared with approximately 38 million board feet per year during the 1970's and early 1980's. The difference is due partly to increased limits placed on timber harvest to produce other resources and partly due to changes in the timber base brought about by either new information or past treatment. The last timber management plan calculated the allowable sale quantity based on certain growth rates, reforestation periods and other resource objectives, all of which have been revised to include more current information. The allowable sale quantity proposed in the Forest Plan reflects the yield that can be maintained under the existing situation, including other resource objectives and the existing timber base. As shown in the benchmark alternatives analysis, considerably higher levels of timber harvest are possible but were not selected.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.





Preferred Alternative. I would like to know if their objectives were considered in anyway, and if so, how much?

In brief, Alternative 12 gives far too little emphasis to elk, one of the major resources of the Forest and creates too many conflicts between timber and wildlife on the highest value wildlife producing lands.

#### TIMBER MANAGEMENT

Conversely, Alternative 12 places far too much emphasis on growing timber, which you say is producing a current net growth of only 26 cubic feet per acre per year. This places the entire Salmon NF at a point only slightly above what is considered commercial timber, 20 cubic feet per acre per year. Compared to lands in Region 6, which produce up to 225 cubic feet per acre per year, the Salmon NF contribution to national timber supply is almost nothing. Therefore, why should it be emphasized forest-wide as a major product at the expense of water, fish, wildlife and recreation?

Since the mid-1950's when the Forest Service encouraged the timber industry to move onto the National Forests on a large scale, the local mill has been subsidized by roads, cheap logs and an overharvest of the available timber supply. I have heard you argue that the Forest has not been overcut. However, your new sustained yield allowable cut is calculated to be 21 MMBF per year, which is 16 MMBF per year less than it has been for approximately 30 years. This, to me, is an over cut of 480 MMBF (almost 1/2 billion BF). These trees should still be standing on the mountains providing usable hiding cover for deer and elk, streamside cover for trout and salmon and protection of watersheds.

A major timber / wildlife conflict is the Salmon NF's poor track record in reforesting Douglas-fir habitats. After 14 years of observation, I have not seen one site on the entire Forest where a Douglas-fir stand has been harvested and regenerated to the point where it is elk hiding cover (trees over 8 feet tall). Harvesting many of the severe sites with the shelterwood system certainly has to be contributory to this problem. At a Regional Silviculturist Workshop held on the Forest a few years ago, there was widespread agreement among the Silviculturists that the method was not working.

I would like to see any evidence that this controversial "timber mining" system is working or is expected to work in the future. It is having such a damaging affect on big game habitat by its long term removal of cover that I feel you should prepare an EIS on this aspect of timber management alone.

Hadley B. Roberts

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Examples of poor regeneration in Douglas-fir habitats can be found. Many of these are old "diameter limit cuts" where the better leave trees were cut. Many of these areas would be well regenerated if current methods had been used. Current treatments for shelterwood cuts include

1. Providing properly spaced suitable leave trees for seed and shade,
2. Providing site preparation by destroying suppressed and diseased trees that prevent a suitable stand from being established and where possible scarifying or otherwise exposing a seedbed, and
3. Recognizing those areas that can't be regenerated (unsuitable lands) and recognizing those areas that must be planted.

Due to the uncertainty of weather and seed crops, the shelterwood method does take some time, however, and many of our recent cuts are just starting to regenerate. Recent stocking surveys have verified that successful regeneration can be expected in a reasonable time when proper techniques are applied. Improved technique will result in much better establishment and growth than in the past. It will be necessary to continually monitor our regeneration efforts.

The Salmon had a bad year for burned acres in 1985; in fact, it was the worst year in recorded fire history. The primary contributing factor was the condition of the fuel complex and, more specifically, the large fuels which were influenced by the dry weather patterns experienced in the winter and spring. The abnormal dryness of the larger fuels caused them to be involved more rapidly than normal in the early stages of a fire, causing extreme fire intensities to be generated shortly after fire ignition, making it difficult to impossible to contain them with initial attack forces. Examples: The Butte Fire went from a spot at discovery to a 5-acre crown fire in less than half an hour, the escape from the Butte Fire developed from an undetected hotspot within the fire interior to a high intensity crown fire in a matter of minutes. Because of the fireline intensities, crown involvement, and spotting potential of the fires in the 1985 season, conventional direct attack control strategies could not be used. The resulting indirect strategies involved the commitment to substantially larger burned areas than would be the case under more normal burning conditions.

In the initial suppression considerations for the Plan it was felt that fire suppression could be managed through broad strategy statements without tying managers to specific tactical considerations, however, after the 1985 fire season, we feel as you do that specific standards are necessary for the use of heavy equipment on the Salmon. These standards will provide guidelines to the incident (fire) management team pertaining to line width, fire rehabilitation considerations, and firefighter safety.

Unplanned ignitions will only be utilized in the Frank Church--River of No Return Wilderness. The utilization of prescribed fire outside the Wilderness is covered on pages IV-73 and IV-74 under "Vegetation Treated by Burning (P15)





Pre-commercial thinning is another area of great wildlife concern that was glossed over in the Plan. There are environmental problems associated with loss of large blocks of big game hiding cover for extended periods of time; and there is also the question of whether it is economically sound? Do you have evidence to support the fact that pre-commercial thinning is justifiable economically? If so, where? If it is economically sound in only portions of the Forest, I suggest you limit its use to only those areas. Again, I suggest an EIS be written for justifying the practice of pre-commercial thinning on the Forest.

The economics of timber management are also questionable. I wish to point out that timber costs in every alternative exceed timber benefits, the reverse being true for amenity values (recreation, fish, wildlife and wilderness) where benefits always exceed costs. Furthermore, the Preferred Alternative has the lowest present net value of any showing positive values and far lower than any that emphasize amenities. To put things in perspective, amenity values in the preferred alternative are the only reason the Preferred Alternative had a positive PNV.

In the era of vast budget deficits, the Preferred Alternative does not show well either. Table II-7B in the DEIS shows the Return to Treasury is one of the lowest of the 12 alternatives and far lower than any emphasizing amenities.

#### RANGE MANAGEMENT

While still employed by the Salmon NF, I participated with Range Conservationists and Wildlife Biologists in an inventory of areas of conflict between livestock and wildlife. The results showed that on the 188,000 acres of suitable rangeland on the Salmon NF, there were 33,500 acres of on which there were existing conflicts between cattle and wildlife in general. Of these, there were conflicts between cattle and elk on 18,400 acres. These included inter-specific competition for forage and space on calving areas, wet meadows and willow complexes and key forage areas.

This report was prepared for the planning process to point out problem areas and possible solutions. It was conspicuously missing from the DEIS, with no mention being made of it. Why? I suggest you add this study to the final DEIS, including any conclusions drawn from it, and what will be done to mitigate these conflicts.



Hadley B. Roberts

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We agree that the California Bar Panger Station should be preserved. It has been submitted for entrance to the register of historic sites in Idaho. Funding has also been requested to initiate the restoration of this site.

In reference to your request that KESR maps be included in the plan document, these maps are available for viewing in the Supervisor's Office. Including these maps in the Forest Plan would simply add bulk to an already large document.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



ROAD MANAGEMENT

It is difficult to comment on this section because it is unclear what you plan to do. I found five different references to miles of road that would be built during the life of the Plan.

For example, (1) on page IV-97 of the Plan it says, "Development of arterial and collector roads will proceed at the rate of 17 miles of new construction and reconstruction per year during the first decade." (2) On page IV-94 of the Plan it says, "Road system development associated with the timber harvest program will average 22.8 miles of new construction per year and 10 miles of reconstruction per year over the first decade." (3) On page IV-108 of the DEIS, Table IV-1 shows that 46.2 miles of road will be constructed and reconstructed annually. (4) On page IV-52 of the DEIS, the table shows a total of 56 miles of road will be constructed and reconstructed annually. (5) And lastly, Table II-10 on page II-161 of the DEIS shows a total of 55 miles per year. I am slightly confused! Which is correct? This is a range of from 17 to 56 miles of road per year. How could you possibly analyze the effects of roads on other resources based on such erroneous figures?

Assuming a worst case scenario of 56 miles of road per year, I see little hope for maintaining adequate security cover for elk and deer. These animals are already stressed by pressures from 1600 miles of permanent roads and 1000 miles of primitive and temporary roads, most of which are still open for public use. I would strongly urge you to reduce to the bare minimum both the amount of existing open roads and also planned road construction.

During the planning process, I made an analysis of the number of miles of open roads actually needed for administration of the Salmon NF yet still not detrimentally affect wildlife habitat. I arrived at a figure of 600 miles. I would suggest you shoot for a figure in this neighborhood.

Your Forest Direction statement on page IV-65 says that you will "Manage road use by seasonal closure if use causes unacceptable wildlife conflict or habitat degradation." This should cause the Forest to re-analyze the effects of these roads, and how this direction is currently being implemented. For example, the North Fork Ranger District took the lead many years ago in closing unnecessary and damaging roads, and now have most of the major ones closed. The Cobalt District has developed an active program over the last few years and is making much headway. The Salmon District only recently "got with the program" but still has a large backlog of old roads to close. And, the Leadore District hasn't even scratched the surface. I would like to see your

road closure program applied equally across the board, including adequate law enforcement. Maintaining road closures in high value wildlife habitats is the most efficient and cost effective method for rehabilitating these areas.

WILDERNESS MANAGEMENT

"This area is not recommended for wilderness designation in the preferred alternative." This statement is repeated after each Roadless Area Evaluation in the Appendix of the DTIS. Yet there is no rationale given for these decisions. I would like to know and feel the public has a right to know why none of the Salmon NF roadless areas were selected for wilderness designation? Please explain.

I am especially interested in knowing why the Lemhi Range and West Big Hole Roadless Areas were not selected. The Lemhi Range had strong support under the Carter Administration, appearing in their wilderness proposal but not acted upon. Just because another administration is in office does not make the area any less desirable for wilderness.

Since the Beaverhead NF proposed their portion of the West Big Hole RA for wilderness, it would appear that the Salmon NF could give it equal consideration. The Continental Divide with its high rocky ridges and lower elevation timberlands should be treated as total ecosystem, not the edge of one. The divide is a very illogical boundary for this wilderness; but instead should be its backbone. This precedent has been set in numerous other wilderness areas along the divide in Montana, Wyoming and Colorado.

In my review of the DEIS and Plan, I failed to find an alternative similar to Idaho Conservation League's that proposed only these two Roadless Areas for wilderness designation, Lemhi Range (189,000 acres in both Salmon and Challis NF's) and West Big Hole (46,000 acres on Salmon NF). In all of the alternatives in which these two were considered, many other less attractive areas were also considered which tended to water down the value of these premier areas.

RECREATION MANAGEMENT

Table IV-E-1 shows that 286,400 acres were allocated to Semi-Primitive - Motorized recreation. Nowhere can I find any assigned acreage to Semi-Primitive - Non-motorized recreation. Was this an oversight? Certainly there has to be some place on the Salmon NF outside of the Frank Church - River of No Return Wilderness where a person can get away from the noise of trail bikes, snowmobiles and other

mechanized equipment.

#### FIRE MANAGEMENT

The Salmon NF's track record in fire suppression during the summer of 1985 was terrible. Burned acreages were excessive and could have been reduced, especially the last 10,000 acres of the Butte Fire that escaped after the fire was dormant for two weeks. Worse than the burned acres were the hundreds of acres that were denuded by bulldozers because of lack of guidance for their operation. I suggest you prepare Standards and Guidelines for Soil Resource Management that will cover any eventuality if and when catastrophic fires occur again.

Will there be any attempt to use unplanned ignitions for managing any portions of the areas assigned to the Semi-Primitive recreation? It appears that three areas - Beaverhead Range, Allen Mountain and the Lemhi Range - could benefit by both planned and unplanned ignitions to improve wildlife habitat.

#### CULTURAL RESOURCES

I found no reference to the old California Bar Ranger Station on Napias Creek. This old historic landmark should be preserved at all cost. It is gradually weathering away and will probably not last for many more years if nothing is done to restore it.

#### ADDITIONAL INFORMATION NEEDED

Conspicuously missing from the Plan and DEIS are maps showing the key resources of the Forest. These are urgently needed so the public can see at a glance the areas of potential major resource conflicts. I strongly suggest that the following maps be included in the Final Plan and EIS. They are: - big game summer ranges (especially key elk summer range), big game winter ranges, Dahlenega Creek - Sheep Creek elk migration corridor, livestock / wildlife conflict areas, 10 year timber sale action plan and 10 year road plan. An updated timber growth potential map (including suitable and unsuitable timber areas), similar to the one prepared by the Forest in the mid-1970's, should also be included.

#### MY PREFERRED ALTERNATIVE

I have given you many reasons why I can not support Preferred Alternative No. 12. Now, I would like to offer my suggestions for a preferred alternative. First, I want to go on record as completely supporting Idaho Conservation League's Lemhi County Citizen's Alternative, whose preamble

reads as follows:- "The primary goal of this alternative is to increase emphasis on non-market opportunities and amenity values such as soil and water, fish and wildlife, visual quality, cultural resources and dispersed recreation. Market opportunities will be emphasized on the most productive timber and rangeland, only where they do not reduce non-market opportunities. Timber management programs will also be utilized as a tool for enhancing wildlife habitat, scenery and water yield. The budget is unconstrained."

This alternative would provide, (1) adequate habitat to meet the goals of Idaho Department of Fish and Game for all species of fish and wildlife, (2) provide wilderness designation for the two premier areas - Lemhi Range and West Big Hole Roadless Areas, (3) eliminate most livestock / wildlife conflicts, (4) construct and maintain the minimum amount of roads necessary for overall management of the Forest, (5) provide adequate acreages of both Semi-primitive Motorized and Non-motorized recreation experience, (6) provide direction for planned and unplanned fire ignitions in Semi-primitive areas, and (7) still provide adequate supplies of timber and forage to support local industry.

This is exactly how I perceive the Salmon National Forest should be managed to best meet the needs of the American public and to best meet the intent of the Multiple Use - Sustained Yield Act.

The alternative that most closely resembles the ICL alternative in the array you analyzed is Alternative 3 (Non-market emphasis). However, it contains much more wilderness than recommended by ICL. I suggest you modify Alternative 3 to include only the Lemhi Range and West Big Hole Roadless Areas as wilderness and leave all of the remaining proposed wilderness as SPNM or SPM recreation areas. I would completely support this alternative.

This is a drastic change in direction from what is currently being carried on, but one that I feel is fully justified. Commodities such as timber and livestock have been overemphasized on the Salmon NF for too long. This trend should be reversed. Your figures clearly indicate that the amenity resources provide the best economic return and are the most environmentally sound.

Please consider these suggestions as you revise the DEIS and Plan.

Sincerely,

*Hadley B. Roberts*

HADLEY B. ROBERTS  
Certified Wildlife Biologist  
U. S. Forest Service (Retired)

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cc:

Regional Forester, R-4  
Congressman Stallings  
Congressman Seiberling  
Senator McClure  
Senator Melcher  
Governor Evans  
The Wilderness Society  
Idaho Conservation League

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United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Forest Supervisor  
Salmon National Forest  
P.O. Box 729  
Salmon, ID 83467

November 15, 1985

Reply to 1920

Date

Dear Sir:

I appreciate this opportunity to comment on the Proposed Forest Plan and DEIS for the Salmon National Forest. The following comments and questions are primarily addressed to the Proposed Forest Plan.

1. Why are hunting and fishing RVD's left out of Table II-2B? They do not appear to be included anywhere else in the Plan. What would the existing and projected RVD's be if these two forms of recreation were included?

2. Is the projected RVD demand based on the error in reporting procedures as noted in item 5 on page II-10?

3. On page II-16 it is stated that "Local interest in the designation and management of currently roadless areas is very high." What about the national level of interest? The Salmon National Forest is what the name implies a national forest not a local forest. How does the Proposed Forest Plan reflect national or local interest in designation of roadless areas? To me designation implies formal wilderness designation.

4. Why is the Forest Service involved in the maintenance of ranch and farm economies as stated on page II-36? Where, in any of the applicable laws and regulations governing the National Forests, does it state that the Forest Service is to become involved in ensuring economic stability to any special interest group? Has the Salmon National Forest misconstrued the intent of RPA from improving range conditions to ensuring economic stability for a small and select group of individuals?

5. Your implication in the "Timber Management, Existing Situation Summary," page II-39, is that older and/or unmanaged stands of timber are non-productive. That is true if one only manages for timber production. As the development interest like to point out, that is not multiple use.

6. There is no explanation in the text on Table II-15.

7. The demand analysis for timber noted on page II-44 is obsolete. The use and citing of that study is erroneous and misleading. The timber/logging industry is and has been depressed for a number of years. It does not appear that that situation will change in the near future, if ever, in this part of the country. To base the Current (or future) Management Direction on the data contained in the above referenced study is not a sound plan. The only allusion to the decreased demand in is tucked away on page IV-94 of the Proposed Forest Plan.

Marvin E Hoyt  
147 E 15th  
Idaho Falls, Idaho

Dear Mr Hoyt

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

Hunting and fishing RVD's are reported in the wildlife sections. One place to find these numbers is in Chapter II of the DEIS. They are shown as wildlife and fish use in the output tables for benchmarks and alternatives.

Item 5 on page II-10 does not say that the reporting procedure is in error. What it is intended to say is that since use is reported on a Forest-wide basis, it presents a false picture of supply exceeding demand. On a site specific basis, demand exceeds supply in some specific locations such as the river canyon.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will





Marvin E Hoyt

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8. What "increased" interest in minerals and energy development are you referring to on page II-51? Both of those industries are, and have been, cutting back on exploration and development over the past five years. The statement on page 51 is inconsistent with the statement on page II-55 under projected demand.

9. On page II-72 the statement is made that financing future roads by means of timber sales does not appear likely. If the roads are constructed for timber harvests why should the public be expected to pay for those roads in order for individuals and companies can more easily profit? Almost all other resources on the forest suffer as a consequence of road building.

10. On page III-2 under planning issue #4 the last sentence states that "Whenever possible, road users will be assessed for the road maintenance fund." Does the Salmon National Forest suggest that public funds can and will be used for new road construction in deficit timber sales and then, if those roads remain open for recreational use, recreationists will be assessed for using the roads? The issue of paying ones own on the nations public lands would be more acceptable to recreationists if that same policy applied to all users.

11. Planning issue #5 states that ORV Management is adequate. What does the ORV management plan consist of? Displaying off-road vehicle restrictions in the Forest Travel Plan? That is hardly a management plan, much less an adequate one.

12. In planning issue 13 you state that you are partly in the business to influence community stability. The Forest Service is in the business of managing a public resource, not ensuring financial stability to local communities. Where does the Salmon National Forest get its direction to influence community stability?

13. Why is there a disparity in managing for "economically" important wildlife indicator species and "other" management indicator species? If the Salmon National Forest can differentiate between those two segments of the wildlife population and selectively manage for each why do you not differentiate between uneconomical and economical timber sales?

14. Deficit timber sales are not covered anywhere in the Proposed Forest Plan. Does this mean that they will continue as usual?

15. How was the figure of 71,879 acres derived at under "Vegetative Diversity" on page IV-83? It is impossible to arrive at that figure (or nearly impossible) from information contained in the Proposed Forest Plan. 10% of classification 6 in Appendix A Table I would amount to 74,490 acres. The 235,000 acres referred to in classification 5, Table I could conceivably end up in classification 6. It also appears that a large percentage of the 337,900 acres of the forest lands in classification 7 should be added to classification 6 since they are suitable forest lands and they are not part of a designated wilderness.

Even if one could figure out how the number (71,879) was arrived at it is a pitifully small amount of acreage compared to the approximately 1.3 million acres of land not included as wilderness.

16. With the increased importance of recreation on the Salmon National Forest,

occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision

Although we know of no legal requirement to maintain community stability, there is little doubt the National Forest Management Act of 1976, National Environmental Policy Act of 1969, and subsequent implementing regulation require that this issue be considered in formulating a Forest Plan. Also implicit in the foregoing direction is that the Forest Service is responsible for evaluating alternative courses of action for their potential effects on local economies, however, we recognize that community stability or economic development cannot be ensured by the agency since the means to accomplish such a goal are not available to us. On the other hand, the Forest Service does sometimes have the ability to prevent actions which could destabilize communities or provide opportunities which could help communities reach their economic goals. The difference is between one of providing opportunities if otherwise acceptable in terms of maintaining the productive capacity of the National Forest, and actively promoting or assuming responsibility for the direction and health of a local economy

We do not agree with your comments regarding statements made on page II-39, Timber Management--Existing Situation. There is no statement nor implication that "older and/or unmanaged stands of timber are non-productive." What is implied is that older and/or unmanaged stands are generally less productive of timber than younger managed stands. In specific cases stands may actually exhibit negative growth rates. Your point concerning production of resources other than timber is well taken, however, please consider the context of the statement. This is a statement concerning the existing situation regarding timber management. It was not intended to extend beyond the timber resource. We agree that an unproductive or less productive stand from a timber standpoint may well be very productive from another resource standpoint.

While the study referred to on page II-44 under the heading Demand Analysis is several years old, we do not agree that it is obsolete. The timber/logging industry has been depressed recently and, while this depression in the industry has lasted for several years, the current market does show signs of recovery. The number of mills dependent upon Salmon National Forest timber has not changed and the mill capacity is actually increasing. It is not possible to know positively what the market and timber/logging industry will do in the near future, let alone during the next 10 years. Under the situation which exists, estimation of a horizontal demand curve for Salmon National Forest timber is entirely justified. Incidentally, allowable sale quantity if based on the productive capacity of the land, not on demands

The description referred to has been changed. All characterizations in the DEIS and Forest Plan now describe the existing level of mineral activity as





Marvin E. Hoyt

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the decline in demand for forest products and mining activity, and the apparent interest by the Salmon National Forest in influencing local economies why not recommend that some of the 830,469 existing roadless acres be included in the national wilderness system. That action would significantly increase the opportunity for dispersed recreation and preserve a larger area of old growth timber which in turn will increase the habitat available for those wildlife species you refer to as "other". With an increase in wilderness acreage there will be a corresponding long term maintenance or improvement of water quality and quantity.

The increase in logging that the Forest Plan suggests will ultimately lead to increased water quality degradation due to the inherent instability and erodibility of soils on the Salmon National Forest. This has local, regional, and national implications because of the importance of the Salmon River to local and downstream users.

Overall trends for consumptive uses on the Salmon National Forest are downward. Trends are upward for non-consumptive uses. However the Forest essentially is stressing consumptive uses over non-consumptive uses.

It appears that the Salmon National Forest is intent on doing "business as usual". This is indicated in their selection of Alternative 12 of the DEIS (Modified Current Management Direction) even though the trends are downward for traditional uses of forest lands

A more appropriate and imaginative alternative and plan would be one that allows consumptive use of forest and mineral products to a degree commensurate with demand, as long as those seeking to exploit the resources can and are willing to pay all costs associated with their proposals. A forest plan based on those lines would benefit resources on the forest as well as conserve all resources.

Cordially,

*Marvin E. Hoyt*  
Marvin E. Hoyt  
147 E. 15th  
Idaho Falls, ID 83401

having slowed, with a high potential for future development if domestic and world markets become favorable

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The statement you question on page II-72 was meant to indicate that road costs will tend to increase in the future and it may be more difficult to finance road construction with purchaser credit.

Under existing legislation the Forest Service has the means to assess road maintenance costs to commercial users, e.g., outfitters and guides, timber purchasers, mining companies, however, we do not have the authority to charge individual private users other than for very specific services such as qualified designated campgrounds. Legislation is pending in Congress that would give the Forest Service the authority to expand those services or facilities for which a fee can be charged.

Management of off-road vehicles is guided by Executive Order 11644 as amended by Executive Order 11989, and the Forest Service Manual and the Forest Service Trails Handbook. Recommendations as to implementation of this direction on a local level are developed by an interdisciplinary team composed of managers, wildlife and fisheries biologists, recreation specialists, soils scientists, hydrologists and other specialists as needed, all with the involvement of the public. The end result is the product to which you refer, that being a Forest Travel Plan which displays off-road vehicle restrictions.

The term "deficit sale" is often confused with the term "below cost sale." A deficit sale is one in which the Forest Service appraisal indicates that an operator of average efficiency would not be expected to make a reasonable profit.





Marvin E. Hoyt

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The 10 percent old growth requirement refers only to tentatively suitable timber land. All the unsuitable timber land is available for old growth if it is of the right age and composition. The apparent discrepancy in the numbers are due to the edge effects of wilderness and unsuitable timber lands adjacent to suitable timber lands. The old growth requirement is based on state-of-the-art knowledge concerning old growth dependent indicator species.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

Throughout the Forest Planning process, cumulative sedimentation effects of logging and road construction have been evaluated. In Alternative 12, downstream beneficial uses are being protected and no long-term downstream deterioration in water quality or beneficial uses will result from the logging and roading scheduled. Localized areas in small drainages within the portions of the Salmon River Basin on the Salmon National Forest will experience short-term degradation as a result of activities such as road construction and timber harvest. The use of mitigation features and standards and guidelines described in Chapter IV of the Forest Plan, will minimize these effects, as well as protect local channel conditions and beneficial uses, such as fisheries habitat. Cumulative sedimentation analyses done for development of the Forest Plan, as well as during continuing project level analyses will continue to provide guidance in protecting the downstream resources as well as stream channel conditions in the Salmon National Forest.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,



RICHARD T. HAUFF  
Forest Supervisor

FS 0200-6-621

VI-274



Forest Supervisor  
Salmon, Natl Forest  
Re Salmon Forest Plan

...I've gone through the proposed Forest Plan with interest because it is very much a reminder of the original multiple use plan that I helped develop in the 1960s. I think the proposal is considerably more detailed and comprehensive.

My comments will be few and perhaps minor.

I find mention of the possible change of vegetation type conversion to grass monoculture on page IV-29 to be layman like and not a reasonable situation. Surely the plan does not intend the conversion.

I find mention of timber harvest in goat habitat and the research needed. This subject, at least goat habitat has been thoroughly researched. Timber harvest on goat habitat seems impractical.

Lately there has been much concern with pro and con about riparian damage by livestock. From my experience management can relieve some of the, some cannot be prevented without total elimination of livestock, some is not.

0026

December 12, 1985



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 779  
Salmon, ID 83467

Reply to 1920

Date

Mr. Orlo Johnson  
Route 1, Box 182A  
Salmon, Idaho 83467

Dear Orlo

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

In our judgment, the selected Alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experience. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Latah County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

The mention of a type conversion to "introduced grass monocultures" was a treatment measure included in a management prescription designed to maximize livestock production. Under our preferred alternative this management prescription is not proposed for use on any allotments.

Concern for a better understanding of potential impacts of timber management on mountain goat summer range was specific to the mid-elevation coniferous forest zones above the Salmon River Canyon. This area serves as summer range for mountain goats, and both Forest Service and Idaho Department of Fish and Game biologists expressed concern about potential timber harvest impacts and the apparent lack of research information to assess these impacts. A cooperative study between the Idaho Department of



VI-275



Mr. Orlo Johnson

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Fish and Game and the Forest Service was prepared in 1982, however, it was never funded.

Riparian zones are indeed areas of special importance to many resource management concerns for these areas has been expressed in National Forest Management Act direction to protect riparian zones and their dependent resources (water, fish and wildlife). Planning direction, expressed through numerous standards and guidelines, outlines management requirements associated with resource management activities necessary to protect and preserve riparian areas on the Forest.

Livestock grazing can and does influence the nature and condition of riparian areas. Resolution of conflicts will be completed on a site and/or project specific basis using options appropriate to the conditions and circumstances involved.

Responses like yours were helpful in preparing the final Plan. Again, thank you for taking the time to provide us with your thoughts.

Sincerely,

PICHARD T. HAUFF  
Forest Supervisor



always disastrous and elk are not immune from being culprits in the high meadows.

In the Desired Future Condition of the Plan: I am pleased to see it stated that:

- 1 None of the inventoried riparian areas will be designated as wilderness.
- 2 An increase in ADMs for livestock is planned. This must be logical as the bulk of the allotments have been under improved management for sometime. Also as there are no sheep left on the forest some range suitable for cows must have become available.
- 3 Although it has been mentioned before I like the coordination re-emphasized between timber harvest, range, wildlife and watershed.
- 4 If recreation facilities are under planned now, they surely will be shortly.
- 5 Noxious weed control has been inadequate since the invasion of Canadian thistle. Control gave us to a policy of living with the weed. Now that we've learned better, we have an opportunity to do something with at least three new and more aggressive species.

These are the sum of my comments on this extensive plan. I think it good direction and hope it can be implemented without more costly delay.

One other subject I like to comment on is an article appearing in several local newspapers. It is written by a former employee apparently unhappy with his career or this lot in life. It concerns primarily timber harvest on the Salmon, and elk habitat and populations.

In my opinion the man foresees absolutely ridiculous problems. I've covered most of this forest since 1938 either on foot, horseback, or by vehicle. From that time until about 1960-65 there weren't a lot of elk in the Salmon River Drainage. In fact in the beginning supplemental animals were transplanted from Yellowstone Park. Between 1945 and 1975 timber harvest was probably heavier than at any time before or since. Yet today the elk population must be greater than it's ever been. To me this is a good indication that timber harvest on the Salmon NF is complementary to elk habitat.

I offer this in rebuttal to his statement.

Paul Johnson

0657  
Kurt Becker  
P.O. Box 346  
Bethel, AK 99559

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DO 1 2 3 4 5 6

226-1/2/866

Dick Hauff, Forest Supervisor  
Salmon National Forest  
P O. Box 729  
Salmon, ID 83467

Dear Dick

After reviewing the Draft EIS and Proposed Salmon Forest Plan, I wish to offer the following comments for your consideration. My speciality is wildlife biology so my comments may be biased toward this particular resource. Still, they should hold some merit as I was employed as a wildlife biologist on the Salmon National Forest from 1977 to 1980. I am also a certified wildlife biologist.

To begin with, it is readily apparent that the preferred alternative will not meet Idaho Department of Fish and Game's population goals for deer or elk. But then considering the fact that you plan on cutting 21 mmbf, much of this in key migration corridors, on key elk summer range and constructing some 17-56 miles of road per year (which have no guarantee of closure) this is not surprising.

Granted the allowable cut has decreased from 36 mmbf to 21 mmbf but this is still much too high. The Salmon Forest has very limited high growth timber land, and most of this lies within the ponderosa pine zone that has already been heavily harvested. The Douglas-fir zones have been plagued with mistletoe and type conversion problems after cutting and the lodgepole pine/alpine fir zone has been uneconomical to harvest and has low growth tables. Inroads into key elk migration corridors will continue to disrupt movement patterns and harvesting in key elk summer range, where timber growth tables are marginal, is a poor management decision.

Additional road construction, particularly if closures are not incorporated or enforced, can only lessen the value of the wildlife habitat that will be impacted by timber harvesting.

From a purely economical standpoint, providing for the 21 mmbf cut is not justified. Your preferred alternative will result in one of the lowest returns to the U.S. Treasury of all alternatives considered, yet is still recommended. I agree that you must consider the economic stability of the community when arriving at the allowable cut, but when both mills are already shut down and timber markets depressed, what value is such a subsidized program, particularly when it impacts other resources?

I could find no discussion of range/wildlife conflicts in the document, even though this is a major problem on the Forest. Specifically, portions of the Lemhi Range and Bitterroot Mountains on the Salmon and Lemhi Districts have significant conflicts between elk and livestock on portions of key elk summer range. I trust you will correct these deficiencies in the FEIS.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to 1920

Date

Kurt Becker  
P O. Box 346  
Bethel, AK 99559

Dear Mr. Becker

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other





Kurt Becker

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I also encourage you to address the potential uses of prescribed fire, using both planned and unplanned ignitions for wildlife habitat improvement, fuels reduction and timber stand improvement. The summer of 1985 was a holocaust for wildfires on the Salmon National Forest and I hope you can see that a little fire all of the time is much better than alot of fire all at once. Prescribed fires burn cooler, leave better vegetative mosaics and usually result in much improved wildlife habitat. Conversely, wildfires, particularly on lower elevation winter ranges can severely, reduce palatable forage species, and result in dramatic increases of annuals such as cheat grass.

Although this does not pertain necessarily to wildlife, I noticed one glaring omission in the plan no recommended wilderness areas. While it is true that the FC RONR wilderness provides an immense area for recreational users to get away from the hectic pace of modern day living, this wilderness area is not the only part of the Salmon National Forest worthy of such designation. Minimally, that portion of the Bitterroot Mountains that abuts the Big Hole Roadless area should be proposed, as it has been in Montana. The Salmon N.F. portion has very little commodity value at stake and such a recommendation would not result in any significant reductions in timber yield. I encourage you to recommend this area for wilderness so recreationists can enjoy a wilderness experience without having to travel so far to enjoy it. The Lemhi Range Roadless area is another very worthy wilderness candidate. It too has high amenity but low commodity values and should be included as a proposed wilderness area.

I trust you will address these important issues in the Final EIS and will select a preferred alternative which is much more commensurate with the high amenity values that characterize the Salmon National Forest.

Sincerely,

Kurt Becker

geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

There has been some confusion generated regarding the ability of the various alternatives of the Draft Forest Plan to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from





Kurt Becker

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implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers

All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA). The guidelines for transportation system management are located in the Draft Forest Plan on pages IV 65-68

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

- 1 Meeting Idaho Department of Fish and Game goals for big game
- 2 Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water
3. Protecting soil productivity in accordance with the National Forest Management Act.
- 4 More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.



Kurt Becker

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5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.

6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

The utilization of prescribed fire on the Salmon Forest is covered on pages IV-73 and IV-74 under "Vegetation Treated by Burning" (P15).

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

VI-280





Kurt Becker

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It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch;
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area;
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch; and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek

There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied

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Kurt Becker

6.

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages;
5. Key big game summer range in the Tobias Creek area,
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



FS 0200 28(7 82)

VI-281



SALMON RIVER  
COPY \_\_\_\_\_  
CC \_\_\_\_\_

0057

JAN 6 '86

INFO Q	ACTION
SURP	1 2 3 4 5 6
LAND	1 2 3 4 5 6
TRAIL	1 2 3 4 5 6
ELISA	1 2 3 4 5 6
FRANK	1 2 3 4 5 6
GO	1 2 3 4 5 6

12/31/85

Dear Sirs

I have reviewed your proposed forest plan and have prepared my comments concerning specific topics, instead of a page by page review. My comments are as follows:

#### Recreation:

In this section you propose to increase the size of the Meadow Lake Campground. I strongly disagree with this proposal. This campground is only suitable for very limited summer use (a maximum of 4 months each year), and is located in a very fragile environment that will not heal easily after new construction. In addition, the area itself is not attractive to the majority of the public. I suggest that the monies available for this project be put to "better" use's by upgrading some of the middle Salmon River Campgrounds where use and interest is high. I see no information in your plan that would support an increase in the size of this campground unless there is pressure from some outside special interest group.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O. Box 729  
Salmon, ID 83467

Reply to 1920

Date:

William V. Casey, Jr.  
Rt. 2, Box 216  
Rigby, Idaho 83442

Dear Mr. Casey:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Meadow Lake Campground is one of the most popular overnight camping and fishing spots on the Forest. The resource damage that is occurring, such as erosion and compaction, is the result of uncontrolled, unrestricted vehicular and pedestrian traffic. The new design for the campground will incorporate features, such as barriers and hardened surfaces, that will restrict or channel vehicles and people onto surfaces that will accommodate their use without further resource damage. The lakeshore will be rehabilitated with topsoil and seeding and a surfaced access trail provided. The reconstruction of the campground will not increase use over current levels, but will accommodate the use that the site is already receiving, and in a manner that will protect the fragile environment at this popular location. Your point that sites are needed on the Salmon River is well taken and, in fact, Meadow Lake will not be constructed until after sites are constructed at Spring Creek and Owl Creek along the river.

Throughout our Forest Planning process we have tried to predict (through the use of models as well as professional judgment) the consequences of not only natural events, but also induced management activities on populations of wildlife and fish. A predominant constraint in this process was to ensure adequate habitat was available at all times for perpetuation of each species of wildlife.

As I am sure you are aware, habitat conditions for a diverse complex of native fauna is dynamic and constantly changing. A low seral stage, indicative of conditions following a timber sale or natural event such as a wildfire, may be conducive to some species of wildlife, whereas, climax conditions may favor others. For these reasons it becomes essentially impossible (even with no induced management activity) to maintain existing or current populations of all species of wildlife.







William V. Casey, Jr

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## Wildlife

I feel that the forest should be managed to maintain or increase big game populations not reduce them as in Table II-7 page II-25. The forest should be managed so that all areas including roaded areas have viable populations of wildlife. The forest should not be managed so that specific areas are unsuitable for wildlife because of roading, logging, mining or what ever. The plan seems to show that wildlife will be given consideration where logging is not feasible but where marketable timber exists that wildlife will have to take a back seat to the logging interests.

## Timber

There should be more than 10% of the oldgrowth maintained outside of the wilderness areas. Old growth is important for all species of wildlife and to provide elk calving and big game escape cover. The forest plan seems to favor timber production over other interests such as wildlife, recreation, wilderness and other less commodity oriented activities. The forest plan is proposing road densities exceeding 2 miles of road

I can assure you, however, that the Salmon National Forest will continue to manage and monitor habitat to insure viable populations of the native fauna are maintained. Should any species become Federally listed as threatened or endangered, requirements of the Endangered Species Act of 1973 will be enforced, which dictates that "no actions will be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5). Referring to Table II-7, page II-25 of the Forest Plan, the objective of the preferred alternative (12) is to increase population levels of all four big game species about existing levels.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Management activities in all geographic areas will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support big game population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Manipulation of forest vegetation (i.e., timber management) is a very powerful habitat management technique and can be of great benefit to early and mid-successional species such as mule deer and elk, however, forage is only one component of wildlife habitat. Therefore, timber harvest entries are carefully designed to provide all aspects of good wildlife habitat after completion of the sales. Coordination of the timber and wildlife resources commonly involve such things as closing roads after completion of sales to restore necessary security for hunted species, leaving uncut blocks of timber between cutting units, cutting more small units as opposed to several very large units, etc.

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness; and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.





William V. Casey, Jr.

3.

per square mile of forest area Road density should not exceed 2 miles per square mile. The forest plan also proposes to build over 39 miles of road throughout the forest each year. I object to this amount of construction and reconstruction. It would seem as though the forest is bent on building roads into all non-roaded areas of the forest in a minimum amount of time. I would suggest that a maximum of 10 miles per year would meet most "multiple" use needs. The proposed forest cutting levels also cause me concern, the forest should not be proposing to cut more timber than it can sell, nor should the forest feel that it is their duty to provide a living to everyone in the area who wants to cut trees. The forest should reduce their backlog of sales and reduce the average annual cut to approximately 15 mm BF ~~per year~~ throughout the life of the plan. A reduction in the cutting of ponderosa pine should be implemented, no increase in ponderosa pine cutting volume should be allowed. Local mills should be encouraged to retail to handle the smaller logs that will be coming out of the forest in the future, the forest cannot

Administration of new programs such as this is time consuming and often difficult at the onset; however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.





William V. Caley, Jr.

5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.

6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The allowable sale quantity of 21.1 million board feet per year will be offered only if it is expected to sell. If it becomes apparent that certain types of sales are not marketable, then the volume offered will be reduced accordingly.

The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timber land. Densities vary according to the harvest system used and the location of the timber stands. The harvest system used varies depending on the type of terrain. The random scattering of mature timber stands on the Forest requires additional road miles for access.

Although we know of no legal requirement to maintain community stability, there is little doubt the National Forest Management Act of 1976, National Environmental Policy Act of 1969, and subsequent implementing regulations require that this issue be considered in formulating a Forest Plan. Also implicit in the foregoing direction is that the Forest Service is responsible for evaluating alternative courses of action for their potential effects on local economies; however, we recognize that community stability or economic development cannot be ensured by the agency since the means to accomplish such a goal are not available to us. On the other hand, the Forest Service does sometimes have the ability to prevent actions which could destabilize communities or provide opportunities which could help communities reach their economic goals. The difference is between one of providing opportunities if otherwise acceptable in terms of maintaining the productive capacity of the National Forest, and actively promoting or assuming responsibility for the direction and health of a local economy.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions. Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road



be expected to provide large diameter logs forever. Companies throughout the west are already capable of utilizing small logs; the companies in the Salmon area should be also

### Wilderness

I am not an environmentalist or a total wilderness advocate. However, the wilderness section of the forest plan left me totally disappointed. There was absolutely no consideration given wilderness values in the plan. This type of forest planning by the forest commits the public to be either anti, or pro wilderness advocates, and have little sympathy for each other. The plan is totally inadequate in roadless or wilderness area designations. Out of approximately 30 roadless areas, not one area was proposed by the forest for protection. I would like to propose that areas 13901, 2, 3 and 193942 receive some type of protection from development. ~~I~~ ~~I~~ I am completely stunned by the proposal to log or road almost everyone of the forest's roadless areas; this type of proposal will lead to court suits, political name calling, and will do nothing to provide for balanced management of the forest's resources.

0057

I appreciate the opportunity to comment  
on the forest plan and hope that you will  
seriously consider my comments when preparing  
the final portion of your plan

WV luyh

William V Casey Jr.

Rt 2 Box 216

Ruby Idaho

83442



William V. Casey, Jr.

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construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. Three management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis on most of the area;
2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singheiser Mines; and
3. Emphasis on medium investment timber outputs on the Panther Creek Face

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities, while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of post, pole, and sawtimber also occur in the northern tip and along the Panther Creek Face. Most of the remaining area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next plan revision.





William V. Carey, Jr.

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Taylor Mountain Roadless Area Number 13505 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended that the Challis portion be designated wilderness. Five management prescriptions will be applied to the Salmon National Forest portion of this area:

1. Semi-primitive motorized recreation emphasis along the Ridge Road to Iron Lake and in Moyer Creek, Opal Creek, and Otter Creek drainages and the Hat Creek Lakes area.
2. Key elk summer range--optimum habitat emphasis in the upper elevations of Spring Creek, Middle Fork of Hat Creek and North Fork of Hat Creek.
3. Anadromous fish emphasis with medium investment timber outputs in the headwaters area of Iron Creek.
4. Emphasis on medium investment timber outputs in Salt Creek and Woodtick Creek, and a portion of the North Fork of Hat Creek, and
5. Emphasis on low investment timber outputs in Weasel Creek, lower Opal Creek and at the high elevations around Moyer Peak.

Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple use purposes. The majority of the area provides high elevation big game summer habitat and opportunity for scenic and primitive recreation experiences. Significant growing stocks of post, pole and sawtimber occur primarily in the northern and northeast portions of the roadless area. During the current planning period, timber management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied:

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages;
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake;
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek;
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,



FS 6200 28(7 82)



William V. Carey, Jr.

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5. Key big game summer range in the Tolmie Creek area;
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages.
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas; and
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low; however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of pole and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The Anderson Mountain Roadless Area Number 13942 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized for an area adjacent to the Continental Divide, and
2. Anadromous fish emphasis with high investment timber outputs at the lower elevations.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Past mining activities indicate a high probability of continued mineral development within this area. Mineral potential, recreation values (including the Continental Divide National Scenic Trail), and significant growing stocks of sawtimber occur within this roadless area. No resource activities are planned in the upper elevations, to be managed as semi-primitive, that would preclude future consideration of this area for wilderness during the next plan revision.



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William V Casey, Jr.

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Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0071

P O Box 1271  
Boise, ID 83701

Jan 5, 1986

Richard Hauff, Supervisor  
Salmon National Forest  
P O Box 729  
Salmon, ID 83467

Supervisor Hauff,

Please enter these comments into the public record of responses on the draft Salmon National Forest Plan and Environmental Impact Statement

I do not support the proposed management plan for the Salmon National Forest. Like its name suggests, modified current direction, the plan is nothing more than business as usual for the Forest Service cut timber at the expense of every other resource on the forest.

Under this management plan the U S taxpayers will be forced to support a money-losing timber program. I am tired of seeing my tax dollars squandered to support loggers and mills. If these industries need constant government support to keep running, then change is needed. I'd rather see tax dollars spent to pursue ways of getting these people out of an industry which is obviously on its way out, and into another field which has more of a future. Keeping these loggers on the federal dole has got to stop!

This plan will liquidate much of the remaining old growth stands of Doug Fir. These stands are very important from a watershed and wildlife standpoint. I recommend that all existing stands of old growth timber on the Salmon Forest be identified and removed from the timber base. They should be preserved for their role in providing thermal and escape cover for wildlife, and for stability of watersheds.

The Idaho Fish and Game Department has worked for years to secure a harvestable population of elk on the Salmon Forest. The IDF&G has identified critical summer habitat which needs to be left roadless. Yet the Forest Service essentially thumbs its nose at these recommendations, and proceeds to plan timber sales in much of the remaining good elk habitat on the Salmon Forest. I oppose any further development of the Anderson-Three Mile area, Hayden and Tobias Creeks, Musgrove Creek, Salzer Bar, Pierce Creek and Horse Creek. The final Salmon Plan should maintain all roadless elk summer range as roadless, at least through the first decade of the plan.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to 1920

Date:

Craig J. Gehrke  
P O Box 1271  
Boise, Idaho 83701

Dear Mr Gehrke:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is





The plan to log the Sheep and Dahlenega Creek area is ludicrous, given its high value as an elk migration corridor. This area in particular should remain roadless.

Elk are becoming more and more recognized as a valuable big game species. Idaho is blessed with one of the most significant populations of elk in the United States, thanks to wise management decisions by the Fish and Game and the large amounts of roadless land in the state. Plans like the one the Salmon Forest proposes indicates that the Forest Service seems hell-bent to eradicate the elk from Idaho.

Minimum viable populations, which the plan says it will maintain, are not good enough. In 1978 Regions 1 and 4 entered into an agreement with the Idaho Fish and Game which stated that the goals for habitat management on the national forests in Idaho would be to manage "to protect, maintain, and enhance existing populations." Now in several places in the Salmon Plan is the statement which in effect promise reductions of old-growth dependant species. Doesn't the word of the Forest Service mean anything?

Actions by fire suppression crews last summer on the Salmon were disgraceful. Bulldozers did more to damage the land than any fire could have. The Forest Service must develop and include in the final plan standards and guidelines not only for actions taken during fire suppression but for soil and other resource recovery after the fire has taken place.

The Salmon Forest has over 830,000 acres of some of the finest roadless land left in the country. Out of that base, the Forest Service could not even bring itself to recommend one acre for wilderness. Your RARE II restudy is completely inadequate, and will not be able to withstand even the most casual legal challenge. The Ninth Circuit Court was quite specific in its views that an adequate legal review of roadless areas needed to present to the public a clear picture of the trade-offs associated with development or non-development of roadless areas. Yet the Forest Service consistently chose to ignore the court's recommendations, and address the roadless area review only in the most general and vague terms.

As an alternative management scheme, I support alternative 3, with a slight modification. I believe that the entire Lemhi Range roadless area should be designated wilderness. The only way the existing Doug Fir in the lower reaches of the Lemhis will ever be safe to continue to offer high watershed and wildlife values will be to take the whole range out of the timber base through wilderness designation. The Forest Service cannot be trusted to manage it wisely.

I particularly support wilderness designation for the West Bigholes. As you know, the Beaverhead Forest has recommended wilderness for the east side of the range. The west side should be designated to complete the system. The Continental Divide trail should provide the core, not the boundary, for a West Bigholes Wilderness Area.

Craig J. Gehrke

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not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

A minimum of 10 percent of all forest habitat acres have been mapped as old growth retention stands for all alternatives to meet the needs of wildlife management indicator species. The actual amount of old growth retained in excess of the 10 percent minimum varies by alternative, depending on several factors, including timber harvest levels and roading feasibility. Furthermore, many old growth stands have not been mapped because they do not meet the established stand size or distribution criteria, yet they contribute to the needs of wildlife species that utilize old growth habitats all or part of the year.

Watershed stability in all areas of the Forest, including old growth stands, will be maintained through comprehensive evaluations which include field reviews, and cumulative sedimentation and water yield modeling and analysis. Density of land management activities will continue to reflect the need to maintain watershed values and protect downstream beneficial uses.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat







Alternative 3 offers the best hope for the Salmon Forest to be managed in a way that provides for a realistic economic future for Idaho protection of its fish, wildlife, and watershed resources. Protection will be insured not through empty promises and monitoring and mitigation but through preservation of roadless areas. Man cannot improve on naturally functioning ecosystems. He can only disrupt them.

In 1983 and 1984 the Salmon Forest figured prominently in Idaho's wilderness debate. From the town of Salmon there came much misinformation and ignorance about wilderness and its effects on the local timber industry. Yet we saw the Champion mill close and return nearly a two supply of sold but uncut timber. It seems that in picking a management alternative the Forest Service has bowed to misinformed hysteria from the local loggers and chose a plan with no wilderness and one which will significantly degrade other resources to favor timber "mining" and livestock grazing. Wilderness recommendations aside, forest plans are to be legal documents, conforming to the National Forest Management Act. The draft Salmon Plan and DEIS far fall short of meeting the requirements of the NFMA. It appears to me that if the Forest Service pursues its current thinking on the Salmon Forest, then the agency is in for years of legal fights, and is a long way from enacting a forest plan.

I'm a native Idahoan. I and others like myself who were born here or who move here because of the attractions this state has to offer will not let the Forest Service get away with handing the national forests over to the timber and mining industry.

Please include these comments in the final Salmon Forest management plan and EIS, and send me all documents relating to the final plan.

Sincerely,

*Craig J. Gehrke*  
Craig J. Gehrke

Craig J. Gehrke

potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

Manipulation of forest vegetation (i.e., timber management) is a very powerful habitat management technique and can be of great benefit to early and mid-successional species such as mule deer and elk; however, forage is only one component of wildlife habitat. Therefore, timber harvest entries are carefully designed to provide all aspects of good wildlife habitat after completion of the sales. Coordination of the timber and wildlife resources commonly involve such things as closing roads after completion of sales to restore necessary security for hunted species, leaving uncut blocks of timber between cutting units, cutting more small units as opposed to several very large units, etc.





Craig J. Gehrke

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The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

In the initial suppression considerations for the Plan it was felt that fire suppression could be managed through broad strategy statements without tying managers to specific tactical considerations, however, after the 1985 fire season, we feel as you do that specific standards are necessary for the use of heavy equipment on the Salmon. These standards will provide guidelines to the incident (fire) management team pertaining to line width, fire rehabilitation considerations, and firefighter safety.

As directed by the Assistant Secretary of Agriculture and in compliance with 36 Code of Federal Regulations 219.17 (36 CFR 219.17) published in the Federal Register on April 18, 1983, roadless areas on the Salmon National Forest were re-evaluated during the Forest Planning Process for possible wilderness recommendation. Each roadless area was described as to its environmental, wilderness and resource attributes and evaluated against all Forest Plan Alternatives to identify impacts to wilderness characteristics and environmental consequences of wilderness/nonwilderness designation. Criteria used for evaluating roadless areas were developed based on the 9th Circuit Court ruling of California vs. Block.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been



Craig J. Gehrke

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recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch;
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch; and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek.

There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. As in the Lemhi Range Roadless Area, this area contains significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,





Craig J. Gehlke

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2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake.

3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek.

4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages.

5. Key big game summer range in the Tobias Creek area.

6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages.

7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock



Craig J. Gehlke

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grazing consistent with the agriculture base and rural life style of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future use of the Forest.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD L. HAUFF  
Forest Supervisor

VI-293



Jan 4 1986

Dear Sir

I appreciate the opportunity to comment on your proposed Forest plan. You have taken on a tough job of trying to balance amenity and commodity values and provide all resource users with opportunity to pursue their varied interests. I was pleased to see you plan to manage

SALMON

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ACTION

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VI-294

riparian areas for other uses as well as livestock grazing. I don't have to tell you that many stream bottoms in the salmon area are in pathetic condition. However, I could not find how you plan to implement these improvements, or when, or even where for that matter.

Leaving a few areas for semi-primitive recreation was also a good management decision. As most wild places on the Forest are lost to timber sales, etc. these semi-primitive areas will greatly increase in use and value. Another wise decision was to leave some areas for big game winter and summer range.

While going through the large amount of material the Forest provided I did find several areas I would like to suggest be changed on the proposal 12 management plan:

#1. Most areas marked 2A on the proposal 12 map are mostly roadless. This is their attraction to both wildlife and many forest users such as hunters, photographers, hikers, horsemen, etc. Your description of 2A areas is for semi-primitive motorized including



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 779  
Salmon, ID 83467

Reply to, 1920

Date

Mr. Zane Abbott  
Route 1, Box 277D-5  
Salmon, Idaho 83467

Dear Mr. Abbott

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on the Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. The predictions were calculated based upon proposed timber harvest level, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat; however, the prescriptions being proposed for application to other





4 wheel drive vehicles and snow mobiles. Does this mean you plan to put in access roads for the vehicles to drive on, or allow them to keep adding their own roads as has occurred in the North & Copper Basin areas. And could the area really be considered primitive after access roads are put in? Maybe a better label would be just semi-primitive, to be used as is. To say an area is primitive for motorized travel then not have the facilities present for motorized travel will obligate the forest service to allow for road facilities in the future when this is done the area is no longer semi-primitive but just like any other roaded area on the forest. Most of the Salmon National Forest could now be classified as semi-primitive motorized with its huge network of open logging roads. However, opportunity for semi-primitive non motorized is scarce and will become much more scarce with the planned timber sales.

#2. Change parts of the Jureano Roadless Area from 5C to 4B-1 to provide not only good elk summer range but more importantly bighorn sheep summer range. The areas are. The ridge leading out to the Dutchmans Hump, Trapper Ridge, Fritzer Gulch, The ridge between Trail and Bridge Creeks, and the ridge between Bridge and Beaver Creeks. All these ridge areas are marked by mature Douglas fir with a good forb and grass cover underneath. They all also have open sagebrush & grass slopes and steep rocky canyons with scattered mahogany trees near by. The sheep spend summers and falls up till November.

geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in these areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Riparian zones are indeed areas of special importance to many resource management concerns for these areas has been expressed in National Forest Management Act direction to protect riparian zones and their dependent resources (water, fish and wildlife). Planning direction, expressed through numerous standards and guidelines, outlines management requirements associated with resource management activities necessary to protect and preserve riparian areas on the Forest.

Multiple use activities can and do influence the nature and condition of riparian areas. Not all of these influences are detrimental, but some are, and changes in use will be necessary to comply with legal intent. Resolution of conflicts will be completed on a site and/or project specific basis using options appropriate to the conditions and circumstances involved.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas, such as Williams Basin. For example, a key provision of the range prescription (B-A) states that "forage use by livestock on critical big game winter range sites will not be increased." The proposed burn to remove big sagebrush is in an area that is snow-covered during normal winters and therefore not available as winter forage for elk and deer.

West Panther Creek Roadless Area Number 13504 will not be recommended for wilderness designation or managed for semi-primitive recreation purposes.





Mr. Zane Abbott

Three management prescriptions will be applied

1. Key big game winter range emphasis on the Panther Creek area,
2. Emphasis on medium investment timber outputs on most of the area, and
3. Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and significant growing volume of sawtimber occur within this roadless area which can contribute significantly to Salmon National Forest outputs. During the current planning period, timber harvest activities are planned on about 65 percent of the area, predominantly in the Big Deer Creek, Little Deer Creek and Quartz Creek drainages, precluding these portions of the area from consideration as wilderness during the next plan revision.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-296

Under these cool lush fir stands with the rocky canyon escape cover close by there is no other displacement habitat once these mentioned areas are logged and roaded. Mitigation would be impossible. These areas now support a large herd of bighorns with more class 3 rams than any other place on the Forest. Similar habitats in Beaver and Hot Springs creeks that were logged and roaded in the past no longer support near the bighorn numbers as these areas do. The key habitat ingredient is the thermal-escape cover combination. They must be present in close proximity with each other along with freedom from human harassment to support these kinds of bighorn numbers. Also concerning this area I would have to disagree with paragraph 2 on page C-176 of the DEIS book. On even numbered years grazing is intense in many areas of the Teton Roadless Area. I have guided sheep hunter friends and taken a ram myself in this area for the last 5 years. I have observed competition between bighorn sheep, elk, and cattle in all the mentioned areas except the Bridge Creek-Beaver Creek Ridge. There is a lot of cattle trespassing Trail Creek which is not in the Williams Basin riparian creek allotments. On even years the sheep are concentrated in marginal habitat and into the Trail, Bridge Creek areas where livestock competition is less. Removal of livestock from this area and into an area where they could be managed more easily and not be in conflict with a very valuable wildlife resource



could be another advantage of a change of 5C to 4B-1. I would think this would be one of the most important decisions that could be made for the future of the Bighorn sheep herds on Panther Creek.

#3. Also, in the interest of future wildlife numbers I think the south facing slopes of Williams Creek from Horse Mountain down to the mouth of the Canyon should be changed from 8A to 4A. The North facing slope of Williams Creek is now marked 4A for big game winter range. The south facing side is 8A for intensive cattle use. However, most big game winter on the south facing side for obvious reasons. There are usually at least 60 elk and also as many as 100 deer in the Horse Mt, Williams basin area each winter. Lately cattle grazing has become more intense here. This winter range is important enough that some forage should be saved for wintering big game. I also noticed that in 1990 50 acres of sagebrush are scheduled to be burnt in the Williams Basin. In a year of deep snow, like winter 1985, this could spell doom for the mule deer that depend on sagebrush stands for food. Deer are wintering in these brush stands this winter. In the area that someone has already burnt in Williams Basin you won't even see a deer track. Other important winter ranges you left off your map that I am familiar with are the lower south facing slopes of Spring Creek, Perseus Creek, and Henry Creek.

especially is now being overgrazed at the expense of big game

#4. Change the classification of all the drainages coming off Gant Ridge into Panther Creek from 5B to 4A. A large number of elk both summer and winter here. It would be both difficult and expensive to put logging roads into this area, and this would run it as elk summer range. There is a good ratio of forage to security-thermal cover there already. This area is also an outstanding semi-primitive area that has easy access for Salmon residents that do not have time for a longer trip into the Wilderness area to hunt.

Thanks again for the opportunity

Yours Truly,

Zane Abbott

Zane Abbott

Rt 1 Box 227 D-5

Salmon, Idaho 83467

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P O Box 8787  
Moscow, ID 83843  
7 Jan 1986



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Dear Mr Hauff

FOREST PLAN COMMENTS

I have made it my business to read literally every Idaho forest plan, and without doubt, yours is the worst of the lot, far more dominated by single use timber harvest and poor economics than was even the wretched Caribou Plan. Of the alternatives developed, none is acceptable, although at least Alt 3 has a few decent elements to it. Of the alternatives developed that fairly consider wilderness, not one shows the boundary for wilderness additions as proposed by Idaho conservation groups. In fact, your range of alternatives is faked and unreal, leaving you wide open to legal challenge. At the very least, failure to include the conservation groups' alternative was discourteous.

The Salmon is one of Idaho's biggest money losers when it comes to harvesting timber. I have watched your sales for years and not one has ever made money for the taxpayers. This welfare for timber is not a great tragedy so long as it has limits--limits both in scale and especially in geography. Neither can be seen in your plan. Instead, we get virtually unlimited subsidy, nearly unlimited road building, and very extensive use of single use timber management, all this on a forest where trees grow slowly and where erosion comes quickly and often. It is almost as if you could only see that local saw mill and not what the Salmon Forest really looked like. The history of land stewardship in general on the Salmon has been dismal and your new road building plans will make your record nearly criminal. When present net costs so greatly exceed net benefits, especially when the costs come from timber and most of the benefits from other uses, something is clearly amiss. To add to that, you have failed to account in any way for great values foregone by your development schemes, something you are required to do, in detail, by the 9th Circuit Court's Calif v Block decision. You seem not ever to have read that decision, or at least not to have considered it in any way.

The worst of this welfare logging will occur in the Lemhi from Gilmore Summit to Hayden Creek. These areas need to be left alone. The logging in Dalonega and Sheep Creeks is equally unwise and will disrupt wildlife with no real benefit to the nation.

I urge you to reconsider your entire plan for the Lemhi, where even the Challis NF plans no development. This area and your side of the West Big Holes clearly has great wilderness potential, and that is what you should recommend, at the very least along lines suggested by the local ICL Chapter.

I am also shocked that not one acre of land now roadless is to be left that way in a primitive, non-motorized state. Every other forest in Idaho has recommended at least some acreage for primitive, non-motorized.

The plan is also missing a whole lot of maps that the public at large needs to see: one showing roads and sales planned for the next decade and one showing lands unsuited for timber as determined by the absolute standards of NFMA (not as determined by the NFMA regulations put into effect by the USFS).

The plan is also missing a discussion of why you picked such a poor alternative. Your chosen one is harder on the environment than others, loses more money than most, and has no visible attraction. Why was it picked?

The plan is illogical in showing increased sediment from all your new roads linked to relatively stable anadromous fish numbers in all alternatives. How could such an unlikely miracle occur?

The plan, in its impact on Douglas fir via timber harvest, appears not to meet NFMA regeneration requirements. I know the Salmon NF quite well and have never, not even once, seen Douglas fir regeneration on cutover areas that meets adequate height and stocking density goals. There is considerable evidence that you are mining this species on the Salmon, yet you plan continued and even increased harvest of this species. This is probably illegal and is surely unwise.

Reply to 1920

Date.

Dennis Baird  
P O. Box 8787  
Moscow, Idaho 83843

Dear Mr Baird

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

Timber harvest in the Lemhi Range is expected to be compatible with other resource objectives. The selected Forest Plan alternative provides for significant portions of the Lemhi Range to be managed in a manner that would exclude timber harvest and associated road construction.





Page two

I am also concerned that you plan to increase grazing levels slightly, and more worried that your excellent earlier studies of conflict between wildlife and domestic stock are not being used (or published) in this plan. The places where such conflicts occur are few and small in size, and you ought to be able to avoid them entirely and still not put ranchers out of business. Instead, this issue is avoided entirely, which is not very wise in light of the other, road-related impacts you already plan for wildlife.

The plan should also take a more serious look at the ten RNA proposals that have been submitted to the forest. All ten are of high value, do not need further study, and should be recommended in your final forest plan. There is no conflict in any of these potential RNA's between resource extraction and RNA preservation.

The forest plan also needs to have a lot of clarification added when dealing with fires in roadless land. Much of the fire line construction using dozers in the past 2-3 years has been irresponsible and destructive in the extreme. There is growing economic evidence to show that fighting fires in general on poor site forests like the Salmon is a huge waste of money. There may be some argument over that, but the high level of dozer use in past Salmon fires is inexcusable and cost a bundle of money. Your fire managers clearly need clearer guidance, as does the forest plan.

The plan does a very poor job in the matter of budgets. It is apparent that considerable budget increases, especially for roads, will be needed, but the actual increase being proposed is unclear. Clear data on past and future budgets ought to be part of your plan, along with precise language telling citizens just what will happen if these budgets are not received. Also, what will happen if the 5-10% decrease in your budget due to the Gramm-Rudman Act actually occurs? How do you plan to cope, in detail, with budget decreases? How are your budgets linked to the monitoring plan?

The monitoring plan also needs clarification, both in matters of budget but also in explaining how you plan to notify the public of what you have learned through monitoring. You should be planning regular, clear, and systematic notification of the public of the exact results of your monitoring work, perhaps through a regular newsletter.

In short, I found virtually nothing in this plan to suggest that you are planning to wisely steward either my land or my tax dollars. You have picked a preferred alternative, for reasons that are unknown, that wastes the maximum amount of both scarce resources. If the final plan looks even remotely like the draft, I am confident that it will be successfully litigated and overturned, a fate that such a plan would richly deserve.

Sincerely,



Dennis Baird



Dennis Baird

The density of open road per square mile of land area is a tremendously important factor to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness, and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber road after use is now considered to be one of the most effective wildlife-habitat coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset, however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

While there is considerable support for additional Wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions. Semi-primitive management prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

The Draft Salmon National Forest Management Plan identified areas as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive.





Dennis Baird

3.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from minerals activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of roadless designation for Allan Mountain and some areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980, the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the [Frank Church] River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom, and Blue Joint vicinities. The bulk of the Allan Mountain area will also be managed for semi-primitive unroaded opportunities.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas do not contribute to the allowable sale quantity. Limited activity could occur due to minerals development or salvage following natural disasters; however, we expect such activity to be minimal. We have also modified the selected alternative to increase the limited development areas between Lost Trail Pass and Sheep Creek.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.



Dennis Baird

4.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

The Forest Plan sets in motion the process of establishing Research Natural Areas. By this Plan, 10 areas were identified for protection until field verification can be made and establishment reports prepared.

The Idaho Natural Area Coordination Committee has taken the lead in field identification and is assisting with establishment reports.

As their reports are completed, we will submit them to the Chief of the Forest Service for approval.

In the initial suppression considerations for the Plan it was felt that fire suppression could be managed through broad strategy statements without tying managers to specific tactical considerations, however, after the 1965 fire season, we feel as you do that specific standards are necessary for the use of heavy equipment on the Salmon. These standards, to be included in the Forest Plan, will provide guidelines to the incident (fire) management team pertaining to line width, fire rehabilitation considerations, and firefighter safety.

The use of heavy equipment in nonmotorized areas will be consistent with Forest Service policies relative to these areas.

Forest Management Direction, on page IV-3, requires a "...cost-effective level of fire protection to minimize the combined costs of protection and damage, and to prevent loss of human life."

The cost of including the maps and plans, which you requested, in the final Forest Plan would be prohibitive. These documents are available for your review at the Forest Supervisor's office.

In our judgement, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and unpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

VI-300





Dennis Baird

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Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0132

William R. Meiners  
Consultant

SALMON NF

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SUP			
LMP	1	2	3 4 5 6
TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
TRVW	1	2	3 4 5 6
AO	1	2	3 4 5 6

cc: to Jensen (1/11/86) H

January 7, 1986

Richard Hauff, Supervisor  
Salmon National Forest  
P O Box 729  
Salmon, ID 83467

Re Comments - Draft Environmental Impact Statement and the Proposed  
Land and Resource Management Plan for the Salmon National Forest

Dear Supervisor Hauff

I have reviewed the Draft Environmental Statement (DEIS) and the Proposed Land and Resource Management Plan (LRMP) for the Salmon National Forest. They are inadequate, in violation of applicable law and/or regulation, are not in compliance with certain controlling decisions relative to the management of national forest lands, or are simply not in the public interest.

NO LAND DISTURBING ACTIVITIES SHOULD BE ALLOWED ON SOILS SUSCEPTIBLE TO MASS FAILURE FROM ROAD CONSTRUCTION AND/OR LAND DISTURBING ACTIVITIES

The statutes, 16 U.S.C. Section 1604(g)(3)(E), require that LRMPs, such as the Salmon LRMP, will propose timber harvest activities only where soil, slope or other watershed conditions will not be irreversibly damaged and where protection is provided for streams, stream banks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat.

I looked in vain for such assurances, none were found. To the contrary, the LRMP, at pp II-49 and 50, and the DEIS at pp III-56 and 57 describe the rather high mass failure, erosiveness, and other soil properties that do not assure the mandate of statute will be achieved. Indeed, it is very distressing to find, DEIS at p III-57, that a Land Type System inventory covering some 68 percent of the Salmon NF has been completed but no (with one exception LRMP, Appendix E, pp VII E-1, E-2 and E-3) such data appears in either the LRMP or DEIS as a data base by which a reviewer may judge proposed Forest Service management activities. Hence, one must ask: What effect will the proposed action or any of the alternatives have upon soil stability in both the near and long term? What is the risk of serious erosion, accelerated erosion, sediment transport, mass failure? Is a worst case analysis necessary to address these factors? If existing technology cannot determine the fore-



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

William R. Meiners  
Resource Planning and Management Associates, Inc.  
885 South Locust Grove Road  
Meridian, Idaho 83642

Dear Mr. Meiners:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Areas identified as having significant mass failure and slope instability potential have been identified during the Forest Planning process. Large areas of mass failure or severe erosion areas have been designated as "forest land physically unsuitable," and are not scheduled for roading, timber harvest or other site disturbing activities. These areas are also designated on Forest Land System Inventory maps, which are continuously updated and used during project level analysis. Since the Land System Inventory maps are working maps, and continuously updated with new field information, they were not included in the Forest Plan document, but are being used extensively in the planning process. After eliminating areas with severe mass instability and/or erosion hazards, we have sought to minimize adverse impacts on other areas by scheduling and modifying surface disturbing activities. The standards and guidelines for soil and water as well as other resources are found in the Forest Plan and are designed to mitigate the adverse effects of such activities as road construction and timber harvest.

Although the term "integrated pest management" is not always used, the concept is built into the General Forest Direction and into timber management prescriptions. Refer in the Draft Plan to pages III-3-4, IV-2, IV-33-35, IV-38, IV-47, and IV-74-78. Insect and Disease considerations were a major factor in the development of the Timber Prescriptions 5A-5C.

Timber harvest, and other activities have been cumulatively assessed for changes in watershed response, including water yield and timing. Timber harvest is scheduled such that cumulative amounts of clearcuts and road areas are well below those densities which have been found to cause significant amounts of water yield or peak flow changes. Cumulative sedimentation analysis and sedimentation threshold limits have resulted in the density of clearcutting and road construction being consistently lower than those levels which result in significant changes in water yield and timing.



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going factors precisely, then a worst case analysis must be prepared - See Council on Environmental Quality Regulations

#### THE SALMON LRMP/DEIS MUST CONTAIN AN INTEGRATED PEST MANAGEMENT PROGRAM

I commend the LRMP for at least acknowledging that an integrated pest management program is required and an obligation in forest management activities is recognized, LRMP at pp II-81 and 82. The LRMP having so recognized these facts, does nothing about them - they are simply ignored in all alternatives and the proposed action.

#### THE LRMP/DEIS DOES NOT DEMONSTRATE IF OR HOW IDAHO WATER QUALITY STANDARDS WILL BE MET

The DEIS at p IV-38 asserts that "State water quality standards will be met in all areas influenced by implementation of land management activities proposed in all alternatives." Question is what, where, and how will the "implementation of land management activities proposed in all alternatives" impact upon or effect the volume, timing, and quality of water flow to the hydrologic regime both on-site and off-site? How do the "serious injury" criteria of the Idaho Water Quality Standards and the definition now being negotiated by and between the Idaho Department of Health and Welfare and the Forest Service relate to those effects and to any other effects to the water? Moreover, fishery values are a protected beneficial use of water in Idaho, where and how does the LRMP and its alternatives assure compliance with this requirement of State law?

#### THE LRMP/DEIS IGNORES AND/OR GIVES LIP SERVICE TO COOPERATION WITH STATE AGENCIES

The LRMP at IV-1 lists Forest Management Goals that do not bode well for the Salmon N F fish and wildlife resources. Even management indicator species are given the short end of the stick, particularly if, somehow and in someone's judgement, such species are deemed as having little or no economic importance. What is a minimum viable population? By whose definition? To set the record straight Minimum viable populations are not good enough, particularly when we are dealing with greatly stressed species on an ever diminishing habitat base. A wildlife plan, signed by and between the Forest Service, Regions 1 and 4, and the Idaho Department of Fish and Game in 1978 titled A Program for Fish and Wildlife Habitat on the National Forest and Grasslands in Idaho, August, 1978, U S GPO 1978-796-058/20, held our fish and wildlife resources at a higher esteem than now appears evident in the Forest Service - one of the specific goals of that plan states "Intensify fish and wildlife management to protect, maintain, and enhance existing populations." This is a must for inclusion in the Salmon LRMP for this and future generations.

Yet another Forest Service error that is inaccurate and misleading



William R. Meiners

The draft "serious injury criteria" were not applied in all alternatives. They were, however, applied in the preferred alternative, and are addressed on IV-2 of the Draft Forest Plan. Aquatic habitat capability will be maintained at a level sufficient to meet State species production goals for resident and anadromous fisheries. We believe this approach will result in a high level of water quality relative to other beneficial uses.

The 1978 Sikes Act Plan titled, "A Program For Fish and Wildlife Habitat On the National Forests and Grassland in Idaho," did contain a goal to manage for existing populations. Based on the State-wide plan, each National Forest in Idaho prepared an individual Forest Sikes Act Plan which was based on the State Plan. These plans were approved in 1978 and expired in 1982. Following its expiration in 1982, the Salmon Forest did not prepare a new Sikes Act Plan, but instead directed our wildlife and fish coordination efforts into our Comprehensive Forest Land Management Plan.

Throughout our Forest Planning process we have tried to predict (through the use of models as well as professional judgment) the consequences of not only natural events, but also induced management activities on populations of wildlife and fish. A predominant constraint in this process was to ensure adequate habitat was available at all times for perpetuation of each species of wildlife. As I am sure you are aware, habitat conditions for a diverse complex of native fauna is dynamic and constantly changing. A low fire stage, indicative of conditions following a timber sale or natural event such as a wildfire, may be conducive to some species of wildlife, whereas, other conditions may favor others. For these reasons it becomes essentially impossible (even with no induced management activity) to maintain existing or current populations of all species of wildlife.

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home range/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.



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is found in the LRMP at page IV-17. One finds this statement: "Additional Big Game Outfitter permits will be considered if demand shows more of these services are needed. Presently, there is no apparent need to increase this service. Other types of Outfitter/Guide permits will be handled when proposed in accordance with manual directions." This "overall Forest direction" is given in total disregard of Idaho State Law. Idaho State Law is controlling in the licensing of outfitter/guide activities within Idaho with issue of a license/permit for specific activities a joint responsibility by and between appropriate land managing agencies. To allude, as is here done, that the Forest Service retains sole responsibility is misleading and a public disservice.

#### THE LRMP/DEIS IGNORES THE OUTFITTING INDUSTRY

Idaho's recreation industry is alive and well and shows promise of becoming the major industry in shoring-up Idaho's lagging economy. Timber, mining, agriculture - all resource extractive industries are on hard times, their future is clouded. Not so, the recreation industry with "outfitting" being and becoming an evermore significant industry as predicated upon a renewable, essentially non-extractive/exploitation resource base. Yet, the outfitting industry is ignored in its contribution to the Salmon NF sphere-of-influence, state and regional. Why?

The Contribution of Outfitting and Guiding to the Idaho Economy Summary Report by James M. Lansche, Jr., 1985 (a summary of the findings reached in his thesis submitted to Idaho State University for his master of business education degree) finds some \$37 million accrues to the Idaho economy annually from the outfitting industry. The contribution by outfitters and guides on the Salmon NF is not peanuts given the number of outfitters and guides involved and the clientele served. It is clear that the dollar value set on various non-timber outputs, such as recreational activities and particularly outfitting, are inaccurate. The final Salmon National Forest LRMP/DEIS must correct this serious neglect of a significant industry that contributes in a major way to the so-called "community stability" and to Idaho's economy.

#### THE EVALUATION OF ROADLESS AREAS FOR WILDERNESS IS NOT ADEQUATE

The Ninth Circuit's opinion in California v. Block, 690 F.2d 753 (1982), set forth the requirements that must be met when an environmental impact statement evaluates a roadless area for wilderness. These requirements are not met by the evaluations in the DEIS by the Salmon National Forest.

It is incredible that, given the outstanding and unique character of the roadless lands within the Salmon National Forest boundaries, the Salmon National Forest finds not one single acre worthy of wilderness classification as demonstrated in the selected or proposed action. This is ludicrous and in the face of significant public interest and testimony that a considerable acreage of these roadless lands be classified as wilderness. I refer, as example, to that acreage identified



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The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and logging retention for habitat. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

The Forest-wide direction contained on page IV-17 concerning outfitter and guide permits is not intended to disregard Idaho State law. We recognize that the State is responsible for licensing outfitters, while the Forest Service has the responsibility to issue or not issue special use permits which allow outfitters to operate on public lands administered by the agency. We will consult fully with State agencies in the exercise of our responsibilities.

The Forest Service recognizes the contribution of tourism and the very significant role that the outfitting and guiding industry plays in recreation. We concur that the outfitter and guide business is a healthy and integral part of the economic stability of the State of Idaho. Contributions to employment are reflected in Chapter III of the DEIS under the Service category. Dollar values of nontimber outputs used in the planning process are those established for the 1980 Resource Planning Act (RPA) update. Information is not available for updating, on an annual basis, the full set of values used in our analysis.

As directed by the Assistant Secretary of Agriculture and in compliance with 36 Code of Federal Regulations 219.17 (36 CFR 219.17) published in the Federal Register on April 18, 1983, roadless areas on the Salmon National Forest were re-evaluated during the Forest Planning process for possible wilderness recommendation. Each roadless area was described as to its environmental, wilderness and resource attributes and evaluated against all Forest Plan Alternatives to identify impacts to wilderness characteristics and environmental consequences of wilderness/nonwilderness designation. Criteria used for evaluating roadless areas were developed based on the 9th Circuit Court ruling of California vs. Block.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.



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for wilderness/reserved classification the the Idaho Wildlife Federation and Idaho Outfitters and Guides Association - a total of some 573,670 acres (See Idaho Wildlife Federation Roadless Area Recommendation for Classification of Idaho's Remaining National Forest Wildlands Heritage, dated February 9, 1984 - a copy of which was submitted for information in drafting the Salmon LRMP/DEIS)

THE LRMP DOES NOT MEET THE CRITERIA AS SET FORTH BY THE ASSISTANT SECRETARY OF AGRICULTURE IN HIS DECISION ON THE SAN JUAN AND THE GRAND MESA, UNCOMPAHGRE AND GUNNISON NATIONAL FORESTS DATED JULY 31, 1985

This recent decision by the Assistant Secretary has much to say as to what and how a forest plan should be written. The subject LRMP/DEIS should be redrafted in compliance with the criteria as outlined by the Secretary

#### THE SALMON LRMP/DEIS FAILS TO MEET THE MANDATE OF APPLICABLE LAW

There are many shortcomings and oversights. Of particular concern is the National Forest Management Act of 1976 (NFMA) and the National Environmental Policy Act of 1969 (NEPA) as both of these acts are specific in their requirements relative to National Forest System Resource Planning (NFMA, Sec. 6) and procedures to assure that the public interest is served (NEPA, Sec. 101 and 102). This is simply not done in the subject documents. Rather, a reviewer (the public) is left awash among wondering what or how basic resource capabilities are addressed or prompts the rationale/actions proposed and how or if such rationale/action serves the public interest.

The LRMP at page I-2 embraces the management plan for the Frank Church--River of No Return Wilderness (FC-RONR) as an integral part of the instant Salmon National Forest LRMP/DEIS. This is interesting, particularly since no environmental assessment of the FC-RONR management plan was made nor is there an assessment made in the instant LRMP/DEIS relative to environmental impacts that accrue from implementation of the FC-RONR management plan. These concerns were expressed to the Forest Service in my comments relative to the FC-RONR draft management plan. My concerns persist! The FC-RONR management plan was not subjected to full NEPA scrutiny, assessment or public response and, in my opinion, is illegal under NEPA. And, now, to attempt sweeping a faulted management plan under the Salmon National Forest LRMP/DEIS is unlawful. The entire scope of proposed management activities within the FC-RONR require identity and assessment as they impact the Salmon National Forest - its land, its resources - the public and must be identified and made part of the Salmon National Forest Final Environmental Impact Statement and Land and Resource Management Plan (LRMP/FEIS).

#### THE INADEQUACIES OF THE LRMP/DEIS ARE ENDLESS

Timber Why, when the Salmon National Forest is such a poor timber growing forest (a projected current average annual growth of some 26 cubic feet of wood per acre - that is, a total growth that equates to



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Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current sustainability and availability for consideration as wilderness during the next plan revision.

Deputy Assistant Secretary MacCleary's decision, regarding the Colorado Forests, required that the planning documents be revised to include adequate information concerning the economic implications of the alternatives. Reasons for selecting the preferred alternative are documented in the record of decision.

The development of the Frank Church--River of No Return management plan was required by the Central Idaho Wilderness Act of 1980 and activities must necessarily conform to that Act and to the Wilderness Act of 1964. The major Federal action occurred with Congressional designation of the Wilderness. The management plan was developed as required and an Environmental Assessment was prepared. Based on that Environmental Assessment, a Decision Notice and Finding of No Significant Impact was signed and made available to the public on March 11, 1985. The requirements of NEPA were complied with during that process. We have incorporated the FC--RONR Management Plan into the Forest Plan by reference under the authority of 36 CFR 219.2, Scope and Applicability, Section (b), which allows that plans developed under special area authorities (such as the Central Idaho Wilderness Act) may be incorporated without modification into forest plans.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities



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about six(6) six(6) inch diameter fence posts six(6) feet long per acre per year as a "producing commercial forest") does the Forest Service persist in timber harvest and roading activities? By any stretch of the imagination, watershed values, fish and wildlife values, recreational values far exceed timber values. And, considering that timber harvest with its associated roading places all other values at risk - in peril of destruction, and Forest Service's posture and proposed actions are truly not in the public interest.

Monitoring The proposed monitoring and evaluation program (LRMP at pp V-2 through V-5) is a farce. Nothing like locking the barn door after the horses have been stolen. The LRMP at p V-3 states "A detailed monitoring program will be prepared as part of the Forest's annual work plan." Bluntly stated, this means the Forest Service really isn't committed to monitoring/evaluation, don't know just what or how they will do the monitoring/evaluation but may do it if funds are available. A comprehensive monitoring/evaluation program must be in hand, portrayed in the LRMP/DEIS for scrutiny and a worst case analysis developed where, when and if all does not go well.

Livestock The impact of livestock grazing on water quality, the riparian ecosystem, fish habitat, recreational values, and many other public values is legion, yet, the LRMP does little more than to give this misuse of land lip service. William S. Platts, Livestock and Riparian-Fishery Interactions of the 47th North American Wildlife and Natural Resources Conference, 1982 (Wildlife Management Institute, Washington, D.C.) p 513 provides insight to the problem. Evidence is overwhelming, there are solutions but the LRMP/DEIS does not identify or address either the problems or solutions in a meaningful manner.

Recreation The LRMP at II-10 states "Meadow Creek Campground is located in a fragile high alpine area. Use far exceeds designated capacity of the developed area and due to gentle terrain past efforts to control vehicular movement have been unsuccessful. Lakeshore erosion, compaction and vegetative damage is the result." Why, then, is the Forest Service proposing to expand this overused campground? At 9000 foot elevation on the southern end of the Lemhi Range, the Meadow Creek Campground is definitely in a high, alpine fragile environment. What logic prompts the proposed expansion of this campground? If a larger campground facility is necessary to accommodate use, why not build it at a lower elevation and in a more stable environment near the old ghost town of Gilmore? Maintenance of the road to Meadow Lake with restriction of use to day use only would certainly seem more appropriate and in keeping with environmental concern and resource capability.

Alternatives There is not an adequate range of alternatives. For example, there is no alternative that discusses and assesses an uneven-age timber management scenario or, conversely, there is inadequate justification for the even-aged timber management scenario. The statutes and regulations require this to be done. In like manner, the reduction or



William R. Meiners

6 Retaining 1,037,000 acres of the Forest in an undeveloped condition throughout the planning period.

The intent of monitoring and evaluation is to provide an assessment of the progress achieved toward meeting the goals, objectives and standards expressed in the plan. At present, detailed monitoring programs have not been identified. Allocation of available funds can and will have an influence on the scope and intensity of monitoring and evaluation efforts.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Selkirk National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game, and resident and anadromous fish. Protection and enhancement of riparian areas is also an objective of the preferred alternative.

Meadow Lake Campground is one of the most popular overnight camping and fishing spots on the Forest. The resource damage that is occurring, such as erosion and compaction, is the result of uncontrolled, unrestricted vehicular and pedestrian traffic. The new design for the campground will incorporate features, such as barriers and hardened surfaces, that will restrict or channel vehicles and people onto surfaces that will accommodate their use without further resource damage. The lakeshore will be rehabilitated with topsoil and seeding and a surfaced access trail provided. The reconstruction of the campground will not increase use over current levels, but will accommodate the use that the site is already receiving, and in a manner that will protect the fragile environment at this popular location. Your suggestion of building a new campground at Gilmore is a good one but the area is outside the Forest boundary and there is no other suitable location between the townsites and the lake.

Our interpretation of the "No Action Alternative," is consistent with the Council of Environmental Quality and Forest Service regulations for implementing the NEPA Act. Significant issues, concerns and opportunities were identified during the scoping process and are the basis for the formulation of alternatives. If issues, concerns, and opportunities were properly identified, and we feel they were, the full range of alternatives should be the result. An alternative emphasizing market values (2) has been included as has an alternative emphasizing nonmarket values (3). An alternative emphasizing wilderness and wildlife (8) has also been included as has an alternative emphasizing high productivity (5). We feel this represents an adequate range of alternatives.

NEPA does not specifically require that plans include an "uneven-aged" management alternative, but rather that (1) for clearcutting, it is determined to be the optimum method, "and for other such cuts" it is determined to be appropriate to meet the objectives and requirements of the relevant land management plan [Sec. 6(g)(3)(F)(i)], and that (2) harvest methods designed to regenerate even-aged stands of timber will be used.





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even exclusion of livestock grazing and its effect/impact upon watershed values inclusive of water quality, wildlife habitat, riparian ecosystems, fish habitat, economics, etc is not investigated or presented as an alternative. And, the LRMP/DEIS lacks a No Action Alternative. A "no action" is required by NEPA. It is required to provide the baseline against which to compare the environmental impacts of all other alternatives and the proposed action. Alternative #1 - Current Management Direction (No Action) does not serve this purpose.

The Forest Service is required to "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated, 40 CFR Sec 1502 14(a)

In conclusion, I find the Salmon National Forest LRMP/DEIS inadequate (as has been only partially noted), a disappointment and not in the public interest. Actually, no alternative addresses a meaningful resource management program for the forest that truly serves the public interest. Alternatives 3, 8, 9 and 11 all have a positive thrust regarding protection of habitat, watersheds, wildlife, fish, roadless areas, our national forest heritage. Alas, the Forest Service selected none of these and for no good reason and without even listing Decision Criteria, selected Alternative 12 as the proposed action. Alternative 12 must be rejected, what it proposes is a public disservice for this and future generations. The LRMP/DEIS must go back to the drawing board to develop and assess an alternative that recognizes resource capability, maintains and enhances fish, wildlife, watershed and other resource values, and, which serves the public's interest. Alternatives 3, 8, 9 or 11 could serve as a departure basis upon which to build such a program of resource management.

Sincerely,

*William R. Meiners*  
William R Meiners

WRM mjm

cc Governor John Evans  
Senator James McClure  
Senator Steve Symms  
Congressman Larry Craig  
Congressman Richard Stallings



William R. Meiners

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only after interdisciplinary review of the potential environmental, biological, aesthetic, engineering, and economic impacts on each advertised sale area has been made, as well as the consistency of the sale with the multiple use of the general area [Sec 6(g)(3)(F)(ii)]. The selection of appropriate silvicultural harvest methods generally can only be made on a stand and site basis to assure that, to the maximum extent possible, applicable biological (both biotic and abiotic) and economic concerns, and the specific on-site management requirements of all other associated resources, uses, and activities are identified and can be met. In fact, the references to "each advertised sale" and to "the sale" in NEPA Sec 6(g)(3)(F)(ii) would seem to support the intention that such analyses be made on a site specific basis. For this reason, the detailed analysis of any alternative limiting silvicultural practices to either uneven-aged or even-aged management without recognizing project level management needs and objectives, which would contribute to the identification of an "optimum" harvest method, would be neither reasonable or practical.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experience. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Latah County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility. The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



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SALMON N F

JAN 10 '86

January 8, 1986

Info	O	Action	□
SUP			
LMP	1	2	3 4 5 6
TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
RRVW	1	2	3 4 5 6
AO	1	2	3 4 5 6

CC:TO. Jensen 1/11/86

Richard Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

RE: SALMON FOREST  
PLAN

Dear Dick

The tenacity to create the volume of paper work now termed the Salmon Forest Plan is awesome. I commend you and your staff for the long days (and nights) of effort needed to create this tome.

Perusing the various alternatives, it is soon obvious that acceptance will be directed to some variant of the "preferred alternative." I notice that you have changed from the previous recommendation that the Lemhi Mountains be a wilderness study area. Why is that? Has the character of the land undergone any change? Have any previous supporters of its inclusion in the wilderness system recanted their support?

It is also noted that you are not cooperating with the Beaverhead National Forest by recommending a complementary portion on our side of the continental divide to coincide with the West Big Hole Wilderness proposal in their preferred alternative. What is the reason for lack of continuity in this area?

Considering your previous position that the Lemhi Mountains be a wilderness study area, this plan should at least propose that the Lemhi's be managed under the Non-motorized Semi-Primitive Area.

Elk migration paths across the head of Dahlenega Creek, Sheep Creek, Indian Creek and Hughes Creek also ought to be given this more protective classification.

Your plan should include a good mapping of the critical migration route of elk over the Montana border into Dahlenega Creek, across Morgan and Eagle Mountain into Sheep Creek, through Sheep Creek and out onto Steen Mountain and beyond. This migration route should be given special consideration and a plan made for it.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 799  
Salmon, ID 83467

Reply to: 1920

Date:

Richard R. Smith  
P.O. Box 1032  
Salmon, Idaho 83467

Dear Dr. Smith

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.



Richard Hauff


Page Two

January 8, 1985

No new roads should be built in this route and a seasonal closure of the Lick Creek to Morgan Mountain Road should be enacted. There is relatively little valuable timber there and if taxpayers are to subsidize access to timber this taxpayer votes to subsidize it in a less controversial area - not in a fragile elk migration route.

My best wishes in creating a wise and skillfully crafted plan that best serves the needs of the inhabitants of this land

Sincerely,



Richard R. Smith

RAS js



Richard R. Smith

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The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied:

- 1 Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages.
- 2 Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake.
- 3 Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek.
- 4 Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages.
- 5 Key big game summer range in the Tobias Creek area.
- 6 Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages.
- 7 Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas; and
- 8 Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of pole- and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek area will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comment, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been





Richard R. Smith

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recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch,
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek;
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch, and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kerney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the



Richard R. Smith

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Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-310



SALMON N F

JAN 13 '86

Info O Action ☐

SUP  
LMP 1 2 3 4 5 6  
TAF 1 2 3 4 5 6  
ELM 1 2 3 4 5 6  
PRW 1 2 3 4 5 6  
PO 1 2 3 4 5 6

2 CC's TO Jensen 4/21/86

January 6, 1986

Mr. Richard Hauff, Supervisor  
Salmon National Forest  
P.O. Box 729  
Salmon, Idaho 83467

RE. Comment on the Salmon National Forest Draft Management Plan

Dear Mr. Hauff:

I greatly appreciate this opportunity for public comment on the Salmon National Forest Draft Management Plan. The Salmon National Forest includes some of the most magnificent natural resources in Idaho, and I value each visit to the forest as a treasure. Portions of the Salmon N.F. touch such special areas as the Frank Church - River of No Return Wilderness and the Main and Middle Fork Salmon Wild and Scenic Rivers. In addition to these federally recognized habitats within the N.F. are tremendous Roadless Areas such as the Bitterroot Range (including the West Big Hole Roadless Area) and the Lemhi Range Roadless Area. I have a number of general and several specific comments on the twelve alternative drafts.

I was shocked and disappointed to see that the preferred Alternative is No. 12, and could not find decision criteria to explain this choice. What were the decision criteria and where do they appear? Was there opportunity for public review and comment upon the decision criteria, as there legally should have been? The preferred Alt. is not in the public interest because it follows the same old anachronistic timber harvest and road building scenario that has plagued our forests for years at the disregard of all other values, particularly those which are non-consumptive or non-commodity focused (such as fish and wildlife habitat, scenic values, primitive recreation, wilderness values, and natural species and community diversity). It is as though wilderness values are entirely dismissed because Alt. 12 proposes no new wilderness at all - despite the fact that there are clearly meritorious roadless areas in the N.F. I am enclosing a paper I presented recently to outdoor programmers which elaborates anthropocentric and biocentric values of wilderness, which I ask to be included in the record.

I strongly support Alt. 3, which emphasizes "nonmarket outputs and values such as water, fish and wildlife and dispersed recreation." In addition to recommending roadless areas in Alt. 3 for wilderness protection, I would add the Anderson Mountain



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1920

Date

Peter Bowler  
Star Route  
Bliss, Idaho 83314

Dear Mr. Bowler

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.



0174



R A. and the entire Lemhi Range, not just portions. Other R A.s I feel should be recommended for wilderness management include Goat Mtn , Italian Peak, Sheepeater, Musgrove, Napias, Sal Mtn , Perreau Creek, and Jesse Creek All of these are supported in Alts 8 or 9, but should be combined in a better endorsement Alt

I adamantly support the designation of the ten Research Natural Areas proposed by the Idaho Natural Areas Coordinating Committee These include Deadwater, Kenny Creek, Davis Canyon, Mill Lake, Frog Meadows, Allan Mt., Bear Valley Creek, Colson Creek, Dome Lake, and Dry Gulch - Forge Creek How are these potential RNAs being evaluated, by whom, with what qualifications, and when will the public have opportunity to review and comment this analysis? Under what set of criteria are they being researched by the Forest Service? RNA preservation and designation are of utmost public interest value and the Forest Service should change its non-committal stand and support their recognition.

I am a staunch believer in and supporter of wildlife as a great benefitter to the public. It is absolutely essential that elk habitat be protected as elk habitat with cattle removed, and that riparian habitat be protected and enhanced.

Current livestock AUM allocation at 54,100 is far too great; instead, lower allotments, as in Alt. 3, 8, and 9, which propose 48,000 AUMs are much more reasonable. Most importantly, however, is the need to get cattle out of key elk habitat. Natural resource welfare and subsidy of the cattle industry is an anachronism we can no longer afford, particularly when it is in conflict with wildlife which has much greater value to the public, to whom the resource belongs.

I am attaching a paper presented by Mr. Bruce Bowler to the Idaho Wildlife Federation entitled "Wildlife. Is It Necessary?" which aptly delivers the public interest view of wildlife versus cattle grazing. Please include it in the record.

The Plan proposes far too much new roading. From my perspective, roading by the Forest Service represents yet another form of natural resource welfare to an industry which has no need of it, the woods products industry Even Alt. 3, which suggests the least new roading of the Alts., has too ambitious an approach with a net increase of nearly 500 miles over time. I strongly support the excellent proposal to close new roads when they are not actually being used for timber harvest or related activities. This would be a very positive approach that would mitigate some of the worst impacts of roading. I might add that I think the final Plan should very carefully examine existing roads and close those which penetrate high value wildlife habitat but are not used for management purposes.

P er Bowler

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Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision

The Anderson Mountain Roadless Area Number 13942 will not be recommended for wilderness designation. Two management prescriptions will be applied

1. Semi-primitive motorized for an area adjacent to the Continental Divide; and
2. Anadromous fish emphasis with high investment timber outputs at the lower elevations.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Past mining activities indicate a high probability of continued mineral development within this area. Mineral potential, recreation values (including the Continental Divide National Scenic Trail), and significant growing stocks of sawtimber occur within this roadless area. No resource activities are planned in the upper elevations, to be managed as semi-primitive, that would preclude future consideration of this area for wilderness during the next plan revision.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests The Challis National Forest has not recommended wilderness designation for that portion of the area The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness Eight management prescriptions will be applied

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages;
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,
5. Key big game summer range in the Tobias Creek area,



Page 3 of 4

Considering the fact that there appears to be little difference in the various Alternatives' treatment of fire control, I urge the preparation of guidelines for fireline construction. I have heard horror stories about ambulance chasing attitudes of bulldozer owners who get paid for bulldozing anywhere and any way they please when fires occur. Bulldozer damage can be extensive, as was evidenced during the past fire season in the Salmon N.F. Guidelines should be formulated to protect the fragile soils from becoming denuded by uncontrolled dozing.

The Forest Service needs to do a better job of systematically inventorying and protecting its cultural sites. It is ridiculous to rely on a couple of temporary summer employees to survey 407 recorded sites and potentially hundreds of others. The protection of cultural sites should be a high priority for the Forest Service.

I disagree entirely with the approach the F.S. has taken to managing recreation in the Plan. Besides not recommending any new wilderness, it proposes all semi-primitive recreational areas be opened to motorized instead of non-motorized recreation. This would place such jewels as the Lehmis and the West Big Holes at the mercy of dirt bikes and is a classic example of thoughtless planning. I urge that all semi-primitive recreation areas be designated as non-motorized sites. Another piece of poor planning is the proposal to expand the overused campground at Meadow Lake which is situated too close to the lake and really can't be viably expanded in its constricted locality anyway. A larger campground should be designed at Gilmore, which makes more sense from the point of view of protecting the lake. Mountain bicycles should not be allowed in any roadless area, particularly the Lehmis or the West Big Holes. They are notorious in the damage they cause to trails. I request that all roadless areas touching wilderness areas be maintained as a roadless buffer zone.

How can your stream sedimentation rates range in increase from 11% to 40% in the Alts., but anadromous fish and trout not reflect substantial differences in fish mass? Please explain this paradox.

The timber harvest proposal is far too great. As was pointed out in the 1984 GAO report, "Congress Needs Better Information on Forest Service's Below Cost Timber Sales" (GAO/RCED -84-96), all timber sales in the Salmon N.F. in 1981 - 1982 were below cost, losing \$1.5 million in 1981 and \$0.95 million in 1982. With this kind of extravagant red ink at the detriment of true public interest values in wildlife and non-logged habitat, the proposal to log 23.9 MMBF/yr. is ridiculous, and the Service acknowledges that "If current lumber market conditions continue, only 10.6 MMBF/yr. is expected to sell." As is admitted on page II-85,



Peter Bowler

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6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainage.

7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The Goat Mountain Roadless Area Number 13944 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized recreation emphasis for use on approximately 90 percent of the area; and

2. Medium investment timber outputs on the Grizzly Hill/Irish Boy area.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. High mineral potential and past mining activities indicate a high probability of continued mineral development within this area. During the current planning period, timber harvest and minerals development (if it occurs) would preclude portions of the area from wilderness consideration during the next planning period.

The Italian Peak Roadless Area Number 13945 involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management's (BLM) Eighteen Mile Wilderness Study Area. Portions on the





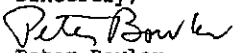
Page 4 of 4

"Projected levels of harvest exceed that which would allow the attainment of State big game goals. Meeting these goals would necessitate a reduction of timber harvest levels." I urge the F.S. to drastically lower its cutting proposal, and keep the public from losing money and at the same time sacrifice public natural resources. If only 10.6 MMBF/yr. is expected to sell, why not make that the top cut limit?

The section treating old growth habitat and species diversity is shallow, and it seems improbable that this portion is legally adequate. While the Plan asserts that "Habitat for old growth-dependent species will decrease in non-wilderness areas, but will not fall below that necessary to support minimum viable populations" (III-1), the likelihood of maintaining sensitive species at minimum viable population levels seems small. Population dynamics and ecological needs of old growth dependent species are not well understood, and aiming at minimum "viable" levels is unrealistic to guarantee survival of the species in the Salmon N.F. I am attaching an excellent discussion of old growth habitat by Andy D. Stahl (1985) which I ask be included in the record. I am against cutting any additional old growth formations on ecological and species diversity grounds.

This is a plan which needs a turn-about in direction. Rather than pursue a modestly altered current direction, the F.S. needs to re-read Aldo Leopold and get a land-ethic orientation into its management designs. I am attaching a copy of "A Sand County Almanac" which I urge you to read, circulate among your staff, and include in the Plan record. Future generations are going to be heavily impacted by the resource sacrifices here needlessly proposed, and it is folly to persist in thinking that F.S. management in the future is going to continue as it has been in the past - the lopsided management of public timberland toward commodity and consumptive ends. In fact, Idaho's great resource is the natural environment, which is the best economically renewable hope we have. The future of the F.S. will be management for maximum public rather than special interest values and mitigation for decisions already enacted.

Thank you for your consideration. I look forward to the Final Plan and sincerely hope that it better reflects the true public interest.

Sincerely,  
  
 Peter Bowler  
 Star Route  
 Bliss, Idaho 83314

Pb/d1

Peter Bowler

4.

Beaverhead National Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation. Five management prescriptions will be applied to the Salmon National Forest portion.

1. Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,
2. Key big game winter range emphasis in Hawley Creek,
3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,
4. Range management for domestic livestock emphasis on the gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages; and
5. Medium investment timber outputs in Frank Hall and Wildcat Creeks

There was moderate public support for, but also strong public opposition to wilderness designation of the Salmon National Forest portion of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. The hardrock minerals and phosphate potential of this area is high, which indicates a high probability of continued mineral development in the future. Currently, intensive range management occurs with many fences and water developments in existence. During the current planning period, continued mineral development, timber harvest and range management activities will preclude much of the Salmon portion of this area--except the Chamberlain Basin portion--from consideration as wilderness during the next plan revision.

Sheepeater Roadless Area Number 13520 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied:

1. Key big game winter range emphasis is placed on the north face of the Salmon River.
2. Anadromous fish emphasis with medium investment timber outputs will be applied to all of Owl, East Owl, and the northern portion of Spring Creek, and
3. Emphasis on medium investment timber outputs will be applied to the upper portions of Boulder, Little Sheepeater, Big Sheepeater, Dutch Oven, and Cove Creeks. Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. Mineral potential for the area is undetermined. There has been minor mineral production and extensive exploration. Past timber management activities and significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber product outputs. Current and predicted resource activities would preclude this area from further consideration for wilderness during the next plan revision.







Peter Bowler

Musgrove Roadless Area Number 13517 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied.

- 1 Key big game winter range emphasis on the Panther Creek and Porphyry Creek faces.
- 2 Emphasis on medium investment timber outputs on most of the area, and

3. Emphasis on low investment timber outputs in the headwaters of Musgrove Creek and the West Fork of Blackbird Creek. Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. Past timber management activities and significant growing stocks of sawtimber make this area an important contributor toward Salmon National Forest timber product outputs. During the current planning period timber harvest activities are planned in Musgrove Creek that would preclude this roadless area from consideration as wilderness during the next plan revision.

Napias Roadless Area Number 13509 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. A management prescription for emphasis on medium investment timber outputs will be applied to the entire roadless area. Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and significant growing stocks of post, pole and sawtimber occur within this area which can contribute to Salmon National Forest commodity outputs. During the current planning period timber harvest activities are planned in the Sawpit and upper Napias Creek drainages, precluding this roadless area from consideration as wilderness during the next plan revision.

Perreau Creek Roadless Area Number 13511 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Two management prescriptions will be applied.

1. Emphasis on medium investment timber outputs on most of the area, and
2. Emphasis on range management in the Williams Basin-Perreau Creek areas.

Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes.



## Attachments:

Bowler, B. April 9, 1983. Wildlife Is It Necessary? Presented to the Idaho Wildlife Federation 48th Annual Convention at the Owyhee Plaza, Boise, Idaho.

Bowler, P.A. November 8, 1985. University Outdoor Programs and the Wilderness/Natural Setting Experience. Paper presented at the Association of College Unions - International, Region XV Conference hosted by the University of California, Los Angeles.

Leopold, A. 1966. A Sand County Almanac with Essays on Conservation from Round River. Ballantine Books, New York (20th printing edition, May, 1984).

Stahl, A. August - September Issue, 1985. Old Growth - An Irreplaceable Asset. Washington Wildfire.



Peter Bowler

6.

Jesse Creek Roadless Area Number 13510 will not be recommended for wilderness designation; however, the emphasis will be semi-primitive, nonmotorized management. This roadless area includes the unroaded portion of the Salmon City Municipal Watershed and will be managed with emphasis on producing sustained yields of quality water. Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes.

The Forest Plan sets in motion the process of establishing Research Natural Areas. By this Plan, 10 areas were identified for protection until field verification can be made and establishment reports prepared.

The Idaho Natural Area Coordination Committee has taken the lead in field identification and is assisting with establishment reports.

As their reports are completed, we will submit them to the Chief of the Forest Service for approval.

The impact of domestic livestock grazing upon the wildlife and fish resources was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurable with maintaining high wildlife and fisheries outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game, and resident and anadromous fish. Protection and enhancement of riparian areas is also an objective of the preferred alternative.

All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA). Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan. This travel plan is updated periodically using both public input and information gathered by monitoring the current travel plan. Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range.

The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timber land. Densities vary according to the harvest system used and the location of the timber stands. The harvest system used varies depending on the type of terrain. The random scattering of mature timber stands on the Forest requires additional road miles for access.

Decisions on road location and standards are made by considering environmental effects on soil, water, wildlife, visuals and associated costs. The road standards for specific projects are developed during the project's Environmental Assessment. Basic guidelines for transportation system management can be found in the Draft Forest Plan on pages IV 65-68.



Peter Bowler

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The use of heavy equipment in nonmotorized areas will be consistent with Forest Service policies relative to these areas. In the initial suppression considerations for the Plan it was felt that fire suppression could be managed through broad strategy statements without tying managers to specific tactical considerations; however, after the 1985 fire season, we feel as you do that specific standards are necessary for the use of heavy equipment on the Salmon. These standards will provide guidelines to the incident (fire) management team pertaining to line width, fire rehabilitation considerations, and firefighter safety.

The protection of cultural resource sites is a high priority on the Salmon Forest. This summer a GS-7 professional, plus our five para-professionals, will be available for project reviews.

A portion of the areas that were depicted as semi-primitive motorized in the Draft Plan will be designated semi-primitive nonmotorized in the final Plan.

Meadow Lake Campground is one of the most popular overnight camping and fishing spots on the Forest. The resource damage that is occurring, such as erosion and compaction, is the result of uncontrolled, unrestricted vehicular and pedestrian traffic. The new design for the campground will incorporate features, such as barriers and hardened surfaces, that will restrict or channel vehicles and people onto surfaces that will accommodate their use without further resource damage. The lakeshore will be rehabilitated with topsoil and seeding and a surfaced access trail provided. The reconstruction of the campground will not increase use over current levels, but will accommodate the use that the site is already receiving, and in a manner that will protect the fragile environment at this popular location. Your suggestion of building a new campground at Gilmore is a good one except for the fact that the Forest boundary is approximately two miles up the mountain from the townsite and there is no other suitable location between the townsite and the lake.

Mountain bikes will be allowed in all areas except designated wilderness. Research to date has not shown mountain bikes to cause unacceptable resource impacts, particularly when compared with other modes of transportation that are also permitted, such as trailbikes and horses.

During the passage of the Central Idaho Wilderness Management Act of 1980 the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the [Frank Church] River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the wilderness depending on their resource characteristics. Areas adjacent to the wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom and Blue Joint vicinities.

Your concern relative to the relationship between sedimentation rates and fish population responses would appear to be logical. One of the main reasons why the fish population did not vary substantially between alternatives is related to the fact that fish survival is influenced only slightly by minor increases in sediment. Substantial changes in survival would be expected when sediment rates exceed approximately 50 percent over natural for anadromous species and 100 percent over natural for resident



VI-316



Peter Bowler

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trout. All alternatives were below these levels and, therefore, fish responses were minimal

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

1. Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The 1978 Sikes Act Plan titled, "A Program For Fish and Wildlife Habitat On the National Forests and Grassland in Idaho," did contain a Goal to manage for existing populations. Based on the State-wide plan, each National Forest in Idaho prepared an individual Forest Sikes Act Plan which was based on the State Plan. These plans were approved in 1978 and expired in 1982.



Peter Bowler

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Following its expiration in 1982, the Salmon Forest did not prepare a new Sikes Act Plan, but instead directed our wildlife and fish coordination efforts into our Comprehensive Forest Land Management Plan.

Throughout our Forest Planning process we have tried to predict (through the use of models as well as professional judgment) the consequences of not only natural events, but also induced management activities on populations of wildlife and fish. A predominant constraint in this process was to ensure adequate habitat was available at all times for perpetuation of each species of wildlife. As I am sure you are aware, habitat conditions for a diverse complex of native fauna is dynamic and constantly changing. A low seral stage, indicative of conditions following a timber sale or natural event such as a wildfire, may be conducive to some species of wildlife, whereas, climax conditions may favor others. For these reasons it becomes essentially impossible (even with no induced management activity) to maintain existing or current populations of all species of wildlife.

I can assure you, however, that the Salmon National Forest will continue to manage and monitor habitat to ensure viable populations of the native fauna are maintained. Should any species become Federally listed as threatened or endangered, requirements of the Endangered Species Act of 1973 will be enforced, which dictates that "no actions will be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5).

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk; and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions





Peter Bowler

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being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

We agree that our management in the future is not going to continue as it has been. Timber harvest is going to be down at least 45 percent, while other resource outputs remain close to past levels. The plan will be updated at about 1-year intervals to reflect needed change.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0231



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

January 8, 1986

Reply to 1920

Date:

Pete Wyman  
Rt. 5, Box 309  
Spokane, Washington 99208

To Richard Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, ID 83467

From Pete Wyman  
Rt 5, Box 309  
Spokane, WA 99208

Subject Salmon National Forest Draft EIS

Dear Mr. Wyman.

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

Expenditures to administer the grazing program currently exceed direct revenues received. Grazing fees are based on a formula established by Congress in 1978 which ties them to production costs and market conditions (the price farmers/ranchers receive for their product). For the past several years there have been dramatic increases in production costs while prices received have been declining. Should this trend be reversed, the fees paid for grazing could very likely exceed administrative costs. Congress could also change the method used to determine grazing fees causing increase or decrease in direct returns.

Providing a level of livestock grazing consistent with the agricultural base and rural lifestyle of Lemhi County was an important consideration in the selection of our preferred alternative. The projected increase in permitted grazing over the current program level is less than 1 percent, and involves implementing a higher level of management on selected allotments. One of the main reasons for proposing a more intense level of grazing management was to reduce conflicts with wildlife and fish.

Riparian zones are indeed areas of special importance to many resources. Management concern for these areas has been expressed in National Forest Management Act direction to protect riparian zones and their dependent resources (water, fish and wildlife). Planning direction, expressed through numerous standards and guidelines, outlines management requirements associated with resource management activities necessary to protect and preserve riparian areas on the Forest.

Livestock grazing can and does influence the nature and condition of riparian areas. Resolution of conflicts is planned for on a site and/or project specific basis using options appropriate to the conditions and circumstances involved. For example, recently we have been using the concept of the riparian pasture as one of many management tools to meet the riparian management objectives.

SALMON NF

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Info	0	Action	□
SLP			
LVP	1	2	3 4 5 6
TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
PRW	1	2	3 4 5 6
IS	1	2	3 4 5 6

2 CCs TO Jensen 1/13/86





Pete Wyman

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The Salmon National Forest contains some of the outstanding scenic, wildlife and fisheries in the nation including the Lemhi, Continental Divide, and Salmon Rivers. Yet, it is a poor growing forest that is costing the public in large subsidies (GAO study) and in over-cut forests with a deteriorated water and soil conditions. The preferred alternative has a PNV over PNC of \$500,000, even worse than the current direction. Further, the plan shows that the taxpayer's would lose \$51.8 million. The losses are most likely much greater since the 1978 process prepared for the USFS by Adams and Haynes failed to predict the decline in housing subsidies, prices and the possible effects of tax reforms on housing growth in the future.

#### Grazing

The plan shows some increases in grazing, but the costs were not easily discernable. What were the costs in AUM's? Since the costs are more likely above the receipts, then range benefits are a cost to the taxpayer. Therefore, there is no reason to expand grazing. With import substitution and private land available there is no reason to believe demand will rise for public grazing in the future. But of course, if permittees only pay 15% or \$1.35 of the "true" price of an AUM or \$8.94, then one might expect an increase in "demand" on USFS land. (There would be quite a "demand" for gold if the Federal government sold their gold stock for 15% of the market price!) Current allotments are competing with wildlife, and that cost should be added to grazing. Why did the forest use grazing values that are higher than the appraised value for 1985 of \$6.90 and \$5.00 for Region I and 4? What is the fair market value of grazing? Was the \$8.94 (11-91) the result of the Grazing Fee Review and Evaluation?

Only about two percent of the nation's livestock is grazed on mostly BLM public land. But over half of the allotments are held by less than one thousand permittees or three percent of the total. What is the breakdown

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, i.e., if not all, would appear to be poor investments based on present market value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

There is very little private timber in the Salmon National Forest area. In addition, the price that the Salmon charges for timber does not have a significant effect on private timber prices because mill capacity far exceeds timber supply.

It is important to note that all proposals in the plan can be accomplished from a physical, biological, economic, and legal perspective. It is not certain they will be accomplished. First, the outputs proposed by the Plan are projections or targets. For example, the number of acre-feet of water meeting water quality goals is a target number the Forest will strive to attain. Another example is allowable sale quantity of timber. That is the maximum regulated volume of timber that can be sold over the planning period--not necessarily the volume that will be sold.

Secondly, all activities, many of which are interdependent, may be affected by the budget. The Plan is implemented by way of various site-specific projects, such as the building of a road, development of a campground, or the sale of timber. If the budget is changed in any given year, the projects scheduled for that year may have to be rescheduled, however, the goals and land-activity assignments described in the Plan will not change unless the Plan is revised. If the budget is changed significantly over a period of several years, the Plan itself may have to be amended [36 CFR 219.10(e) (1984)] and, consequently, will reflect different target outputs. "Significance" will be determined in the context of particular circumstances.

Our budgeting system specifies that road costs should be charged to the benefiting function. Most road construction is charged to timber. The exceptions are roads built by mines, and campground road construction.





Pete Wyman

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of allotments per permittees for the forest? Is subleasing allowed?  
Only with this information can we see if it is in the public interest to  
subsidize grazers

Finally, I strongly object to an uneconomic grazing of riparian areas  
because of the adverse effects on water quality, soils, stream banks, fish  
etc. as noted I question whether you can mitigate grazing damage along  
streams Show me where there has been zero damage by grazing? It is not  
up to the public to show damage but rather you should show that the  
uneconomic use of cattle will enhance water quality Otherwise, grazing  
should be phased out of all riparian areas important to fish and water  
quality, in particular any drainage of the Salmon River and Middle Fork.  
I question the statement that 85% of the Forest rangeland is in satisfactory  
condition (IV-26) The Proposed plan (II-32) indicates that about one-  
half of forage conditions are fair to poor and the apparent down trend  
is three times the up trend

#### Community Impact

Much is said or implied about wilderness and timber availability impact  
on local communities It must first be demonstrated that beneficial  
public timber management impacts are greater than would occur with alternative  
investments It is not in anyones interest to maintain economic in-  
efficiency in timber management in perpetuity If timber management is  
uneconomical in light of alternative returns on investments, but closing  
local mills may cause a social hardship, then temporary inefficiency may  
be socially desirable. But it may also be cheaper to buy out local mills  
or to compensate local workers for retraining or for moving expenses.

Maintenance of small isolated communities by the USFS may also dis-  
regard the public costs of providing rudimentary public services since small  
communities rarely support themselves A more balanced approach to the

The Forest Plan will provide a wide range of recreation opportunities  
including primitive and semi-primitive. The final Plan will also designate  
some portion of the areas that were depicted as semi-primitive motorized in  
the draft as nonmotorized and some as motorized-restricted to designated  
routes

While there is considerable support for additional wilderness designation on  
the Salmon National Forest, there is also considerable opposition to any  
additional wilderness. This opposition to wilderness designation is based on  
numerous factors One is the potential for mineral values which occur in  
many of the Salmon's RARE II roadless areas. Another is the high level of  
interest from motorized users who would be excluded from their preferred  
activities. Concerns about the availability of adequate timber supplies and  
the potential future loss of water rights or reductions in livestock grazing  
have also been expressed

Despite strong disagreement on wilderness classification, public input has  
indicated a high degree of support for a management strategy that would limit  
development on some portion of the undeveloped areas in order to protect the  
recreation, wildlife, fisheries, scenic and watershed values commonly  
associated with wilderness A strategy that accomplishes this is the  
implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will  
provide a high degree of protection for those undeveloped areas to which they  
have been applied. There will be no timber harvest or new road construction  
unless necessary for mineral development. Judging from past experience there  
is little likelihood that significant impacts from mineral activity will  
occur during the next decade. These areas will be managed primarily for the  
benefit of recreation and wildlife. There will be a mix of motorized and  
nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a  
semi-primitive management prescription will be essentially intact at the end  
of the first planning cycle, thereby maintaining their current suitability  
for consideration as wilderness during the next plan revision

The timber harvest level in the selected alternative is compatible with  
providing very high levels of noncommodity outputs. The selected alternative  
provides for

- 1 Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and  
resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest  
Management Act.
4. More recreational capacity than anticipated demand for all classes  
of recreation, including wilderness, except in the Wild and Scenic River  
corridors.





pro-timber bias presented is needed. The USFS is no more expected to guarantee a resource within a range desired by any mill that exists in the area than any other resource. I demand a lot of gold, but no one seems willing to sell it at the price I want to pay!

There is nothing to show the effect of the plan on private timber growing land. If the USFS sells timber below cost, there is little incentive of private lot and even commercial owners to make economic investments.

#### Budget

The preferred alternative is unclear to me as to the status of the budget. There is no reason to believe that an era of tight budgets will disappear for the foreseeable future. Further, the PA apparently assumes adequate budget for wildlife and fisheries enhancement and watershed restoration back log and regeneration. Yet, these budget items have rarely been adequately funded and are currently being cut while the plan foresees increased logging sedimentations. The PA should be rerun with a lower and more realistic budget.

#### Roads

Are policing and maintenance costs of road closures added to timber costs? The USFS may have problems closing the large number of roads needed to protect other values. Are these costs of ORV or snowmobile roads subtracted from those roads? Will a budget be available for policing road closures?

Are any roads attributed to other uses? Unless roads can be shown to have a positive benefit to non-timber activities, they should all be attributed to timber. The plan given didn't appear to give any reasons for turning most of the roadless areas into motorized recreation with its greater attendant costs.

Pete Wyman

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5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.

6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. Three management prescriptions will be applied to the Salmon National Forest portion

1. Semi-primitive nonmotorized recreation emphasis on most of the area.

2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singheiser Mines, and

3. Emphasis on medium investment timber outputs on the Panther Creek Face.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities, while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of post, pole, and sawtimber also occur in the northern tip and along the Panther Creek Face. Most of the remaining area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next plan revision.

Taylor Mountain Roadless Area Number 13505 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended that the Challis portion be designated wilderness. Five management prescriptions will be applied to the Salmon National Forest portion of this area.

1. Semi-primitive motorized recreation emphasis along the Ridge Road to Iron Lake and in Moyer Creek, Opal Creek, and Otter Creek drainages and the Hat Creek Lakes area.

2. Key elk summer range--optimum habitat emphasis on the upper elevations of Spring Creek, Middle Fork of Hat Creek and North Fork of Hat Creek;

3. Anadromous fish emphasis with medium investment timber outputs in the headwaters area of Iron Creek.





SALMONRoadless Areas

Without a site specific stratification study and the classification of economic suitability of timber, it is very difficult to judge the alternative uses for USA's. The specific costs and benefits for each roadless area are not clear.

The Salmon NF bias against wilderness is apparent in the plan. If the rate demand for leaving land in its natural state for wilderness, hunting and fishing etc grows faster than the social rate of discount, then the economic benefits are almost infinite. This is particularly true beyond the one hundredth year. By leaving out the value of the forest endowment to future generations, as the plan apparently does, then we bias the plan towards current activities. Future generations benefit from the greatest number of alternatives possible. The demand for wilderness is site specific while the supply is fixed. On the other hand, timber supply is not site specific and there are other alternatives on more productive sites. There is ample evidence by resource economists to indicate that preservation values outweigh timber values in roadless areas since the remaining areas are of poorer quality sites and more expensive to log, road, etc. Hyde estimated that if marginal land (mostly Class V and IV) were withdrawn from timber production, wilderness could be increased by three times the level of a few years ago. His study concentrated on the more productive western Douglas Fir region of the NW.

The plan makes repeated references to the unanimous support of the Idaho delegation of Sen. McLure's bill. This was of course before the election of Rep. Stallings. Since there has been no hearings, I don't believe he has taken a stand.

Despite the repeated references of great scenic wildlife and fish values that don't exist in much of the United States, the bluntly biased plan cannot find a single acre worthy of wilderness. Stating the amount of boardfeet in each area without including productivity is almost worthless. It appears to deliberately mislead industry into believing there is timber



Pete Wyman

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4 Emphasis on medium investment timber output in Salt Creek and Woodtick Creek, and a portion of the North Fork of Hat Creek, and

5 Emphasis on low investment timber outputs in Weasel Creek, lower Opal Creek and at the high elevations around Moyer Peak

Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple use purposes. The majority of the area provides high elevation big game summer habitat and opportunity for scenic and primitive recreation experiences. Significant growing stocks of post, pole and sawtimber occur primarily in the northern and northeast portions of the roadless area. During the current planning period, timber management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages;
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Easin Lake.
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages;
5. Key big game summer range in the Tobias Creek area.
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages;
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management, emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and an input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more





Pete Wyman

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when in fact the Salmon is a poor productive forest. In addition much of the roadless area timber is probably not economically efficient to cut.

Appendix C should be redone as it fails to give any reason the decisions.

The following areas should be wilderness:

#### Camas Creek 13-901

Protection of a major tributary of the Salmon River should be paramount.

The record of the USFS in protecting the anadromous fish of the Salmon from logging, eg.) South Fork and mining damage, eg.) Panther Creek has not been reassuring.

#### Taylor Mt 13-902

Iron Creek with its anadromous fishery, alpine lakes and unique fisheries needs wilderness protection. Further most of the land is a poor 31 cubic feet/acre productivity site.

#### Lemhi Range 13-903

The area is one of the poorest timber producers, (36-39 cu. ft /acre), has outstanding scenery and water quality, including salmon fishery, and the large number of big game animals and the past interest should be reason enough to find a few acres of wilderness quality. The cattle range conditions do not total 100%. Why? The fact that 50 percent is poor to fair should be reason enough to reduce AUM's. Boundaries can be adjusted for proved mining claims but the remainder of the range should be Wilderness.

#### Bitterroot Range

Most of West Big Hole 13-943, Anderson Mt. 13-942, Allan Mt. 13-946, Goat Mt. 13-944, Italian Peak 13-945, should be wilderness as they are contiguous to roadless areas in Montana, that would make more viable wilderness protecting the Continental Divide. It is strange that the West Big Hole is recommended for wilderness in Montana but not in Idaho.

#### Duck Peak 13-518

This area is contiguous to the River of No Return Wilderness contains a

than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas; however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch,
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch, and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.



variety or vegetation, wildlife habitat, topography and an anadromous fish habitat that drains into the Middle Fork of the Salmon

West Panther Creek 13-504

With elevations from 3500 to over 9000 feet and steep slopes of 20 to 70 degrees and poor productivity 34-52 cu./ft, it is doubtful if the area could be logged economically without damage

Long Tom 13-521

It is amazing that this contiguous area that cannot be anything but roadless and is part of the breaks of the Salmon River was not recommended wilderness

In summary, it is safe to conclude that the non-timber values clearly outweigh the timber values and the greater costs of cutting and new roads will not pay for the marginal benefits. The second growth will be worth less than the old growth or become worthless as it fails to regenerate while the public will suffer losses of wildlife, water quality, deteriorated environment and other amenities. The plan is an inefficient use of the taxpayer's scarce dollars will result as the Salmon can not show that the "needed" timber can not be obtained more efficiently elsewhere. Wilderness designations will be the most economic use of the public's resources for present and future generations. The plan is a disaster to the public and should be redone



Pete Wyman

7

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comment, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Anderson Mountain Roadless Area Number 13942 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized for an area adjacent to the Continental Divide, and

2. Anadromous fish emphasis with high investment timber outputs at the lower elevations.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Past mining activities indicate a high probability of continued mineral development within this area. Mineral potential, recreation values (including the Continental Divide National Scenic Trail), and significant growing stocks of sawtimber occur within this roadless area. No resource activities are planned in the upper elevations, to be managed as semi-primitive, that would preclude future consideration of this area for wilderness during the next plan revision.

The Italian Peak Roadless Area Number 13945 involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management's (BLM) Eighteen Mile Wilderness Study Area. Portions on the Beaverhead National Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,

2. Key big game winter range emphasis in Hawley Creek,

3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,

4. Range management for domestic livestock emphasis on the gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages, and

5. Medium investment timber outputs in Frank Hall and Wildcat Creeks.

There was moderate public support for, but also strong public opposition to wilderness designation of the Salmon National Forest portion of this area.





Pete Wyman

8.

during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. The hardrock minerals and phosphate potential of this area is high, which indicates a high probability of continued mineral development in the future. Currently, intensive range management occurs with many fences and water developments in existence. During the current planning period, continued mineral development, timber harvest and range management activities will preclude much of the Salmon portion of this area--except the Chamberlain Basin portion--from consideration as wilderness during the next plan revision.

Allan Mountain Roadless Area Number 13946 will not be recommended for wilderness designation. A management prescription of semi-primitive motorized will be applied to most of the roadless area. Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple uses. High mineral potential and past mining activities indicate a high probability of continued mineral development in portions of the area. The Divide-Twin Creeks National Recreation Trail is also located within this area. This National Recreation Trail is available for all types of trail use including motorized vehicles (trail machines). No other activities are planned that would preclude consideration of this area for wilderness during the next Forest Plan revision.

The Goat Mountain Roadless Area Number 13944 will not be recommended for wilderness designation. Two management prescriptions will be applied

1. Semi-primitive motorized recreation emphasis for use on approximately 90 percent of the area; and
2. Medium investment timber outputs on the Grizzly Hill/Irish Boy area.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. High mineral potential and past mining activities indicate a high probability of continued mineral development within this area. During the current planning period, timber harvest and minerals development (if it occurs) would preclude portions of the area from wilderness consideration during the next planning period.

Duck Peak Roadless Area Number 13518 will not be recommended for wilderness designation. Seven management prescriptions will be applied:

1. Anadromous fish emphasis with low investment timber outputs on a large portion of the area in Rams Creek, Duck Creek, Hammer Creek, Little Jacket Creek and Trail Creek;



Pete Wyman

9.

2. Anadromous fish emphasis with medium investment timber outputs in Meadow Creek and Beagle Creek;
3. Anadromous fish emphasis with high investment timber outputs on the Silver Creek Face;
4. Emphasis on medium investment timber outputs in Cabin Creek, Corral Creek and Fourth of July Creek;
5. Key big game winter range emphasis on the lower Panther Creek Face;
6. Key elk summer range--optimum habitat emphasis on the ridge and upper slopes between Duck Peak and Red Rock Peak; and
7. Semi-primitive nonmotorized recreation emphasis in Forge and Anvil Creeks.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and some mining activity occurs in the southwestern portion of this roadless area. Significant growing stocks of sawtimber exist on the Silver Creek Face, tributary drainages to Panther Creek and in Beagle Creek where timber management activities are occurring or planned. The remaining area provides key elk summer range, good opportunity for primitive recreation experience and production of high quality water for anadromous fish habitat in the Middle Fork Drainage. During the current planning period it is estimated that resource management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

West Panther Creek Roadless Area Number 13504 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied:

1. Key big game winter range emphasis on the Panther Creek Face,
2. Emphasis on medium investment timber outputs on most of the area, and
3. Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use

VI-326





Pete Wyman

10

purposes. High mineral potential and significant growing stocks of raw timber occur within this roadless area which can contribute significantly to Salmon National Forest outputs. During the current planning period, timber harvest activities are planned on about 65 percent of the area, predominantly in the Big Deer Creek, Little Deer Creek and Quartz Gulch drainages, precluding these portions of the area from consideration as wilderness during the next plan revision.

Long Tom Roadless Area Number 13521 will not be recommended for wilderness designation. A management prescription of semi-primitive, nonmotorized recreation emphasis will be applied to the entire roadless area. Moderate public support of wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. The unit is adjacent to the Frank Church--River of No Return Wilderness and the Wild and Scenic Salmon River. Mineral potential is undetermined. No activities are predicted that would preclude consideration of this area for wilderness during the next Forest Plan revision.

The Draft Salmon National Forest Management Plan identified areas as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



121, Box 183-L  
Salmon Idaho 83467

0270

SALMON, ID

JAN 15 '86

Jan 11, 1986

Info	Action
SUP	
LMP	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
GRWV	1 2 3 4 5 6
EO	1 2 3 4 5 6

cc: TO - Jensen 1/13/86  
JH

Forest Supervisor  
Salmon National Forest  
Salmon, Idaho 83467

Dear Mr. Hanft:

After five years in the making you have succeeded in producing a most incomprehensible Draft Environmental Impact Statement. On a project where public input is so crucial you have produced documents which I feel can not be digested or fully understood by the majority of the public. Many of the tables and charts have abbreviated headings that are completely unidentifiable, and I thought I knew most of the government acronyms. I'm sure most people are making their alternative selections based solely on Table S-1 and Table II-1 in the DEIS. It seems that if the majority of the tables and charts in the DEIS were put in an appendix you might have a more readable EIS document.

There is no one ~~the~~ alternative that I feel provides the best mix of resource uses. I think that Alternative 12



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

Betsy Rieffenberger  
Rt. 1, Box 183-L  
Salmon, Idaho 83467

Dear Ms. Rieffenberger:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch;
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area;
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek;
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch; and



Should be modified to reflect the following concerns:

0270

1. It appears unjustifiable to increase AUM's on the Forest with the current conflicts between wildlife and cattle in many areas. Also I don't believe AUM's can be increased and still achieve your stated objective of "enhancing riparian ecosystems currently in a degraded condition. If there are some areas on the Forest that can support additional grazing than these areas should be used to relieve pressure from some of the degraded areas.

2. The West Big Hole Roadless Area should be considered for wilderness designation. This seems logical since the contiguous area in Montana has been recommended for wilderness.

3. Though I do not believe that the Lemhi Mountains Roadless Area should be recommended for wilderness, I do believe that this area deserves some type of permanent roadless protection, to preserve the aesthetic and wildlife values in the area.

4. The elk migration corridor from Montana in the Dahlenega-Wagonhammer area should receive some degree of protection from resource development activity to maintain the integrity of the area for wildlife. I do not feel that this can be accomplished through seasonal logging restrictions.

(2)



Betsy Rieffenberger

2.

5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied:

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages;

2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake;

3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,

4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,

5. Key big game summer range in the Tobias Creek area;

6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages;

7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas; and

8. Range management emphasis in the Swan Basin area.



5 With timber market conditions in the  
depression they are in and no indication  
of any improvement in these conditions  
it appears that more emphasis should be  
placed on wildlife habitat enhancement  
and recreation in the preferred alternative.  
Winter recreation opportunities, in  
particular, received little, if any, emphasis.  
If the timber market conditions remain  
depressed then recreation/tourism  
may be the one resource to save the  
local economy.

VI-330 In summary I believe that it is ironic  
that five years ago I said that I felt  
that the Forest Plan was just a giant  
paper exercise and that in the end  
forest management would be business as  
usual. From reviewing the selected  
alternative it appears that I wasn't far  
off in my prediction.

Sincerely,  
Betsy Rieffenberger

(3)



Betsy Rieffenberger

3.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low; however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. As in the West Big Hole area, this area also contains significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

The allowable sale quantity of 21.1 million board feet per year will be offered only if it is expected to sell. If it becomes apparent that certain types of sales are not marketable, then the volume offered will be reduced accordingly.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:







Betsy Rieffenberger

4.

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0271



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

9 January 1986

Reply to: 1920

Date:

Forest Service Supervisor  
Salmon National Forest  
P. O. Box 729  
Salmon, Id. 83467

Dear Supervisor:

Although I currently live in Germany my home is in Boise and I will be returning this year. I work for IBM and I am on temporary assignment here. I have returned each fall and late summer to hunt and pack in the Salmon and I am very concerned with it's future management. I use the areas on both sides of Panther creek and I have hiked and fished in many other parts of the Salmon Forest.

I know that this area along with many others has a good population of elk and I feel very strongly that you should do nothing to harm our elk herd, especially by taxpayer-subsidized roading and logging. I don't know how you can continue doing this in these days of enormous federal budget deficits. I also feel that you should see to it that elk, antelope and bighorn sheep be given priority over cattle and sheep in grazing conflicts and allotments. Please support "Alternative 3" in the plan where emphasis is on non-market outputs and values such as water, fish and wildlife and dispersed recreation.

I support continued Wilderness designation for the Lemhis, West Bigbelles, Anderson Mountain and Italian Peaks. This will permanently protect them for hunting, fishing, camping, horsepacking, backpacking, and offer the best means of protecting our wildlife. I am opposed to further degradation of the riparian habitat, streams should be managed at 90% of fish potential. ~~Livestock~~ ~~management~~ should be eliminated where necessary and past damage corrected. Continued roadless designation should be afforded for Allen and Goat Mountains, Lemhis, West Panther, Big Deer Creek, Long Tom, Little Horse, Duck Lake and the Ocean roadless areas.

Sincerely,

*Jim Kochaver*

James T. Kochaver  
Schneckoppestr. 2  
D-7030 Boeblingen  
F. R. Germany

SALMON N F

JAN 13 '86

Info	O	Action	C
SUP			
WPE	1	2	3 4 5 6
TAF	1	2	3 4 5 6
ELM	1	2	3 4 5 6
PRW	1	2	3 4 5 6
AO	1	2	3 4 5 6

2 CC:STO Jensen 4/17/86

Mr. James T. Kochaver  
Schneckoppestr. 2  
D-7030 Boeblingen  
F.R. Germany

Dear Mr Kochaver,

Thank you for your comments on the Proposed Salmon National Forest Plan and Draft Environmental Impact Statement.

The proposed harvest level of 22 million board feet is a considerable drop from historic harvest levels. The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."





Mr. James T. Kochaver

3.

Thank you again for your participation in the development of the Salmon National Forest Plan.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-333



Mr. James T. Kochaver

2.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity; semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of roadless designation for Allen Mountain and some areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980, the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the [Frank Church] River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom, and Blue Joint vicinities. The bulk of the Allan Mountain area will also be managed for semi-primitive unroaded opportunities.



SALMON N.F.

0290

JAN 14 '86

1330 S. Main #14  
Moscow, Idaho 83843  
Jan. 9, 1986

Info	0	Action	1	2	3	4	5	6	7	8	9
SUP											
CLM											
TAF											
ELM											
FRWY											
LD											

700510-1-1/16/86

Salmon National Forest  
Supervisor's Office  
Salmon, Idaho 83467

Re Public Comment on Forest Plan

Dear Sirs

Due to a number of commitments and obligations I have presently at school I have been unable to study the Salmon plan in detail, particularly the written part. I would like very much to read it all, but I fear it won't be possible before tomorrow, the deadline date for public comment

I have, though, spent about three hours studying maps of the various proposals, particularly as they regard wilderness classification. The plan is of great interest to me because of the geographical issues to be decided (my undergraduate study is in geography) and because of the economic and environmental issues which it addresses around the town of Salmon, which is where I grew up.

The comments I make are my own, and reflect what I have been able to learn about the Forest over the years. My familiarity is certainly not as deep as is the familiarity of those who have been working on the Forest for many years. Nevertheless, I think I am acquainted with the areas as most people are likely to be who do not live in the area. As will be evident in my comments, I am not stumping for any particular industry or environmental group. I am simply offering my gut reaction to the proposals based on my biases as to what would be best for everything in the long run.

It is with great regret that I cannot concur in the Forest Service's "preferred alternative" which was Alternative 12 in the group of maps I saw at the library here. In a nutshell, it is unrealistic, highly biased and politically impossible. It is likely to open the door to yet another generation of bitter controversy, extended lawsuits and appeals, and ultimately leave many unresolved questions. I would have thought that during the last few years it would have become painfully obvious to everyone involved that there will be no meaningful resolution of the wilderness issue on the Salmon National Forest unless--as a bare minimum--that part of the North Lemhi recommended by RARE II (168,000 acres if my info is correct) is included in the proposal.

When will the agencies, politicians, and the industry face the music? Dragging this into a Hundred Year's War hurts everyone--most especially the resource dependent families in towns such as Salmon--because there is no certainty in how to prepare for the future. Local individuals might not like the concept of wilderness, but at least when they know what it's going to be, they can prepare to make long term adjustments accordingly. Alternative 12, which proposes no new wilderness, leaves the questions begging.

A realistic and more pragmatic option which would not hurt the economy much, if at all, would be Alternative 7 (though I recall I liked parts of 3 or 4 for East half of the Forest)



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to. 1920

Date.

Ralph Maughan  
Box 1173  
Pocatello, Idaho 83204

Dear Mr. Maughan:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1 Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,



VI-334



Ralph Maughan

2

First of all, Alternative 7 would recognize much of the North Lemhi's as wilderness (though I think that #3 and #4 recommended even more). The North Lemhi area by all counts is a high quality area with many, if not all the attributes, that wilderness areas are supposed to have. Timber and minerals, throughout much of this area, are poor to nil. It is my understanding that reforestation efforts in some areas have been disastrous due to the cold, arid climate. Oil potential in the area is highly skeptical and unproved. There are numerous other areas around in which to engage in ORV recreation. In addition, since ranchers are often allowed to continue their grazing operations in wilderness, it seems to make little sense to delay the inevitable.

Part of the Beaverheads east of Salmon should also be classified as wilderness, if only for the purpose of having it so designated on highway maps. It is my opinion that having part of this area as wilderness would help diversify the tourist industry in Salmon and attract people to the town for the purpose of seeing Salmon--not just driving through to get to a river or hunting trip. Some day the Salmon Chamber of Commerce will awaken to the fact that the Beaverheads can be the scenic icon of the area. Within Idaho, only Driggs and Stanley have such a dramatic backdrop of mountains as far as towns go. Scenery in the Beaverheads is as beautiful as any we have in Idaho, and especially with Alternative 7 there would appear to be few economic hardships suffered in such a classification (with the exception of Sheep Creek, which could perhaps be classified as a semi-primitive area).

The Hat Creek Lakes-Taylor Mountain area is a well known and popular hiking area not far from Salmon. Though I am not convinced that it is big enough (with the twin Meyers Cove area) to be a full fledged wilderness, its roadless status is probably appropriate. Taylor Mountain is the second highest peak on the SNF in the Salmon River Mountains and had the highest fire lookout to have existed on the Forest.

The Big Deer Creek area was fought over at length when the River of No Return Wilderness was established and expressly released in the legislative history surrounding that bill. In light of the valuable minerals and timber in the area I think it is best that this and other similarly situated areas are left out of at least the wilderness proposals. A bargain is a bargain.

The West Long Tom Mountain area was probably also debated in the creation of the RNP. However, due to the extreme environmental conditions of this area (the worst fire area of the Forest, overlaying the highly erodible Idaho Batholith or slopes as steep as any to be found in the Salmon River Canyon) I think it might be appropriate to attach this to the RNRU, despite the fact this might be inconsistent with my recommendations for Big Deer Creek above.

The Allan Mountain area in the North Fork District is claimed by the wildlife people to be a pivotal area for elk habitat. Perhaps it is. I don't have much familiarity with the wildlife issues (I'm not a hunter) or this area. It doesn't appear on the map to be a large enough area to be a great wilderness area, but perhaps it should be. Another option would be to put this in an intermediate category (such as Sheep Creek to the east) which might allow helicopter logging if justified, but no road building.

2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,

3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,

4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,

5. Key big game summer range in the Tobias Creek area,

6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,

7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of pole and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since



0287



Ralph Maughan

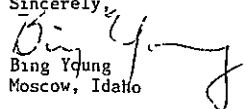
3.

The Chipps Creek area directly west of Salmon would probably be fine as a semi-primitive area. Ironically, as many places as I have seen within this state, I have not seen much of this area, though it is the closest to where I grew up. I hear that there are lots of shale slides.

It is my hope that the Forest Service will not shirk its responsibilities for fear of being out of favor with locals and/or politicians. Admittedly, making decisions about the long term future of public lands is not an easy or popular task. It will affect economics and the environment for many future generations, if not forever. If job security and being loved by all are the primordial concerns of a persons life, then perhaps forestry management is not the right career option.

It is time we all started looking at each area of the Forest and asking the question "What will be the best long-term benefit to the most people given the peculiarities and nuances of this select area?" The fact that forests in other parts of Idaho and other parts of the country may produce more timber than the Salmon, or have less Wilderness than the Salmon should be irrelevant. They don't all have the same geography. The bottom lines for acreages of wilderness or semi-primitive areas should be just that--the bottom line. Pre-determining how many acres of wilderness we want in Idaho or on the SNF is the wrong way to resolve the issue. We ought to look first at the particular areas involved, look at the local human situation surrounding those areas and make our decisions accordingly. We have had the cart before the horse too long.

The Salmon National Forest could do an enormous public service--probably not spelled out as a requirement in the CFRs or the US Code but a service nonetheless--if its personnel could seek to better explain and communicate the issues facing it to the lay public. In discussing issues of forest management with many Idahoans, I find that I spend most of the time trying to dispel myths perpetrated by extreme environmentalists or industrialists. Public presentations, maps of outlined proposals hung up in the public library or courthouse, or down to earth articles and editorials regarding the problems the Forest is facing printed in the local newspaper would all go a long way towards building a bridge of trust that is greatly needed if we are ever to resolve many of these issues in our lifetimes.

Sincerely,  
  
 Bing Young  
 Moscow, Idaho

the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.

NEPA requires that a broad range of alternatives be considered. We believe that we have met that requirement.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
 Forest Supervisor



VI-336

SALMON N F

0304

0304

Jan 10, 1986

JAN 14 '86

Supervisor  
Salmon Nat 1 Forest  
Box 729  
Salmon, ID 83467

Dear Supervisor

Below follow my comments on the Salmon Draft Forest Plan and Environmental Impact Statement

My comments are much shorter than I had intended, given all of the time I have spent in the past on the Forest and in reviewing your past proposals. However, last minute personal concerns and the time-consuming difficulty of making a living in the sorry economy of Idaho and the United States in general consumed my time.

I think your proposed plan has some merits, but errs vastly by placing too much emphasis on two rapidly declining industries -- timbering and ranching -- with little thought of how Idahoans will have to make a living in the future period shorter than your forest plan.

Your aggressive timber program will further harm the taxpaying public and further degrade the recreational aspects of the Forest which, I believe, could be its future. No person who has ever observed the way timber grows on the Oregon or Washington coast or in the southeastern United States could ever believe that East Central Idaho could ever produce sustained yield timber in an economically competitive fashion. Organized timber "harvest" will remain only as long as Senator Jim McClure (or similar officials) are able to exert enough political influence to continue the timber road subsidy. With the Gramm-Rudman budget balancing bill and \$200 billion dollar federal deficits, this won't be much longer.

I urge you to help our economic future by foregoing your wasteful proposed logging of the Lemhi Range in particular. Please also preserve the elk migration corridor between Dalonega Creek and Sheep Creek so that this economically valuable species can migrate between Idaho and Montana. Perhaps you should adopt the view of medical doctors that if you can't do any good, at least do no harm.

I also urge you to reduce the livestock grazing in the Lemhi Mountains so that there will be more wildlife. Your plan seems to bend over backwards to favor livestock and ranching interests. Perhaps I'm feeling a bit testy, but

Info	0	Action	□
SUP			
IMP	1 2 3 4 5 6		
TAF	1 2 3 4 5 6		
ELM	1 2 3 4 5 6		
PRWW	1 2 3 4 5 6		
AD	1 2 3 4 5 6		

ZCC:TO: [Signature]

I'm so tired of seeing hundreds of people lose their jobs in Idaho cities like Pocatello, silently, with no fanfare, congressional hearings, or attempt to help them retrain, while the whim of every one of Idaho's landed gentry is catered to by federal agencies, down to last sacred cow. If only their political and cultural arrogance was matched by their contribution to the economy!

Please record that I favor alternative 3, although none of your alternatives are my real choice. I would choose an alternative that reflected the Moody-Kostmeyer Idaho Wilderness bill, which you haven't included among your alternatives.

Sincerely,

Ralph Maughan  
Ralph Maughan  
Box 1173  
Pocatello, Idaho 83204

\*Since this is an obvious and viable alternative, I think your failure to make it one of your alternatives, no matter how much you may disagree with it, is a conscious attempt to prevent a large number of Idahoans and citizens of other states from responding effectively to your plan, and hence, your range of alternatives is legally deficient from the standpoint of NEPA.



United States  
Department of  
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Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date:

Lewis W. Campbell  
113 Lafayette St.  
Salmon, Idaho 83467

Dear Mr. Campbell:

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

The seven range prescription strategies in Appendix D were developed to provide a range of management intensities that could be analyzed in any given alternative. What prescription strategy was applied to what allotment varied by alternative, depending on the basic thrust of the alternative. From a cost-benefit relationship, it was helpful to identify which allotments would receive the higher levels of management intensity within some level of constrained funding.

The difference between a strategy of 3 and 4 is that cultural treatments, such as sagebrush management, reseeding, etc., are provided for in strategy 4 and not in strategy 3. Although cultural treatments could occur under strategy 3, it would require a more in-depth environmental analysis and modification in the allotment management plan.

Good quality winter ranges are often considered to be the foundation of big game herds. As a land managing agency, the Forest Service is very interested in maintaining adequate winter ranges for deer and elk and habitat improvement projects are conducted yearly on many acres, however, as winter range areas continue to be developed, the problem of maintaining good quality winter ranges in adequate quantity becomes more acute. Maintaining the habitat quality of key big game winter ranges will continue to be a priority under the preferred alternative of the Forest Plan.

Reducing conflicts between big game and livestock on key big game winter ranges is also necessary if habitat quality is to be maintained. By reducing competition for forage on National Forest lands, depredation problems on private lands should be reduced.

Winter feeding of big game herds is an expensive project that is sometimes conducted by the Idaho Department of Fish and Game during extremely severe winters to help reduce winter losses and/or reduce depredation problems. Money for this task is generated through the sale of elk, mule deer and



SALMON N.F. Jan 14, 1986 0313

JAN 14 '86 4D

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CRP	1 2 3 4 5 6
YAC	1 2 3 4 5 6
ELM	1 2 3 4 5 6
BRWN	1 2 3 4 5 6
AD	1 2 3 4 5 6

200's to 400's

Forest Supervisor  
Salmon National Forest  
PO Box 729  
Salmon, ID 83467

Dear Sir:

In general I support your selection of Alternative 12 as the preferred Alternative for the Forest Plan. Through that Alternative the Forest Service should be able to meet its responsibilities to both the people of the United States, and as much as possible, to the people of the local area.

As wide a variety of management options as possible is needed if the responsibilities of land managers is to be met. The extremely <sup>wide</sup> nature of the problems faced require an action spectrum as wide as possible if efficient and effective solutions are to be achieved.

Example: Appendix D, Range Mgmt Strategies, Prescription 4 identifies a wide range of actions that can be considered for application to specific allotments.

Questions: Have your restricted potential actions in Prescription 3 to a point where effective and efficient action may not be available to solve a problem?

Wilderness Areas presently designated to be Wilderness appear to more than adequate to meet the intent of the original Wilderness Act for this area. Additional Wilderness only serve to make management of the area more difficult and expensive.

I have two points I would like you to consider for inclusion in the final plan:  
1- At least some mention of the need to avoid over-obligation of available big game winter range is needed. Meeting State Fish and Game goals is not justification for the impacts occurring on private land owners each winter because of the existing situation of inadequate winter range.





Lewis W Campbell

2.

03/3

Increasing big game populations should not be precluded if the Fish and Game were to take mitigating actions, ~~ie~~ Purchase of private lands more impacted by wintering big game; implementation of a feeding program such as Wyoming Game and Fish, or some other real mitigation actions. The presently practiced "baling wire and bushkin" approach to the problem of fencing stock yards and wishful thinking is unfair to both the ranchers and the sportsman.

I'm not trying to start a fight with the Fish and Game, I am suggesting that the whole problem should be made very resable so that all the agencies and the land owners will be encouraged (pushed) to find an honest solution.

- 2- I do not feel that the potential for conflict between elk migration and timber harvest is adequately identified. I am not suggesting that the Management direction is wrong. I am suggesting that the need for migration route considerations in development of timber activities should be more prominently displayed.

While not exactly a comment on the plan I suggest that some type of a summary, with page and section references to the plan, would have greatly helped reviewers to understand and evaluate the total document. I feel it would also be a more workable tool for the people charged with implementing the plan. Not a substitute for, but a complementing addition to the plan. Especially if it identified the "red flag" areas and situations.

Sincerely,  
Lewis W Campbell  
113 253776  
T-1

antelope tags, whereby \$1 50 from each tag is specifically set aside for emergency feeding. This is an effective method of placing the financial burden directly upon the recreationists who consumptively utilize the big game resource. Since this is entirely a State function, you may want to contact the Idaho Department of Fish and Game directly.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

Your suggestion to incorporate a summary section, highlighting the important points in the plan, with page and section references, is a good idea. This addition would make for a more useable document and we will attempt to include it in future efforts.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



0456

SALMON NF

JAN 22 '86

Info	0	Action	1	2	3	4	5	6
SUP								
LMB	1	2	3	4	5	6		
TAF	1	2	3	4	5	6		
CLM	1	2	3	4	5	6		
JRW	1	2	3	4	5	6		
AO	1	2	3	4	5	6		

CC's TO: 2 Jensen 1/23/86

Salmon Nat'l Forest  
District Supervisor  
Salmon, Idaho

Re. 1986 Forest Plan (5 yr)

Dear Mr. Hauff;

Alternative 12 being preferred, let's follow this proposal with emphasis on using a Multiple Use concept. It is a workable type program where an operator of livestock can gear an operation to balance and not have to make drastic changes in operation. This firmable approach will give younger generation a secure enough feeling to invest time and money in an operation and maybe help save the family farm. As a true conservationist this alternative will give opportunity for wildlife habitat by maneuvering of livestock as a tool so as to keep forage palatable and not allowing forage to become stale. It is evident that the human element with only the eyeball approach likes to admire the meadows that wave in the wind. We all do, but the forage approach that has high palatable desires of cattle, appear to have equal taste for the game. They allow stands of stale grass to accumulate only at times, to be taken by fire. I don't mean to say or feel that the only <sup>good</sup> use of grass is ~~being~~ a cow's belly. Management



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83447

Reply to 1920

Date.

Eugene F. Edwards  
P.O. Box 1145  
Salmon, Idaho 83467

Dear Mr. Edwards

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.





Eugene F. Edwards

2

In relation to your concern about off-road vehicles and big game conflicts, the direction, standards and guideline on page IV-110 contain sufficient direction to ensure that motorized vehicle use must be compatible with big game objectives. This will be accomplished with wildlife biologists' involvement in ORV use management and travel planning.

We've tried to develop a plan which provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

PICHARD T. HALFF  
Forest Supervisor



phones or gas have a percent take and, a percent leave. A good M.P. should have priority to conserve water, water shed, timber, grazing, wildlife, scenic quality, and leave the situation later better for everyone. Surely there is no one who would desire only one of the assets noted above.

A true environmentalist surely would not desire to have only one of the above assets captioned. To benefit of only a selfish fantasy that only a very few would ever see. It is an emotional issue with the large percent of these people who want to crow about, and parade around that they are God's only children. In my view to provide food, shelter, clothes and water, all assets put on earth are here to use, especially all renewable assets. One of the main assets would include water, which when the public goes out in the vast areas do create problems. Now we have to look our water because cross country activity has spread contamination to such streams way back in areas designated range, timberland, or wilderness. This disease is commonly known as back packers disease. Who is going to pick out the next paper after a good case of distemper, similar to what we get south of the border? p. +

They should advertise, "We have a new wilderness," known as whatever and wherever. Let's central our wilderness we need absolutely no more designated as such. We do have some, and rightly so, because most of that on the Salmon Trust is extra rough and steep and is good for nothing else because that is what it is and that is enough here. It will be wilderness until the tin bank and the candy wrapped public see the advertisement on maps and make them rush to see what an area of this stature may be.

We have a prime example of what lock up means in the Salmon Nat'l. Trust. This lock up now is known as the Salmon River of No Return Corridor, Kild and Senio River. The deadwater area after years of study is determined as cause of the ice jam that most every year poses problems to the city of Salmon and the ice jam usually gets into the national news. This problem has a viable remedy but no the deadwater debris dam cannot be touched, it is in the Kild and Senio River corridor. There is no doubt this could be changed, but to get Congress to go this direction, evidently would be against their grain.

Cont.

This is a prime example of what one line of that old horse Allen can be similar problems on any designated areas. How many folks will ever see the center of the Frank Church Wilderness area on the ground? Most people's agility is determined by whether they can get around. Most people the age of 40 to 50 would put them over the hill, and on to the road. Frank Church Wilderness area is roadless. When we have roadless areas, this for sure, is a lock up even on scenic views, to be used by only a selected few. These lock up crises are beginning to return undesirable views to the lock up theory.

I am still in preference to Alt's 12 per say, and use multiple use concept. This is not a one sided approach to the use of nature's assets and will leave what was here, when we come, in a better condition than any lock up of any sort could ever do.

We also have another situation beginning to surface. In the late 1800's livestock people cut trails to manage grazing and livestock movement before there were any roads. In the late 1900's we have developed so much leisure time, of which I'm not opposed to, that now we have to have

snowmobiles, skis, and motor cycles.  
These are usable and fun machines.

The problem being out on open ranges,  
any of these vehicles can cause havoc  
to winter game on winter ranges.

Another problem being that they have  
now designated routes for skis only  
or snowbikes only, These routes were  
cleared mostly in the 1800's. What  
is it going to be like for the game  
belonging areas or to drive cattle on  
trails for motorcycles only?

Conflict, Conflict - Conflict.

Yours truly  
Eugene F. Edwards



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 779  
Salmon, ID 83447

Reply to. 1920

Date:

*Call stamped  
next pg 11/23/86*

0517

Jan. 20, 1986

Dear Mr. Hauff

I would like to commend all  
of your staff who worked  
on the Forest Plan, for the  
monumentous task of putting  
together this mountain of  
a report.

I could go along with  
Alternative 12 with the  
several modifications listed  
below:

The area north of Big Deer  
Creek that is in 5B, change  
it to 4B-1 to protect the  
large elk herd that resides  
there. The area south of Big  
Deer Creek change it from  
5B to 5C. This because  
of the already high incident  
of water pollution from the  
Blackbird mine.

Ken Rogers  
Cobalt Ranger Station  
Cobalt, Idaho 83229

Dear Mr. Rogers:

Thank you for taking the time to comment on the Proposed Land Management Plan  
and Draft Environmental Impact Statement for the Salmon National Forest.

Timber harvests and road construction in areas of key elk summer range  
(KESR's) are concerns that surfaced in many letters of response. The  
preferred alternative incorporates management activity design and associated  
coordination measures to ensure that any adverse effects upon the big game  
resource will be very short-term and, in most cases, limited to the life of  
the timber sale. The predicted long-term effects of these activities will in  
most cases be of benefit to deer and elk, and in many cases the benefits will  
be very substantial, especially in areas where natural forage openings and  
timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon  
National Forest. At the same time, all other acres on this Forest were  
classified into optimum, acceptable, or marginal summer elk habitat, and the  
key big game winter ranges were also mapped. These maps then became the  
basis for predicting the elk habitat potential under each of the 12 proposed  
management alternatives included in the Draft Forest Plan. These predictions  
were calculated based upon proposed timber harvest levels, associated road  
construction, silvicultural practices and knowledge of the effects that  
habitat parameters such as cover, forage and open road densities have on  
elk. This analysis revealed that the elk habitat potential under proposed  
Alternative 12 (the draft preferred alternative) would be more than adequate  
to support an elk population level that meets the Idaho Department of Fish  
and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife  
prescriptions applied) under each proposed alternative, depending upon the  
theme (i.e., commodity, amenity, etc.) of the particular alternative. These  
designated KESR's will be managed to favor elk under a set of very specific  
prescriptions designed to enhance elk habitat, however, the prescriptions  
being proposed for application to other geographic areas also include an  
array of wildlife coordination measures that will help ensure that adequate  
habitats to meet species management goals for elk and other management





Ken Rogers

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indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Reclassifying the head of Silver Creek near the Rabbitsfoot Mine to 3A-5C instead of 3A-5B, or the area north of Big Deer Creek to 5C from 5B, would change the degree of investment in regeneration work after timber harvest. It would not result in reclassifying the area as unsuitable for timber production or substantially changing the short term production from those areas. Any proposed timber sale activity for this area will evaluate potential soil and water impacts during the Timber Sale Environmental Assessment.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

0517

- 2

The area in the head of Silver Creek where the Rabbitsfoot mine is located that is 3A-5B. I believe due to the low timber values and fragile soils it should be changed to 3A-5C.

Good luck with finalizing the plan.

Sincerely,

Ken Rogers

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ELM	1 2 3 4 5 6		
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CC's TO	Donner 1/25/86		



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Jan. 23, 1985

Dick Hauff  
Supervisor, Salmon National Forest  
P O Box 729  
Salmon, ID 83467

SALMON N F

JAN 27 '86

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2 CC's TO J. K. H. H. J. K. H. H.

Dear Dick,

The purpose of the planning process is, in our way of thinking, to develop management plans which realistically reflect the forest's ability to produce resources and the public's demand for those resources.

The responsibility for compiling the necessary information and developing the management options rests with you, the forest service. The responsibility to review the options and say which is preferred lies with the myriad of interests which comprises "the public." The responsibility for the decision on which plan is enacted rests with all parties concerned.

As members of one of those publics the following is our perspective

First, we would like to commend all the forest service employees who spent countless hours reviewing data, developing options evaluating outcomes and making decisions. The magnitude of the job was amazing. As members of the public we appreciate all the effort.

For the most part the information contained within the documents was detailed enough to aid review. It lacked, however, critical rationale which was essential in evaluating certain issues. One of those issues is the plan's treatment of roadless lands.

It was not explained why roadless areas were not recommended for wilderness classification. This is especially important information because two large areas, the Lemhi and the West Big Hole, have previously been recommended by the Salmon National Forest for wilderness classification and have been included in Congressional wilderness legislation on two occasions.

We find it unusual that of the 830,469 acres of roadless land outside the Frank Church River of No Return Wilderness not one single acre was recommended for wilderness or for semi-primitive non-motorized management. Here again no explanation is given for such management decisions.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

Lill Erickson and Phillip Herne  
P.O. Box 1922  
Salmon, Idaho 83467

Dear Ms. Erickson and Mr. Herne,

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

VI-346





Without the rationale it appears the forest service has made a "political" rather than managerial decision. In light of the intense anti-wilderness feeling in some segments of the Salmon community, we can understand the temptation of the forest service to bend to that interest.

But we'd like to point out, it is not the responsibility of the forest service to make political decisions on wilderness. That responsibility lies with Congress. It is the responsibility of the forest service to evaluate roadless lands based on the lands' ability to meet the characteristics outlined in the Wilderness Act and to make recommendations based on that evaluation.

Personally we support wilderness recommendations for both the Lemhi and the West Big Moles. They are pristine lands which embody all of the characteristics required by the Wilderness Act of 1964. They are areas of high amenity values and little commodity value. We agree with the boundaries contained in Alternative #3.

We do not support in concept below-cost timber sales. There may be occasions when sales critical to the local sawmill and which do not contain significant amenity values should be sold for below cost, but those occasions should be an exception rather than a general practice.

It seems folly to us for the Salmon National Forest to spend approximately \$2,584,000 preparing sales to only collect \$503,000 in timber receipts. It is our sincere belief the huge federal debt is the cause of the economic woes plaguing Idaho's traditional industries, not wilderness as it is so often accused.

We believe the plan should recognize the economic value of the recreation industry to Idaho and Salmon. It has been determined by the Idaho Division of Economic Affairs that the recreation industry is more valuable to Idaho's economy than the timber and mining industries combined. The plan should reflect those economic realities and protect the fisheries, wildlife, water quality and recreation opportunities upon which that industry depends.

In our opinion Alternative #12 does not reflect the above mentioned concerns. It seems, rather, to be a reflection of the management practices of the past.

Poor management practices have occurred on the Salmon for years because of the basic premise of promoting traditional industries at whatever cost to taxpayer and resource was necessary. Times have changed. The nation with dwindling resources and a two trillion dollar deficit can no longer afford the waste.

The Salmon National Forest should use the planning process to re-think old concepts and look objectively at the trends of the future. Alternative 12 does not do that. It merely modifies the level of the harvest.



Lill Erickham and Phillip Herne

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The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied.

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,
5. Key big game summer range in the Tobias Creek area,
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low; however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.





Lill Erickham and Phillip Herne

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None of the alternatives reflect the option we believe accomplishes the goal of the planning process. However, Alternative #3 comes the closest. We support a modified Alternative #3 which recommends the Lemhi and West Big Holes for wilderness and which establishes a semi-primitive non-motorized management plan for the more pristine roadless lands.

We also urge the Salmon Forest to bring together the varied interests to discuss the issues and look specifically at proposals. The forest service should promote cooperation rather than division, or the time and effort invested in the plan could be easily jeopardized.

Thank you for providing us this opportunity to comment. We do appreciate the effort on the plan and would truly like to see an equitable resolution to the conflicts it contains. We offer our help in whatever way to accomplish that goal.

Sincerely,

Lill Erickson and Phillip Herne

cc Congressional Delegation  
Gov. John Evans  
Region 4 Supervisor  
ICL

VI-348

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion.

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch;
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch; and
5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

In regard to your comment on below-cost timber sales, it is true that most timber sales have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the





Lill Erickham and Phillip Herne

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Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

Finally, in our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



January 22, 1986

Forest Supervisor Richard Hauff  
Salmon National Forest  
Box 729  
Salmon ID 83467

Dear Supervisor Hauff,

I would like to offer these comments on the Salmon Forest's draft management plan. I apologize for being some days past the deadline, and hope you can nevertheless count my letter among the official comment.

Among the alternatives presented, I support Alternative 3. I oppose the selected alternative on the grounds below.

Roads. There is neither economic or environmental sense in proposing 1245 miles of new road over the plan period. This roading will generally hurt water quality, fisheries, and wildlife--and thus the Forest's recreational economy--and will cost many millions of dollars the Forest Service will never recover.

It is both more sensible for the resources, and more in line with federal budget reality, to plan for \$150-200,000 for annual appropriated road funding. The plan should be adjusted accordingly. I do support the goal of closing all newly-constructed roads except when being used for timber harvest.

Timber. The proposed 23.9 MMBF harvest annually is also too high. Over the planning period, this level of harvest has a present net value of -\$51 million. That amount of money-losing for an activity the Forest is not well-served physically for cannot be justified. Virtually every timber sale offered on the Salmon Forest is a below-cost sale. Economics aside, this might be justified if other values were not damaged. But they are.

I am not arguing against any timber harvest that does not pay for itself. But the scale proposed is not supportable. I favor an annual allowable harvest in the range of 10-12 million board feet (essentially what has been selling in recent years) for the next decade, with a review at that time of resource impacts, economics, and local timber needs.

Wildlife. All of this uneconomic roading for uneconomic timber harvest has an effect. The plan admits that current management direction will not meet the Idaho Fish and Game's big game goals after the first decade. Given the roughly equivalent levels of roading and logging proposed in the selected alternative, that will not change.

The plan much underestimates the impacts of proposed roading and logging on elk. Many key elk summer range areas are planned for roading in the first decade--Mugrove Creek, Anderson-Threemile Creeks, Hayden and Tobias Creeks, Pierce Creek, Horse Creek, etc. Overall the plan will eliminate half of the Forest's existing key elk summer range. The irony of course is that most of these areas are not good timber-growing sites.

I also protest strongly the plan to road and log in Sheep Creek and Dahlonga Creek. A Forest Service research project in 1976 showed the vital importance of this area as an elk migration corridor, and recommended that it

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2 CC's TO SENS 11/24/86



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to. 1920

Date

Pat Ford  
414-1/2 2nd St.  
Boise, Idaho 83702

Dear Mr. Ford

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timber land. Densities vary according to the harvest system used and the location of the timber stands. The harvest system used varies depending on the type of terrain. The random scattering of mature timber stands on the Forest requires additional road miles for access.

Decisions on road location and standards are made by considering environmental effects on soil, water, wildlife, visuals and associated costs. The road standards for specific projects are developed using the project's Environmental Assessment. Basic guidelines for transportation system management can be found in the Draft Forest Plan on pages IV 65-68.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay



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remain roadless. That is what should happen.

Roadless Areas. I support Wilderness classification for the Lemhi Range, the West Big Holes, Camas Creek, and Italian Peak. The Forest should recommend these areas as Wilderness, and manage them to retain Wilderness values.

Most of the remaining roadless land on the Forest would remain roadless if the economics of this plan were anywhere near balance. I would therefore manage most of the rest of the roadless land customarily, in a semi-primitive classification allowing motorized use where not in conflict with wildlife or watershed values.

Thank you for this chance to comment.

Sincerely,

*Pat Ford*

Pat Ford  
414 1/2 2nd Street  
Boise ID 83702



Pat Ford

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values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water
3. Protecting soil productivity in accordance with the National Forest Management Act
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk; and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Early in the planning process, KESR's were mapped on the entire Salmon National Forest. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the





Pat Ford

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theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

There has been some confusion generated regarding the ability of the various alternatives of the Draft Forest Plan to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to



Pat Ford

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accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers.

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied:

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages;
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake.
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek.
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages.
5. Key big game summer range in the Tobias Creek area.
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages.
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area.

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

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Pat Ford

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The Italian Peak Roadless Area Number 13945 involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management's (BLM) Eighteen Mile Wilderness Study Area. Portions on the Beaverhead National Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,
2. Key big game winter range emphasis in Hawley Creek,
3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,
4. Range management for domestic livestock emphasis on the gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages, and
5. Medium investment timber outputs in Frank Hall and Wildcat Creeks.

There was moderate public support for, but also strong public opposition to wilderness designation of the Salmon National Forest portion of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act and in input submitted to the proposed Salmon National Forest Management Plan. The hardrock minerals and phosphate potential of this area is high, which indicates a high probability of continued mineral development in the future. Currently, intensive range management occurs with many fences and water developments in existence. During the current planning period, continued mineral development, timber harvest and range management activities will preclude much of the Salmon portion of this area--except the Chamberlain Basin portion--from consideration as wilderness during the next plan revision.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Golway Gulch;
2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area;
3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,
4. Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch; and



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Pat Ford

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5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment period for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes; and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. Three management prescriptions will be applied to the Salmon National Forest portion:

1. Semi-primitive nonmotorized recreation emphasis on most of the area;
2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singheiser Mines, and
3. Emphasis on medium investment timber outputs on the Panther Creek Face.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities, while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of post, pole, and sawtimber also occur in the northern tip and along the Panther Creek Face. Most of the remaining area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current



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Pat Ford

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planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next plan revision

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. Judging from past experience there is little likelihood that significant impacts from mineral activity will occur during the next decade. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mix of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability for consideration as wilderness during the next plan revision.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFFE  
Forest Supervisor





SALMON N F

0289

JAN 14 '86

1330 S Main #14  
Moscow, Idaho 83843  
Jan 9, 1986

Info	Action
SUP	
LMP	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
SRV	1 2 3 4 5 6
IO	1 2 3 4 5 6

CC#10 - 1/14/86

Salmon National Forest  
Supervisor's Office  
Salmon, Idaho 83467

Re Public Comment on Forest Plan

Dear Sirs

Due to a number of commitments and obligations I have presently at school I have been unable to study the Salmon plan in detail, particularly the written part I would like very much to read it all, but I fear it won't be possible before tomorrow, the deadline date for public comment

I have, though, spent about three hours studying maps of the various proposals, particularly as they regard wilderness classification. The plan is of great interest to me because of the geographical issues to be decided (my undergraduate study is in geography) and because of the economic and environmental issues which it addresses around the town of Salmon, which is where I grew up

The comments I make are my own, and reflect what I have been able to learn about the Forest over the years. My familiarity is certainly not as deep as is the familiarity of those who have been working on the Forest for many years. Nevertheless, I think I am acquainted with the areas as most people are likely to be who do not live in the area. As will be evident in my comments, I am not stumping for any particular industry or environmental group. I am simply offering my gut reaction to the proposals based on my biases as to what would be best for everything in the long run

It is with great regret that I cannot concur in the Forest Service's "preferred alternative" which was Alternative 12 in the group of maps I saw at the library here. In a nutshell, it is unrealistic, highly biased and politically impossible. It is likely to open the door to yet another generation of bitter controversy, extended lawsuits and appeals, and ultimately leave many unresolved questions. I would have thought that during the last few years it would have become painfully obvious to everyone involved that there will be no meaningful resolution of the wilderness issue on the Salmon National Forest unless—as a bare minimum—that part of the North Lemhi recommended by RARE II (168,000 acres if my info is correct) is included in the proposal.

When will the agencies, politicians, and the industry face the music? Dragging this into a Hundred Year's War hurts everyone—most especially the resource dependent families in towns such as Salmon—because there is no certainty in how to prepare for the future. Local individuals might not like the concept of wilderness, but at least when they know what it's going to be, they can prepare to make long term adjustments accordingly. Alternative 12, which proposes no new wilderness, leaves the questions begging.

A realistic and more pragmatic option which would not hurt the economy much, if at all, would be Alternative 7 (though I recall I liked parts of 3 or 4 for East half of the Forest)



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Bing Young  
1330 S. Main, #14  
Moscow, Idaho 83843

Dear Mr. Young.

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

The Lemhi Range Roadless Area Number 13903 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. The Salmon National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness. Eight management prescriptions will be applied

1. Semi-primitive motorized recreation emphasis in the head of Big Timber Creek and associated drainages,
2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,
3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,
4. Anadromous fish emphasis with medium investment timber outputs in the Hayden Creek/Bear Valley Creek drainages,
5. Key big game summer range in the Tobias Creek area,
6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,
7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and
8. Range management emphasis in the Swan Basin area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management





Bing Young

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First of all, Alternative 7 would recognize much of the North Lemhi's as wilderness (though I think that #3 and #4 recommended even more). The North Lemhi area by all counts is a high quality area with many, if not all the attributes, that wilderness areas are supposed to have. Timber and minerals, throughout much of this area, are poor to nil. It is my understanding that reforestation efforts in some areas have been disastrous due to the cold, arid climate. Oil potential in the area is highly skeptical and unproved. There are numerous other areas around in which to engage in ORV recreation. In addition, since ranchers are often allowed to continue their grazing operations in wilderness, it seems to make little sense to delay the inevitable.

Part of the Beaverheads east of Salmon should also be classified as wilderness, if only for the purpose of having it so designated on highway maps. It is my opinion that having part of this area as wilderness would help diversify the tourist industry in Salmon and attract people to the town for the purpose of seeing Salmon--not just driving through to get to a river or hunting trip. Some day the Salmon Chamber of Commerce will awaken to the fact that the Beaverheads can be the scenic icon of the area. Within Idaho, only Driggs and Stanley have such a dramatic backdrop of mountains as far as towns go. Scenery in the Beaverheads is as beautiful as any we have in Idaho, and especially with Alternative 7 there would appear to be few economic hardships suffered in such a classification (with the exception of Sheep Creek, which could perhaps be classified as a semi-primitive area).

The Hot Creek Lakes-Taylor Mountain area is a well known and popular hiking area not far from Salmon. Though I am not convinced that it is big enough (with the twin Meyers Cove area) to be a full fledged wilderness, its roadless status is probably appropriate. Taylor Mountain is the second highest peak on the SNF in the Salmon River Mountains and had the highest fire lookout to have existed on the Forest.

The Big Deer Creek area was fought over at length when the River of No Return Wilderness was established and expressly released in the legislative history surrounding that bill. In light of the valuable minerals and timber in the area I think it is best that this and other similarly situated areas are left out of it. At least the wilderness proposals. A big win is a bargain.

The West Long Tom Mountain area was probably also debated in the creation of the RNR. However, due to the extreme environmental conditions of this area (the worst fire area of the Forest, overlaying the highly erodible Idaho Batholith on slopes as steep as any to be found in the Salmon River Canyon) I think it might be appropriate to attach this to the RNRW, despite the fact this might be inconsistent with my recommendations for Big Deer Creek above.

The Allan Mountain area in the North Fork District is claimed by the wildlife people to be a pivotal area for elk habitat. Perhaps it is. I don't have much familiarity with the wildlife issues (I'm not a hunter) or this area. It doesn't appear on the map to be a large enough area to be a great wilderness area, but perhaps it should be. Another option would be to put this in an intermediate category (such as Sheep Creek to the east) which might allow helicopter logging if justified, but no road building.

Plan. Hardrock mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs. Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

The Draft Salmon National Forest Management Plan identified areas within the roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the Lemhi Range Roadless Area.

The West Big Hole Roadless Area Number 13943 contains acreage on both the Salmon and Beaverhead National Forest. Wilderness designation has been recommended for a portion (55,087 acres) of this area on the Beaverhead National Forest. Five management prescriptions will be applied to the Salmon National Forest portion.

1 Semi-primitive nonmotorized along the Continental Divide from the head of Bradley Gulch, south to Colway Gulch,

2 Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,

3 Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek;

4 Key big game winter range emphasis along the lower slopes from Trail Gulch south to Gold Star Gulch, and

5. Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek. There was both strong public support and strong opposition expressed for wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Mineral potential is high with many mineral claims located throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered high while development potential at the lower elevations is considered low. The Continental Divide National Scenic Trail is located within portions of the semi-primitive units. Significant growing stocks of poles and sawtimber make portions of this area an important contributor toward Salmon National Forest timber product outputs. No activities are planned that would affect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.



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The Chippys Creek area directly west of Salmon would probably be fine as a semi-primitive area. Ironically, as many places as I have seen within this state, I have not seen much of this area, though it is the closest to where I grew up. I hear that there are lots of shale slides.

It is my hope that the Forest Service will not shirk its responsibilities for fear of being out of favor with locals and/or politicians. Admittedly, making decisions about the long term future of public lands is not an easy or popular task. It will affect economics and the environment for many future generations, if not forever. If job security and being loved by all are the primordial concerns of a person's life, then perhaps forestry management is not the right career option.

It is time we all started looking at each area of the Forest and asking the question "What will be the best long-term benefit to the most people given the peculiarities and nuances of this select area?" The fact that forests in other parts of Idaho and other parts of the country may produce more timber than the Salmon, or have less wilderness than the Salmon should be irrelevant. They don't all have the same geography. The bottom lines for acreages of wilderness or semi-primitive areas should be just that--the bottom line. Pre-determining how many acres of wilderness we want in Idaho or on the SNF is the wrong way to resolve the issue. We ought to look first at the particular areas involved, look at the local human situation surrounding those areas and make our decisions accordingly. We have had the cart before the horse too long.

The Salmon National Forest could do an enormous public service--probably not spelled out as a requirement in the CFRs or the US Code but a service nonetheless--if its personnel could seek to better explain and communicate the issues facing it to the lay public. In discussing issues of forest management with many Idahoans, I find that I spend most of the time trying to dispel myths perpetrated by extreme environmentalists or industrialists. Public presentations, maps of outlined proposals hung up in the public library or courthouse, or down to earth articles and editorials regarding the problems the Forest is facing printed in the local newspaper would all go a long way towards building a bridge of trust that is greatly needed if we are ever to resolve many of these issues in our lifetimes.

Sincerely,

*Bing Young*  
Bing Young  
Moscow, Idaho

Bing Young

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The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive in the West Big Hole Roadless Area.

The Anderson Mountain Roadless Area Number 13942 will not be recommended for wilderness designation. Two management prescriptions will be applied:

1. Semi-primitive motorized for an area adjacent to the Continental Divide, and
2. Anadromous fish emphasis with high investment timber outputs at the lower elevations.

There was moderate public support for, but also strong public opposition to wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Past mining activities indicate a high probability of continued mineral development within this area. Mineral potential, recreation values (including the Continental Divide National Scenic Trail), and significant growing stocks of sawtimber occur within this roadless area. No resource activities are planned in the upper elevations, to be managed as semi-primitive, that would preclude future consideration of this area for wilderness during the next plan revision.

Taylor Mountain Roadless Area Number 13505 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended that the Challis portion be designated wilderness. Five management prescriptions will be applied to the Salmon National Forest portion of this area.

1. Semi-primitive motorized recreation emphasis along the Fidge Road to Iron Lake and in Moyer Creek, Opal Creek, and Otter Creek drainages and the Hat Creek Lakes area.
2. Key elk summer range--optimum habitat emphasis in the upper elevations of Spring Creek, Middle Fork of Hat Creek and North Fork of Hat Creek;
3. Anadromous fish emphasis with medium investment timber outputs in the headwaters area of Iron Creek.
4. Emphasis on medium investment timber outputs in Salt Creek and Woodtick Creek, and a portion of the North Fork of Hat Creek, and
5. Emphasis on low investment timber outputs in Weasel Creek, lower Opal Creek and at the high elevations around Moyer Peak.

Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition was expressed. The Conference Committee Report to the Central





Bing Young

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Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple use purposes. The majority of the area provides high elevation big game summer habitat and opportunity for scenic and primitive recreation experiences. Significant growing stocks of post, pole and sawtimber occur primarily in the northern and northeast portions of the roadless area. During the current planning period, timber management activities would occur on approximately 25 percent of the area. The remaining undeveloped portions of the area will retain their wilderness attributes and be available for wilderness consideration during the next plan revision.

Camas Creek Roadless Area Number 13504 contains acreage on both the Salmon and Challis National Forests. The Challis National Forest has not recommended wilderness designation for that portion of the area. Three management prescriptions will be applied to the Salmon National Forest portion.

1. Semi-primitive nonmotorized recreation emphasis on most of the area,
2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singheiser Mines, and
3. Emphasis on medium investment timber outputs on the Panther Creek Face.

Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities, while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and past mining activities indicate a high probability of continued mineral development in the northern tip of the area. Significant growing stocks of post, pole, and sawtimber also occur in the northern tip and along the Panther Creek Face. Most of the remaining area provides high elevation big game summer habitat and good opportunity for primitive recreation experiences. During the current planning period, the majority of this roadless area will remain undeveloped and be available for consideration as wilderness during the next plan revision.

West Panther Creek Roadless Area Number 13504 will not be recommended for wilderness designation or managed for semi-primitive recreation emphasis. Three management prescriptions will be applied.

1. Key big game winter range emphasis on the Panther Creek Face,
2. Emphasis on medium investment timber outputs on most of the area, and
3. Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage.



Bing Young

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Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes. High mineral potential and significant growing stocks of sawtimber occur within this roadless area which can contribute significantly to Salmon National Forest outputs. During the current planning period, timber harvest activities are planned on about 65 percent of the area, predominantly in the Big Deer Creek, Little Deer Creek and Quartz Gulch drainages, precluding these portions of the area from consideration as wilderness during the next plan revision.

Long Tom Roadless Area Number 13521 will not be recommended for wilderness designation. A management prescription of semi-primitive, nonmotorized recreation emphasis will be applied to the entire roadless area. Moderate public support of wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition to new wilderness was also expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this roadless area be managed for nonwilderness multiple-use purposes. The unit is adjacent to the Frank Church--River of No Return Wilderness and the Wild and Scenic Salmon River. Mineral potential is undetermined. No activities are predicted that would preclude consideration of this area for wilderness during the next Forest Plan revision.

Jesse Creek Roadless Area Number 13510 will not be recommended for wilderness designation, however, the emphasis will be semi-primitive, nonmotorized management. This roadless area includes the unroaded portion of the Salmon City Municipal Watershed and will be managed with emphasis on producing sustained yields of quality water. Little public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunities while considerable opposition against new wilderness was expressed. The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple-use purposes.

In our judgment, the selected alternative provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.





Bing Young

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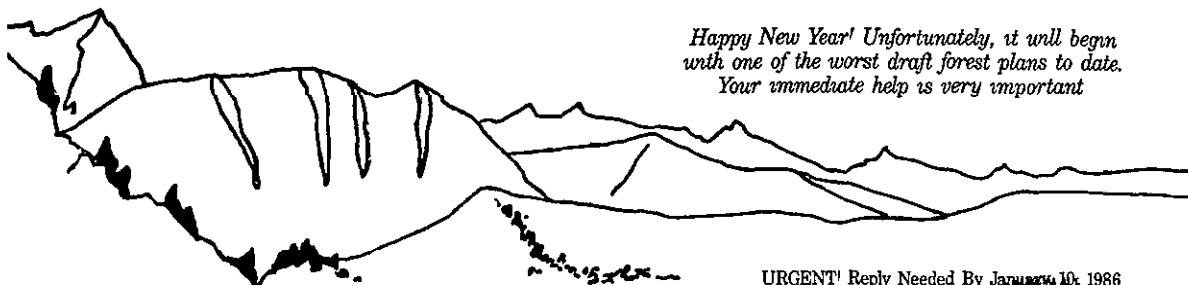
Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



Happy New Year! Unfortunately, it will begin  
with one of the worst draft forest plans to date.  
Your immediate help is very important



URGENT! Reply Needed By January 10, 1986

WPPY  
FC

JAN 2 '86

# SALMON NATIONAL FOREST ALERT

## Draft Forest Plan Proposes to Destroy Resources

The final Salmon Forest Plan is required by law to reflect public comment gathered on the draft forest plan. You must write if we are to have the Salmon forest remain the fine area it is today. Please **WRITE YOUR LETTER TODAY!**

INFO Q	ACTION <input type="checkbox"/>					
SLIP	1	2	3	4	5	6
LMP	1	2	3	4	5	6
RAF	1	2	3	4	5	6
LM	1	2	3	4	5	6
RWW	1	2	3	4	5	6
AD	1	2	3	4	5	6

## Low Wildlife, Less Wilderness, More Waste

### THE SETTING

The Salmon National Forest is a relatively undiscovered part of central Idaho rich in nationally significant resources. These include portions of the Frank Church/River of No Return Wilderness, the Middle Fork of the Salmon Wild and Scenic River, and the main Salmon Wild and Scenic River. These nationally renowned areas are protected.

Also included in the Salmon Forest are the Lemhi Mountains, one of the highest ranges in the state, and the Beaverhead Mts of the Bitterroot Range (also called the West Bigholes) along the continental divide. Both areas offer extremely high wildlife, fish, solitude and scenic values. Both are currently unprotected, and both were not recommended for wilderness in the draft forest plan.

In the midst of some of the highest amenity values in the nation, the Salmon forest has become recognized as a tree farm and has been badly overcut reducing habitat and destroying other resources.

The Salmon National Forest released its draft forest plan for public review this fall, and conservationists have been dismayed at the level of destruction that has been proposed. Excessive timber harvests and road building top the list. The draft plan recommends no wilderness protection, and severely compromises fish and wildlife values of the forest.

The purpose of this alert is to familiarize you with the resources at stake in the Salmon NF, explain why the conservationist proposal is the best way to protect them for all of us, and to help you write a letter to the Salmon NF to express your concerns.

### TIMBER AND ROADS

The draft Salmon plan proposes to harvest an average of 239 million board feet (MMBF) per year over the next 50 years. It also states "if current lumber market conditions continue, only 106 MMBF per year is expected to sell."

This aggressive timber program will harm wildlife values at the expense of taxpayers. A Government Accounting Office report from 1984 clearly shows that all timber sales in the Salmon NF are below cost sales, meaning they show no profit and all extra costs are passed on to taxpayers.

How much money are we talking about? The plan states that it will cost \$66.7 million (present net cost) to remove timber that will be worth \$14.9 million (present net benefit). That will be a net loss of \$51.8 million (present net value). It should be noted that these figures made by the Forest Service are based on timber prices from 1971-80, and that currently prices are lower.

There are several areas you should mention in your letter that should not be harvested. You should oppose any logging in the Lemhi Mountains from Gilmore Summit to Hayden Creek. In the next ten years sales are planned for Deer Creek, Alder Creek, Big Eightmile Creek, Mill and Hayden Creeks. These sales will lose money and destroy the current high values of these magnificent areas.

Research has shown that the corridor between Dalonega Creek and Sheep Creek is an important elk migration route between Montana and Idaho. The draft plan proposes to log it despite the possibility of disrupting the migration pattern of the entire wintering population of the Idaho Department of Fish and Game Management Unit 21-A.

The Salmon NF has 1600 miles of permanent roads and an additional 1000 miles of primitive and temporary roads, some of which are closed but many are not. The proposed plan calls for the construction and reconstruction of 56 miles of roads each year. Big game will continue to be displaced from prime habitat if this plan is activated.

## WILDERNESS

The fact that the Lemhi Mountains and the West Big Hole area in the Bitterroots were not recommended for Wilderness by the Forest Service graphically illustrates how far the FS is from a decent forest plan in the Salmon NF. These two areas have long been supported by the Idaho Wildlands Defense Coalition, and are as deserving of protection as any area in the state.

**Lemhi Mountains**—This roadless area contains some of the finest wildlife habitat in the state. Bighorn sheep, mountain goats, elk, antelope and bear all inhabit this diverse ecosystem of tremendous glaciated peaks and basins, and the lower valleys and canyons. This little traveled range is truly magnificent.

Despite the very low timber values, some of the lower elevations have been roaded and logged. The proposed Salmon forest plan calls for even more logging on important Lemhi drainages such as Hayden Creek, Big Eight Mile and Alder Creeks.

In your letter support a Wilderness recommendation for the Lemhi roadless area and call for no more logging from Gilmore Summit to Hayden Creek.

**West Big Holes**—Easily seen on the east side of Salmon, these peaks are a natural addition to our Wilderness system. This special area remains untouched and enhances our Wilderness system, since it is contiguous to the West Big Hole in Montana, which has been proposed for wilderness designation by the Beaverhead National Forest. The continental divide should be the backbone of this proposed wilderness—not the edge.

Other roadless areas that should be protected as Wilderness, or at the very least as Semi-Primitive Non Motorized, are the Anderson, Allen, and Goat Mountain, and Italian Peak roadless Areas in the Bitterroot Range. Important areas contiguous to the Frank Church/River of No Return Wilderness include the Camas Creek, Duck Peak, West Panther Creek, Long Tom, Little Horse, and Oreana Roadless areas.

## WILDLIFE

If the proposed forest plan is any indication, the Salmon NF has a low regard for the fish and wildlife species contained in the forest.

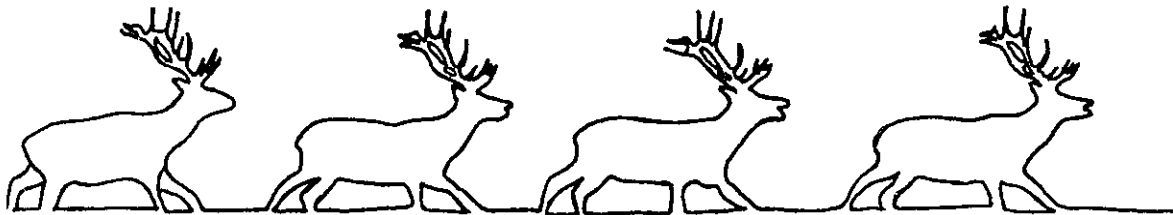
In 1980, Idaho Department of Fish and Game Director Jerry Conley wrote all forest supervisors in Idaho requesting that they manage all of the key summer ranges in the state at 100% of potential. 270,500 acres have been determined to be key elk summer range in the Salmon NF, and support 61% of the current elk population.

Approximately 50% of this key summer range will be roaded and cut within the life of the proposed plan, and many of these favorite elk hunting areas will be logged within the next 10 years. Unless we show how the public feels about this in our letters, elk habitat quality and eventually elk numbers will drop significantly in the near future.

Logging in the Lemhis and also along the migration corridor of Dalhonega and Sheep Creeks will wreak havoc on a fine, healthy, elk population.

Logging and road building will also do great harm to the fish of the Salmon NF. The preferred alternative predicts that sediment taton will be 53% over the natural level in streams without anadromous fish for the first decade under the proposed plan. Those streams with anadromous fisheries will be subjected to sediment taton 21% above natural levels. Many important streams will be severely damaged should the proposed plan be adopted.

Many non game wildlife species will also lose critical habitat, particularly in old growth areas. Species like the grey owl, pileated woodpecker, pine marten, and wolverine will suffer. There have also been sightings in the forest of the magnificent grey wolf, a threatened and endangered species.



#### ADDITIONAL CONCERNS

There are other problems with the proposed plan that promise to continue to degrade the forest

The Salmon NF has long been taken advantage of as a cattle ranch. Overgrazing continues to displace elk and other species from prime habitat to other more marginal areas. The proposed plan actually would increase the amount of grazing on the Salmon forest, but even worse, it does not take adequate measures to reduce cattle-wildlife conflicts that already exist.

Fires caused extensive damage to the forest this past summer, but even worse was the damage done by bulldozers in controlling those blazes. The Forest Service should develop and implement guidelines on where and when mechanized equipment will be used for fireline construction.

#### WHAT YOU SHOULD SAY IN YOUR LETTER

1. Write the Forest Supervisor and tell him that the Forest Service Preferred Alternative No. 12 is completely unacceptable because
  - a. It does not give enough emphasis to the management of elk, Idaho's premier big game species. Furthermore, it completely disregards the Idaho Department of Fish and Game's management objectives.
  - b. It places too much emphasis on managing timber, a low value resource, at the expense of higher value resources—water, fish, wildlife, and outdoor recreation.
  - c. It provides no additional wilderness acreage, particularly for the Lemhi Mountains and the West Big Hole Area. Both areas have long been endorsed by the Idaho Wildlands Defense Coalition, and the preferred alternative does not state why these areas were not selected.
  - d. It supports an existing and proposed road system that many feel is larger than necessary for the best management of the Salmon National Forest. It fails to close many roads that are unnecessary for forest management.
  - e. It does not allocate any acreage for Semi-Primitive Non-Motorized uses.
  - f. It does not resolve the major conflict between elk and cattle for both forage and space.
2. Tell the Forest Supervisor that a slight modification of the current management direction is not enough. A complete change in the management direction is needed on the Salmon Forest, one that would emphasize important amenity values and deemphasize commodity values. State your support for Alternative 3 (Nonmarket Opportunities) which states, "Emphasis is on non market outputs and values such as water, fish and wildlife and dispersed recreation."
3. Strongly support wilderness designation for the Lemhi Mountains and the West Big Hole area, and recommend these areas for Wilderness in the final plan. Recommend for Wilderness or for Semi-Primitive Non-Motorized those areas described in the Wilderness section of this alert, or other areas you feel strongly about.
4. Request that certain maps be included in the final plan. These must include important wildlife areas, suitable and unsuitable timber lands, and 10 year timber sale and road plan maps.

Send your letter to

Richard Hauff, Forest Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

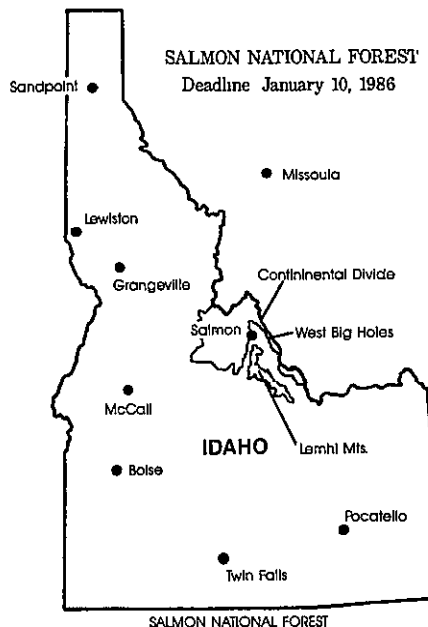
Wood River  
Idaho Conservation League  
Box 2671  
Ketchum, Idaho 83340



URGENT! Reply Needed By January 10, 1986

Salmon National  
Box 729  
Salmon, ID 83467

WRITE IMMEDIATELY! Reply Needed By January 10, 1986



Send your letter to  
Richard Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

Send copies to  
Governor John Evans  
Statehouse, Boise, Idaho 83702

Rep Richard Stallings  
US House of Representatives  
Washington, DC 20515

This alert was produced by the Idaho Wildlands Defense Coalition which includes the Idaho Conservation League, the Sierra Club, The Wilderness Society, and other concerned organizations.

**IDAHO!** The Wilderness State

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# Idaho Environmental Council

P.O. Box 1708

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NEWSLETTER

December, 1985

Vol. 17, No. 9

JAN 3 1986

**CARIBOU NATIONAL FOREST**

**DEC 16 1985**

Supervisor	
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For Engr	
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**ALERT**

**SALMON NATIONAL FOREST**

**DRAFT PLAN**

**YOUR HELP IS NEEDED**

I'M NOT A MEMBER OF THE IEC, BUT WOULD LIKE TO JOIN.

I'M ALREADY AN IEC MEMBER, BUT NOTICE ON MY MAILING LABEL THAT IT'S TIME TO PAY DUES.

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STATE \_\_\_\_\_

ZIP \_\_\_\_\_

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\$ 7.50 STUDENT DUES.

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Caribou Nat Forest  
 Pocatello Idaho

**DEC 16 1985**

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Answered

VI-546

VI-362



## DRAFT SALMON N.F. PLAN THREATENS WILDLIFE, FISH, WILDLANDS

As required by the National Forest Management Act of 1976, the Forest Service has prepared a proposed Forest Plan for the Salmon National Forest and an accompanying draft environmental impact statement (DEIS). The Plan is for 50 years, with reviews every 10 to 15 years. The Forest Service is asking for public comments on the proposed Plan until January 10.

The Salmon National Forest has some of the most outstanding wildlands, wild rivers, and wildlife in America. Parts of the Frank Church-River of No Return Wilderness, Middle Fork Salmon Wild & Scenic River, and main Salmon Wild & Scenic River are on the Salmon N.F. In addition are lesser known but outstanding de facto wilderness areas, notably the Lemhi Range Roadless Area, with high wildlife values, and the Bitterroot Range on the Continental Divide, which includes the spectacular West Big Hole Roadless Area.

In spite of these existing high amenity values, the Salmon N.F. has become a "tree farm". Since the mid-1950's, the Forest has been badly overcut. Hundreds of miles of roads have been constructed to access the timber. Most of these roads remain open, continuing to cause wildlife impacts. Damage to fisheries and big game habitat has also been caused by cattle in the wrong places, and by mining.

These problems were identified earlier by public input and the F.S. has listed them as Issues and Concerns. Yet the proposed Forest Plan fails to address them in any substantial way. Instead, the Plan is merely attempted paperwork justification for "Business as Usual" on the Salmon National Forest.

It is important that everyone who cares about the Salmon National Forest and its future write to the Supervisor and urge improvements be made to the proposed Plan. The summary of some suggested points to make in your letter is on the last page.

### ALTERNATIVES EVALUATED

The Salmon N.F. developed and evaluated 12 Alternative Plans:

- 1 Current Direction ("No Action")
- 2 Market Opportunities
- 3 Non-Market Opportunities
- 4 1980 RPA Program
- 5 High Productivity
- 6 Constrained Budget
- 7 Capability Emphasis
- 8 Wilderness and Wildlife Emphasis
- 9 High Wildlife and T&E Species Emphasis
- 10 All Roadless Areas as Wilderness on Manageability Lines
- 11 All Roadless Areas as Wilderness on Roadless Inventory Lines
- 12 Modified Current Direction (Preferred Alternative)

Alternatives 3, 8, 9, and 11 all have a positive thrust regarding protection of habitat, watersheds, wildlife, fish, and roadless areas. Unfortunately, the F.S. selected none of those. Instead, for no good reason and without even listing Decision Criteria, they selected Alternative 12, one of the resource-wrecking alternatives.

We are suggesting that you support Alternative 3, with a few modifications. However, Alternatives 8 and 9 are also good. Alternative 11, the all-wilderness Alternative, represents an extreme, and so is probably not very viable. (As to its predicted impacts on wildlife and fish, it is quite similar to Alternatives 3, 8, and 9.) Some comparisons of alternatives on the following pages include Alternatives 3, 8, 9 (all fairly decent), 12 (the indecent proposal), and 5 (the worst).

The table below ranks all 12 F.S. alternatives by the amount of roadless area to be retained for the next 10 years. To the nearest 1000 acres, it shows the total areas recommended for wilderness, Semi-Primitive Non-motorized recreation, Semi-Primitive Motorized recreation, and other Multiple uses. The first 3 of these categories would not be open to logging and associated roadbuilding for 10 years; the last would. The "Lost" column shows the roadless acreage expected to be actually roaded and logged in the first 10 years. The table also shows, for the first decade, annual average timber harvest levels and annual average miles of road construction and reconstruction. In addition, the table shows the 50 year Present Net Value (This is the Present Value Benefit minus the Present Value Cost.) The general correlation between the PNV and the amount of wildland retained for 10 years, and the inverse correlation between PNV and levels of road-building and timber harvest, should tell us something. (These data are from the DEIS, pp II-79,81,154,155,160,164, and IV-7,92.)

**COMPARISON OF ALTERNATIVES, with  
Alternatives Ranked by Amount of Wildland Retained, 1st Decade**

(All values are for the first decade except PNV.)

Rank	Alt	W Rec	SPNM	SPM	Open	Lost	Timber	Roads	PNV, 50 yr
Areas are in 1000 acres							MMBF/yr	Mi/yr	Million \$
1	11	830	0	1	0	0	9.1	31	64.1
2	10	677	6	2	145	46	18.1	58	19.2
3	9	579	60	53	138	72	7.7	30	49.8
4	8	471	96	35	228	104	9.5	29	64.0
5	3	349	85	227	169	109	8.0	29	49.4
6	6	0	0	483	347	165	17.6	38	34.4
7	7	237	90	107	396	209	17.9	49	24.6
8	1	77	21	46	686	221	20.5	63	15.3
9	12	0	0	286	544	224	21.1	66	0.5
10	2	184	2	23	621	320	32.9	97	-28.8
11	4	158	3	30	639	348	32.7	104	-28.2
12	5	0	17	0	813	385	36.8	115	-34.4

## WILDLIFE AND FISH

The Salmon National Forest is a tremendous fish and wildlife resource, with a large diversity of habitat. There are 337 species of vertebrates which derive all or part of their habitat needs from the Forest, including 21 species of fish, 9 of amphibians, 10 of reptiles, 222 of birds, and 75 of mammals. There are 3 migrant fish species, including steelhead and chinook salmon, and 18 resident fish species, including cutthroat, rainbow, and brook trout. Of the non-fish species, about 156 are year-long resident on the Forest, 89 are present during nesting only, 57 migrate across the Forest, and 11 winter there. Species include elk, moose, mule deer, white tailed deer, bighorn sheep, goat, pronghorn, bear, lion, coyote, marten, etc. There is habitat for 4 T&E species: bald eagles winter on the Forest; peregrine falcons have nested there, but no nesting has been recorded in recent years; there have been grizzly sightings, but not in recent years; and a very few wolves seem to be present. In addition, Species of Special Concern to Idaho Fish & Game Dept. are wolverine, lynx, bobcat, trumpeter swan, ferruginous hawk, and prairie falcon. (Plan II-6,20; DEIS III-26,IV-15,25) Management Indicator Species are shown in the table below, from DEIS III-21:

Salmon National Forest Wildlife and Fish Management  
Indicator Species, and the Rationale Used for Their Selection

	Hunted	Fished	Trapped	Restricted Habitat Niche Diverse Habitat Conditions	Resident Species	Migrant or Summer Resident	Wide Distribution Over Forest	Easily Monitored	Habitat Requirements
Elk	X			X	X		X	X	High elevation. Sub-alpine fir and Douglas-fir habitats. Many openings in canopy.
Mule Deer	X			X	X		X	X	Mid-elevation. Douglas-fir habitats. Many openings in canopy.
Bighorn Sheep	X			X	X		X		Open to partially timbered. Rock outcrops.
Mountain Goat	X			X	X		X		Open to partially timbered. Cliffs.
Pine Marten			X	X	X		X	X	Old growth sub-alpine fir and lodgepole pine.
Pileated Woodpecker				X	X		X		Cavity nester. Old growth Douglas-fir.
Vesper Sparrow				X		X		X	Sagebrush
Yellow Warbler				X		X		X	Riparian zones (willows).
Ruby-crowned Kinglet				X		X	X	X	Mature/immature Douglas-fir.
Goshawk				X	X		X		Mature/old growth Douglas-fir.
Great Grey Owl				X	X				Mature Sub-alpine fir and Douglas-fir.
Yellow-bellied Sapsucker				X		X		X	Cavity nester. Quaking aspen.
Pygmy Nuthatch				X	X			X	Cavity nester. Old growth ponderosa pine.
Brown Creeper				X		X		X	Cavity nester. Mature Sub-alpine fir and lodgepole pine.
Mountain Bluebird					X	X		X	Cavity nester. Ecotones.
Anadromous Fish (Salmon and Steelhead)		X		X		X		X	Stream habitats with adequate sediment-free spawning gravels, and channels free of migration blocks.
Trout (All species combined)	X		X	X	X		X	X	Cool, clean sediment-free stream and lake habitats, ample instream flow and streamside cover.

## Management Indicator Species (MIS)

Each MIS has been selected to represent other species with similar habitat requirements. The table below shows a partial list of MIS with estimated existing populations, minimum viable populations, maximum potential populations, and the predicted effects on habitat for several alternatives. This table shows only those MIS for which estimated populations vary significantly by alternative; primarily elk, deer, and mature/old growth forest species. The table information is from DEIS S-9, IV-24. Estimated populations are roughly proportional to % of maximum habitat.

### Effects on Selected MIS by Alternative

(Elk and deer populations are shown in thousands; other species as % of maximum habitat, with pop. nos. in parens.)

Species	Minimum Viable	Maximum Potential	Existing	3	8	9	12	5
Elk	1.5	10.3	7.1	9.6	8.7	9.1	7.4*	5.4
Mule Deer	5.0	44.4	21.7	22.3	22.3	22.3	18.6	14.8
Marten	13% (200)	100% (1090)	55% (600)	50%	65%	64%	33%	20%
Pileated Woodpecker	10% (46)	100% (456)	38% (172)	46%	50%	50%	23%	14%
Goshawk	33% (50)	100% (150)	48% (72)	46%	55%	55%	38%	37%
Great Grey Owl	12% (30)	100% (244)	25% (60)	21%	34%	32%	17%	13%
Pygmy Nuthatch	?	100% (3800)	24% (900)	20%	35%	35%	12%	11%
Brown Creeper	5% (1800)	100% (35000)	26% (9000)	20%	35%	35%	9%	9%

(\* This elk figure is highly optimistic. See "Elk" on page 6.)

Some of the MIS are not shown above, since the predicted effect on them does not change much by alternative. Bighorn sheep are estimated at an existing population of 1000, with this number constant for all 12 alternatives. Goats are now at 300, with this number shown as constant for all 12 alternatives.

Anadromous fish and trout (all species combined) are also used as MIS. However, the predictions of effects are suspect, since they show no great difference in fish mass by alternative, while the stream sedimentation rates do. (See page 7)

The proposed plan would have adverse impacts upon many species of wildlife, including elk, deer, anadromous fish, trout, and several old growth species.

For big game species, the Plan admits that Fish & Game goals cannot be met. In "Summary of the Need for Change on the Forest as a Whole" it says (Plan II-84,85):

"Wildlife and fisheries changes identified are centered around the ability to provide habitat sufficient to meet State Fish and Game Department population goals. As projected, the current management direction would not provide the habitat quality needed to meet big game goals after the first decade. This will necessitate changing the objective of meeting State goals or changing the amount and scheduling of timber harvest and road construction."

("current management direction" is Alternative 1, which has about the same level of timber harvest as the proposed Plan.)

A stated Forest Management Goal for wildlife and fisheries is: "Provide wildlife habitat of sufficient quantity and quality to sustain current populations of economically important management indicator species." (Plan IV-1) But the Plan will not even do this, at least not for elk, deer, salmon, steelhead, or trout.

### Elk

In 1980, the Idaho Fish & Game Dept. Director asked all N.F. Supervisors in Idaho to manage all key elk ranges in the State at 100% of potential. A Salmon N.F. inventory found a total of 271 thousand acres of key elk habitat outside the FC-RNR Wilderness, and that 60% of the summering elk were found on these lands. Hadley Roberts, a wildlife biologist with 12 years experience on the Salmon N.F., and now retired, has commented on the Proposed Plan. He has determined that the Plan will eliminate over half of the existing key elk summer range, and doubts the claim that the Plan will maintain the existing 7000-plus elk. Since most key elk summer range is high (over 7000 ft) with short growing seasons, these areas must be regarded as poor timber growing sites. One wonders why the F.S. has created a timber-wildlife conflict by proposing that a low resource timber value degrade a high resource elk range value.

Roberts says that the Plan indicates that many of the key elk summer range areas, all favorite hunting spots, will be roaded and cut within the first decade. Some of the better areas are Musgrove Creek, Salzer Bar, Anderson-Threemile Creeks, Hayden and Tobias Creeks, Pierce Creek, Big Deer Creek, Horse Creek, and Oreana Ridge. And this is only the first decade. The Plan simply ignores the F&G Director's 1980 request for protecting key elk range.

Roberts is also very concerned about plans to road and log in Sheep Creek and Dahlenega Creek, just south of the Anderson Mt. Roadless Area. A F.S. financed research project in 1976 pointed out the extreme value of this elk migration corridor. It recommended that the area remain roadless to protect this value. The Plan completely ignores this recommendation and, says Roberts, might even lead to complete abandonment of the Sheep Creek-Silverlead Creek elk and deer winter range.

## Fish

The following table, from the DEIS IV-41,42, compares the rate of stream sedimentation for the same alternatives compared in the MIS table on page 5.

**Sedimentation Rates in Streams, by Alternative**  
(% over natural level, for the first decade)

		Alternative			
	3	8	9	12	5
Anadromous streams	11%	11%	11%	21%	40%
Resident-only streams	22%	28%	23%	53%	81%

The Plan would greatly increase the rate of sedimentation in important spawning streams. For example, Hayden Creek, Iron Creek, North Fork of the Salmon River, and Indian Creek are all classified as Blue Ribbon streams by the Idaho Fish & Game Dept., as indicated on the 1978 map "Stream Evaluation Map for the State of Idaho". All are important for anadromous fish spawning. And all are threatened by timber sales. In the North Lemhi Roadless Area, Hayden Creek, including the Basin and Bear Lake Creek Drainages, is an important spawning tributary of the Lemhi River. The planned timber sales in Hayden Creek would probably destroy anadromous fish spawning there. Iron Creek drains east from the Taylor Mt. Roadless Area into the Salmon River; the Plan calls for timber harvest in the drainage. Timber harvesting is planned in several of the North Fork drainages, threatening spawning habitat as well as key elk habitat.

### Old Growth Species

After claiming unconvincingly that the Plan will maintain existing populations of economically important MIS, the Forest Management Goal for wildlife and fisheries says: "Provide wildlife habitat of sufficient quantity and quality to at least maintain minimum viable populations for all other MIS." (Plan IV-1).

The non-game species to be hit hardest by the Plan are the old growth species. The discussion of Plan responses to issues and concerns says that "Habitat for old growth-dependent species will decrease in non-wilderness areas, but will not fall below that necessary to support minimum viable populations." (Plan, III-1)

"Minimum viable populations" is not good enough. In 1978, Regions 1 and 4 of the F.S. signed a wildlife plan with the Idaho F&G Dept. for habitat management on the National Forests in Idaho. One of the specific goals of that plan says: "Intensify fish and wildlife management to protect, maintain, and enhance existing populations." ("A Program for Fish and Wildlife Habitat on the National Forests and Grassland in Idaho", August, 1978, U.S. GPO 1978-796-058/20.) On the MIS table on page 5, note that for some old growth MIS, the Plan (Alternative 12) predicts populations closer to minimum viable than to existing. If there are only an estimated 60 great grey owls on the Salmon National Forest, why should we cut their habitat in half? Why should we reduce habitat for pileated woodpeckers or martens by two thirds?

## TIMBER

In the late 1950's, 15 to 20 million board feet (MMBF) of timber were cut annually on the Salmon National Forest. In the 1960's, the average annual cut was 27 MMBF, and for the 70's, it was 34 MMBF. The annual average for the period 1974-78 was 34.8 MMBF, with 10.3 of ponderosa pine, 20.4 of Douglasfir, and 4.1 of lodgepole pine (DEIS Appendix A-15, Plan II-46). The Salmon, Beaverhead, and Bitterroot National Forests have supplied several small mills and 3 major sawmills; the Champion International Mill in Salmon, the Champion International Stud Mill in Darby, Montana, and the Stoltz-Conner Mill in Darby (Plan II-45). Champion closed their Salmon mill in February because of poor market conditions. Wilderness, designated or proposed, had very little to do with the closure. In fact, after Champion closed the mill, they turned back at least 36 MMBF of timber they had contracted to buy but had not cut; this represented a 2 year supply even at a former 2 shift level of operation. Some former Champion employees have bought the mill and are now attempting to operate it on a smaller scale.

The Plan proposes to offer 21.1 MMBF/yr for sale during the first 2 decades, and 25.7 MMBF/yr during the 3rd, 4th, and 5th decades, or an average of 23.9 MMBF/yr over the next 50 years. But the Plan states that "If current lumber market conditions continue, only 10.6 MMBF per year is expected to sell." (Plan IV-93,94).

The proposed 23.9 MMBF/yr is certainly lower than the 34 MMBF/yr cut in the 1970's. But it is still too high. On page II-85, the Plan says that:

"Projected levels of harvest exceed that which would allow the attainment of State big game goals. Meeting these goals would necessitate a reduction of timber harvest levels."

The elk, deer, fish, and many of the non-game MIS species, particularly the old growth species, would also suffer significant habitat loss and population reductions. (See "Elk" on page 6 and the table on page 5.)

The Salmon National Forest is not a good timber growing forest, with a current average annual growth of 26 cubic feet of wood per acre, which is far below what is considered economic on private timber lands. Nor has the F.S. had much success with regeneration of Douglas-fir there. Hadley Roberts says that in 14 years of observation, he has not yet seen one site on the entire Forest where a Dougfir stand has been harvested and regenerated to the point where it is elk hiding cover (trees over 8 feet tall).

In the mid-1950's, the Forest Service nationwide encouraged the timber industry to move to the National Forests on a large scale. The Salmon is a good example of a National Forest with low timber values, which has subsidized the local mill with roads, cheap logs, and overharvest since then, to the detriment of fish and wildlife.

A 1984 GAO report indicates the extent of economic loss on Salmon N.F. timber sales ("Congress Needs Better Information on Forest Service's Below-Cost Timber Sales", GAO/RCED-84-96, June 28, 1984). It shows that all timber sales on the Salmon N.F. in 1981 and 1982

were below-cost; the 5 sales in 1981 lost \$1.5 million and the 8 sales in 1982 lost \$0.95 million. An more recent sale example is the Mill Creek Timber Sale in the Lemhis, which sold on October 21 of this year. The 2039 MBF sale cost the F.S. \$25/MBF for preparation and administration, and another \$25+/MBF for the road, or a direct cost of \$102,929. The timber brought \$13.43/MBF, or \$27,384. With a B/C ratio of 0.27, this represents a loss to the government (i.e., the taxpayers) of over \$75,000.

Even worse, the Salmon N. F. Plan proposes to continue this economically wasteful and environmentally destructive mode of management. The timber subsidies which the F.S. offers only induce more overcutting, mining of old growth, and loss of fish and wildlife habitat. The F.S. plans to continue using appropriated funding to build new arterial timber access roads. For other timber access roads, the Plan proposes to continue augmentation funding at 22% of the total road costs (DEIS II-73). Both of these road funding schemes represent raids on the Federal treasury. While many of us are not opposed to all subsidies, we do tend to oppose those subsidies which contribute to the destruction of natural resources such as wilderness and wildlife habitat.

How much money would the proposed timber plan waste? By the Forest Service's calculation, the Present Net Benefit (PNV) for timber for the 50 year period is \$14.9 million, while the Present Net Cost (PNC) for timber is \$66.7 million. That is, the Present Net Value (PNV) for timber is -\$51.8 million! The timber PNV ranges from about -\$18 million (Alternatives 3, 8, and 9) to about -\$70 million (Alternatives 2, 4, and 5) (DEIS II-81).

Money loser that it is on the Salmon N.F., timber harvest is even worse than it looks in the Plan, which bases its economic analysis on timber prices from 1971-1980 (DEIS Appx B-31). The much lower price of more recent years is probably more realistic.

### Fire

For 1971-80, the annual average number of fires was 10 caused by man which burned 359 acres, and 47 caused by lightning which burned 1391 acres (Plan II-63).

There is no significant difference in the fire protection program for alternatives (DEIS IV-54). Apparently the F.S. would suppress all fires as avidly in wilderness as outside it.

Fires burned an excessive area on the Salmon N.F. this summer. Even worse than the fire damage, says Roberts, was the bulldozer damage. He says that hundreds of acres were denuded by bulldozers because of lack of guidance for their operation. He recommends that the F.S. prepare standards and guidelines for soil resource management that will cover eventualities if and when catastrophic fires occur again.

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(This alert is being sent to members of the Idaho Alpine Club and members of the Upper Snake River Chapter of Trout Unlimited, as well as to those on our regular IEC mailing list.)



## ROADS

There are 1835 miles of Forest Development roads, and about 1100 miles of non-permanent roads on the Salmon N.F. About 50 miles of permanent road per year have been built, some of this from appropriated funding. The Plan says that "It would take 2000 to 2500 miles of additional road to access all the lands currently planned for timber development. At the current rate of road development this would take 40 to 50 years. Financing of road development by means of timber sales does not appear likely to continue at the same rate. The cost per mile increases as the terrain becomes more rugged, while the financing available decreases." (Plan II-72).

The Plan proposes 66 miles of new and reconstructed roads per year for the first decade (DEIS II-154,155). (See table on page 3 for comparison with other alternatives.) This is far too much roading for the good of wildlife and watersheds. The Plan predicts that the total permanent road system at the end of 50 years would be 3080 miles, a net increase of 1245 miles over the current road system. Even alternative 3, with the smallest anticipated road system in 50 years, shows 2300 miles, a net increase of 455 miles (DEIS II-164).

The proposed level for appropriated funding of new roads is \$454 thousand per year, which apparently would build about 11 miles of arterial. The respective levels for Alternatives 3, 8, 9, and 5 are \$189, \$150, \$209, and \$981 thousand per year (DEIS II-157).

One proposal which is very good, and which we should support, is road closures for new roads. The Plan says that there is a need for "a more effective road and area closure policy" (Plan II-85) and that "All newly-constructed roads will be closed when not actually being used for timber harvest, or related timber management activities, except those roads left open for other needs as determined through the NEPA process." (Plan III-2). This means that an Environmental Assessment would have to be done and justify leaving any new road open.

However, there are also existing roads on the Forest that should be closed. Some of the roads are in high value wildlife habitat, and are not needed for management purposes.

## ROADLESS AREAS

According to the RARE III inventory, there are 830,469 acres in 30 roadless areas in the Salmon National Forest, not counting 427 thousand acres of the Frank Church-River of No Return Wilderness. Many of these wild areas have very high fish and wildlife, scenic, and recreational values. Appendix C of the DEIS contains descriptions of each of the 30 roadless areas on the Salmon N.F. As one reads them, he is struck by the value of the wildlife and scenic treasure. There is repeated reference to species of wildlife and fish which don't even exist in most of the United States.

The table below, from page II-79 of the Draft EIS, lists the roadless areas and shows wilderness recommendation by alternative. The total acreage for each area is shown by Alternative 11, the all wilderness alternative. (Alternatives 5, 6, and 12 are not shown because they recommend no wilderness at all.)

TABII II - 1  
ROADLESS AREA CONSIDERED FOR WILDERNESS BY ALTERNATIVE \*

ROADLESS ARFA	ALTERNATIVE									
	1	2	3	4	7	8	9	10	11	
13901 Camas Creek*			32,096		32,096	32,096	32,096	32,096	34,887	
13902 Tivlor Mtn * **		12,553	23,174		23,174	35,727	35,727	35,727	48,280	
13903 Lemhi Range* **	76,749	84,424	102,844	102,844	72,144	102,844	128,938	128,938	153,498	
13903a Goldbur Ridge*			8,175	8,175		8,175	8,175	8,175	11,514	
13941 Blue Joint Mtn.*		490	490	490	490	490	490	490	490	
13942 Anderson Mtn.*						15,946	15,946	15,946	18,120	
13943 West Big Hole*		45,398	46,209	46,209	52,694	59,990	72,961	72,961	81,068	
13944 Goat Mtn *		10,646					34,488	35,488	35,488	
13945 Italian Peak*						20,574	50,181	50,181	50,181	
13946 Allan Mtn.*		8,157	36,706			36,706	36,706	36,706	50,981	
13501 Napoleon Ridge						17,044	17,044	35,630	50,183	
13504 West Panther			25,966			25,966	25,966	36,064	36,064	
13504a South Panther						6,710	6,710	6,710	6,710	
13505 McFleny			1,948			1,948		7,948	3,608	
13506 Jureano								22,700	25,506	
13507 Hawstack Mtn								12,118	12,118	
13508 Phelan								8,850	8,850	
13509 Deep Creek									5,265	
13509a South Deep Creek									12,975	
13510 Jesse Creek		16,161				7,956	7,596	16,161	16,161	
13511 Perreau Creek						7,219	7,219	7,219	8,493	
13512 Agency Creek									5,690	
13513 Sal Mountain		6,488					6,488	6,488	15,826	
13514 Little Horse			7,620			7,620	7,620	7,620	7,620	
13515 Napias						7,880	7,880	7,880	9,771	
13516 Oreana			6,739			6,739	6,739	6,739	7,406	
13517 Musgrove						5,838	5,838	7,071	8,273	
13518 Duck Peak			37,081			37,081	37,081	38,057	48,791	
13520 Sheepwater						12,143	19,492	19,492	31,954	
13521 Long Tom			19,470		19,470	19,470	11,682	19,470	21,633	
TOTAL	76,749	184,317	348,518	157,718	236,774	470,807	579,063	676,925	830,469	
Z to "W"	9	22	42	19	20	57	70	81	100	

\* Contiguous w/other forests

\*\* Salmon is Lead Forest

For all the magnificent wild land on the Salmon National Forest, the Forest Service is not proposing a single acre for wilderness designation! Furthermore, their wretched Plan, Alternative 12, proposes to develop 224 thousand acres of the 830 thousand acres of existing roadless area within 10 years. Twelve of the roadless areas would be completely eliminated from further wilderness consideration. Large fractions of 8 other roadless areas would also be developed (DEIS Appendix C).

There are 3 regions of the Salmon N.F. that we think should remain wild - the Lemhi Range, the Bitterroot Range (5 roadless areas), and the 6 roadless areas contiguous to the FC-RNR Wilderness. Most of these areas are in the wilderness recommendation of F.S. Alternative 3, which includes part of the Lemhi Range, most of West Big Hole and Allan Mt. in the Bitterroot Range, and all of the roadless areas contiguous to FC-RNRW.

A minimum wilderness proposal should include all of the Lemhi Range Roadless Area and the West Big Hole Roadless Areas. These 2 large, spectacular roadless areas continue to have strong support for wilderness. A better proposal would be the wilderness recommendation of Alternative 3, but with all of the Lemhi Range

included, and also with Anderson Mt. included. The Lemhia and Anderson Mt. in particular are threatened by the proposed Plan.

### **Lemhi Range**

**Lemhi Range Roadless Area** - provides outstanding habitat, scenery, and primitive recreation. This large, high area, 303 thousand acres, has 153 thousand acres on the Salmon N.F. and 150 thousand on the Challis N.F. Wildlife includes bighorn sheep, goat, bear, deer, elk, antelope, and probably wolf. Some of the lower elevation forest has already been roaded and logged on the Salmon side, even though timber values are low. The Plan calls for even more timber sales and roads in the Lemhia. These are planned for Alder Creek (a tributary of Big Timber Creek), Deep Creek, Hayden Creek, and Basin Creek, which is a tributary of Hayden Creek. These timber sales and roads would ruin elk calving range, anadromous and resident fish spawning habitat in Hayden Creek, and beautiful roadless land best left alone. Continuing to log the Lemhia is asking all of us taxpayers to pay for mining timber and destroying fish and wildlife habitat.

It is important to urge the F.S. to recommend wilderness designation for the entire Lemhi Range Roadless Area. The F.S. Alternative 3 wilderness recommendation leaves out 50 thousand acres. The Idaho Wildlands Defense Coalition's wilderness proposal also leaves out a large fraction of the Roadless Area. But the excluded portions tend to be at lower elevation, and these are generally the best habitat for most species.

### **Bitterroot Range**

This is the mountain range forming the Continental Divide between Idaho and Montana. All 5 of these roadless areas are contiguous to roadless land in Montana. The Plan particularly threatens Anderson Mt., but does not propose much development in the other 4 areas. Alternative 3 would recommend most of West Big Hole and Allan Mt. for wilderness.

**West Big Hole R.A.** - This is the spectacular range of sharp peaks on the right as you drive north from Salmon. There are important elk and deer migration corridors and anadromous fish streams. Other wildlife includes bear and goat. On the Montana side, the Beaverhead N.F. has recommended part of West Big Hole for wilderness.

**Anderson Mt. R.A.** - This is the forested area to your right as you drive north from Gibbonsville to Lost Trail Pass; the next roadless area on the Divide north of West Big Hole R.A. It is key elk summer range and an important migration area for a large 2 state elk herd. The Fish & Game Dept. has asked the F.S. to leave it undeveloped (as we have), but the F.S. has a large timber sale planned in Anderson-Threemile Creeks, and another in Pierce Creek.

**Allan Mt. R.A.** - This area is on the Divide just west of Lost Trail Pass, where it runs east-west. It is scenic, with some old burned open areas furnishing good habitat and good views. There are bear, lion, goat, wolverine, pileated woodpecker, and many raptors.

**Goat Mt. R.A.** - This is the next roadless area south of West Big Hole R.A. It's high, largely open, scenic country. Antelope and deer migrate through the area. There may be wolves. Prairie falcons and golden eagles nest there. "Prehistoric and historic cultural resources are known to exist within this unit, but their significance has not been determined." (DEIS Appendix C).

**Italian Peak R.A.** - And this is the area south of Goat Mt. on the Divide (It's contiguous to BLM roadless land, which is contiguous to the Targhee N.F. portion of Italian Peak R.A.). It's also open on top and scenic, has elk calving and deer fawning areas as well as winter and summer range. Cultural resources exist here too.

#### **Areas Contiguous to the FC-RNR Wilderness**

These areas all lie on the east side of the FC-RNRW. All are included in the wilderness recommendation of Alternative 3.

**Camas Creek R.A.** - lies west of Panther Creek road, with the Silver Creek road on the north and the road to Sleeping Deer Mt. on the south. Wildlife includes elk, deer, bear, sheep, goat, cougar, and trout. There is potential for wolf recovery. The northern end lies mostly on the Salmon N.F., draining into Camas Creek (via Silver, Castle, and Furnace creeks). Since Camas Creek is a major tributary of the Middle Fork of the Salmon, and this is steep, rugged land, wilderness recommendation is a good idea.

**Duck Peak R.A.** - just across the Silver Creek road to the northwest of the Camas Creek R.A., and west of the Panther Creek road, with the road down Yellowjacket Creek on the northwest. Drainage is mostly into Camas Creek via Yellowjacket and Silver Creeks. The DEIS says (Appendix C) that the area is "extremely diverse in terms of vegetative and topographic features, containing a wide variety of wildlife habitats over almost a mile of vertical relief." There is key elk range and anadromous fish habitat.

**West Panther Creek R.A.** - west of the Panther Creek Road, and east of Gant Ridge on the FC-RNRW boundary. Elevation from 3500 feet to 9000 feet. Deer, elk, and bighorn.

**Long Tom R.A.** - just north of Salmon River. Steep. Corn Creek and Wheat Creek. Elk, deer, lion, bear.

**Little Horse R.A. and Oreana R.A.** - east of Horse Creek in FC-RNRW. These 2 small areas are separated only by the road on Oreana Ridge.

#### **Other**

**Taylor Mt. R.A.** - This area, shared by the Salmon and Challis Forests, is just across the Panther Creek road to the east of the Duck Peak R.A., and north of Morgan Creek Summit. Iron Creek, an important anadromous fish spawning stream which drains directly into the main Salmon River, is threatened by planned roads and timber sales. The area has several alpine lakes in cirque basins, notably the scenic Hat Creek Lakes. Several lakes have trout, and one has grayling. There is key elk summer and winter range for the 200 to 250 animals in the Moyer Creek herd. Alternative 3 recommends it for wilderness.

## MINERALS

There are about 229,000 acres of lode, placer, tunnel site, and mill site claims filed on the Salmon N.F. "The Forest has not been a significant producer of mineral commodities since 1966. However, there is a possibility that the Blackbird Cobalt-Copper Mine will reopen during the 10-year planning period.... Past mineral exploration and production activities within the Forest have created serious environmental problems, primarily in the areas of degraded water quality and aquatic habitat, in the vicinity of the Blackbird Mine." (Plan II-52).

There has been no historic production of leasable minerals (oil, gas, geothermal, and phosphate). There are now 6 oil & gas leases on about 5400 acres, and 40 to 50 more pending on 177,000 acres. There are 4 geothermal leases pending for 6400 acres. And there are 9 phosphate prospecting permits pending on 18,000 acres, some east of Leadore in Hall Creek and some in the Italian Peak area (Plan II-53).

About 69% of the Forest is open to mineral entry and leasing. The Plan would make 76% available. The range over alternatives is from 30% (Alternative 11) to 76% (Alternatives 5 and 12), with Alternatives 3, 8, and 9 at 57%, 50%, and 44%, resp. (DEIS II-162).

## RANGE

The current level of livestock use on the Salmon N. F. is at 54,100 AUM's a year (Plan II-34). (One Animal Unit Month = forage for a 1000 lb cow for one month). The 12 alternatives range from 45,400 AUM's (Alternative 6) to 64,000 AUM's (Alternative 5) (DEIS S-8). The preferred Alternative does not propose to reduce total grazing level, but instead proposes a slight increase to 55,000 AUM's. A lower level would be better, such as in Alternatives 3, 8, and 9, which are all at about 48,000 AUM's.

However, probably more important than the total numbers is the need to direct cattle use away from key wildlife areas. The Plan points out that "Livestock grazing is currently adversely impacting some riparian zones and conflicts with environment policy and direction. Grazing systems and structural improvements need to be implemented on some riparian zones if this direction and policy is to be met." (Plan II-39). It also says that "Enhancement of riparian areas in a deteriorated condition will be emphasized." (Plan III-3).

Some time ago, the Salmon N.F. inventoried areas of conflict between livestock and wildlife. This report showed that of the 188,000 acres of suitable rangeland on the Salmon N.F., there are 33,500 acres where conflicts exist between cattle and wildlife in general. Of this area, there are conflicts between cattle and elk on 18,400 acres. These include interspecific competition for forage and space on calving areas, wet meadows and wallow complexes, and key forage areas. Yet this report is not part of the DEIS, and the cattle-elk problems it identified are not addressed. Roberts says that elk will continue to be displaced from these key summer habitats into marginal areas.

## RECREATION

The Salmon National Forest is of national significance for its outstanding wilderness, wildlife, and recreational values. "Many people know of, and are attracted to, the Salmon National Forest and nearby areas, because of the National reputation of the river, floating, wilderness areas, and hunting and fishing activities along with the general scenic beauty of the area." (Plan II-3).

Yet the Plan, if implemented, will diminish hunting, fishing, hiking, and other primitive forms of recreation. It will destroy fish and wildlife habitat. It will degrade scenic quality of many areas. It will recommend not one acre of designated wilderness. And it will make all Semi-primitive recreational areas motorized instead of non-motorized, which means not even the Lemhis or the West Big Holes will be off limits to the use of dirt bikes.

One campground proposal also needs comment; Meadow Lake. The Plan (as well as nearly every other alternative) calls for expanding this overused Campground, which is at 9000 foot Meadow Lake in the southern end of the Lemhi Range. But the Campground is in a constricted spot and too close to the Lake, in a fragile area already taking a beating. Instead, it would probably be better for the F.S. to build the larger campground at the bottom of the mountain near the old ghost town of Gilmore, continue to maintain the road up to Meadow Lake, and make that a day use area only.

## CULTURAL RESOURCES

There are 407 recorded sites on the Salmon N.F. Over 50% of these are prehistoric open campsites, and 10 to 20% of these are rockshelters along the main Salmon and Middle Fork Salmon Rivers. However, no systematic survey of the Forest has been done, and it is speculated that there may be several thousand more sites not even inventoried. Professional staffing for the cultural resources program has been limited to 1 or 2 temporary summer employees. This level makes any systematic survey very difficult and slow. The Plan says: "Resource management conflicts involving cultural resources will probably increase if the projected program output goals outlined in the draft Regional plan for minerals, timber, recreation, wildlife habitat improvement, and soils are attained."

Three sites are listed on the National Register of Historic Places; Lemhi Pass (crossed by Lewis and Clark in 1805, and by Chief Joseph in 1877), Leesburg, and the Shoup Rockshelters (Plan II-12,14,15).

## RESEARCH NATURAL AREAS

There is now only 1 RNA on the Forest, in the Frank Church RNR Wilderness (Gunbarrel). Ten more sites have been recommended for RNA status by the Intermountain and Idaho Natural Areas coordinating committee. The Plan does not propose any of these areas for RNA status; it only says that they are potential RNA's and are being evaluated. We should support their establishment as RNA's. They are: Frog Meadows, Mill Lake, Allan Mt., Bear Valley Creek, Colson Creek, Dome Lake, Dry Gulch-Forge Creek, Davis Canyon, Kenny Creek, and Deadwater (DEIS IV-50).

## LETTERS NEEDED!

The Forest Service is asking for public comments on their proposed Plan for the Salmon National Forest. It's your Forest. Are you going to let them get away with this terrible Plan? Please write to the Supervisor before Jan. 10. Below are some suggested points.

### 1. The Plan is unacceptable:

- \* It overemphasizes timber management and road-building at the expense of fish and wildlife habitat, scenic values, and primitive recreation.
- \* It proposes no wilderness area, even for the Lemhis or the West Big Holes, both spectacular areas with high wildlife and recreational values, low timber values, and strong support for wilderness.

### 2. A complete change in management direction is needed, not just slight modification of Current Direction. Support the thrust of Alternative 3, which says: "Emphasis is on nonmarket outputs and values such as water, fish and wildlife and dispersed recreation."

### 3. Support a modified Alternative 3 (or 8 or 9). (For comparison, see tables on pp 3, 5, 7, 11 of this alert.) Modifications and points of emphasis include:

#### \* Wilderness recommendation for Roadless Areas (pp 11-13):

Those areas recommended in Alternative 3, but specify entire Lemhi Range R.A.; also add Anderson Mt. R.A.;

Or, ask for whatever wilderness you wish;

However, a minimum recommendation to the F.S. should be the entire Lemhi Range and West Big Hole R.A.'s.

#### \* Semi-primitive Non-motorized classification for (pp 3,15):

A large fraction (you choose) of the area to be managed as roadless outside the recommended wilderness areas.

#### \* Close those existing roads in important wildlife habitat which are not needed for Forest management.

#### \* Support F.S. proposal to close new timber access roads after logging is completed (p 10).

#### \* Support riparian habitat protection and improvement. Move cattle out of important elk habitats (p 14).

#### \* Provide guidelines for fireline construction (p 9).

#### \* Support RNA designations; cultural resource protection (p 15).

Write to: Richard Hauff, Supervisor  
Salmon National Forest  
P. O. Box 729  
Salmon, Idaho 83467.

(Copies to the  
Congressional Delegation  
and Governor Evans would  
be a good idea.)

JOAN REYNOLDS  
P.O. BOX 2039  
HAILEY, IDAHO 83333

0361

SALMON N F

JAN 15 '86

Info O	Action	
SUP		
LMP	1 2 3 4 5 6	
TAF	1 2 3 4 5 6	
ELM	1 2 3 4 5 6	
PRW	1 2 3 4 5 6	
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ECC-TO JAN 15 1986		

Jan 9, 1986

Richard Hauff,

I am writing to express my feelings on the Forest Service Preferred Alternative No. 12. I feel that is ~~is~~ completely unacceptable for a number of reasons. Firstly, it does not give enough emphasis to the management of elk, Idaho's premier big game species. Also, it completely disregards the Idaho Department of Fish & Game's management objectives. Too much emphasis is placed on managing timber, a low value resource, at the expense of higher value resources - water, fish, wildlife, and outdoor recreation. The Lemhi Mountains and the West Big Hole Area have been endorsed by Idaho Wildlife Defense Coalition and the preferred alternative does not state why these areas were not selected. The Alternative supports an existing & proposed road system the many feel is larger than necessary. Furthermore, it doesn't resolve the major conflict between elk and cattle for both forage & space.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 779  
Salmon, ID 83467

Reply to. 1920

Date

Joan Reynolds  
P.O. Box 2039  
Hailey, Idaho 83333

Dear Ms Reynolds

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

There has been some confusion generated regarding the ability of the various alternatives to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers.

Timber harvests and road construction in areas of key elk summer range (KESR's) are concerns that surfaced in many letters of response. The preferred alternative incorporates management activity design and associated coordination measures to ensure that any adverse effects upon the big game resource will be very short-term and, in most cases, limited.





A slight modification of the current management direction is not enough. A complete change is needed on the Salmon Forest; one that would emphasize important amenity values and deemphasize commodity values.

I do a lot of hiking, backpacking, and enjoy the wilderness a great deal. These areas are important to me as well as many others. I strongly support that the Lemhi Mountains and the West Big Hole Area be recommended for Wilderness in the final plan - Please consider my concerns and act on them.

Sincerely, Joan T. Reynolds



Joan Reynolds

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to the life of the timber sale. The predicted long-term effects of these activities will in most cases be of benefit to deer and elk, and in many cases the benefits will be very substantial, especially in areas where natural forage openings and timber/nontimber ecotones are only present in very limited quantities.

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc.) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas. In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

1. Meeting Idaho Department of Fish and Game goals for big game
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

Timber management is the only resource program which was analyzed strictly on the basis of actual cash flow. Viewed in this way, most timber sales on the Salmon National Forest are expected to have costs in excess of the stumpage value expressed in dollars returned to the Federal Treasury. Other economic values of the harvest and sale of timber include employment, capital investment in harvest, transportation, production and distribution facilities, as well as local, state and federal taxes generated by these secondary benefits. Since most other forest resources do not generate significant revenues on the Salmon National Forest, they were assigned values based on estimates of what people are willing to pay to enjoy, or





Joan Reynolds

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obtain these resources. These values do not represent real income returned to the Treasury, and if such real income values were used, most, if not all, other resources would appear to be poor investments, or "deficit" programs.

This difference in the basis for valuing resources has contributed to the perception that the Forest Service is emphasizing a program which is less valuable than other noncommodity uses. The Forest Service will continue to refine the analysis techniques and acquire the data needed to make more meaningful comparisons in the future Plans. At the present, however, it is important to remember that the results of the PNW analysis represent only one factor considered in determining the economic value of the alternatives which were considered.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from minerals activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

The Draft Salmon National Forest Management Plan identified areas as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive.

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness, and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset, however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National



Joan Reynolds

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Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-380



0123



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O. Box 729  
Salmon, ID 83467

P O BOX 883  
OSBURN, IDAHO 83849

SALMON N F

JAN 9 '86

Info O	Action <input type="checkbox"/>
SUP	
LMP	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
RRWW	1 2 3 4 5 6
AO	1 2 3 4 5 6
CC:TO	<i>E. J. [signature]</i>

January 6, 1986

Mr Richard Hauff, Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

Dear Mr Hauff

The Forest Service Preferred Alternative No 12 is completely unacceptable as I see it because

It does not give emphasis to the management of elk, Idaho's premier big game species. Furthermore, it completely disregards the Idaho Department of Fish and Game's management objectives.

It places too much emphasis on managing timber, a low value resource, at the expense of higher value resources -- water, fish, wildlife, and outdoor recreation.

It provides no additional wilderness acreage, particularly for the Lemhi Mountains and the West Big Hole Area. Both areas have long been endorsed by the Idaho Wildlands Defense Coalition, and the preferred alternative does not state why these areas were not selected.

It supports an existing and proposed road system that I feel is larger than necessary for the best management of the Salmon National Forest. It fails to close many roads that are unnecessary for forest management.

It does not allocate any acreage for Semi-Primitive Non-Motorized uses.

It does not resolve the major conflict between elk and cattle for both forage and space.

Reply to 1920

Date

Mr Floyd Strand  
P O Box 883  
Osburn, Idaho 83849

Dear Mr Strand

Thank you for your comments on the Proposed Salmon National Forest Plan and Draft Environmental Impact Statement.

There has been some confusion generated regarding the ability of the various alternatives of the Proposed Plan to meet Idaho Department of Fish and Game wildlife and fish population objectives. This confusion stems from two sources: the use of outdated figures for the State's population goals, and the relationship of various habitat capability levels to population numbers.

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated. This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

Many individuals do not understand how the preferred alternative can meet or exceed the State's population goals for big game while reducing habitat potential on key elk summer range. In fact, the current number of elk, which is growing, is significantly less than what can be supported by current habitat conditions. The habitat potential resulting from implementation of Alternative 12, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from



Letter to Salmon National Forest  
January 6, 1986  
Page 2

A slight modification of the current management direction is not enough. A complete change in the management direction is needed on the Salmon Forest, one that would emphasize important amenity values and deemphasize commodity values. I support Alternative 3 (Nonmarket Opportunities) which states, "Emphasis is on non-market outputs and values such as water, fish and wildlife and dispersed recreation."

I strongly support wilderness designation for the Lemhi Mountains and the West Big Hole area, and I recommend these areas for Wilderness in the final plan. Other roadless areas that should be protected as Wilderness, or at the very least as Semi-Primitive Non-Motorized, are the Anderson, Allen, and Goat Mountain, and Italian Peak roadless Areas in the Bitterroot Range. Important areas contiguous to the Frank Church/River of No Return Wilderness include the Camas Creek, Duck Peak, West Panther Creek, Long Tom, Little Horse, and Oreana Roadless areas.

I request that a complete map and designated boundary lines be included in the final plan. These must include important wildlife areas, suitable and unsuitable timber lands, and 10 year timber sale and road plan maps.

Yours truly,

*Floyd Strand*  
Floyd Strand



Mr. Floyd Strand

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this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of roadless designation for Allen Mountain and some areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980, the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the [Frank Church] River of No Return Wilderness be managed for nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Castle Creek, Long Tom, and Blue Joint vicinities. The bulk of the Allen Mountain area will also be managed for semi-primitive unroaded opportunities.

The Draft Salmon National Forest Management Plan identified areas as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive.

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness, and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset; however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game.



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Mr. Floyd Strand

This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (B-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

In our judgment, the selected alternative provides for a balanced program of activities and outputs. The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for

- 1 Meeting Idaho Department of Fish and Game goals for big game
- 2 Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water
- 3 Protecting soil productivity in accordance with the National Forest Management Act
- 4 More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors
- 5 Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities
- 6 Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

The cost of including the maps and plans which you requested in the final Forest Plan would be prohibitive. These documents are available for your review at the Forest Supervisor's Office.

Thank you again for your participation in the development of the Salmon National Forest Plan.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



January 10, 1986

JAN 15 '86

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MHW 1 2 3 4 5 6  
AO 1 2 3 4 5 6  
CC TO: [Signature]

Richard Hauff, Forest Supervisor  
Salmon National Forest  
Box 729  
Salmon, Idaho 83467

Dear Mr Hauff

This letter is submitted as my comments and recommendations on the Draft Plan for the Salmon National Forest. Please carefully consider this letter, and include it in the public record.

At the outset, I am greatly disappointed with the Draft Plan's aggressive emphasis on timber production and road building, at the expense of wildlife, fisheries, wilderness, recreation, and sound fiscal policy.

For example, I oppose the Preferred Alternative No. 12 because of its repugnant bias toward timber production and its failure to provide for balanced resource management. Specifically, this Preferred Alternative would harm the important elk migration route between Montana and Idaho through the proposed logging between Dalonega Creek and Sheep Creek. It is also appalling that all or most timber sales, according to the 1984 GAO report, are "below cost" sales, which means that the public taxpayers must subsidize adverse environmental impacts.

Many non-game and old growth dependent wildlife species would be harmed, including the wolverine, grey owl, pileated woodpecker, and pine marten. The endangered grey wolf may also be jeopardized through implementation of this draft forest plan, which is contrary to the draft recovery plan for this federally listed species.

Please undertake a substantial change in the direction of management policies and goals in the final forest plan. Please support the emphasis of Alternative 3 (nonmarket opportunities). In addition, please strongly support wilderness designation for the Lemhi Mountains and the West Big Hole Area. Livestock grazing levels should be reduced to provide additional forage and space for elk and other wildlife species. In short, the final forest plan should ensure the long-term protection of abundant fish, wildlife and recreational resources.

Although I am not an Idaho resident, I have hiked in the Salmon National Forest and I have rafted on both the Middle Fork and Main Salmon River. I also own property near Coeur d'Alene.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Mr Richard Spotts  
5604 Rosedale Way  
Sacramento, California 95822

Dear Mr. Spotts

Thank you for your comments on the Proposed Salmon National Forest Plan and Draft Environmental Impact Statement.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1. Meeting Idaho Department of Fish and Game goals for big game.
2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.
3. Protecting soil productivity in accordance with the National Forest Management Act.
4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.
5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.
6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

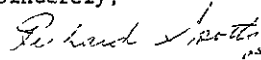
Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment of prescriptions to each area, it became apparent that the semi-primitive motorized and/or nonmotorized recreation prescriptions



Idaho is fortunate to be blessed with such magnificent natural values. These public lands deserve improved management to maintain their values for current and future generations of all Americans.

Thank you very much for considering my views

Sincerely,



Richard Spotts

5604 Rosedale Way  
Sacramento, CA 95822

RS/js

cc Governor John Evans  
Congressman Richard Stallings

VI-385



Mr. Richard Spotts

2

adequately handle all wildlife concerns for maintenance of these corridors. Consequently, since the geographic areas proposed for the recreation prescriptions encompass the areas proposed for wildlife migration prescriptions, the wildlife areas were simply lumped under the semi-primitive motorized and/or nonmotorized prescriptions. Under the draft preferred alternative (12), most of the Montana-Idaho divide from the head of Spring Creek through Lost Trail Pass and on south to Goldstone Mountain is within either the 2A (semi-primitive motorized) or 2B (semi-primitive nonmotorized) prescriptions. As such, these areas will only be subject to salvage timber harvest following natural disasters. Consequently, these migration routes are provided protection from road encroachment and cover removal.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting habitat requirements of the species using these habitats. By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met.

For example, of the many species that depend on or do best in old growth Douglas-fir stands, the pileated woodpecker requires the largest diameter trees for cavity nesting and the largest number of continuous acres for breeding and feeding purposes. Other cavity nesters find suitable nesting sites in trees of equal or lesser diameter. The home ranges/breeding territories of other old growth dependent species can be met within the size limitations established for the pileated.





Mr. Richard Spotts

3

Old growth acres outside wilderness areas have been mapped to ensure stands of adequate size and distribution will be retained to meet the 10 percent established as minimally acceptable. These stands are located over a wide range of aspects and elevations, to ensure good representation of existing site conditions. Stands are fairly evenly distributed over the Forest to minimize the dispersal distance between stands and to reduce the chance of losing stands from catastrophic events.

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility. Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species.

It is stated in the draft Salmon Forest Plan that "the Salmon National Forest provides habitat for three endangered species--gray wolf, peregrine falcon, bald eagle, and one threatened species--grizzly bear" (II-6 and 7). At present, the numbers for all four species are below the theoretical minimum levels necessary to support self-sustaining populations on the Forest (II-26). Theoretical maximum population levels have been calculated for all but the grizzly bear, based on available habitat and food supplies. (Target numbers are not included for the grizzly bear because the Grizzly Bear Recovery Plan does not involve recovery efforts on the Salmon National Forest). Since the Forest provides suitable habitat which is presently unoccupied, there is no need to do habitat improvement work to achieve theoretical maximum populations. However, none of the three species are known to reproduce on the Forest at present, so population increases can be expected to result largely from introductions (II-26 and 27).

Though no habitat improvement work is targeted for threatened or endangered species, neither will any action "be authorized or conducted if judged likely to jeopardize the continued existence of any Federally-listed species or designated critical habitat" (III-5). Management recommendations outlined in the Threatened and Endangered Species Management Plan for the Salmon National Forest are included in the Standards and Guidelines for the Draft Forest Plan to guide recovery efforts for the bald eagle, peregrine falcon, and gray wolf on the Forest (IV-19).

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.



Mr. Richard Spotts

4.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

Thank you again for your participation in the development of the Salmon National Forest Plan.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-386





JAN 27 '86

16 January 1986

Info O Action C

SUP

LMP 1 2 3 4 5 6

TAF 1 2 3 4 5 6

ELM 1 2 3 4 5 6

PR/W 1 2 3 4 5 6

H/O 1 2 3 4 5 6

C/O 1 2 3 4 5 6

JCB

Dear Supervisor,

I feel the ~~current~~ <sup>new</sup> Forest Planning Process is not in the best interest of us the taxpayer. Already too much damage has been done to our national forests.

I whole heartedly support "Alternative 3" in the plan and of the continuing of Wilderness Designation for Lemhi, Anderson Mt, Italian Peak & West Bigholes.

I also believe our National Forests are overgrazed. What once was beautiful grassy areas are now dusty and dry because too much priority has been given to cattle and sheep grazing allotments at very low cost to the cattle and sheep men. This should be decreased not increased as proposed.

I support the roadless designation of Allen and Goat Mts along with all other roadless areas. To many roads eliminate much needed wildlife habitat. I pay very high fee to Hunt and fish and believe some effort is due to the preservation of better wildlife management.



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to 1920

Date

Mr V Reid Jeppsen  
620 Beecher  
Brigham City, Utah 83402

Dear Mr. Jeppsen

Thank you for your comments on the Salmon National Forest Proposed Forest Plan and Draft Environmental Impact Statement.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the proposed Forest Plan is commensurate with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game.

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

The density of open roads per square mile of land area is extremely important to the welfare of hunted wildlife populations. This habitat factor greatly influences the effectiveness of timbered blocks of hiding cover and the solitude necessary to ensure good reproductive success in species such as elk. Consequently, we have recently placed much emphasis



0543

inhabitat.

I am willing to stand by those fighting to keep what precious wilderness area we have left by both moral support and monetary donations.

Please carefully consider my concerns.

Sincerely,

V. Reid Jeppsen  
620 Beecher  
Brigham City, Utah  
84302

SALMON N F

JAN 27 '86

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2 CCs TO Jensen *rk*



Mr. V. Reid Jeppsen

2.

on closing timber roads that were built prior to the time the full effects of roading were realized. This task has been undertaken in an effort to restore big game habitat effectiveness; and we have evidence that it has been extremely successful in many areas. Therefore, closing new single-purpose timber roads after use is now considered to be one of the most effective wildlife-timber coordination measures. This measure is also an integral part of the direction included in the Forest Plan.

Administration of new programs such as this is time consuming and often difficult at the onset; however, the benefits of closures are now being realized by many Forest visitors and the task, though still time consuming, is becoming much easier and more effective each year.

Thank you for your participation in the development of the Salmon National Forest Plan.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-388



JAN 21 '86

Dear Supervisor:

Info 0 Action ☐

SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RRV/W	1	2	3	4	5	6
AO	1	2	3	4	5	6

20050, 1/21/86

We are very concerned with the segment of the Salmon National Forest Mt. and I have enjoyed many hours of fishing in the Salmon river and would like to continue doing so.

We are opposed to taxpayer subsidized timber sales with proposed Forest Service D aft Plan, it will not only make us, the taxpayer, pay for this massive logging operation, it will destroy crucial cover for Elk, Sighorns, goats and watershed protection for trout and steelhead streams.

We support "Alternative 3" which states, "Emphasis on non-market outputs and values such as water, fish and wildlife, and dispersed recreation."

There should be continued wilderness designation for the Lemhi, West Big Hole, Anderson Mtn, and Italian Peaks, to protect them for continued successful hunting and fishing.

Continued overharvesting, and overgrazing only cost taxpayers money, deplete valuable elk habitat, and adds more silt to our already silted river system. This makes no sense. Let's do something now while still have a chance.

5673 Fairview #55 Ron Starry  
Boise, ID 83704 Idaho Sportsman Coalition



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to 1920

Date

Mr. Ron Starry  
8673 Fairview, Apt. 55  
Boise, Idaho 83704

Dear Mr. Starry

Thank you for your comments on the Proposed Salmon National Forest Plan and Draft Environmental Impact Statement.

It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the Treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value; however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

- 1 Meeting Idaho Department of Fish and Game goals for big game.





Mr. Ron Starry

2.

2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.

3. Protecting soil productivity in accordance with the National Forest Management Act.

4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.

5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.

6. Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, and Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity, semi-primitive management area prescriptions will provide a high degree of protection. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Thank you again for your comments.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor



# HAILEY MEDICAL CLINIC

P.O. BOX 760 706 SOUTH MAIN STREET HAILEY IDAHO 83333  
(208) 788-3434

SALMON N F

JAN 17 '86

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BRVW	1	2	3 4 5 6
AO	1	2	3 4 5 6

2 CC's to Senen 1/17/86 S.M.

January 15, 1986

Supervisor  
Salmon National Forest  
P.O. Box 729  
Salmon, Idaho 83467

Dear Supervisor,

I participate in several types of uses in the National forests, including hiking, fishing, hunting and river trips and would like to express my concern over the management of these areas. I oppose taxpayer subsidized timber sales especially in key elk and wildlife ranges. I feel wildlife species such as bighorn sheep, elk, deer and antelope should be given priority over sheep and cattle grazing allotments.

I fully support "Alternative 3", and support wilderness designation for the Lemhis, Bigholes, Anderson Mountain and Italian Peaks to permanently protect these areas for fish and wildlife.

I oppose further degradation of the streams, rivers, forests and mountains through opening more areas to logging and livestock grazing. I feel that past damage to the areas should be repaired.

I also support a roadless wilderness designation for the Allen and Goat Mountains, Camas, West Panther, Big Deer Creek, Long Ton, Little Horse, Duck Peak and Oreana roadless areas.

Thank you for your concern.

Sincerely,

*Carl A. Barbee*  
CARL A BARBEE M.D.  
P.O. Box 509  
HAILEY, ID 83333



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P.O. Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

Carl A. Barbee, M.D.  
P.O. Box 509  
Hailey, Idaho 83333

Dear Dr. Barbee

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest. In response to your input we have the following comments:

Many, as you did, expressed a concern for taxpayer subsidized timber sales. It is true that most timber sales are expected to have costs in excess of stumpage returns. That is, the cost of preparation and administration is expected to exceed stumpage returns to the treasury. If the other benefits associated with timber harvest are ignored, then timber management on the Salmon can appear to be a poor investment. In addition to supplying a portion of the nation's timber needs, other important benefits of timber harvest are employment, income, and the related contribution to the economic diversity of dependent communities. These nonpriced outputs are not valued in the economic analysis. Another important benefit, which is not valued in the economic analysis, is the return to the Treasury in the form of income and corporate taxes. These taxes can offset a sizeable portion of the cost of preparation and administration. Timber management is the only resource program which was analyzed strictly on the basis of direct cash flow to the Treasury. If other resource programs were valued in the same way, most, if not all, would appear to be poor investments based on present net value, however, most other resources such as recreation are valued based on willingness-to-pay values, which are estimates of what nonmarket outputs are worth in the absence of established market values. These willingness-to-pay values are included in the economic analysis even though they do not represent any cash flow to the Treasury. The important thing to remember is that the economic analysis does not display the whole economic picture. All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative.

The proposed harvest level of 21.1 million board feet is a considerable drop from historic levels. The timber harvest level in the selected alternative is compatible with providing very high levels of noncommodity outputs. The selected alternative provides for:

1 Meeting State of Idaho Fish and Game Department goals for big game





Carl A. Barbee, M.D.

2

2 Meeting State of Idaho Fish and Game Department goals for anadromous and resident fish, as well as protecting downstream beneficial user of water

3 Protecting soil productivity in accordance with the National Forest Management Act

4 More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors

5. Maintaining high visual quality throughout most of the Forest. Less than 10 percent will appear to be modified by management activities.

6 Retaining 1,032,000 acres of the Forest in an undeveloped condition throughout the planning period

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. This opposition to wilderness designation is based on numerous factors. One is the high potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Although not recommended for wilderness, much of the Lemhi Range (Lemhi Roadless Area), and the Beaverhead Range (Anderson Mountain, Big Holes, Goat Mountain, Italian Peaks Roadless Areas) will remain undeveloped. Most of these areas will be managed for semi-primitive recreation opportunity. Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from minerals activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

Further, your letter voices support of "roadless wilderness" designation for Allan Mountain and several roadless areas adjacent to the Frank Church--River of No Return Wilderness. During the passage of the Central Idaho Wilderness Management Act of 1980 the House/Senate Joint Conference Committee stated in their committee report that it is the intent of Congress that lands adjacent to the Frank Church River--of No Return Wilderness be managed for



Carl A. Barbee, M.D.

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nonwilderness multiple-use purposes. Various management strategies will be applied to areas bordering the Wilderness depending on their resource characteristics. Areas adjacent to the Wilderness with a semi-primitive recreation management emphasis occur in the Camas Creek, Cartle Creek, Long Tom and Blue Joint vicinities. The bulk of the Allan Mountain area will also be managed with a semi-primitive emphasis.

Thank you again for your participation in the development of the Salmon National Forest Plan.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor

VI-392



0258

SALMON N F

JAN 13 '86

Info 0	Action
SUP	<input type="checkbox"/>
LVP	1 2 3 4 5 6
TAF	1 2 3 4 5 6
ELM	1 2 3 4 5 6
RRWW	1 2 3 4 5 6
AD	1 2 3 4 5 6

cc: to Jensen 4/13/86

Richard Hauff, Supervisor  
Salmon National Forest Supervisor  
Box 129  
Salmon, ID 83467

RE: Salmon National Forest Plan

Dear Mr. Hauff,

In reviewing the proposals for Forest Plans that have been brought out for review the most workable one is the alternative 12 as proposed.

The cost of running a Forest Wilderness is too prohibitive to consider and the people it displaces must be a prime consideration.

No more Wilderness should be allocated within the Salmon National Forest.

There needs to be a great emphasis put on protecting existing State water rights and individual rights to such water.

There should be a continuous on going concern for the people that are affected by any decision affecting the resources of the Salmon Forest.

In considering on going costs against timber, mineral, cattle, water, the wage, tax base and the well being of the citizens need to be addressed. An over-all effect upon not only the people of the community, those on down the line whose livelihood is affected, along with the taxes directly or indirectly paid by these people need to be figured in when determining the actual benefits to the forest.

The game animals need to be considered but should be done so with the domestic animals that use the forest and what the real revenue generated within the community does as far as keeping the community in the black. How much actual tax base and disposable income is generated for actual use by the community and State Government and not by one agency.

Each area needs to be evaluated for what is available and the multiple use concept should be used. Wilderness does not make any more game animals; wise use and management will determine the herd populations.

Roads in any of the forest should be kept to a minimum and consideration should be given to whether to close or leave them open with consideration given for the values and effects of them over all.

Yours for a better Forest thru good management.

Sincerely,

*Jerry A. Perry*  
Rt 1 Box 155A  
Salmon Idaho  
Jan 9, 1986



United States  
Department of  
Agriculture

Forest  
Service

Salmon  
National  
Forest

P O Box 729  
Salmon, ID 83467

Reply to: 1920

Date:

Jerry A. and Virginia Perry  
Rt 1, Box 155A  
Salmon, Idaho 83467

Dear Mr. and Mrs. Perry

Thank you for taking the time to comment on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

We have tried to develop a plan which provides for a balanced program of activities and outputs. More specifically, the selected management plan will ensure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish, and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive nonmotorized user experiences. Equally important, the management plan provides for a level of livestock grazing consistent with the agricultural base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives

Even though we know of no legal requirement to maintain community stability, there is little doubt the National Forest Management Act of 1976, National Environmental Policy Act of 1969, and subsequent implementing regulations require that this issue be considered in formulating a Forest Plan. Although community stability or economic development cannot be ensured by the agency, the Forest Service often has the ability to prevent actions which could destabilize communities or provide opportunities which could help communities reach their economic goals. We believe our plan does provide opportunity for a diverse local economy.

We do not propose any additional wilderness on the Salmon. While there is considerable support for more wilderness, there is also considerable opposition. This is based on numerous factors. One is the high potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or





Jerry A. and Virginia Perry

2

reductions in livestock grazing have also been expressed. Despite strong disagreement about wilderness classification, public input has indicated a high degree of support for management that would limit development on some portion of the undeveloped areas in order to protect the recreation, wildlife, fisheries, scenic and watershed values commonly associated with wilderness. A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. There will be no timber harvest or new road construction unless necessary for mineral development. There is a low likelihood of significant impacts from this activity. These areas will be managed primarily for the benefit of recreation and wildlife. There will be a mixture of motorized and nonmotorized recreation opportunities available.

It is anticipated that the wilderness values of areas assigned a semi-primitive management prescription will be essentially intact at the end of the first planning cycle, thereby maintaining their current suitability and availability for consideration as wilderness during the next plan revision.

Long-term Forest Service policy will be to continue to recognize all water rights issued by the State of Idaho, however, we are also obligated to seek those Federal water rights which are needed for the management of the Salmon National Forest.

Our plan is for all newly constructed roads to be closed when they are actually being used for timber harvest or other resource management activities, unless a substantial need to keep the road open is expressed through the public participation process outlined in the later (d) Environmental Policy Act. Existing roads and trails on the transportation system are outlined on the Travel Plan. The Plan is updated periodically using information gathered from the public through monitoring. Through this process, the Plan is updated to provide for changes in open roads, trails and areas caused by resource or public safety needs.

Responses like yours were helpful in preparing the final Plan. Again, thanks for taking the time to provide us with your thoughts.

Sincerely,

RICHARD T. HAUFF  
Forest Supervisor





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