

Appendix 7

**Response to Comments on the Environmental Assessment
Notice and Comment Period: February 10-March 11, 2012**

Response to Comments on the Environmental Assessment Notice & Comment Period: February 10 – March 11, 2012

This Response to Comments is prepared to meet the intent of 36 CFR 215.6(4)(b) *Consideration of comments*. (1) The Responsible Official shall consider all substantive written and oral comments submitted in compliance with paragraph (a). The Legal Notice of the 30-Day Opportunity to Comment on the *Environmental Assessment for Proposed Forest Plan Amendments 2011 Wildlife Conservation Strategy Phase 1: Forested Biological Community* was published in the Times News newspaper in Twin Falls, Idaho on February 10, 2012. The Legal Notice initiated a 30-day comment period during which comments on the Environmental Assessment were accepted from the public and interested agencies and organizations. During that period, five submissions were received. Table 1 lists the number assigned to each submission, the name and organization of each commentor, and each commentor's city and state.

Letter Number	Name	Organization	City	State
1	Kathy Richmond		Clayton	Idaho
2	Edward Kershner		Boise	Idaho
3	Christine Reichgott	Environmental Protection Agency – Region 10	Seattle	Washington
4	Jeff Cook	Idaho State Parks and Recreation	Boise	Idaho

The following section contains photocopies of comments received and the Interdisciplinary Team's responses to those comments. Responses to individual statements in the letters can be cross-referenced by the corresponding numbers in the page margins.

Letter #	Comment	Response
1	I commend you for amending the forest plan to protect old-growth forest habitat, large trees, especially for snags for bird species, and for restoring habitat to promote recruitment of old-growth.	Thank you for your comment.
	I feel that now is a critical juncture to protect wolverine habitat from human disturbances. Motorized winter access is a major issue that interferes with these animals. Appropriate closure of potential habitat areas for wolverines would answer this concern. I would also like to see a ban on further wolverine implantation tracking devices. This is based on unacceptable past	This Forest Plan Amendment recognizes wolverine as an important focal species that will assist the Forest with analyzing the ongoing human influences and disturbances occurring across large areas of the Forest. This amendment in itself does not restrict motorized winter access or implement specific closures.

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1	<p>mortality of wolverines. Many died from infection as a result of these instruments. With so few wolverines in existence today, I don't feel we can afford to jeopardize any more of these magnificent predators.</p>	<p>The amendment does modify some direction with regard to wolverine in the Forest Plan to ensure direction within wolverine habitat across the Forest is consistent. The revised 2003 Sawtooth Forest Plan did contain direction within appropriate Management Areas (<i>with wolverine denning and general habitat, MAs1-10</i>) to minimize disturbance to wolverine denning habitat from winter recreation activities and to restrict or modify winter recreation activities where conflicts exist with wolverine. This amendment clarifies and presents the direction consistently in all Management Areas that in the 2003 revised Sawtooth Forest Plan were identified as containing wolverine habitat (MAs 2-10)</p> <p>This Forest Plan Amendment does not address wolverine implantation tracking devices. If the Forest planned to monitor wolverine using such devices it would cooperate and/or consult with USFWS, IDFG and other research entities prior to initiating such a study.</p>
	<p>Regarding relocating water development facilities inside the Riparian Conservation Areas (PCAs), this is anathema to the concept of "conservation". These developments should be removed and not replaced. Domestic livestock take a heavy toll in riparian areas. PCAs are critical to protect since they represent only 2% of our land mass, and yet 25% of species depend on them.</p>	<p>The 2003 Forest Plan standard, RAST03, did not address existing water developments, or other livestock facilities, that may be located within Riparian Conservation Areas (RCAs). The Forest does recognize that water developments and other livestock facilities located within RCAs may result in unacceptable resource effects to RCAs. Therefore, this standard was modified to address not only new water developments and livestock facilities, but existing ones as well.</p>
	<p>Regarding your MPC Management Direction on page 1-12, which states "A new road guideline is proposed...that describes how public motorized use would be managed when building new roads....."</p> <p>I would strongly encourage you to prevent any new roads into our national forest lands. We already have hundreds of miles of roads. This is more than sufficient for motorized enthusiasts. Roads are permanent scars on the landscape, they fragment wildlife habitat, pollute water sources, spread noxious weeds, and displace wildlife.</p>	<p>This Forest Plan Amendment in itself does not prevent new permanent or temporary road construction or reconstruction. A new guideline in MPCs 5.1 and 6.1 (<i>Restoration and Maintenance Emphasis in Forested and Non-Forested Landscapes</i>) emphasizes restricting public motorized access on new roads built for vegetation management activities, providing effective closures in project design, and reclaiming or decommissioning these roads when activities are completed. It adds that new permanent roads constructed for vegetation management activities should be put into Level 1 maintenance status unless needed to meet transportation management</p>

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		objectives. Site specific analysis, which includes an assessment of effects to terrestrial and aquatic resources, is required prior to implementing any road construction or vegetation management activities.
	Overall, Alternative B (the Proposed Action Alternative) is visionary and positive for the flora and fauna.	Thank you for your comment.
2	Where did the Rocky Mountain bighorn sheep go? Did they vanish into a crack in the cliff?	Rocky Mountain Bighorn sheep will be addressed in detail in the upcoming Non-forested Vegetation Wildlife Conservation Strategy.
3	The EPA fully supports the development of the WCS. We commend the Forests for taking this action to identify and prioritize needed management actions to conserve wildlife and wildlife habitat, and for beginning the effort with a baseline evaluation of vegetation conditions. We agree with the SNF amendments to establish landscape management that retains old forest habitat; prioritizes vegetative and associated wildlife habitat restoration; focuses on size class, canopy cover, and composition of specific potential vegetation groups (PVGs), and balances restoration with multiple use objectives including reducing fuels in the wildland/urban interface.	Thank you for your comments
	The EA includes monitoring to address risks to habitat and species. Population trends of the new, terrestrial management indicator species and their relationships to habitat change would be monitored to help assess the effects of management activities on wildlife species in mid- to upper-elevation forests. We support forest management activities that promote a resilient ecosystem. We are pleased to see the inclusion of monitoring for non-timber plant species and wildlife.	Thank you for your comments
3	The EA acknowledges that a diversified forest contributes to sustainability over time, particularly in the face of uncertainties related to factors such as climate change. We agree with the SNF goal of promoting resilient ecosystems that can resist disturbance such as insect and disease outbreaks, unplanned fire, and shifting climates. However, we note that the EA did not include a specific discussion related to climate change adaptation. We	The foundation of this Wildlife Conservation Strategy and Forest Plan Amendment is to provide representative, resilient and redundant habitats and habitat connectivity across the landscape of the Sawtooth National Forest. A discussion of these Conservation Concepts is included in the EA, Volume 2-Appendix 1. Adaptation involves the actions taken in response to, or in

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	<p>believe that the WCS amendments provide an opportunity to integrate climate change adaption principles. We recommend that the subsequent WCS phases include a section on climate change adaptation and discuss relevant information on the agency's efforts in evaluating vulnerabilities of climate change both short- and long-term per Executive Order 13514.</p>	<p>anticipation of, projected or actual changes in climate to reduce adverse impacts or take advantage of the opportunities posed by climate change. While the Appendix 2 discussion may not be specific to climate change it responds to the basic principle of providing for resistant and resilient landscapes to best adapt and cope with the consequences of climate change.</p> <p>The existing environment and effects discussion for wolverine in the Terrestrial Wildlife section of the EA does refer to the potential consequences and effects to wolverine due to climate change.</p>
4	<p>Our staff is most concerned with the proposed management direction for wolverines and mountain goats in the northern half of the forest. The proposed indicators, objectives, guidelines, and standards could place additional restrictions on dispersed winter recreation use.</p> <p>On Pages 1-10 and 1-11, the EA discusses the indicators for identifying where potential conflicts between wolverine and human use may exist. A couple of these indicators are not good indicators for identifying areas of potential conflict.</p> <p>Road densities are is not a good standard for knowing where winter recreation use is occurring. Most winter recreation use is confined to groomed winter recreation routes (snowmobile and ski trails) and the slopes where skiers and snowmobiles use. Roads that are groomed receive much more use than roads that are ungroomed.</p> <p>The winter recreation opportunity spectrum (ROS) is listed as another indicator. The winter ROS does not take into account where winter recreation use is occurring especially in the semi-primitive motorized and the roaded natural ROS classes. The Sawtooth National Forest Winter ROS</p>	<p>Forest roads, ROS (semi-primitive motorized), winter groomed and designated trails, and alpine ski areas were used as indicators for winter recreation use and availability. These locations were displayed along with modeled wolverine habitat to analyze the opportunity for conflict between winter recreation and denning wolverines (refer to section 3.3.7.4 in the EA).</p> <p>The proposed amendments do not directly implement any restrictions to winter recreation access. If, as a result of site-specific analysis, conflicts between winter recreation and wolverine denning are determined to exist, modifications may be made to winter recreation access. The Forest is currently involved in a study in cooperation with the RMRS and the Boise and Payette NF, which is identifying both winter recreation use areas and patterns and wolverine denning areas on the Forests. Information from this study will inform future management decisions on recreation use patterns on these forests.</p> <p>Forest roads, ROS (semi-primitive motorized), winter groomed and designated trails, and alpine ski areas were used as indicators for winter recreation use and availability. These locations were displayed along with modeled wolverine habitat</p>

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4	<p>layer does not take into account where recreation use is occurring, but rather where it is allowed and the influence it has on semi-primitive non-motorized and primitive ROS Classes.</p> <p>The ROS Planning Process requires that semi-primitive non-motorized ROS class be at least ½ mile from a semi-primitive motorized ROS class. The Primitive ROS class must be at least 3 miles from a semi-primitive motorized class. ROS does allow for some adjustments due to vegetation and topography, but most of this work has not been accomplished on a Forest-wide basis.</p>	<p>to analyze the opportunity for conflict between winter recreation and denning wolverines (refer to section 3.3.7.4 in the EA).</p> <p>The semi-primitive ROS class was included as an indicator for winter recreation use because this ROS class identifies where motorized recreation is allowed to occur on the Forest. Since these areas intersect with wolverine denning habitat it was important to include this ROS class to display the opportunity for conflict between winter recreation users and wolverine denning habitat.</p>
	<p>Figure 3-32 is a map that shows wolverine source habitat and the winter semi-primitive motorized and roaded natural ROS classes. It does not show where people are actually recreating like on groomed trail routes, popular climbing and skiing slopes, and winter recreation destinations. This map shows that further work needs to be done in order to refine the winter ROS.</p>	<p>Forest roads, ROS (semi-primitive motorized), winter groomed and designated trails, and alpine ski areas were used as indicators for winter recreation use and availability. These locations were displayed along with modeled wolverine habitat to analyze the opportunity for conflict between winter recreation and denning wolverines (refer to section 3.3.7.4 in the EA).</p> <p>The semi-primitive ROS class was included as an indicator for winter recreation use because this ROS class identifies where motorized recreation is allowed to occur on the Forest. Since these areas intersect with wolverine denning habitat it was important to include this ROS class to display the opportunity for conflict between winter recreation users and wolverine denning habitat.</p>
	<p>Much better indicators are groomed and designated snowmobile routes and cross-country ski trail locations. Another indicator to use is winter destination locations like warming huts and yurts. The Forest should also use public input from slopes and areas that winter recreationists use. This information is currently being collected. These indicators should be use rather than road densities and the winter ROS layer.</p>	<p>Forest roads, ROS (semi-primitive motorized), winter groomed and designated trails, and alpine ski areas were used as indicators for winter recreation use and availability. These locations were displayed along with modeled wolverine habitat to analyze the opportunity for conflict between winter recreation and denning wolverines (refer to section 3.3.7.4 in the EA).</p> <p>The semi-primitive ROS class was included as an indicator for winter recreation use because this ROS class identifies where motorized recreation is allowed to occur on the Forest. Since</p>

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4		<p>these areas intersect with wolverine denning habitat it was important to include this ROS class to display the opportunity for conflict between winter recreation users and wolverine denning habitat.</p> <p>The proposed amendments do not directly implement any restrictions to winter recreation access. If, as a result of site-specific analysis, conflicts between winter recreation and wolverine denning are determined to exist, modifications may be made to winter recreation access. The Forest is currently involved in a study in cooperation with the RMRS and the Boise and Payette NF, which is identifying both winter recreation use areas and patterns and wolverine denning areas on the Forests. Information from this study will inform future management decisions on recreation use patterns on these forests.</p>
	<p>Alternative 2 places objectives, standards, and guidelines that will place additional management restrictions on recreation, especially winter recreation. Unfortunately, the EA does not analyze recreation in the Environmental Consequences in Chapter 3.</p>	<p>Proposed amendments do not change the current allowances for motorized over snow recreation in the planning unit. Proposed amendments identify areas where there may be potential conflicts between winter recreation uses and wolverine denning so that more site-specific assessments can be completed to determine if a conflict exists (EA, Appendix 2, "Management Area Direction;" Appendix 2). Only if site-specific analysis determines that a conflict exists could modification to winter recreation access could be applied.</p>
	<p>Quantifying changes to recreation resources because of these new objectives, standards, and guidelines is difficult, if not impossible; however impacts to recreation can be disclosed in a qualitative manner. These new objectives, standards, and guidelines will close some areas of the northern half of the forest to winter recreation use in order to protect wolverine and lynx. Sawtooth National Forest visitors will have fewer places to recreate because of these new objectives, standards, and guidelines.</p>	<p>Proposed amendments do not change the current allowances for motorized over snow recreation in the planning unit. Proposed amendments identify areas where there may be potential conflicts between winter recreation uses and wolverine denning so that more site-specific assessments can be completed to determine if a conflict exists (EA, Appendix 2, "Management Area Direction;" Appendix 2). Only if site-specific analysis determines that a conflict exists could modification to winter recreation access could be applied.</p> <p>The proposed amendments specific to wolverine (Management Areas [MA] 2-6 and 8) modify existing direction in the 2003 Revised Sawtooth National Forest LRMP (refer to FEIS for the</p>

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4		<p>2003 Revised SNF LRMP). For the objective that addresses wolverine reproductive denning habitat security by minimizing disturbance from winter recreation activities, a modification is proposed to standardize the language by adding the words “reproductive denning” to the objective and placing the objective within the Recreation Resources section of all MA with wolverine denning habitat. This will allow for consistent interpretation and application of the objective within wolverine denning habitat across the Forest. A new standard is added to MA 6 and 8 (refer to EA, Appendix 2, “Management Area Direction;” Appendix 2), the same standard which exists in MA2-5 (refer to FEIS for the 2003 Revised SNF LRMP, for the existing Sawtooth Forest Plan direction), so that again the wolverine direction is consistently applied to all locations on the Forest within wolverine denning habitat.</p> <p>The proposed amendment does not include new direction for Canada lynx (refer to EA, Appendix 2, “Forest-wide Management Direction- TEPC;” Appendix 2).</p>
	<p>Appendix 2 contains the Forest Plan Amendments. WIGU17 is a guideline that establishes monitoring of winter recreation use for wolverine habitat management. This is a critical guideline that determines if winter recreation is having an effect on critical wolverine habitat.</p> <p>The new objective and new guideline for Recreation Resources are listed on Page III-21 in Appendix 2. This objective requires the SNF to mitigate for winter recreation effects to a slew of resources, including wildlife species of concern. These species of concern include the wolverine.</p> <p>The guideline requires forest offices to relocate, close and/or change management strategy in order to protect resources. The way these objectives and standards read, only the potential for conflict needs to be considered before a management change is needed (i.e. closure of the area or facility). These proposed objective and guidelines needs to be refined so that only actual documented impacts trigger management change. A fine-scale analysis needs to use documented areas of use and documented impacts.</p>	<p>The proposed amendment includes a modification to Recreation Resources Objective REOB01 (Page III-21 in Appendix 2, of Appendix 2 of the EA). This objective refers to recreation facilities and had previously not included wildlife species of concern, although it did include water quality, aquatic species, and Watch plant habitat. The modification added wildlife species of concern to this objective. The proposed amendment includes a modification to Recreation Resources Guideline REOB01 (Page III-21 in Appendix 2, of Appendix 2 of the EA). This guideline refers to recreation facilities and practices and had previously not included wildlife species of concern, although it did include water quality, aquatic species, and Watch plant habitat. The modification added wildlife species of concern to this guideline. In both cases a fine-scale analysis is required to define the impact and develop appropriate mitigation, relocation, alteration... as needed.</p>

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		<p>The proposed modifications do not directly implement any restrictions to recreation use on the Forest. The modifications do provide that if, as a result of site-specific analysis, conflicts between recreation use and wildlife species of concern are determined to exist, modifications may be made to recreation uses. However any such changes would be required to be implemented through the appropriate, site-specific NEPA process.</p>
	<p>Recreation management in the East Fork Salmon River/White Clouds Management Area would change. Appendix 2 has an objective (374) that states “Provide winter habitat security for mountain goats and reproductive denning habitat security for wolverines in the Boulder and White Cloud Mountains by minimizing disturbance from winter recreation activities.” Adding the reproductive denning habitat security for wolverines will further restrict winter recreation opportunities in the Boulder and White Cloud Mountains.</p>	<p>The proposed amendment specific to wolverine in the East Fork Salmon River/White Clouds Management Area modifies existing direction in the 2003 Revised Sawtooth National Forest LRMP (refer to FEIS for the 2003 Revised SNF LRMP). For the objective (0374) that addresses wolverine reproductive denning habitat security by minimizing disturbance from winter recreation activities, a modification is proposed to standardize the language by adding the words “reproductive denning” to the objective and placing the objective within the Recreation Resources section of the MA, to be consistent will all other MA containing wolverine denning habitat. This will allow for consistent interpretation and application of the objective within wolverine denning habitat across the Forest.</p> <p>This modification will not change the way this objective is applied and does not change the current allowances for motorized over snow recreation in the planning unit.</p>
	<p>In the Big Wood Management Area, Appendix 2 modifies the Recreation Management Objective 458 to provide denning habitat security for wolverines. This objective will further restrict winter recreation opportunities in the Big Wood Management Area.</p>	<p>The proposed amendment specific to wolverine in the Big Wood Management Area modifies existing direction in the 2003 Revised Sawtooth National Forest LRMP (refer to FEIS for the 2003 Revised SNF LRMP). For the objective (0458) that addresses wolverine reproductive denning habitat security by minimizing disturbance from winter recreation activities, a modification is proposed to standardize the language by adding the words “reproductive denning” to the objective and placing the objective within the Recreation Resources section of the MA, to be consistent will all other MA containing wolverine denning habitat. This will allow for consistent interpretation and</p>

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		<p>application of the objective within wolverine denning habitat across the Forest.</p> <p>This modification will not change the way this objective is applied and does not change the current allowances for motorized over snow recreation in the planning unit.</p>
	<p>Recreation management will also change in the Pioneer Mountains Management Area. Objective 542 is modified to provide denning habitat security for wolverines. This objective will further restrict winter recreation opportunities in the Pioneer Mountains Management Area.</p>	<p>The proposed amendment specific to wolverine in the Pioneer Mountains Management Area modifies existing direction in the 2003 Revised Sawtooth National Forest LRMP (refer to FEIS for the 2003 Revised SNF LRMP). For the objective (0542) that addresses wolverine reproductive denning habitat security by minimizing disturbance from winter recreation activities, a modification is proposed to standardize the language by adding the words “reproductive denning” to the objective and placing the objective within the Recreation Resources section of the MA, to be consistent with all other MA containing wolverine denning habitat. This will allow for consistent interpretation and application of the objective within wolverine denning habitat across the Forest.</p> <p>This modification will not change the way this objective is applied and does not change the current allowances for motorized over snow recreation in the planning unit.</p>
	<p>In the Upper South Fork Boise River Management area, the Forest plan would be modified to reflect direction identified in the WCS. Objective 0640 is modified and a new standard is added to the Recreation Resources section. This objective and standard read: 0640 Objective Modified, Appendix 2, Page III-61 Provide winter habitat security for mountain goats and reproductive denning habitat security for wolverine in the headwaters area of the South Fork Boise River by minimizing disturbance from winter recreation activities.</p> <p>0653 New Standard Appendix 2, Page III-61 Restrict or modify winter recreation activities where conflicts exist with mountain goats and/or wolverine.</p> <p>The management area is part of the Fairfield Winter Travel Plan Project</p>	<p>The proposed amendments specific to wolverine in the Upper South Fork Boise River Management Area modifies existing direction in the 2003 Revised Sawtooth National Forest LRMP (refer to FEIS for the 2003 Revised SNF LRMP). For the objective that addresses wolverine reproductive denning habitat security by minimizing disturbance from winter recreation activities (0640 Objective Modified, Appendix 2, Page III-61), a modification is proposed to standardize the language by adding the words “reproductive denning” to the objective and placing the objective within the Recreation Resources section of the MA, to be consistent with all other MA containing wolverine denning habitat. This will allow for consistent interpretation and application of the objective within wolverine denning habitat across the Forest. This modification will not change the way this</p>

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	<p>Area.</p> <p>The way this modified objective and new standard reads, substantial winter restrictions could be implemented in this Management Area where limited authorized snowmobile use occurs, The major purpose of the Fairfield Winter Travel Plan is provide for better winter recreation opportunities on the district.</p>	<p>objective is applied and does not change the current allowances for motorized over snow recreation in the planning unit.</p> <p>A new standard is added (0653 New Standard Appendix 2, Page III-61), the same standard which exists in MA2-5 (refer to FEIS for the 2003 Revised SNF LRMP, for the existing Sawtooth Forest Plan direction), so that again the wolverine direction is consistently applied to all locations on the Forest within wolverine denning habitat.</p> <p>Proposed amendments do not change the current allowances for motorized over snow recreation in the planning unit. Proposed amendments identify areas where there may be potential conflicts between winter recreation uses and wolverine denning so that more site-specific assessments can be completed to determine if a conflict exists (EA, Appendix 2, "Management Area Direction;" Appendix 2). Only if site-specific analysis determines that a conflict exists could modification to winter recreation access could be applied.</p>
	<p>In our experience with other travel plan, objectives and standards like to ones listed above are used to restrict or eliminate recreation use in the area in order to provide habitat security. The Sawtooth National Forest really needs to do a fine-scale analysis that documents where habitat is and where actual winter recreation use in current occurring, and if this use is having any effect before implementing any new closures or restrictions.</p>	<p>The proposed amendments do not directly implement any restrictions to recreation access. The modifications do provide that if, as a result of site-specific analysis, conflicts between recreation use and wildlife species of concern are determined to exist, modifications may be made to recreation uses. The Forest is currently involved in a study in cooperation with the RMRS and the Boise and Payette NF, which is identifying both winter recreation use areas and patterns and wolverine denning areas on the Forests. Information from this study will inform future management decisions on recreation use patterns on these forests.</p>
	<p>We appreciate the opportunity to review this extensive EA. Given the limited amount of time to comment (30 days) and the extensive information for this project (over 500 pages), the Sawtooth National Forest should extend the public comment period out over another month. Additional time would allow citizens to become aware of this project and provide effect comments for this project.</p>	<p>Comment noted. The regulations at 36 CFR 215 do not allow for extension of the comment period.</p>

