

Chapter 5  
Public Comments  
and Agency Responses

This chapter reproduces timely comment letters received on the DEIS from Tribal, federal, state, and local agencies and officials as provided in the Forest Service NEPA Handbook 1909.15. Two agency/tribal letters, received after the NOA comment period, are also reproduced.

**COMMENTS RECEIVED DURING THE DEIS COMMENT PERIOD**

Bureau of Land Management, Challis Field Office ..... 1  
City of Mackay ..... 52  
Bureau of Land Management, Salmon Field Office ..... 54  
Idaho Department of Parks and Recreation ..... 77  
Idaho Department of Fish and Game ..... 92  
Department of the Interior ..... 96  
City of Salmon ..... 99  
Custer County Commissioners ..... 101

**COMMENTS RECEIVED AFTER THE CLOSE OF THE DEIS COMMENT PERIOD**

Environmental Protection Agency ..... 102  
Shoshone-Bannock Tribes ..... 112  
PUBLIC COMMENTS AND RESPONSES ..... 128

**SECTION I - ACCESS** ..... 128

**SECTION II – ALTERNATIVES** ..... 138

ALTERNATIVE 0..... 138

ALTERNATIVE 1..... 139

ALTERNATIVE 2..... 139

ALTERNATIVE 3..... 140

ALTERNATIVE 4..... 141

CONSIDER ADDITIONAL ALTERNATIVES..... 141

**SECTION III – PROCESS and DOCUMENT** ..... 145

813



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Challis Field Office  
1151 Blue Mountain Road  
Challis, Idaho 83226  
<http://www.id.blm.gov/offices/challis>



In Reply Refer To:  
8321 (330)

October 30, 2008

William Wood  
Salmon-Challis National Forest  
Attn: Travel Planning  
1206 South Challis Street  
Salmon, Idaho 83467

Dear Bill:

Below are the Challis Bureau of Land Management (BLM) Field Office comments in regard to the Forest Travel Management plan. Where a comment addresses a specific route, I have enclosed a numbered map depicting the route of interest.

Thank you for the opportunity to comment, and please encourage your staff to contact us at any time with questions you may have. Our travel planning contact, Jeff Christenson, can be contacted at 208-879-6212.

#### Comment # 1

- Forest Service (FS) has Right of Way (ROW) roads on BLM land. They are identified in Grant IDI-8406 which states that the FS has complete control and jurisdiction on these routes. The routes include: Hat Creek Road, Bruno Creek Trail, Little Boulder Creek Trail, Bluett Creek Trail, Big Boulder Creek Road & Trail, Wickiup Creek Trail, Jimmy Smith Lake Trail, Big Lake Creek Trail, Corral Creek Trail, French Creek Road, Sullivan Creek Trail, Kinnikinic Creek Road, Pine Creek Trail, McDonald Creek Trail, Spud Creek Trail, Marco Creek Trail, Keystone Mountain Road, Custer Motorway, Herd Creek Trail, Gooseberry Creek Road, Pig Creek Road, Leaton Gulch Road, Trail Creek Road, Little Morgan Creek Road, Lehman Creek Road, Dry Canyon Road, Dead Cat Canyon Road, Rock Spring Canyon Road, Morgan Creek / Morse Creek Trail, Navarre Creek Road, and Upper Cedar Creek Road.
- The BLM suggests that the FS provide designations for these routes. The BLM travel maps reference the FS for current designations.
- The enclosed maps depict roads on BLM lands with FS ROW with a green line.

Comment # 2 (Map # 1 – Big Hat Creek Area)

- FS /BLM classifications conflict. FS route 6093 is designated as closed to ATV on the Forest and open to ATV on BLM administered lands.
- The BLM suggests that the FS designate Route 6093 as ATV from the ownership boundary to the NW connection with FS Route 60083.

Comment # 3 (Map # 2 – Moose Creek Area)

- BLM designates this route as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM makes no suggestions, but wanted to make sure that the FS knows the route is designated on BLM land.

Comment # 4 (Map # 3 – Eddy Creek Area)

- FS/BLM connectivity issues occur on the Eddy Creek Road. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- Salmon River Electric Co-op (SREC) holds a ROW on the BLM portion of the route.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM or grant the BLM a Public Access ROW.

Comment # 5 (Map # 4 – North Fork Birch Creek Area)

- FS/BLM connectivity issues exist between FS route 40265 and BLM route CU2006 (N. Fork Birch Creek Trail). This route connects Land of the Yankee Fork Interpretive Center with the Bayhorse Town Site.
- The BLM suggests that the FS designate this route as ATV open from the FS boundary south-west (SW) to the intersection of FS route 40265 in order to match the BLM designation.

Comment # 6 (Map # 5 – Woods Basin Area)

- FS/BLM connectivity issues occur between FS route 40052 and BLM route. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary west to the intersection of FS route 40052 in order to match the BLM designation.

Comment # 7 (Map # 6 – Kinnikinic Creek Area)

- FS/BLM connectivity issues occur between FS route 40530 and BLM route CU19913 (Kinnikinic Rd.). It cannot be concluded if these routes connect by looking at the aerial photography alone. The BLM staff was confident that the disconnected portion of the road connects with FS route 40530 and that it is a main route.

- The BLM suggests that the FS designate this route, if it does indeed connect with 40530, as open to full size vehicles from the FS boundary north to the intersection with 40530 in order to match the BLM designation.

Comment # 8 (Map # 7 –First Creek, Second Creek, Squaw Creek Area)

- FS/BLM connectivity issues occur between FS route 40041 and BLM route CU19921. From aerial photo it appears that these routes connect to the north-west (NW) of the FS boundary.
- The BLM suggests that the FS designate this route, if it does indeed connect with 40041, as open to full size vehicles from the FS boundary NW to the intersection with 40041 in order to match the BLM designation.

Comment # 9 (Map #8 –Woods Basin Trail)

- FS/BLM connectivity issues occur between FS route 4175 (Woods Basin Trail) and BLM route CU19949. From aerial photos it appears that these routes connect SW of the FS boundary. However, looking north on the aerial photo, FS route 4175 is not apparent after the intersection. FS route 4175 does not exist in the BLM inventory. Is this a true route? If so, it dead ends at the BLM boundary to the north.
- The BLM suggests that the FS designate the route connecting FS route 4175 and BLM route CU19949 as ATV. It is also suggested that the route leading north from the point of intersection (called out on Map #8) be removed because it is questionable if it exists and there is not a connection to the North on the BLM side.

Comment # 10 (Map #9 –Marco Creek Area)

- FS/BLM route classification conflict. FS route 40690 shows trail-all open and the BLM (CU19946) is showing ATV. FS route 40690 appears to dead end to the south which means there is no access for full size vehicles to this route from the BLM. A full size vehicle access from FS route 4175 also does not exist.
- The BLM suggests that the FS designate route 40690 as ATV open to match the BLM designation.

Comment # 11 (Map #10 –Big Lost River Area)

- FS/BLM connectivity issues occur for BLM routes CU191163 and CU191523\_01. BLM has designated both routes as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM and maintain connectivity.

Comment # 12 (Map #11 –Grant Creek Area)

- BLM designates route CU191137 as open to full size vehicles. The FS draft does not

designate the route beyond the FS boundary.

- The BLM makes no suggestions but wanted to make sure the FS knows that the route is designated on BLM land.

Comment # 13 (Map #12 –Lehman Creek Area)

- BLM designates route CU191198 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM makes no suggestions but wanted to make sure the FS knows that the route is designated on BLM land.

Comment # 14 (Map #13 –East Fork Lehman Creek Area)

- FS/BLM connectivity issues occur between FS route 40205 and BLM route CU191198\_02. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary S to the intersection of FS route 40205 in order to match the BLM designation.

Comment # 15 (Map #14 –T07N R22E sec. 23)

- FS/BLM connectivity issues occur between FS route 40142 and BLM route CU191198. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary SE to the intersection of FS route 40142 in order to match the BLM designation and maintain connectivity.

Comment # 16 (Map #15 –T07N R23E sec. 24)

- FS/BLM route classification conflict. FS route 40211 & U072324A shows open road and BLM route CU191204 (Blaze Canyon) is showing ATV.

Comment # 17 (Map #16 –T06N R24E sec. 6)

- The Forest TMP draft designates route U59-04YY as open road. The BLM does not designate the route beyond the FS boundary.
- The BLM makes no suggestions but wanted to make sure the FS knows that the route is not designated on BLM land.

Comment # 18 (Map #17 –T07N R24E sec. 3)

- FS/BLM connectivity issues occur on BLM route CU191311. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM and maintain connectivity.

Comment # 19 (Map #18 –Jones Creek Area)

- FS/BLM connectivity issues occur between FS route U201 and BLM route CU191554. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary E/NE to the intersection of FS route U201 in order to match the BLM designation and maintain connectivity.

Comment # 20 (Map #19 –Willow Creek Area)

- FS/BLM connectivity issue between FS route 40661 and BLM route CU191062. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary E/NE to the intersection of FS route 40661 in order to match the BLM designation and maintain connectivity.

Comment # 21 (Map #20 –T14N R20E sec.17)

- BLM designates route CU19592\_02 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM makes no suggestions but wanted to make sure the FS knows that the route is designated on BLM land.

Comment # 22 (Map #21 –T13N R21E sec.4)

- BLM designates route CU19480\_03 as ATV. The FS draft does not designate the route beyond the FS boundary.
- The BLM makes no suggestions but wanted to make sure the FS knows that the route is designated on BLM land.

Comment # 23 (Map #22 –Carlson Lake Area)

- FS/BLM route classification conflict. FS route 40268 (Carlson Lake) shows open trail and BLM route CU19278 (Carlson Lake) is showing ATV.
- The BLM suggests that the FS designate route 40268 (Carlson Lake) as ATV to match the BLM designation in an attempt to reduce route management issues and maintain consistent designation on the same route.

Comment # 24 (Map #23 –Mahogany Creek Area)

- FS/BLM connectivity issues occur between FS route 40318 and BLM route CU19298. From aerial photos it appears that these routes connect.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary N/NW to the intersection of FS route 40318 in order to match the BLM designation.
- BLM designates route CU19298\_01 as open to full size vehicles. The FS draft does not

designate the route beyond the FS boundary.

- The BLM makes no suggestions but wanted to make sure the FS knows that the route is designated on BLM land.

Comment # 25 (Map #24 –T11N R25E sec. 3)

- BLM designates route CU19185\_01 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS consider this route in their TMP.

Comment # 26 (Map #25 –T12N R25E sec. 34)

- BLM designates route CU19185 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate this route as open to full size vehicles from the FS boundary W/NW to the intersection of the BLM boundary in order to match the BLM designation and maintain connectivity.

Comment # 27 (Map #26 –T14N R23E sec. 15)

- BLM designates route (No ID because the route originates on Private land and ends on state land) as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS consider this route in their TMP in order to maintain connectivity.

Comment # 28 (Map #27 –T14N R23E sec.5)

- FS/BLM connectivity issues occur on route LE30265. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- This route completes a loop back to BLM.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM designation and maintain connectivity.

Comment # 29 (Map #28 –Falls Creek Area)

- FS/BLM connectivity issues occur on route LE30269. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- This route completes a loop back to BLM.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM designation and maintain connectivity.

Comment # 30 (Map #29 –T15N R22E sec.25)

- FS/BLM connectivity issues occur on route LE30282\_01 & LE30276. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM makes no suggestions but wanted to make sure that the FS knows the route is designated on BLM land.

Comment # 31 (Map # 30 – Little Hat/Ellis Creek Area)

- FS/BLM connectivity issues occur on route CU19564. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- Idaho Department of Transportation holds a ROW on the BLM portion of this route.
- The BLM suggests that the FS designate the route as open to full size vehicles to match the BLM or grant the Idaho Department of Transportation a ROW.

Comment # 32 (Map # 31 – Custer Motorway Area)

- FS/BLM connectivity issues occur on route CU19641\_02. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- Salmon Electric CO-Op (SREC) holds a ROW on this route.
- This route also provides access to the observatory.
- The BLM suggests that the FS designate the route as open to full size vehicles to match the BLM. Public Access to the observatory is necessary for periodic maintenance, school buses, etc. A ROW should also be granted to the SREC if one does not already exist.
- FS/BLM connectivity issues on routes CU19641\_04 & CU19643. BLM has designated these as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate these routes as open to full size vehicles to match the BLM designation. This will provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 33 (Map # 32 – Boone Creek Area)

- BLM designates this route CU191175 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate this route as open to full size vehicles (trail-all open) to the intersection of Boone Creek.

Comment # 34 (Map # 33 – Lime Creek Area)

- FS/BLM connectivity issues occur on route CU19733 & CU19734\_05. BLM has designated this road as open to full size vehicles. The FS draft does not designate the

route beyond the FS boundary.

- This route completes a loop back to BLM.
- The BLM suggests that the FS designate this route as open to full size vehicles to match the BLM designation to maintain connectivity.

Comment # 35 (Map # 34 – North Hole in the Rock Creek Area)

- FS/BLM connectivity issues. BLM has no route connecting to FS 40726.
- The BLM suggests that this may be a good route for the FS to remove from the Travel Plan.

Comment # 36 (Map # 35 – Round Valley BLM/FS Boundary Area)

- FS/BLM connectivity issues occur for the loop from BLM to FS to BLM. Many range improvements exist up here.
- FS/BLM connectivity issues on route CU19597, CU19682 & CU19684\_01. BLM has designated routes CU19597 & CU19682 as ATV. CU19684\_01 is designated on BLM as open to full size vehicles. The FS draft does not designate these routes beyond the FS boundary.
- CU19684\_01 completes a loop back to BLM.
- All routes provide access to multiple livestock water troughs
- The BLM suggests that the FS designate these routes as open to full size vehicles & ATV to match the BLM and provide open/administrative access to the troughs.

Comment # 37 (Map # 36 – Meadow Creek BLM/FS Boundary Area)

- FS/BLM connectivity issues occur for the loop from BLM CU1936\_03 to FS U132219B.
- BLM suggests that the FS look into connectivity here. From aerial photos it appears that these routes connect.

Comment # 38 (Map # 37– Cayuse Canyon BLM/FS Boundary Area)

- FS/BLM connectivity issues occur for the loop from BLM CU19273\_01 to FS 40117.
- BLM suggests that the FS look into connectivity from the FS boundary W to the point of intersection with FS route 40117. From aerial photos it appears that these routes connect.

Comment # 39 (Map # 38 – Summer House Canyon BLM/FS Boundary Area)

- FS/BLM connectivity issues between FS route 40149 and BLM routes CU19181 and CU19184. From aerial photos it appears that these routes connect.
- This 40149 bench route will get used heavily, especially during hunting season.
- The BLM suggests designating both routes as open to full size vehicles from the FS boundary to the intersections with FS route 40149 in order to match BLM designation and maintain connectivity.

813

9

Comment #40 (Map #39-Bayhorse Area)

- FS/BLM route classification conflict. BLM CU40390 shows ATV & FS U23-17CC open road.
- BLM suggests that the FS designate route U23-17CC as ATV to match BLM designation.

Comment # 41 (Map #40 Darling Creek/West Fork)

- FS/BLM connectivity issues on BLM route CU19581 & FS route 40588. BLM has designated this road as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate this route as open to full size vehicles. This will provide recreational access for connectivity to public lands, and administrative access for maintenance of range improvements.

Comment # 42 (Map #41 Pennal Gulch BLM / FS Boundary Area)

- BLM designates route CU19603 as ATV. There is no known connecting route currently in existence on the FS.
- The BLM suggests that the FS construct and designate a connecting route open to ATVs from the FS BLM boundary to the existing FS routes on top of the ridge. This would create a loop riding opportunity.

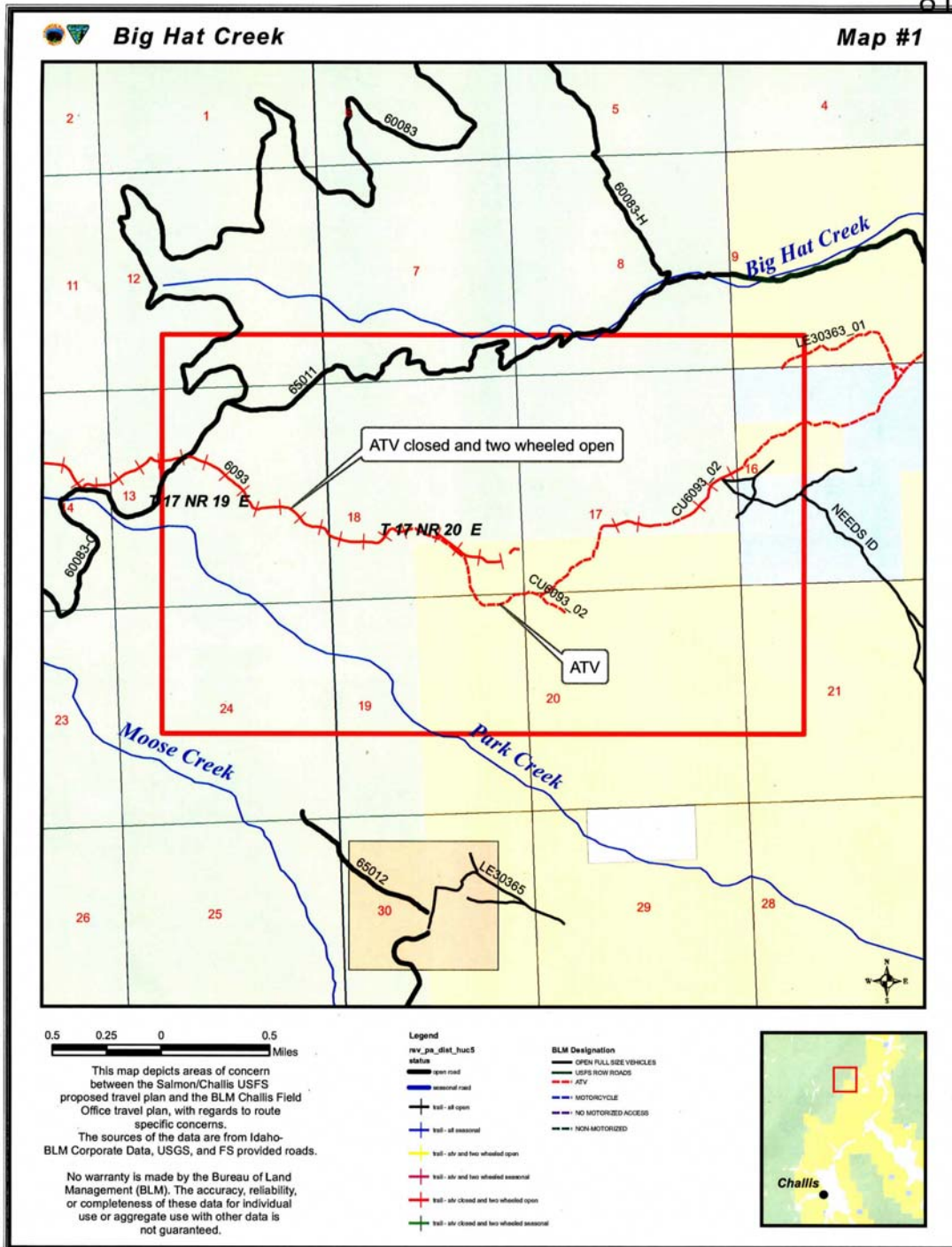
Comment # 43 (Map # 42 – Burnt Creek Area)

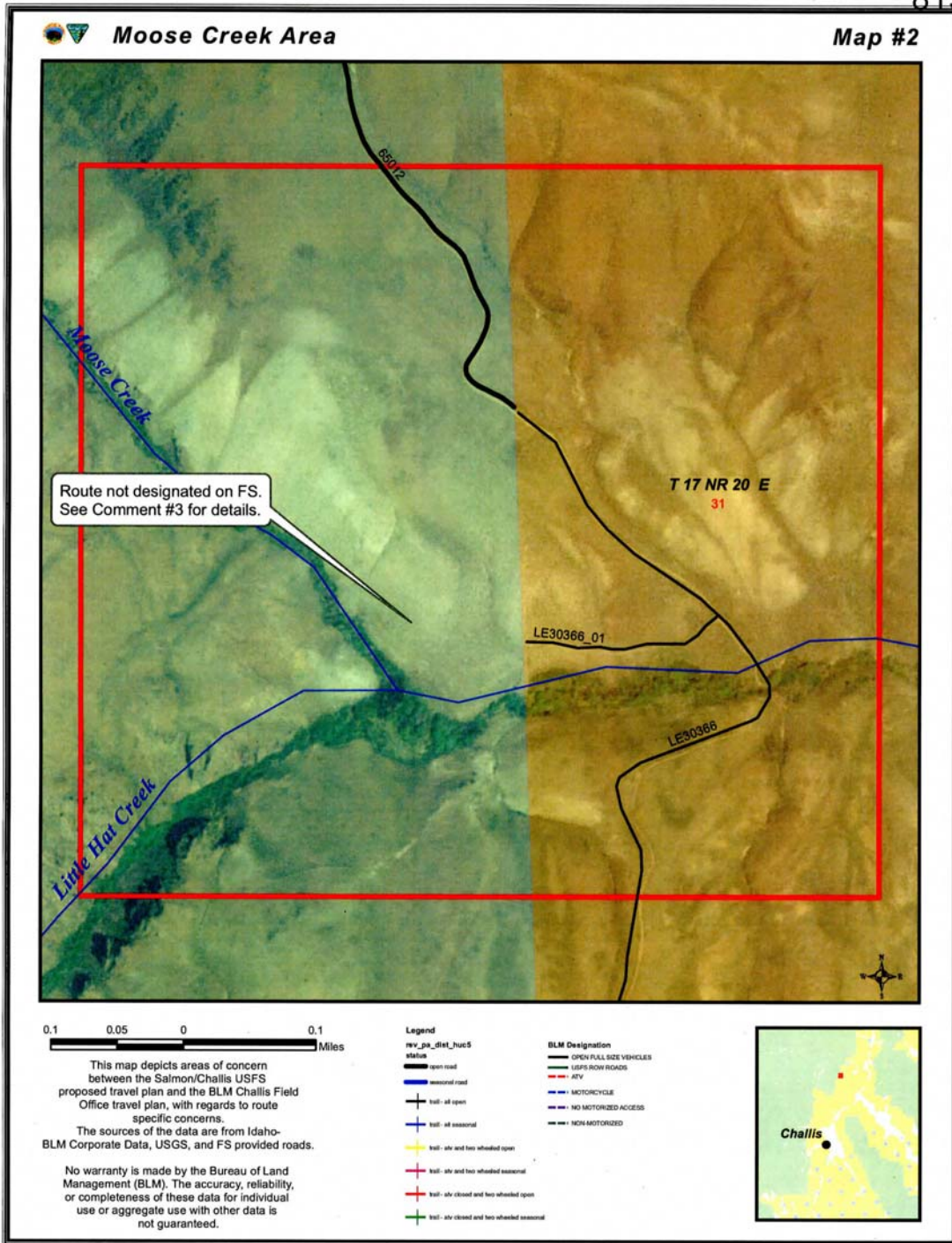
- BLM designates this route CU19219 as open to full size vehicles. The FS draft does not designate the route beyond the FS boundary.
- The BLM suggests that the FS designate this route as open to full size vehicles beyond the FS boundary.

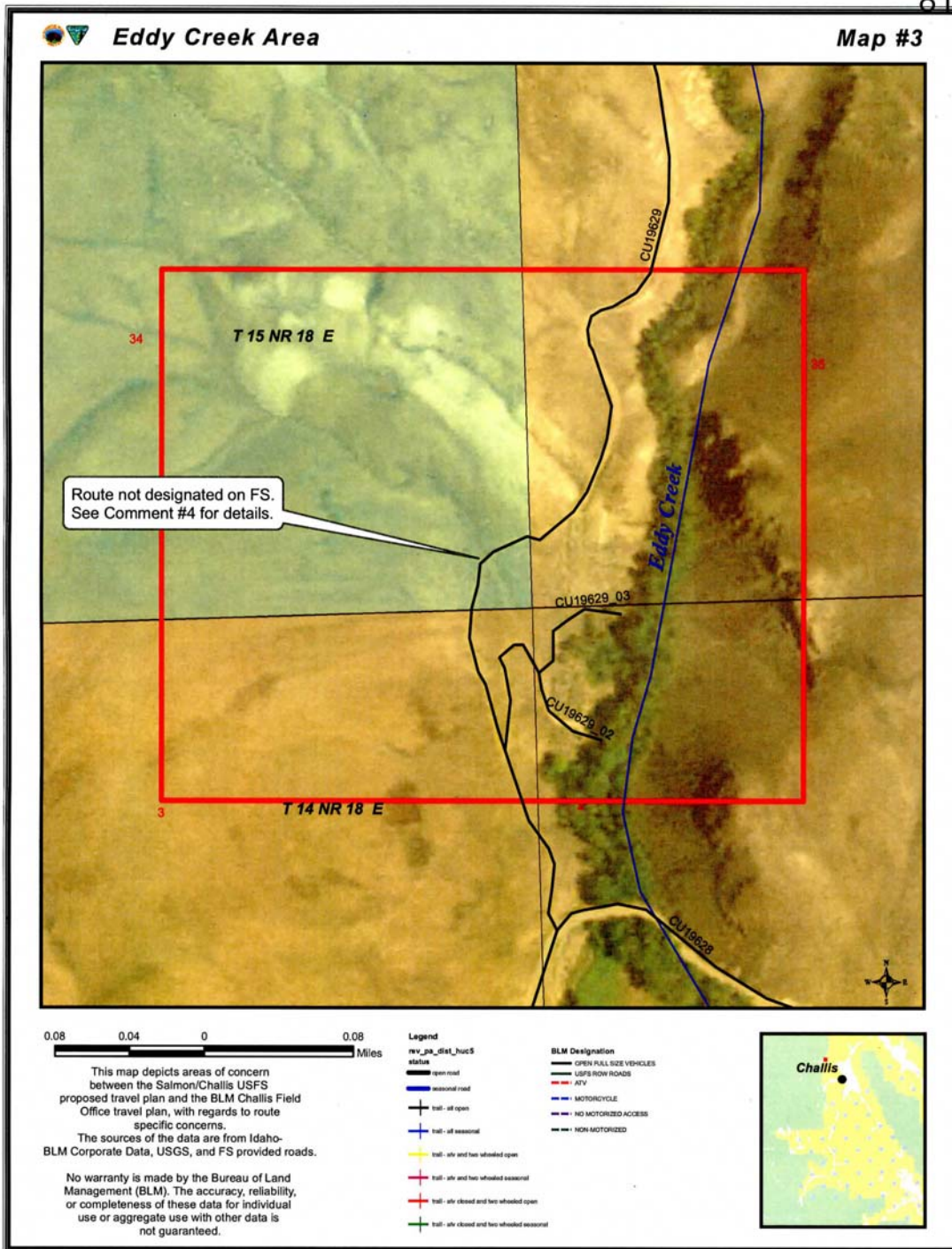
Sincerely,

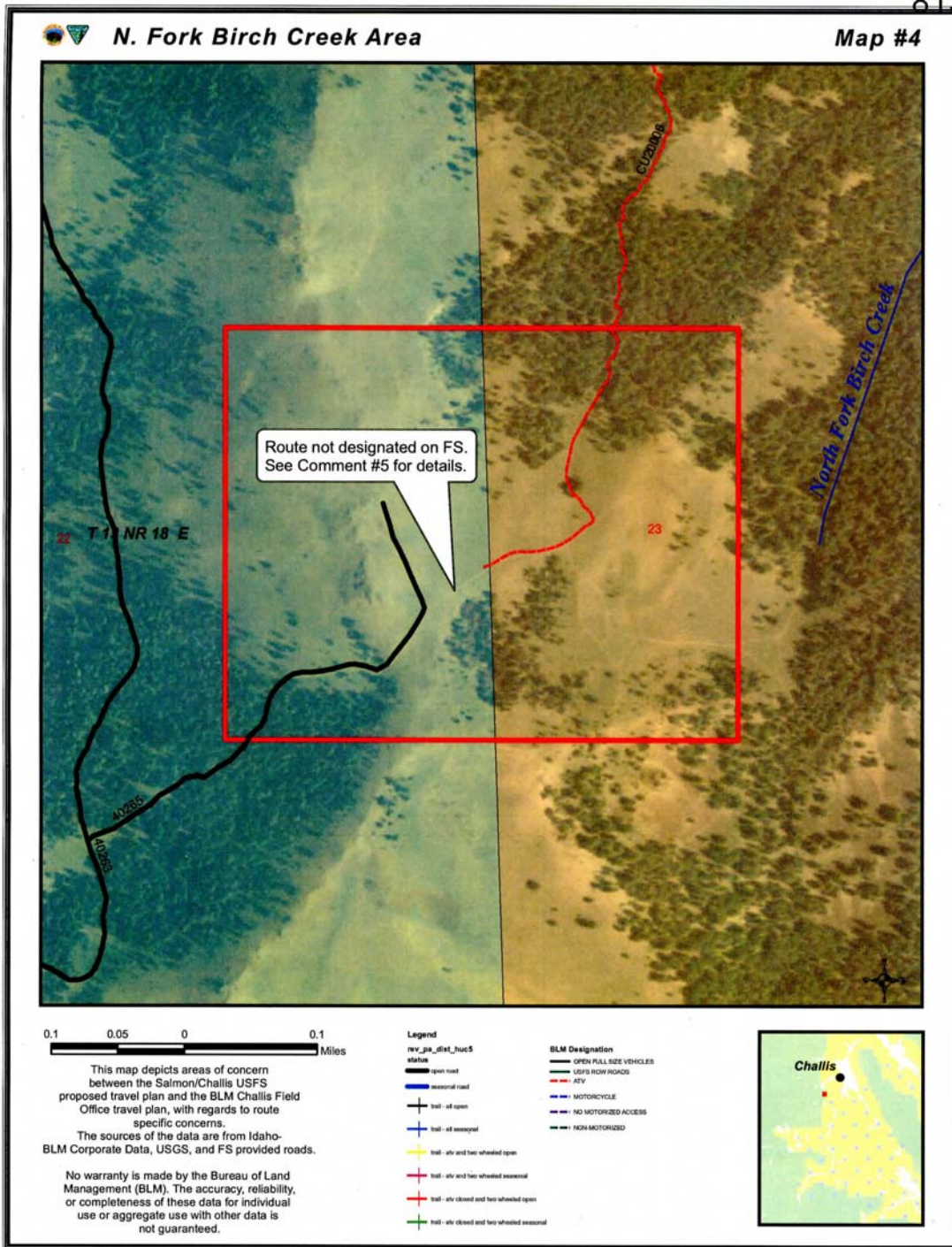
David Rosenkrance  
Field Manager

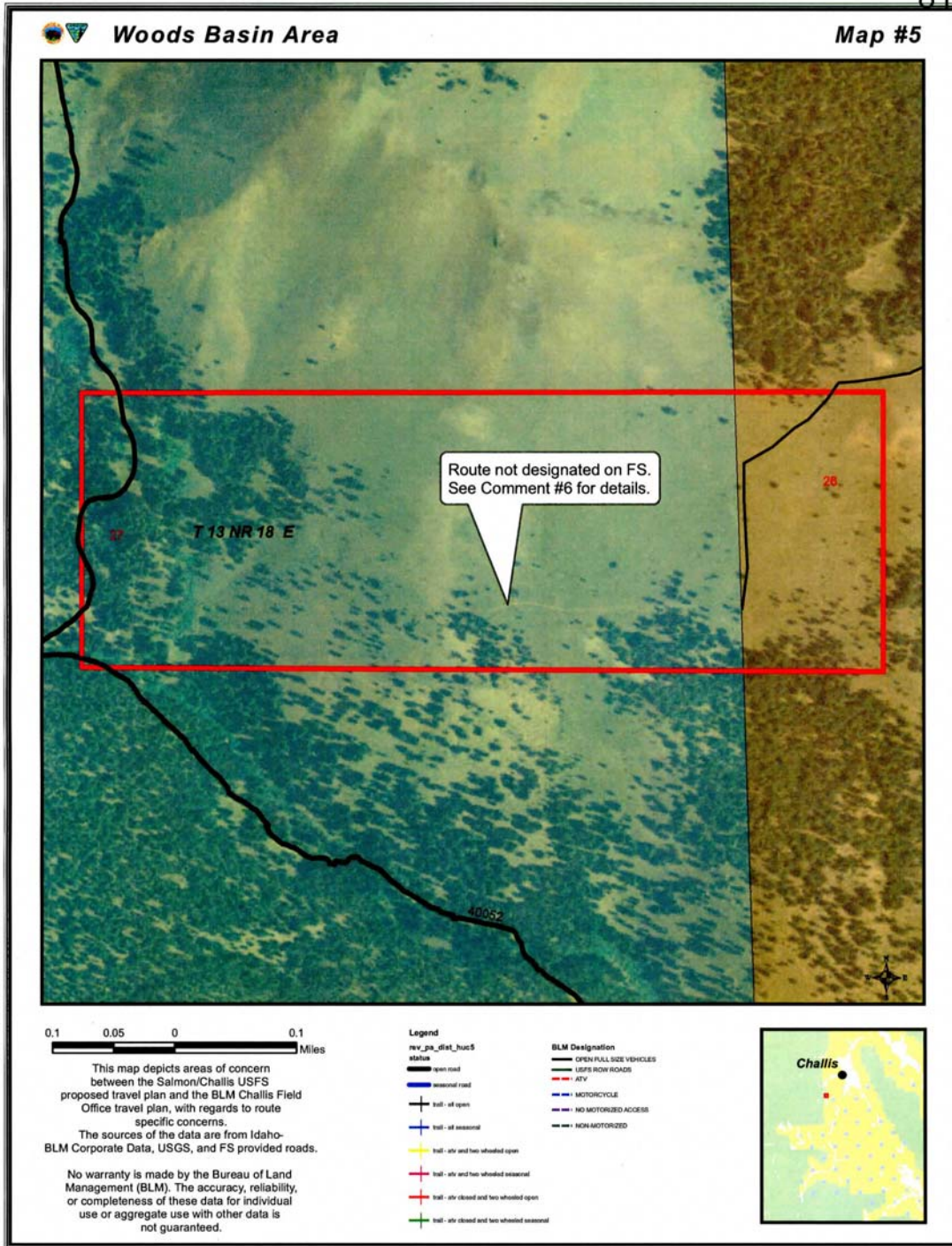
Enclosures

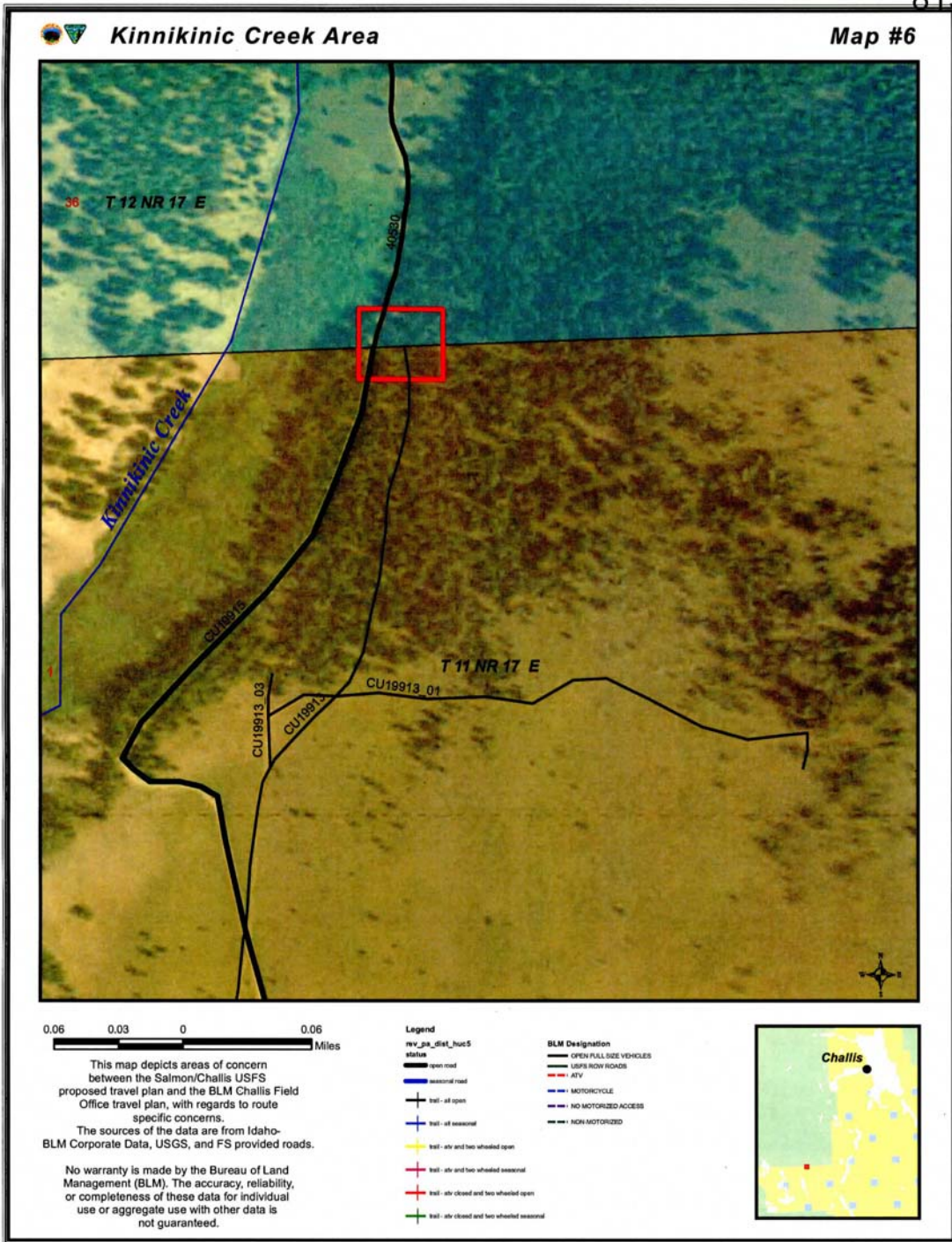




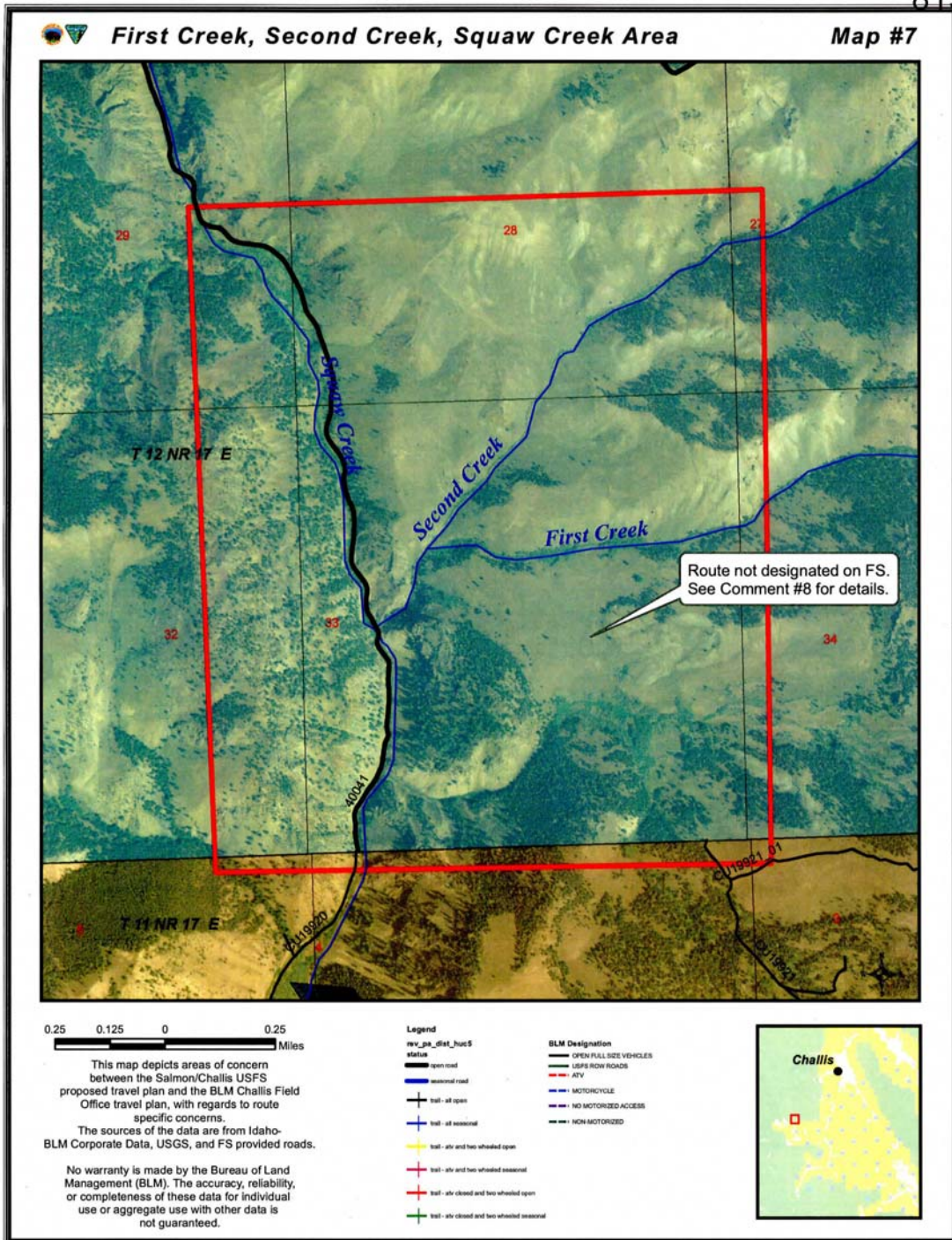


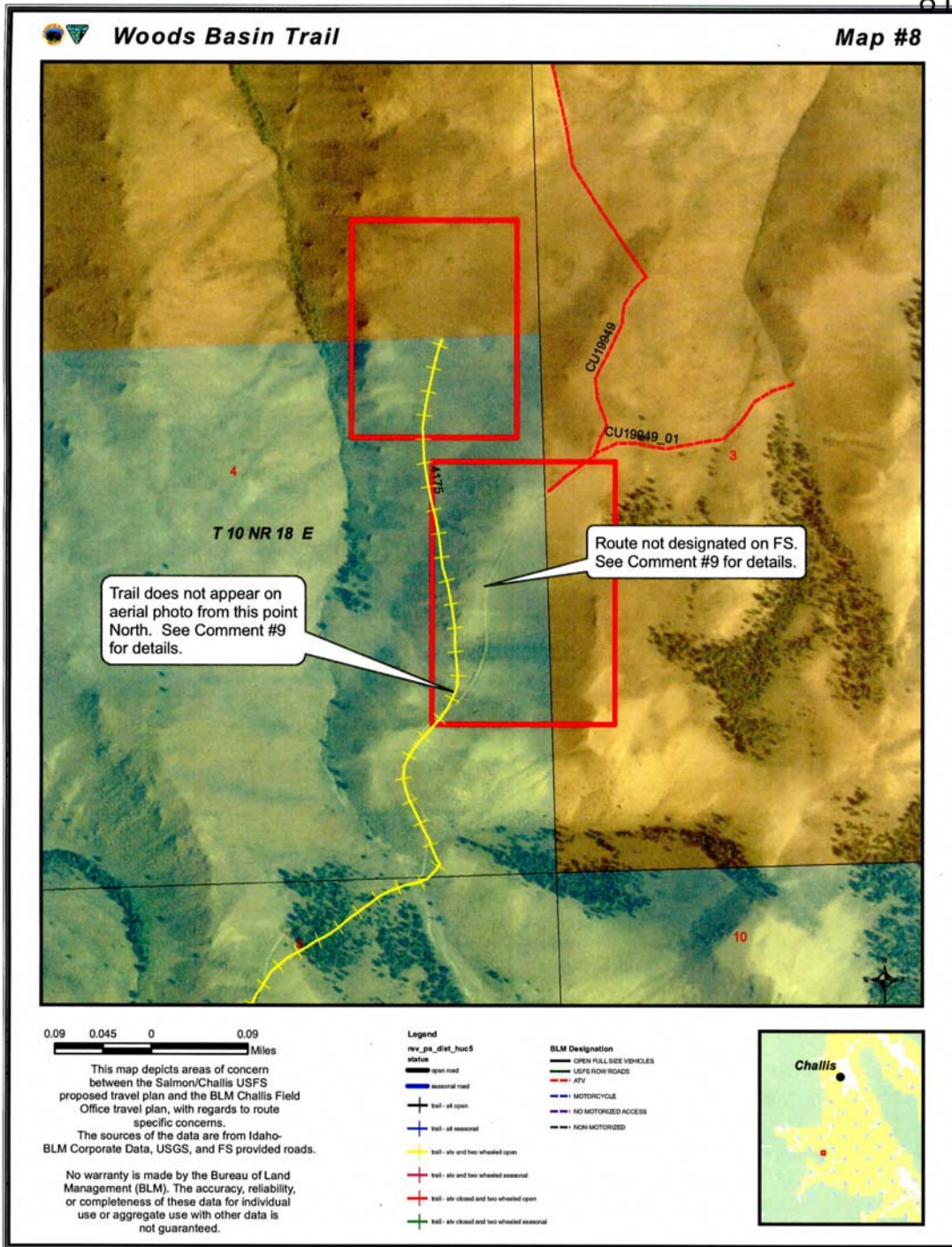


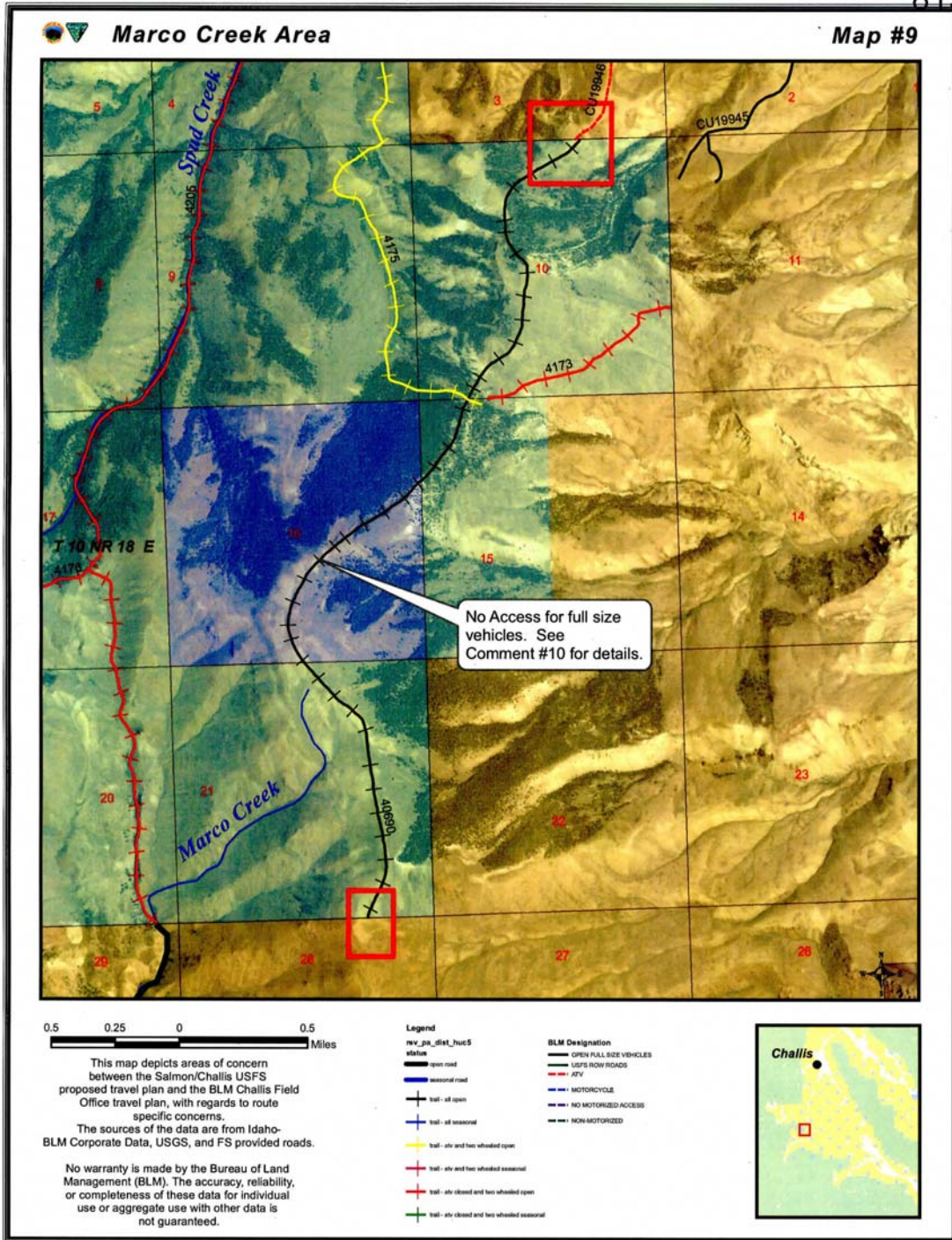


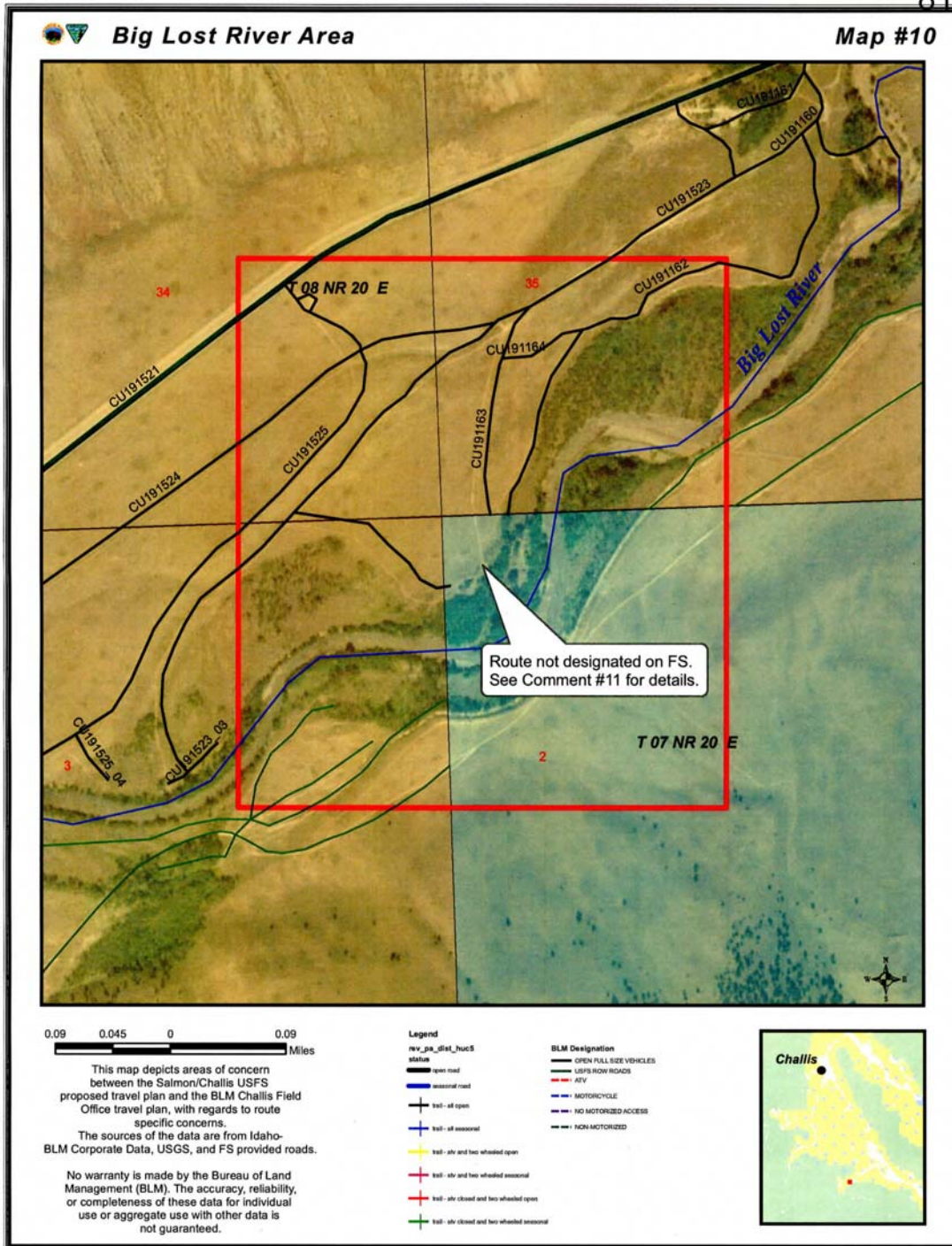


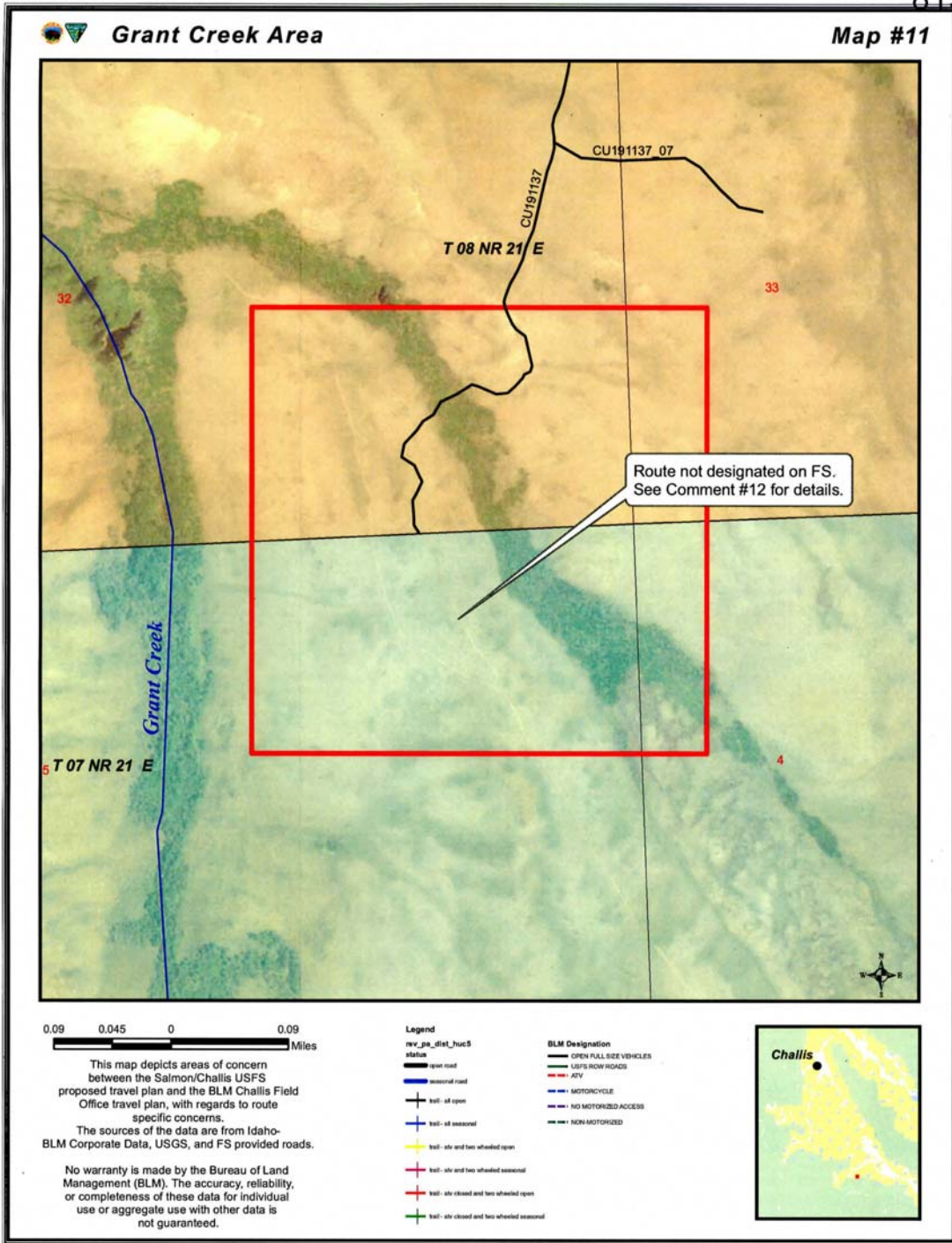
813

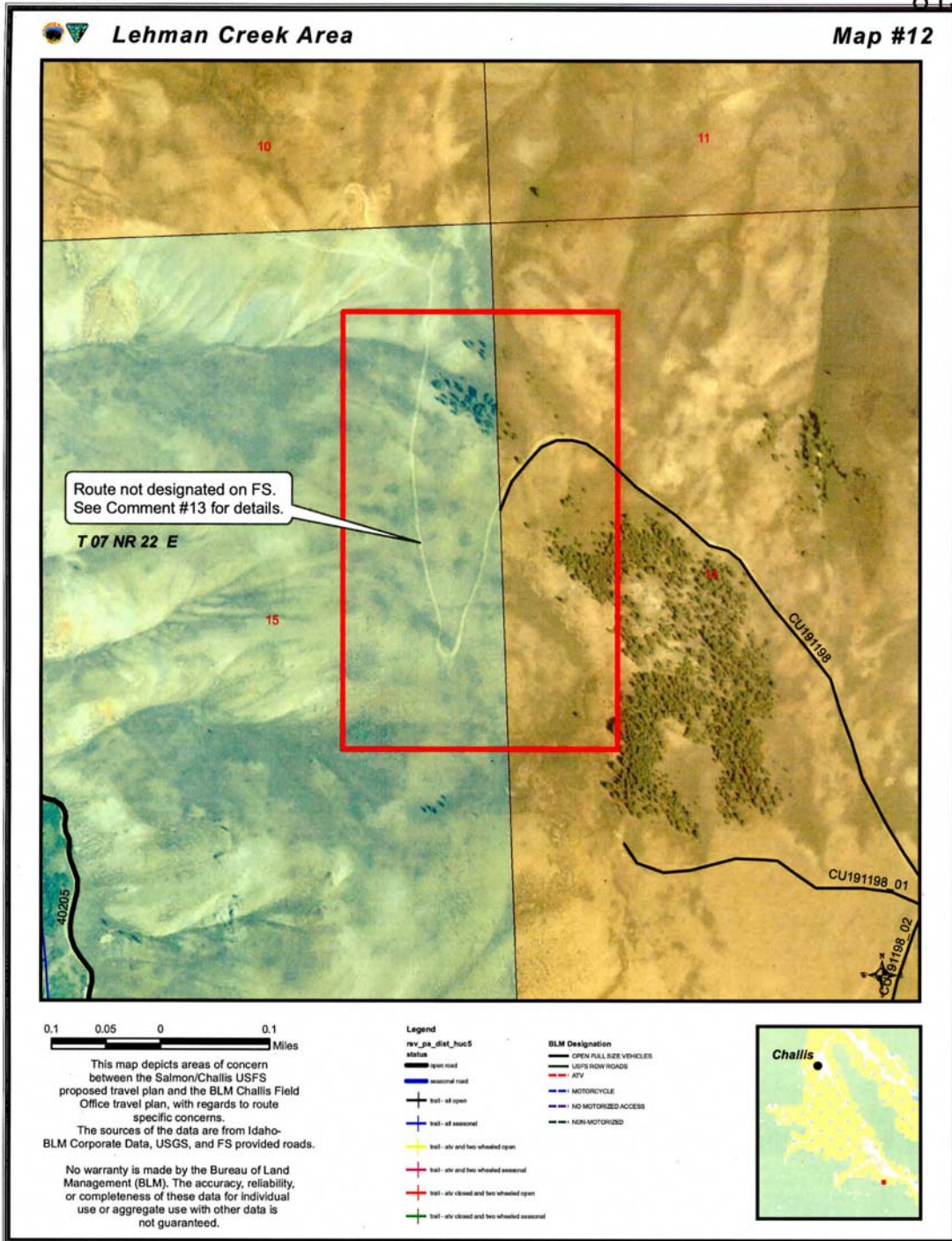


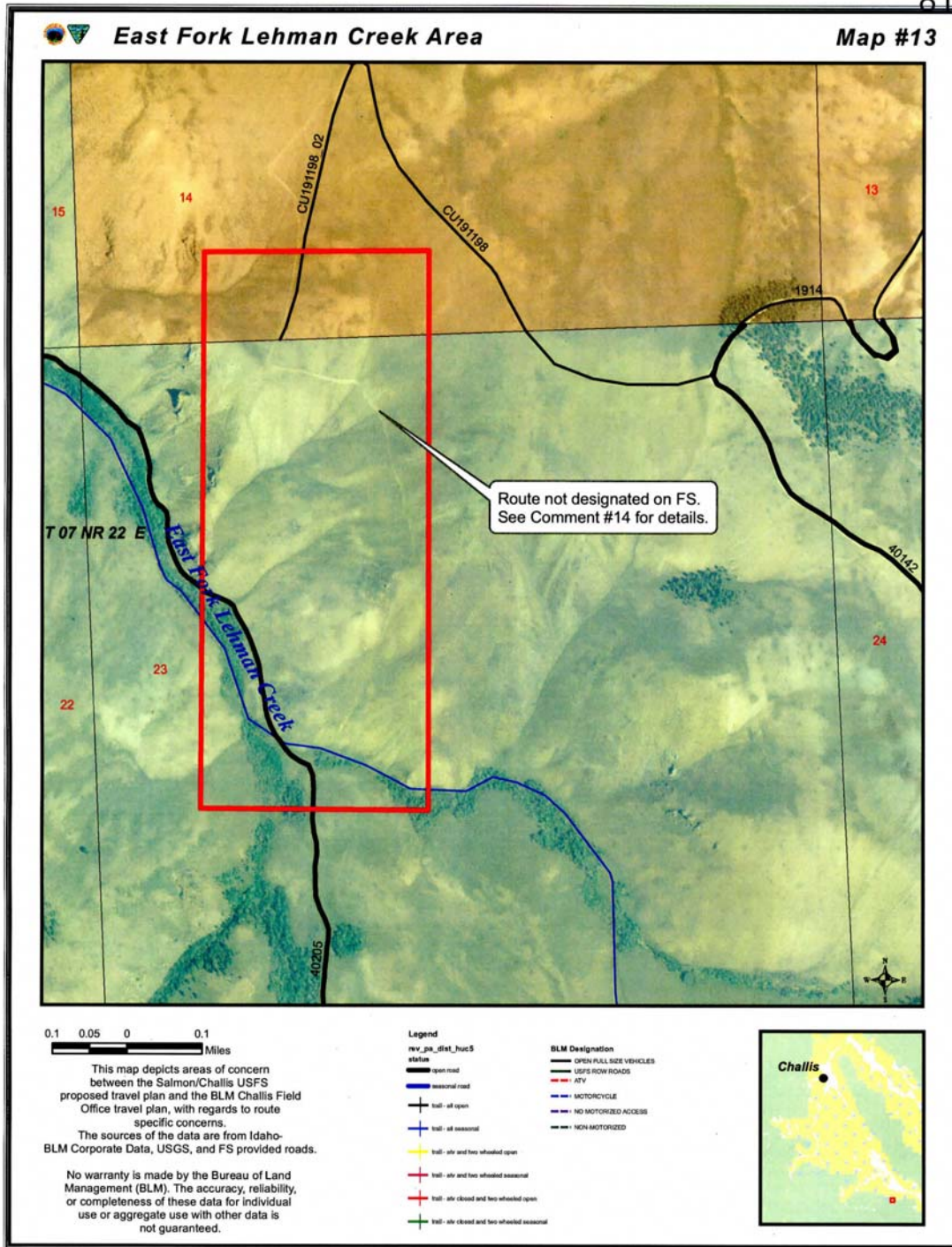




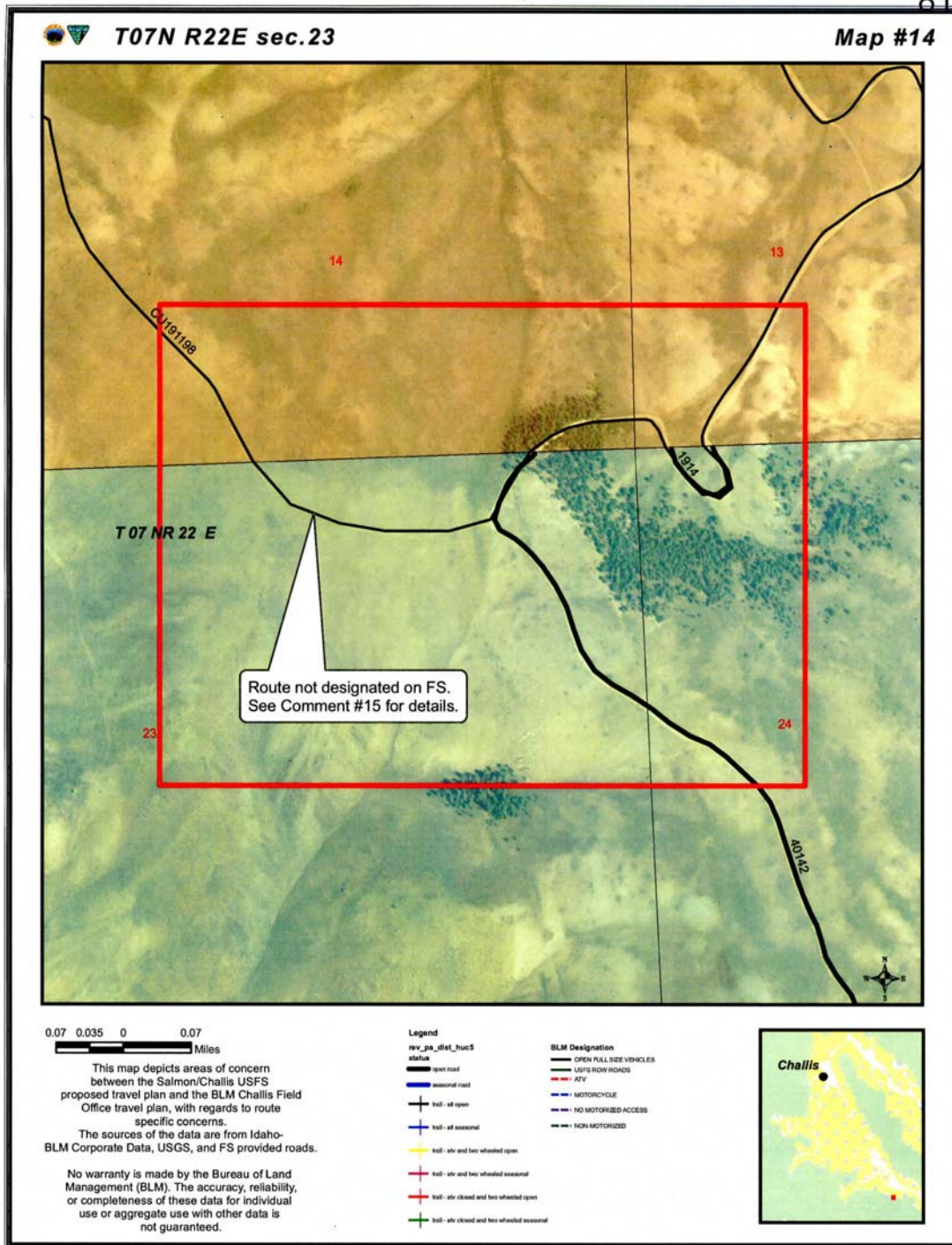


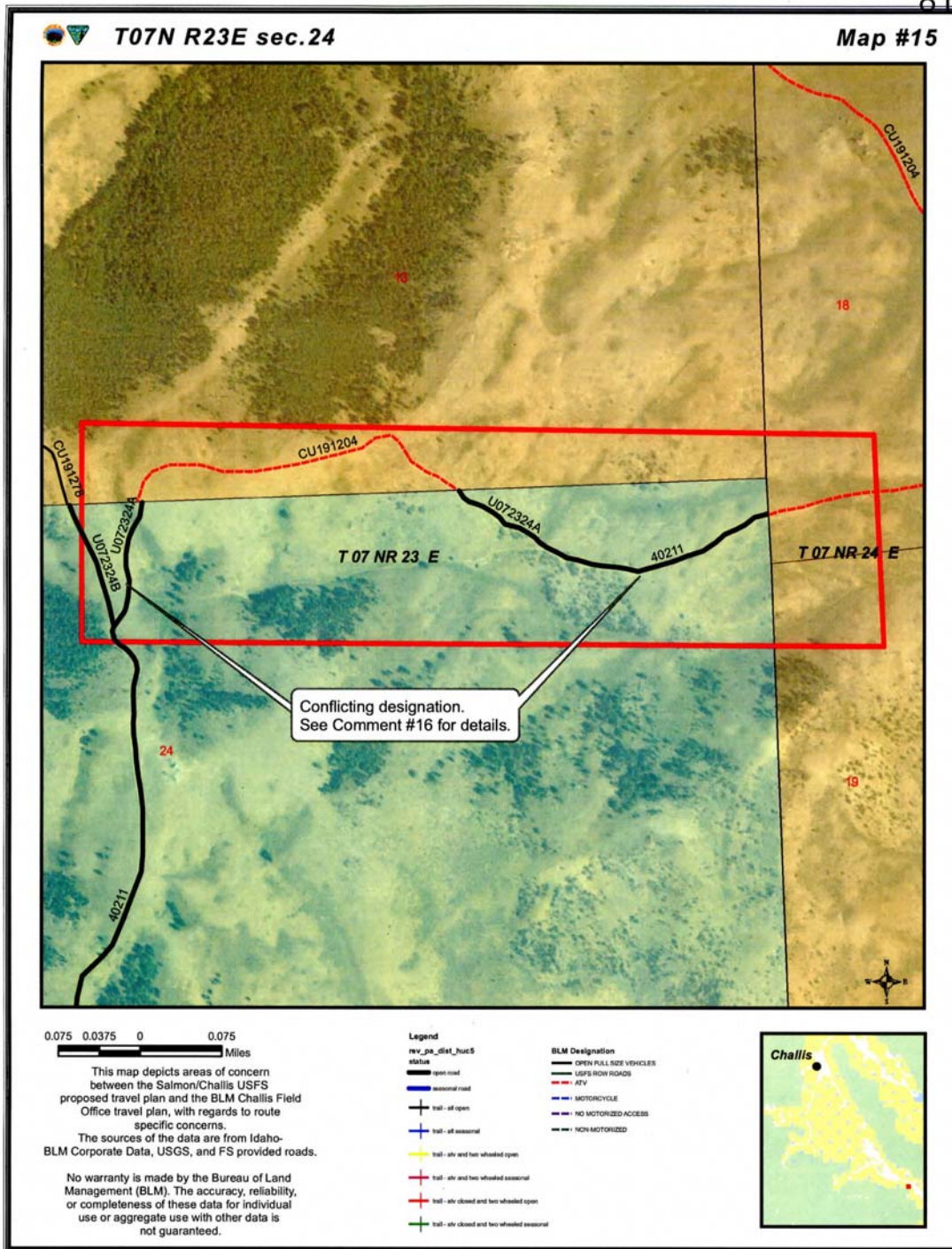


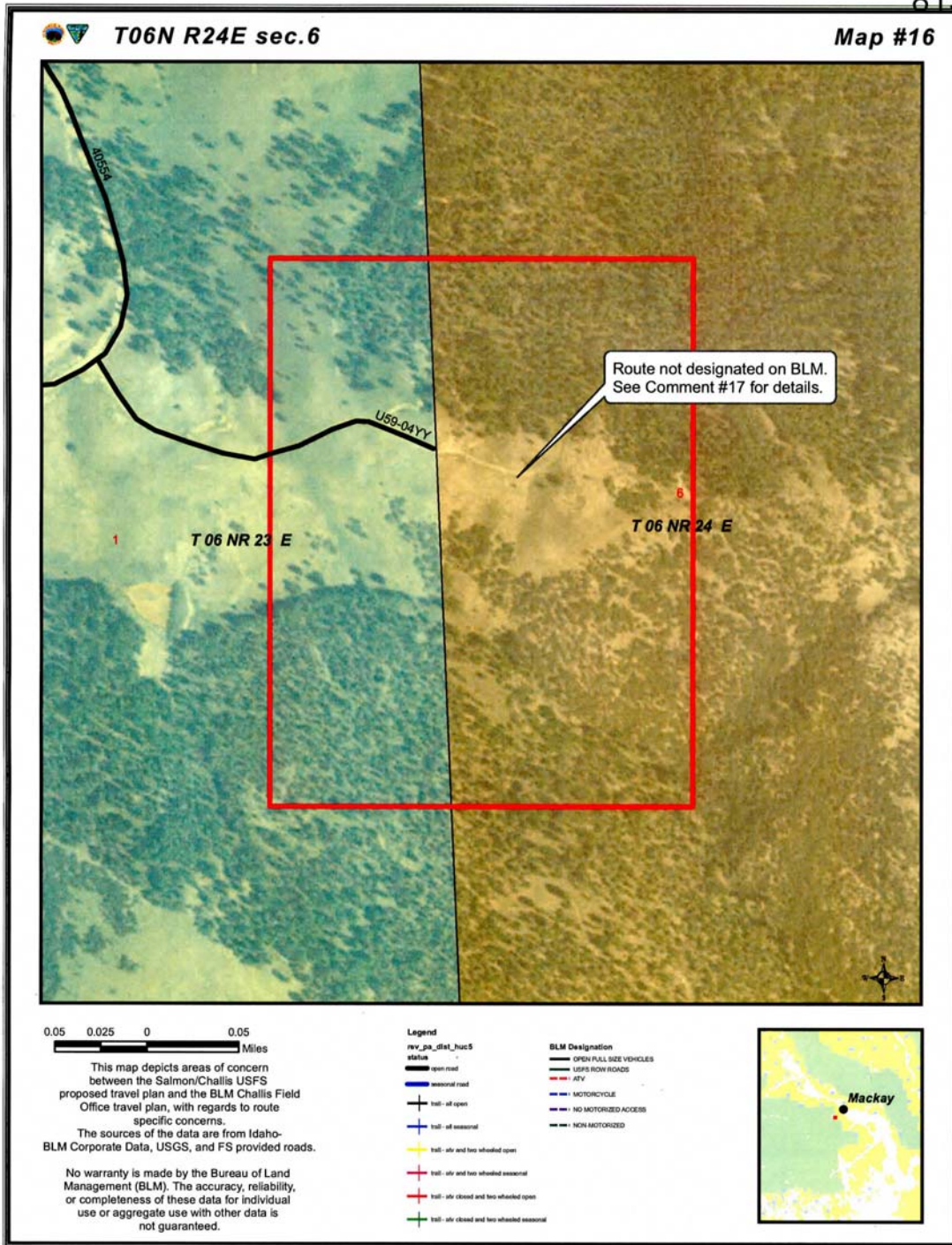


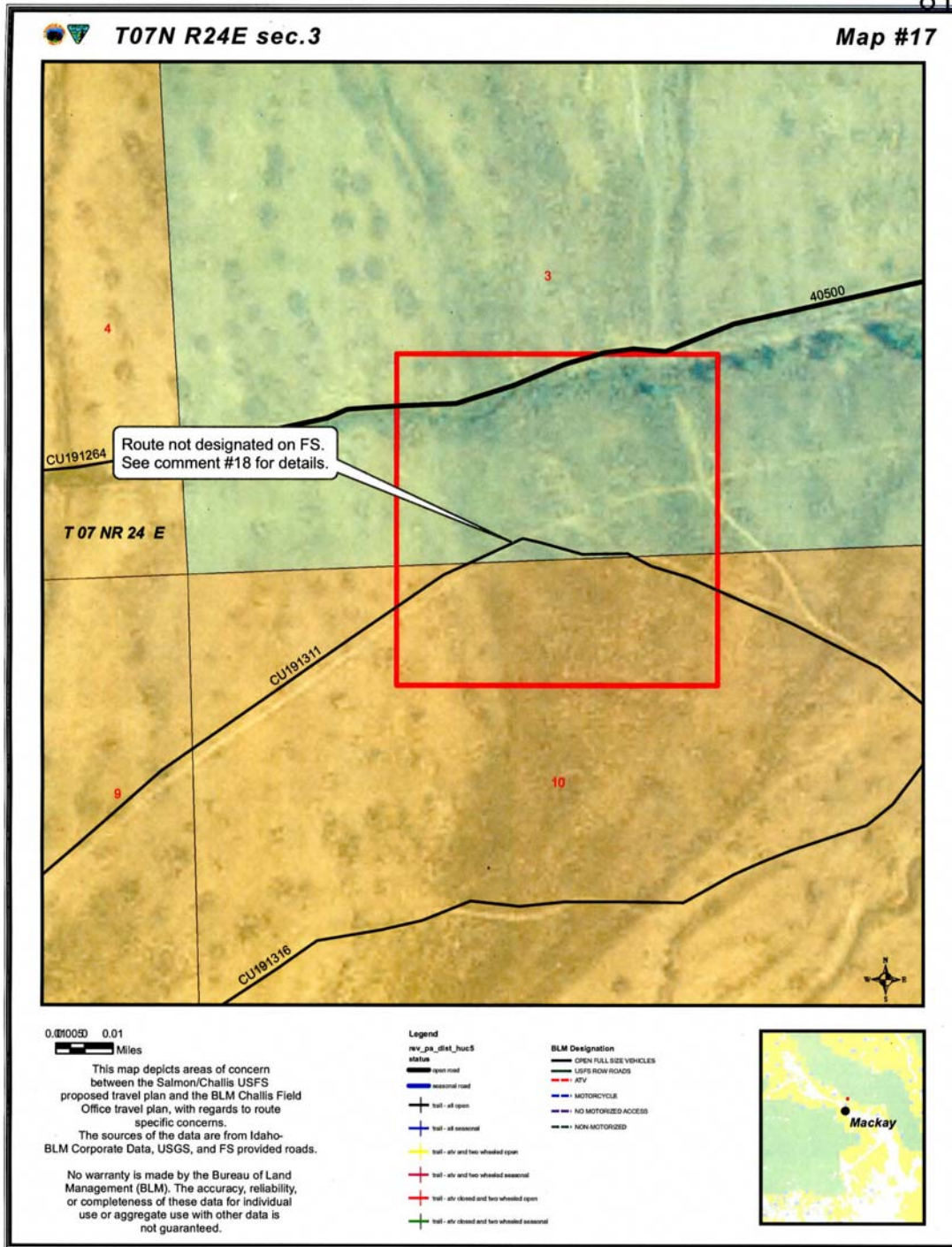


813

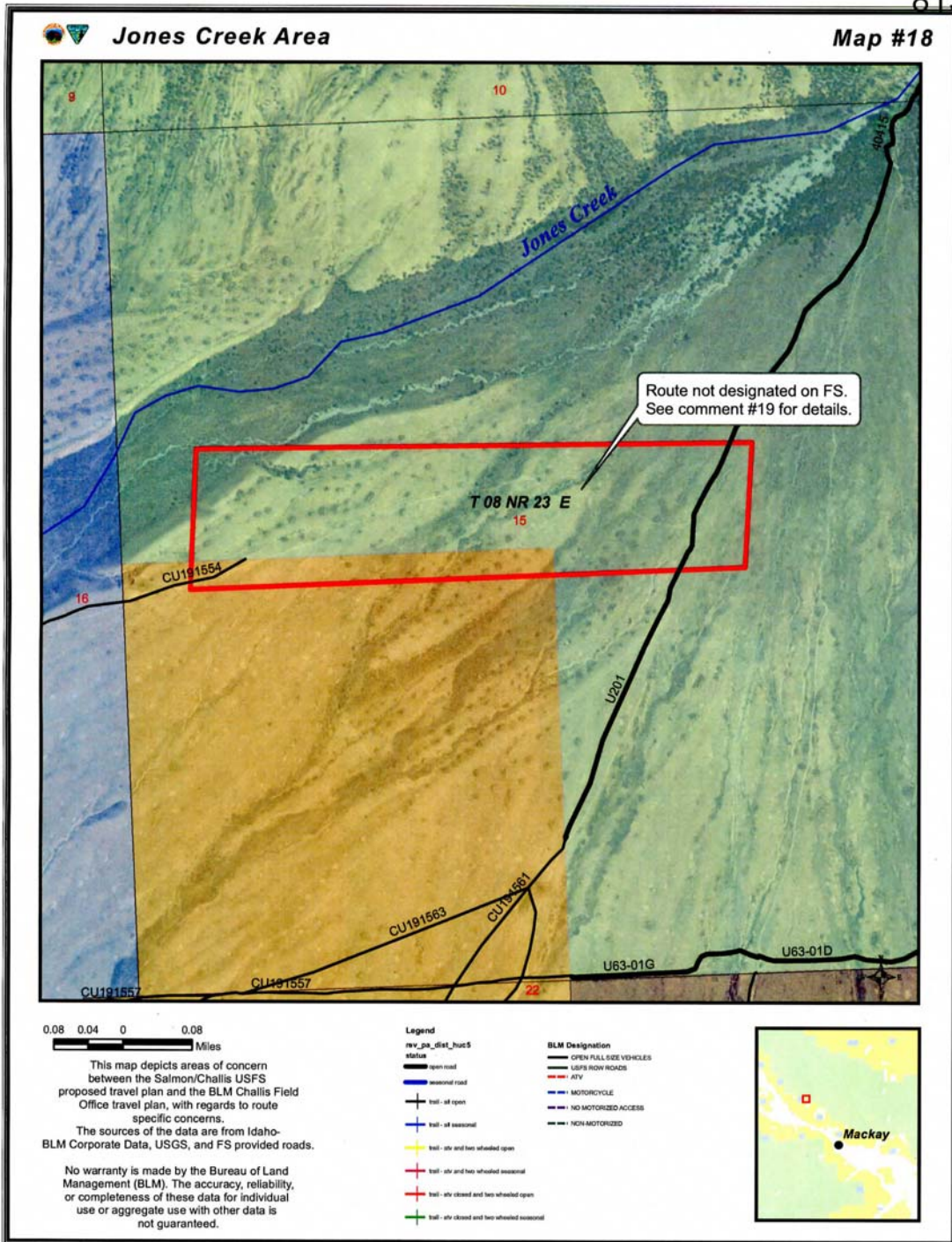


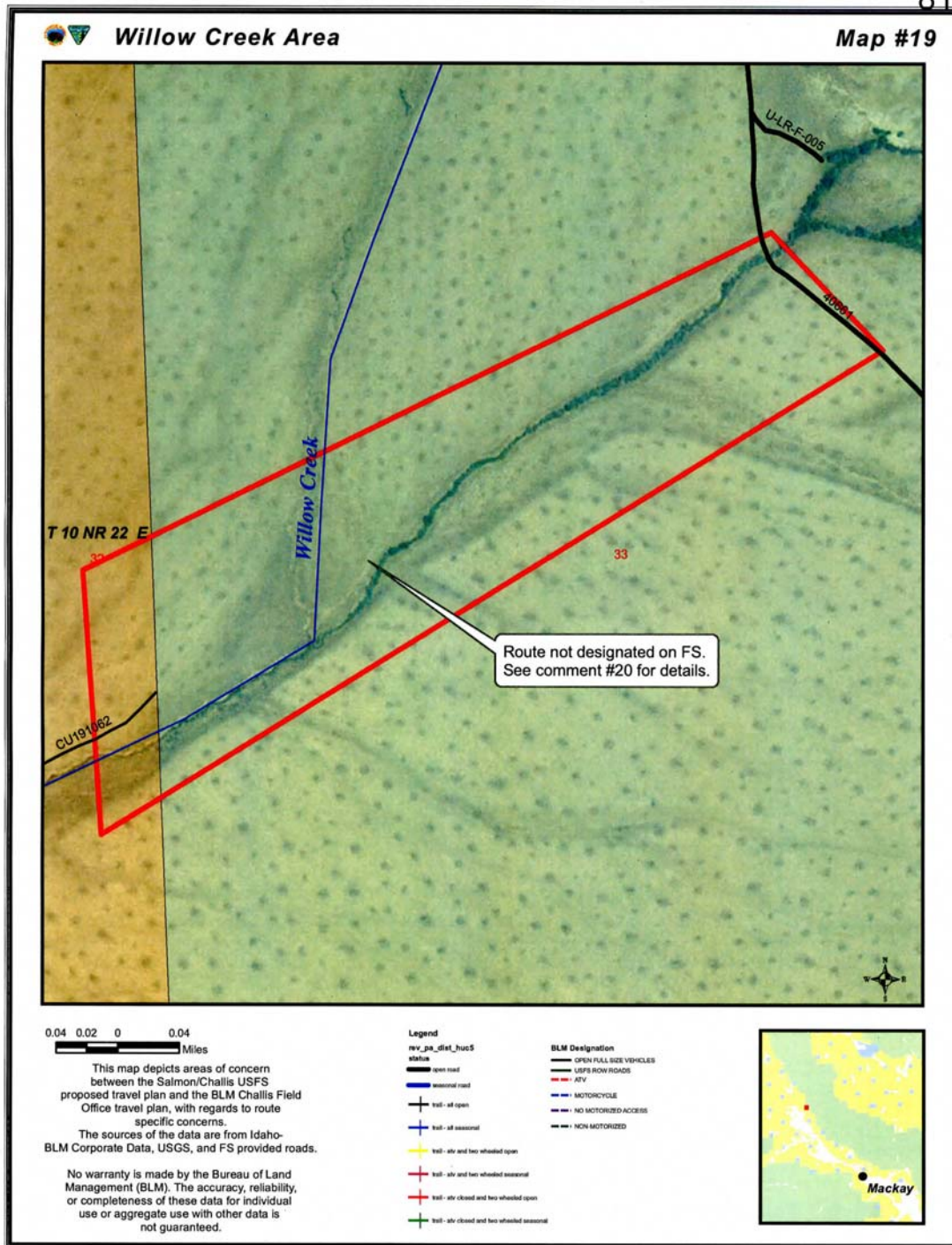


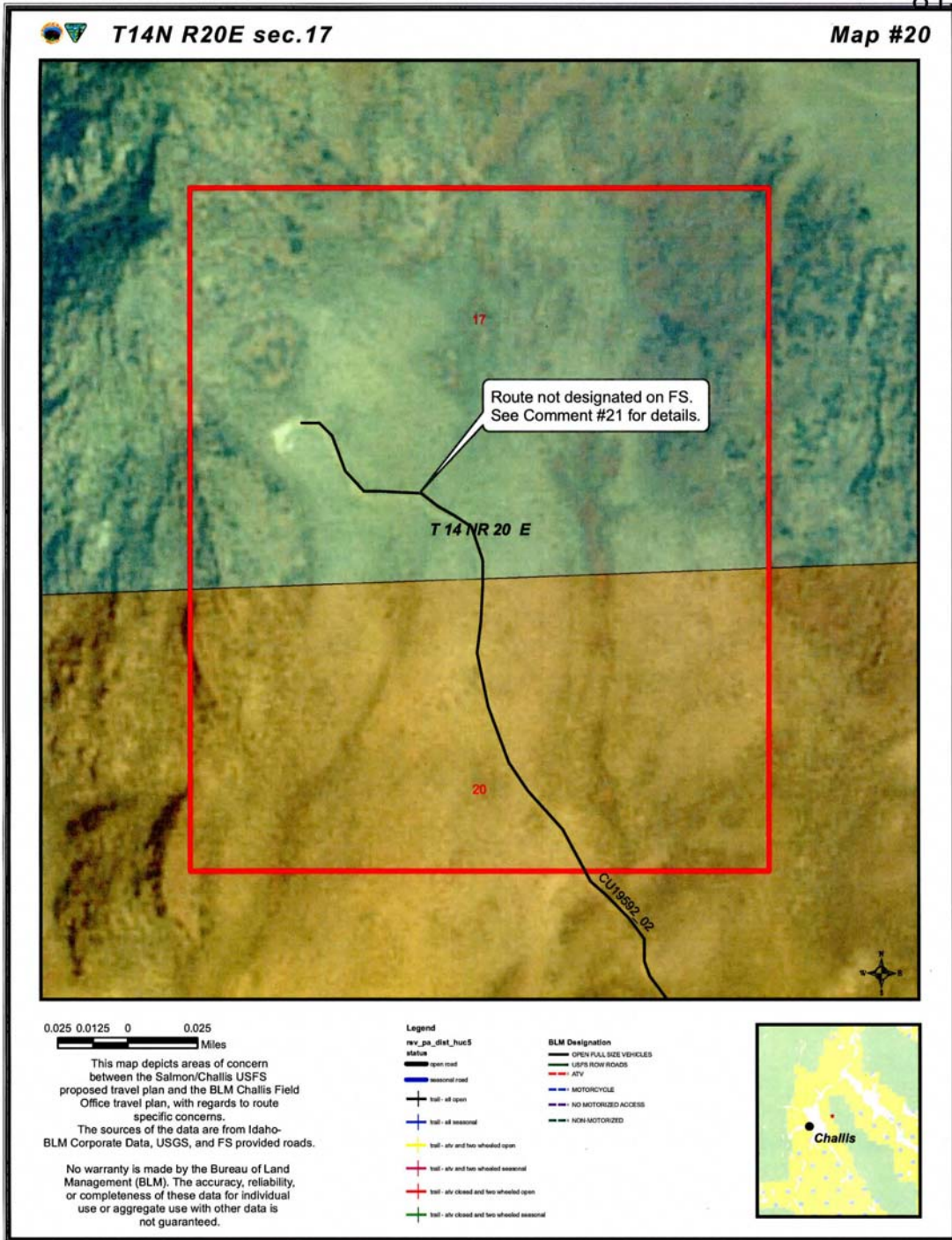


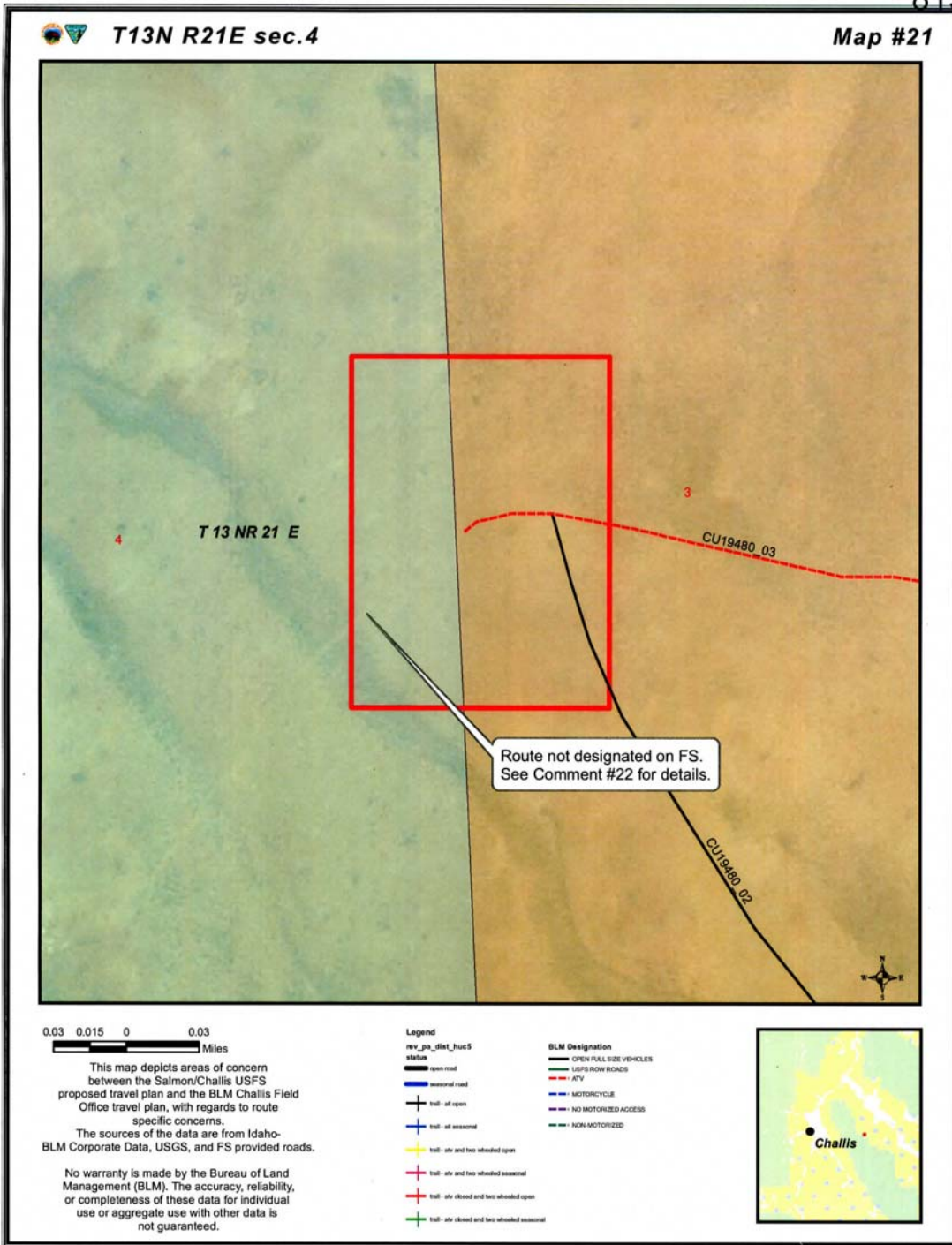


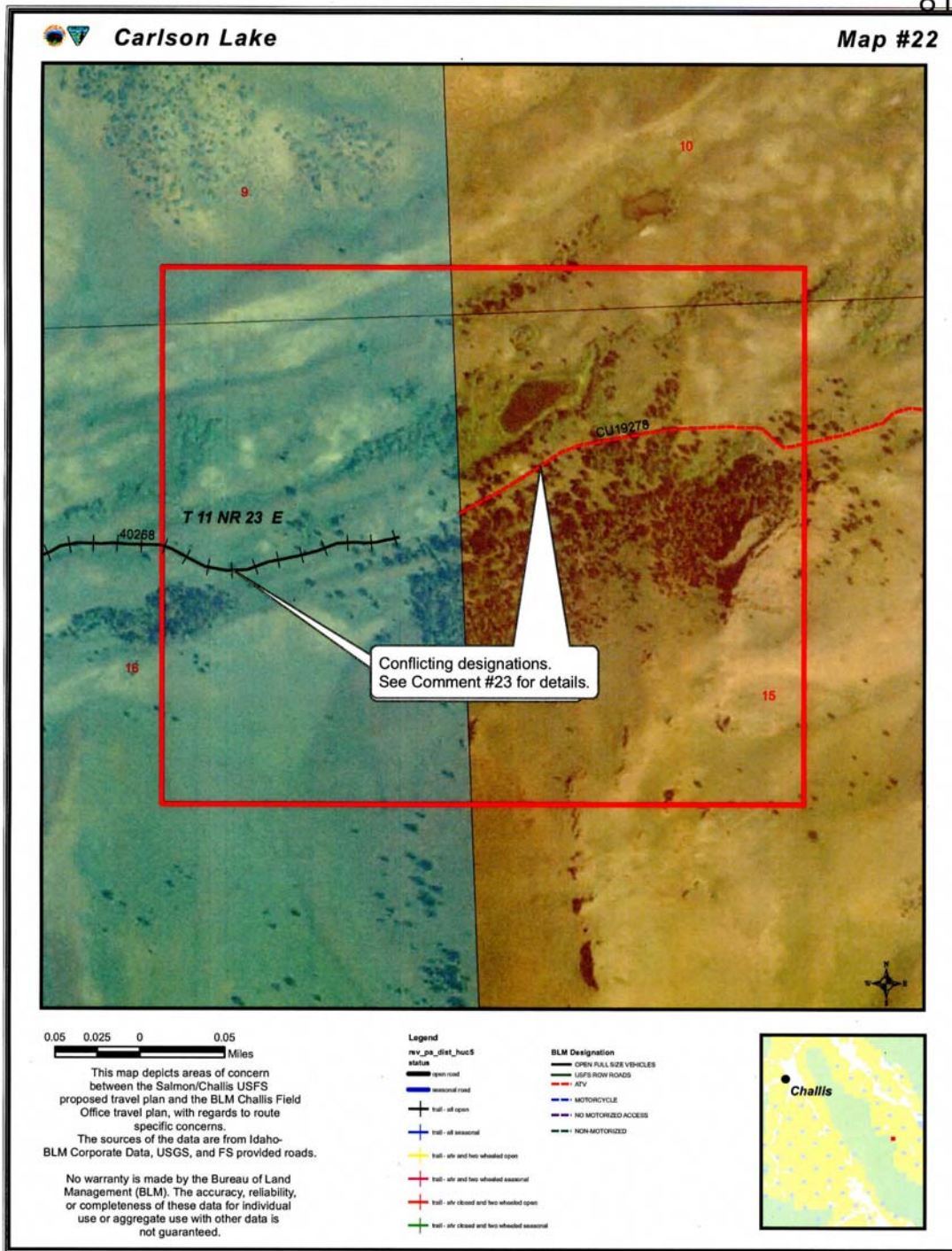
813

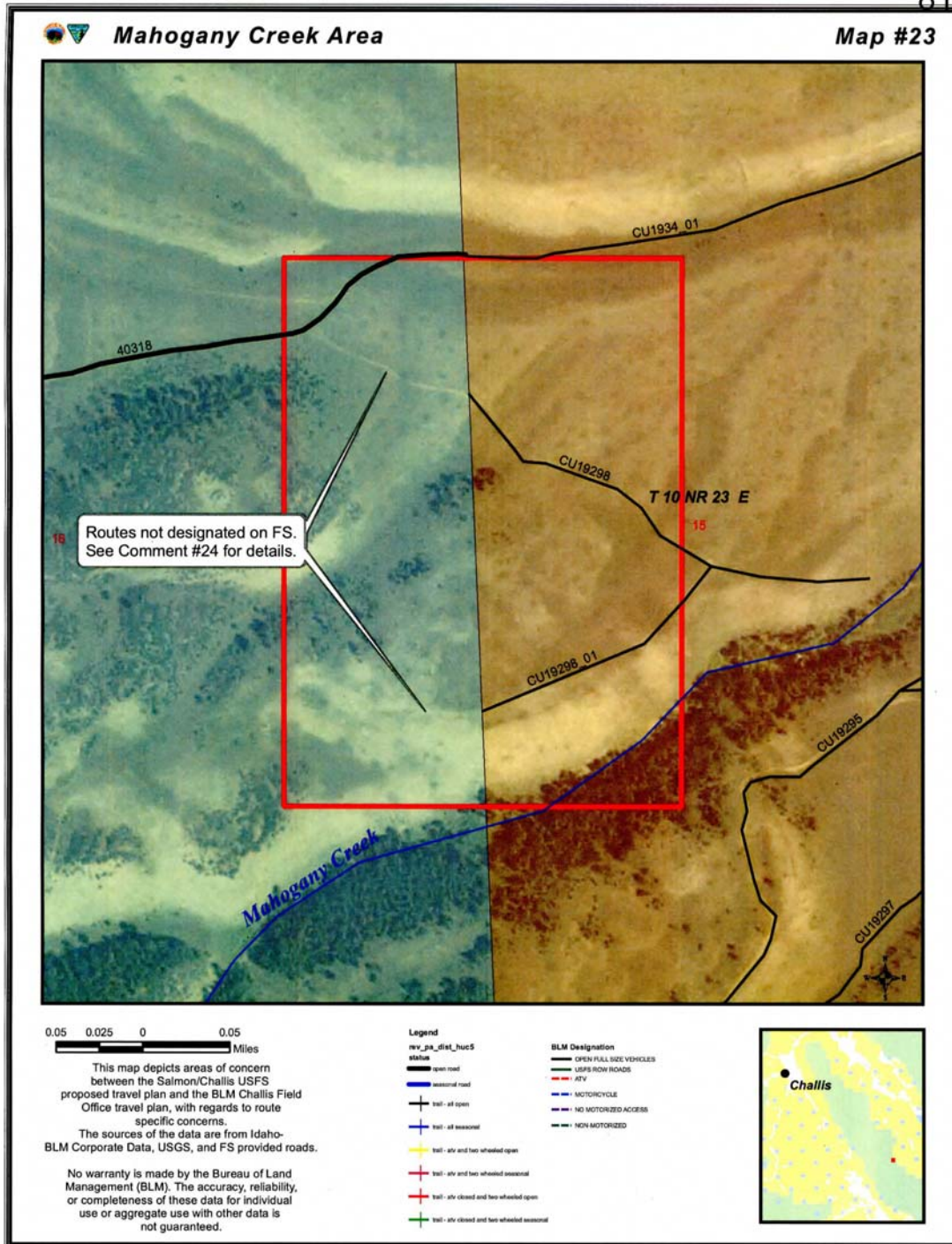


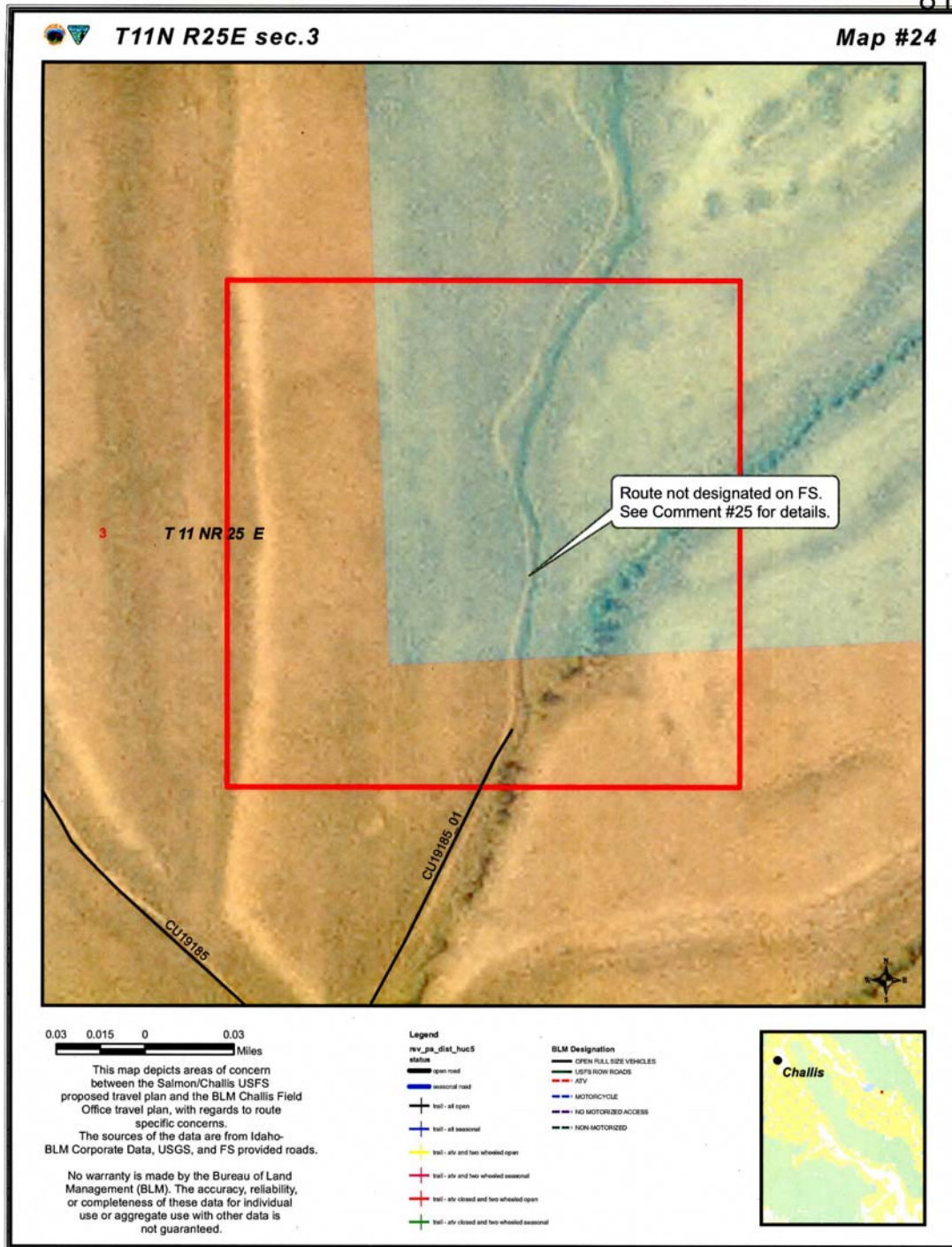


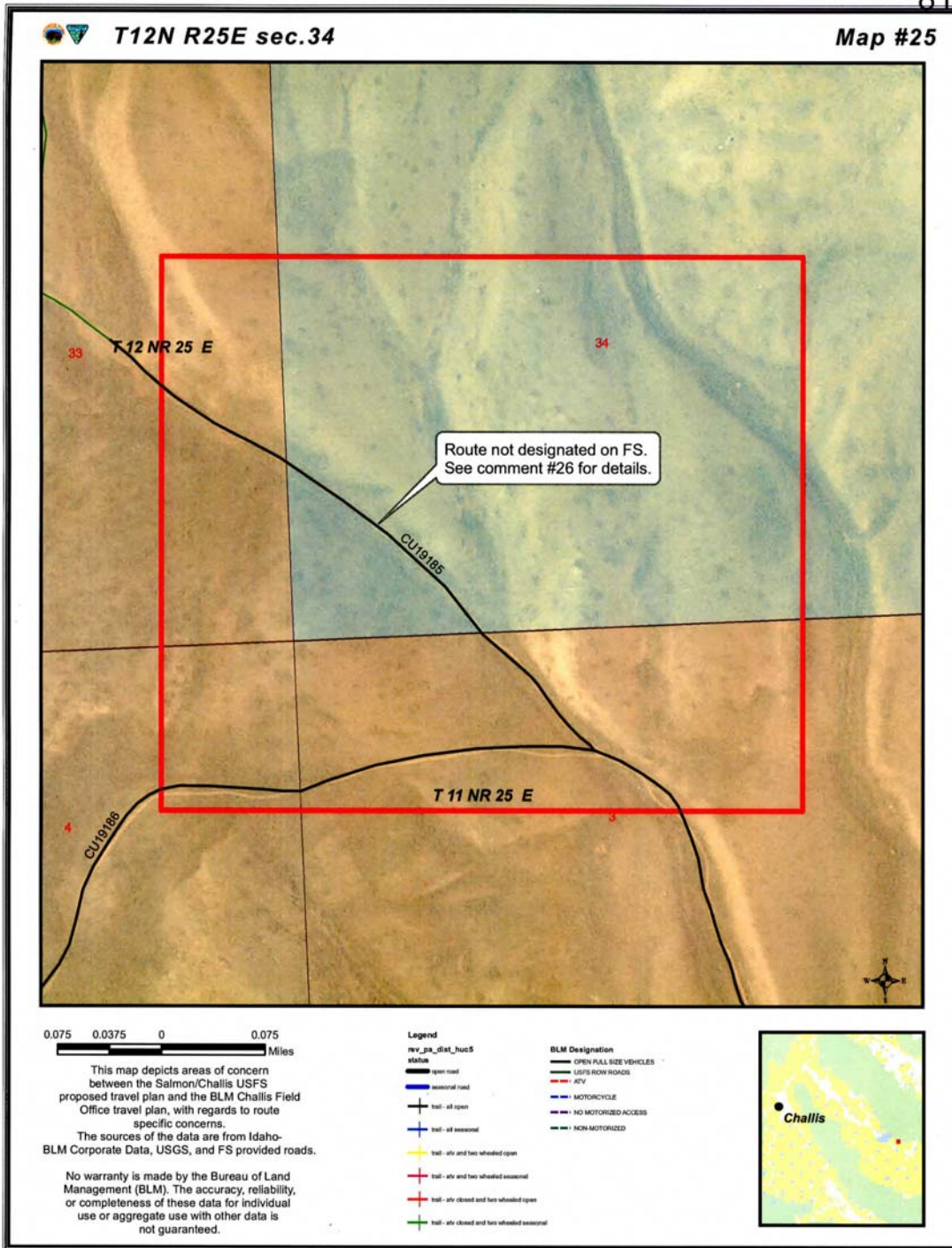


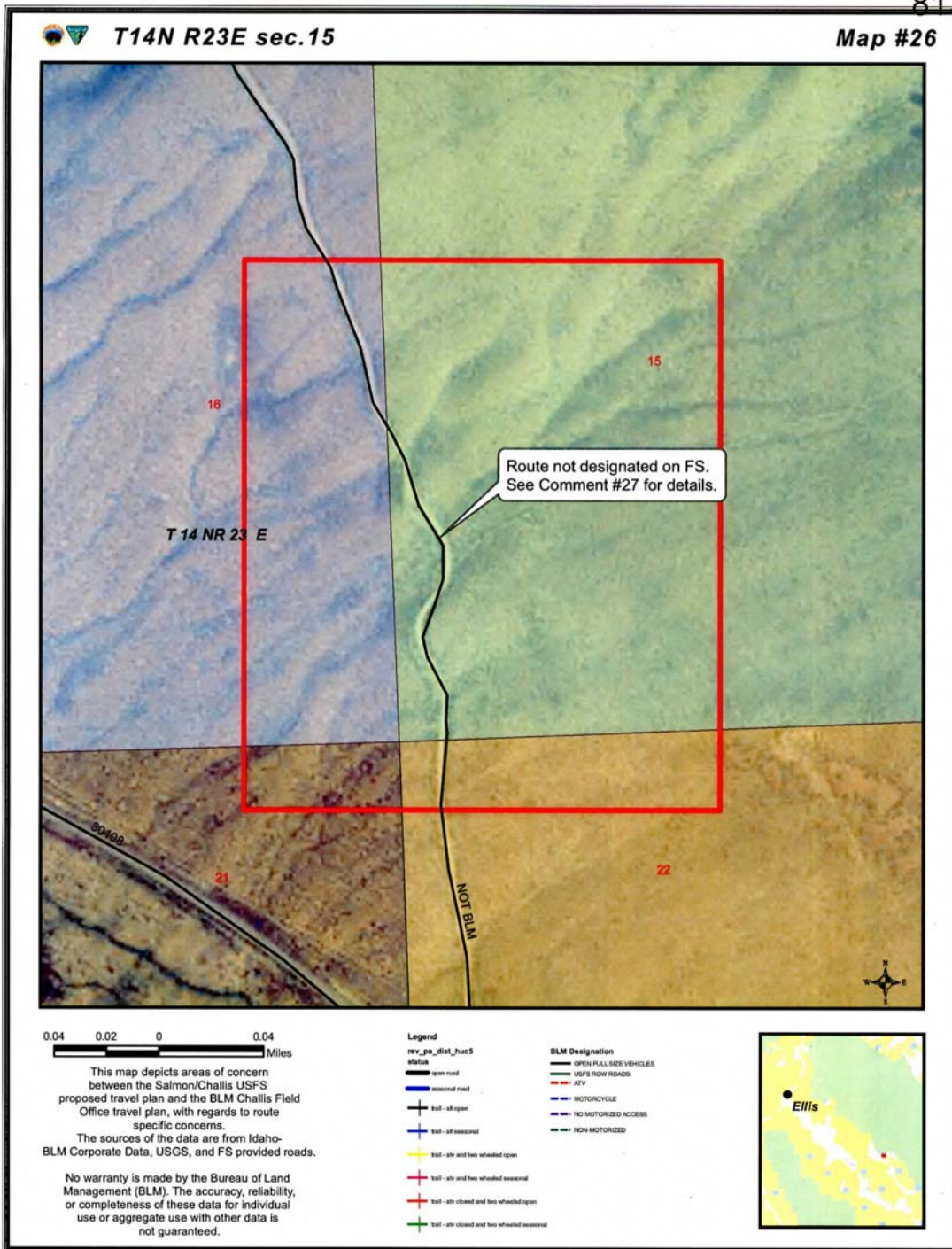


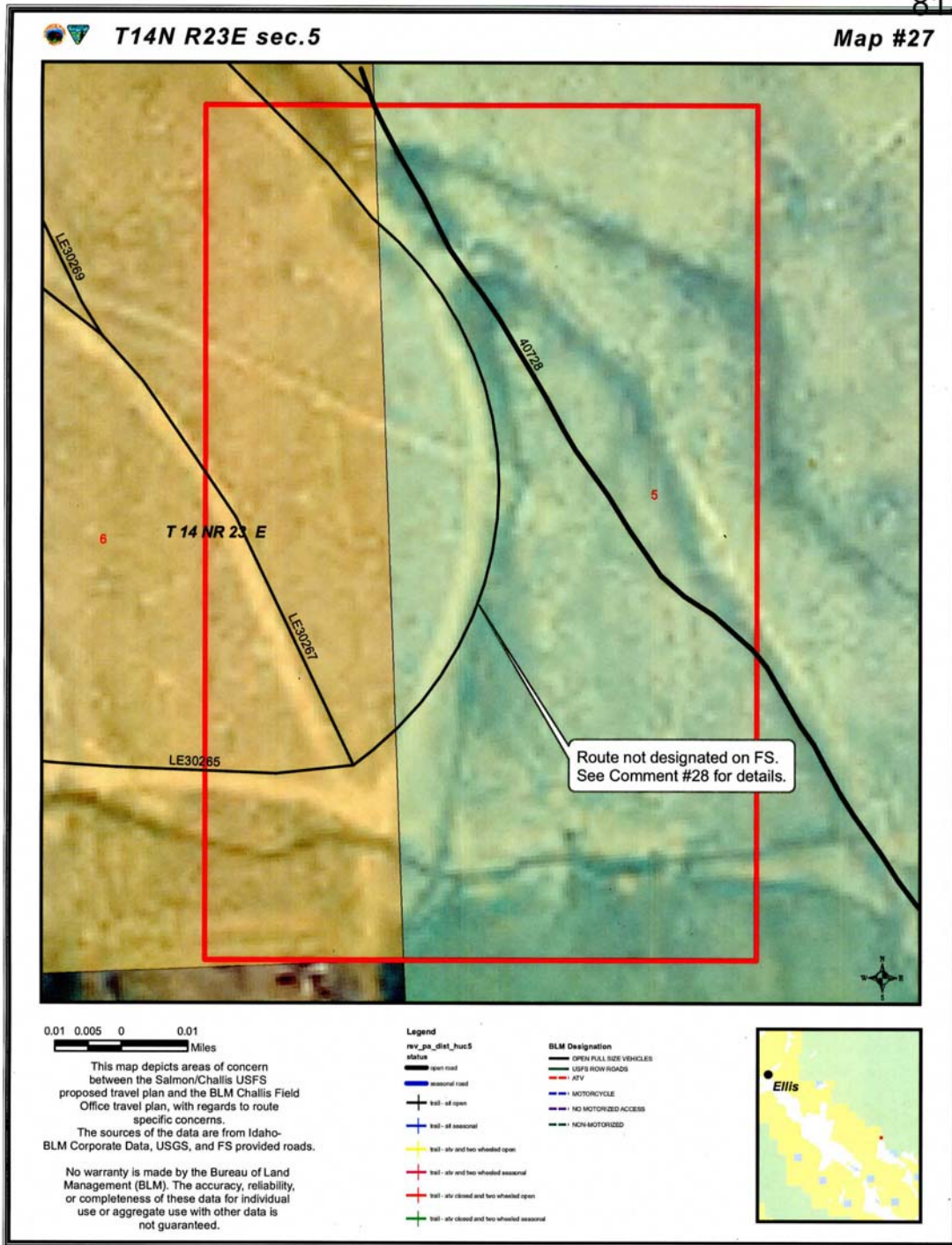




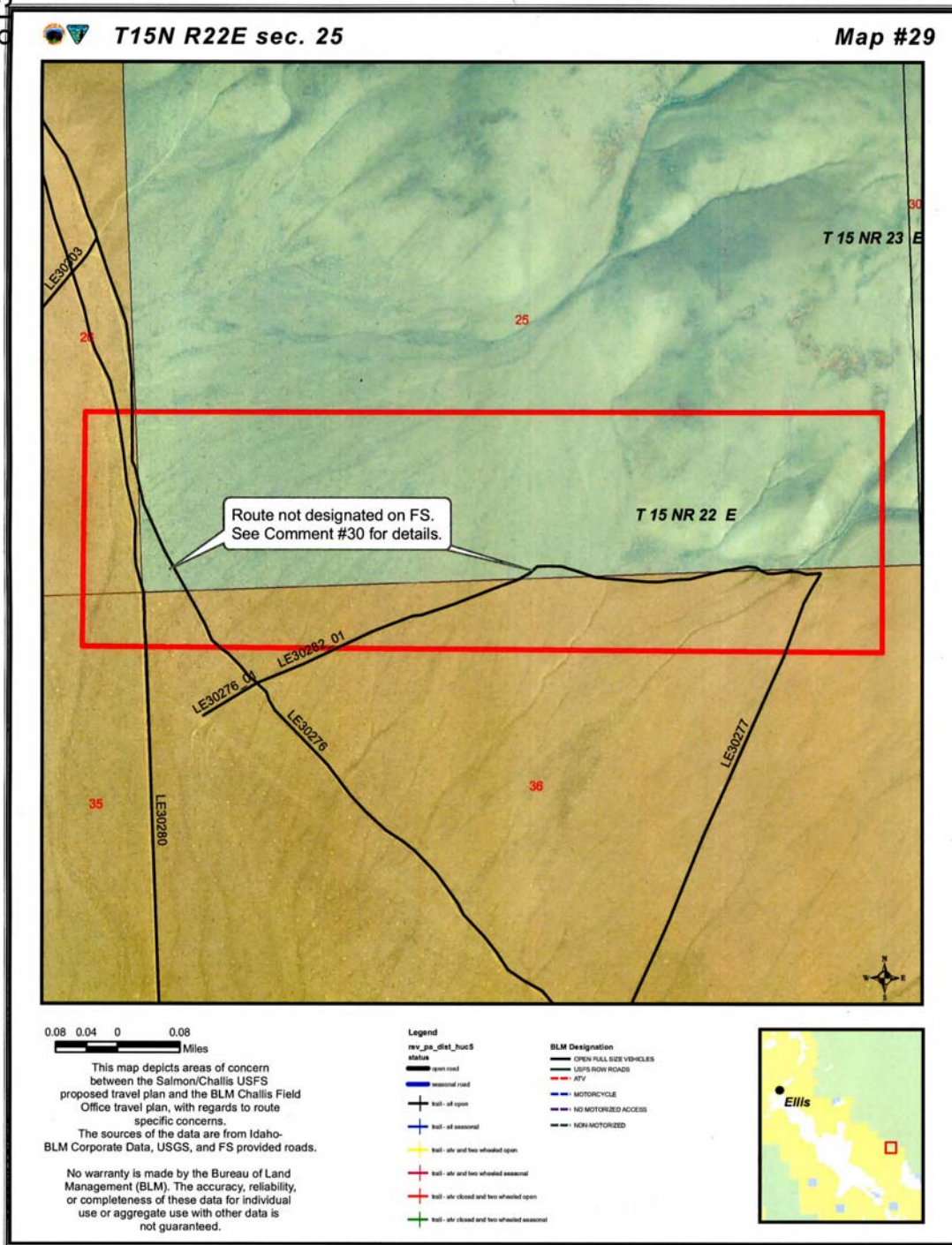




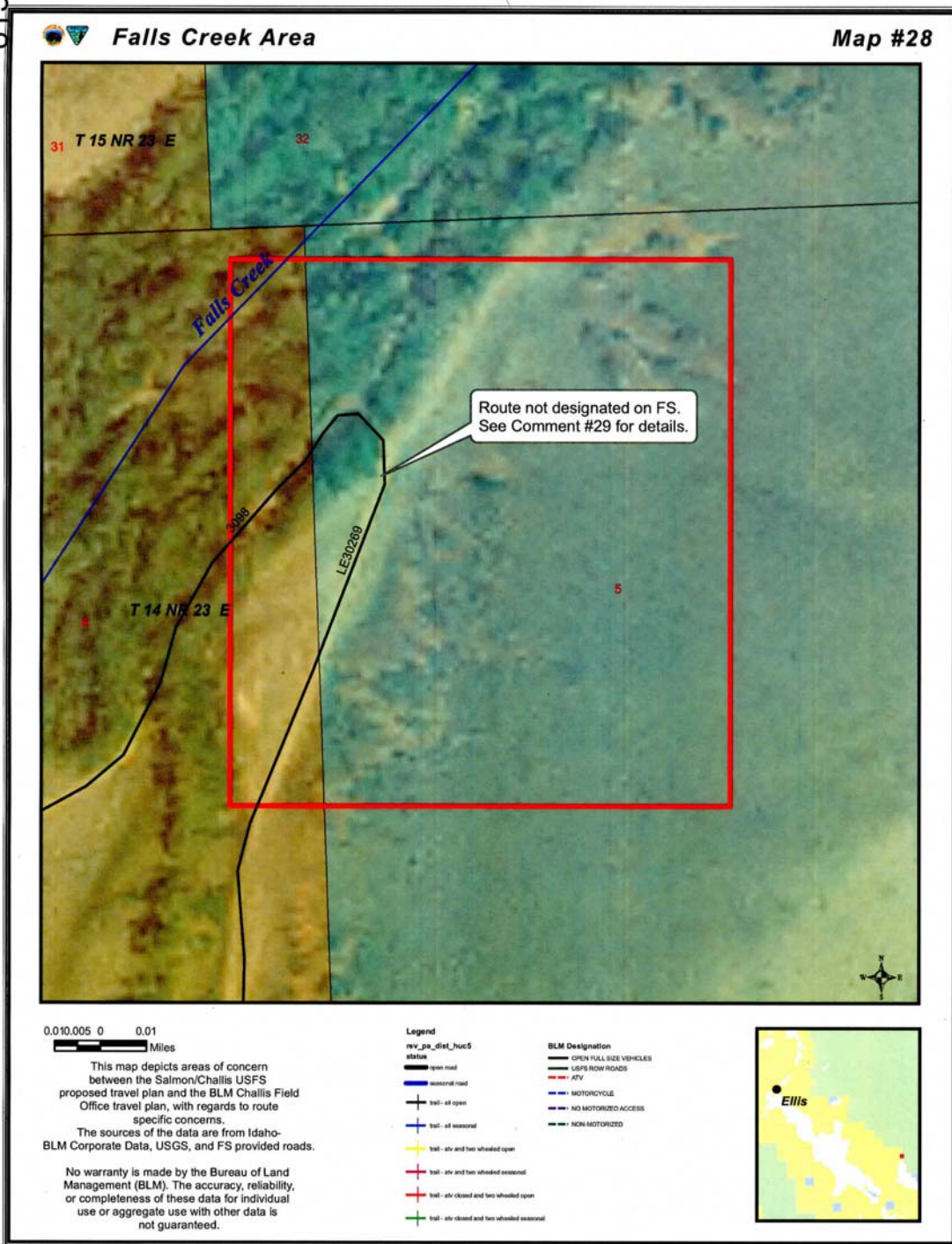




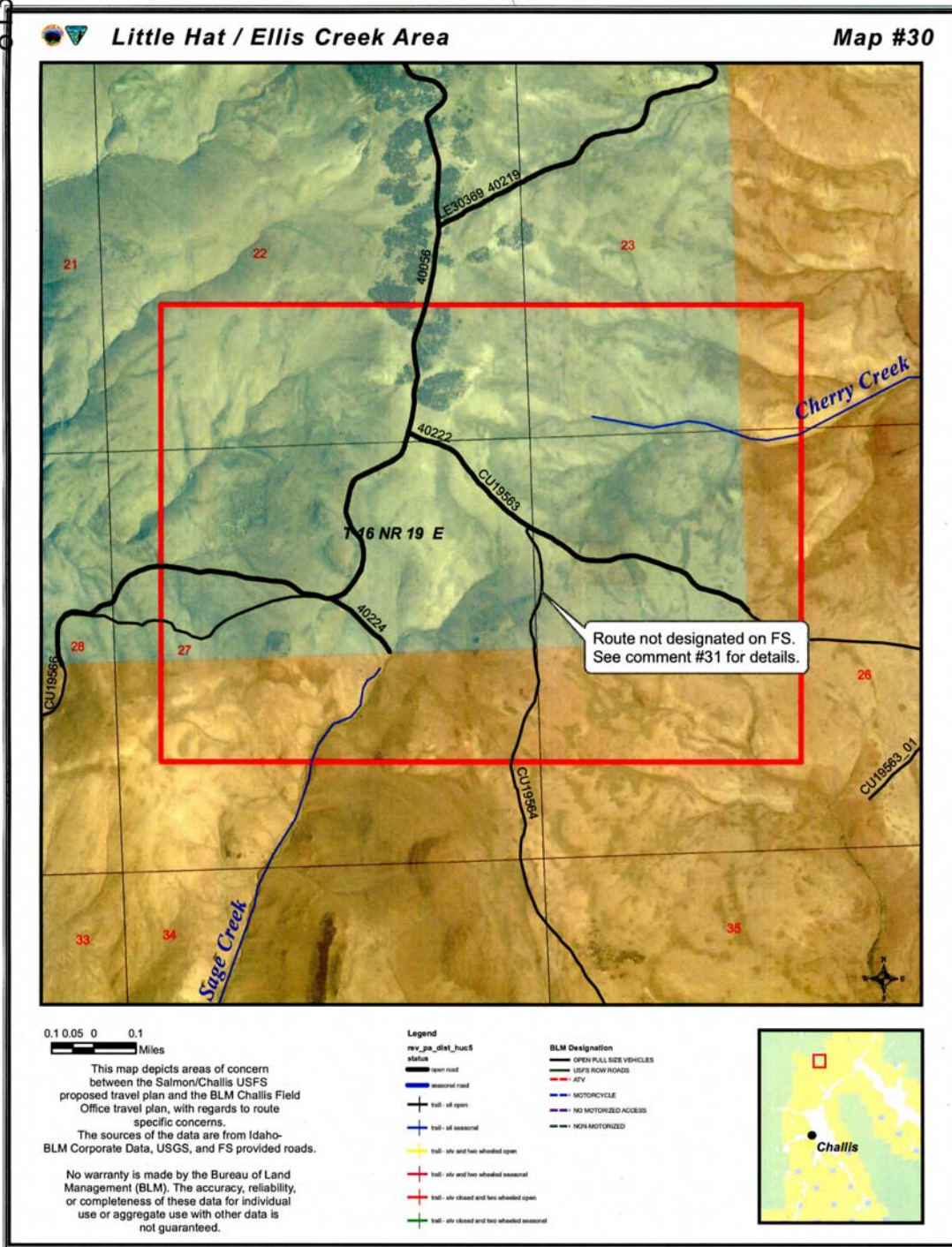
813



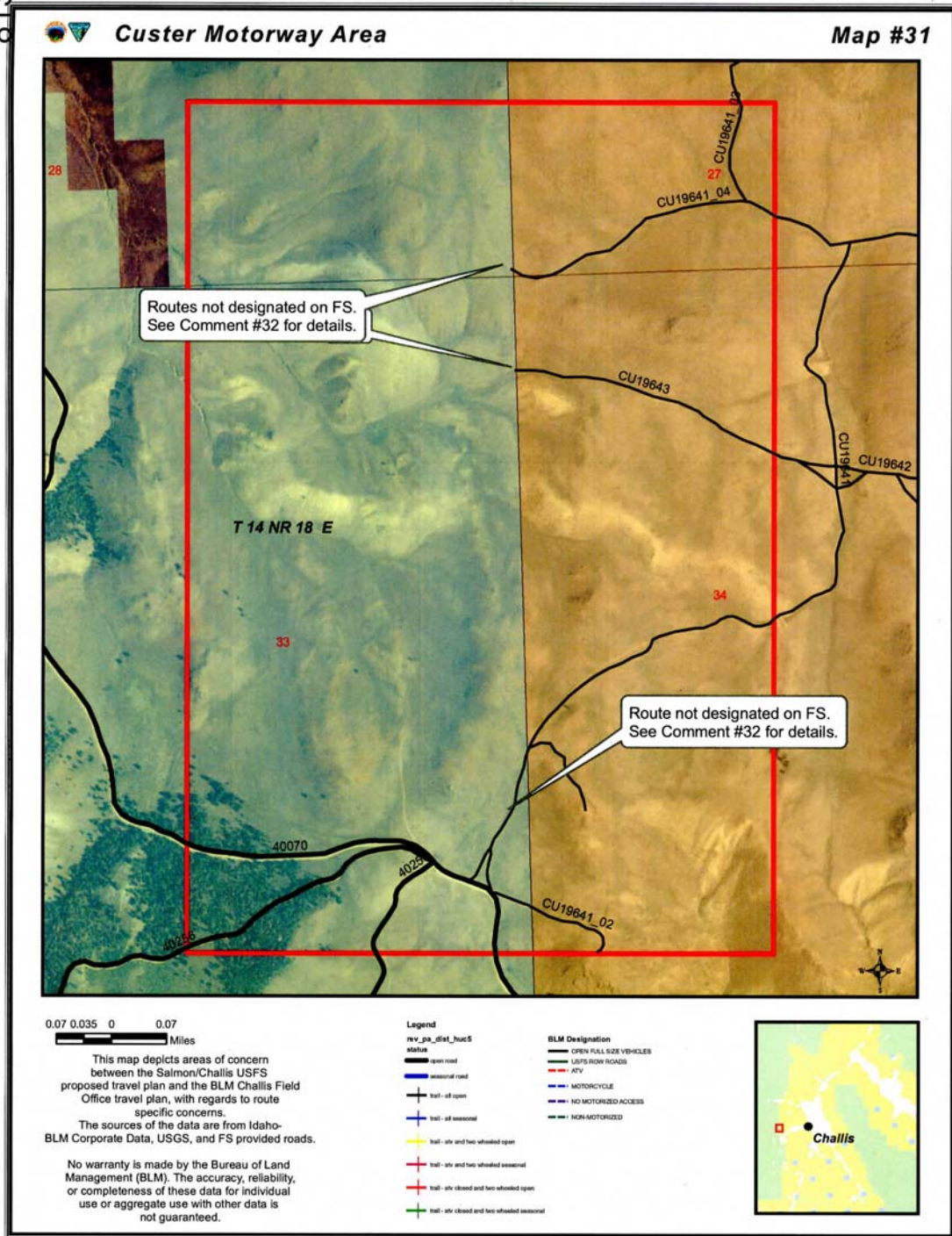
813



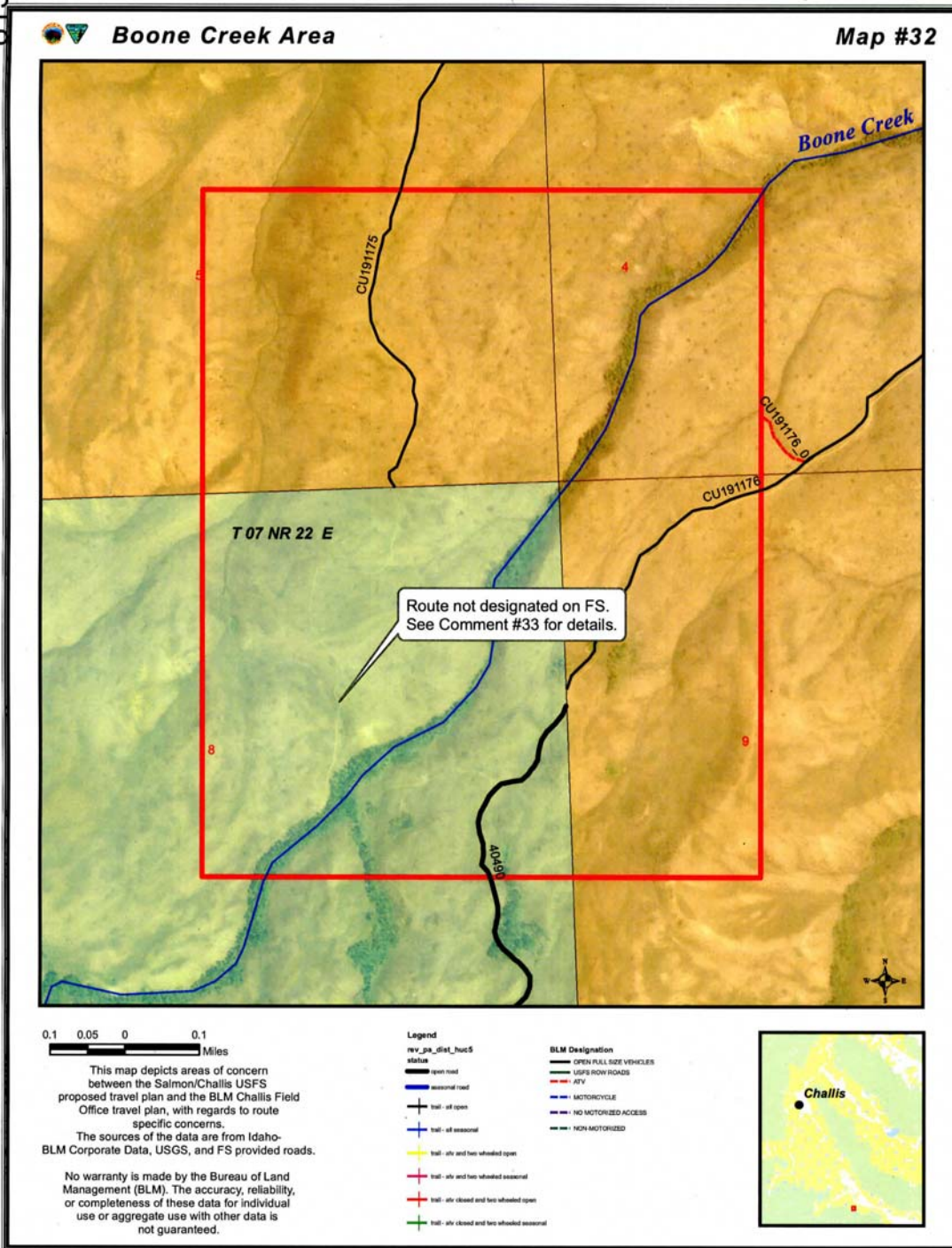
813



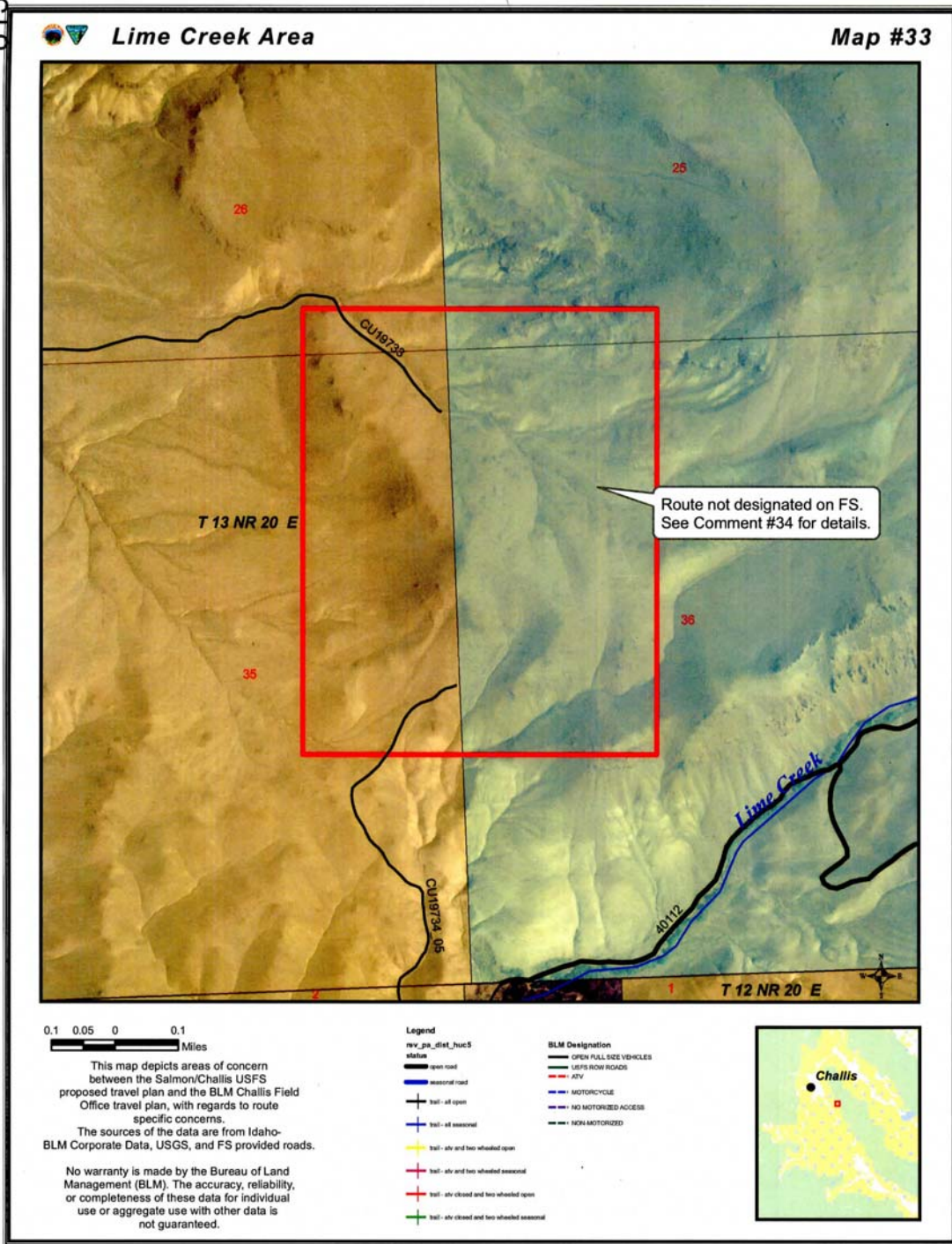
813



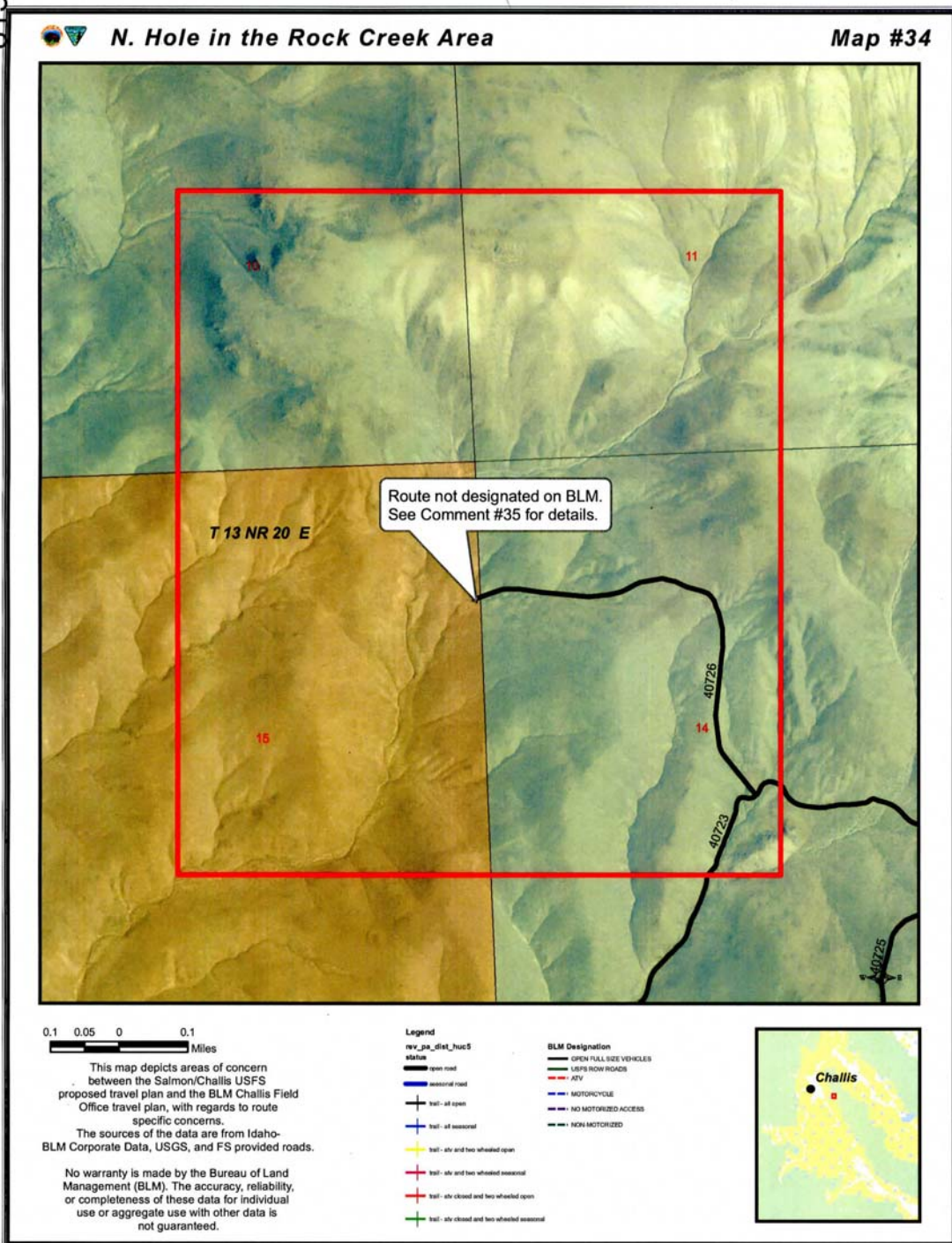
813



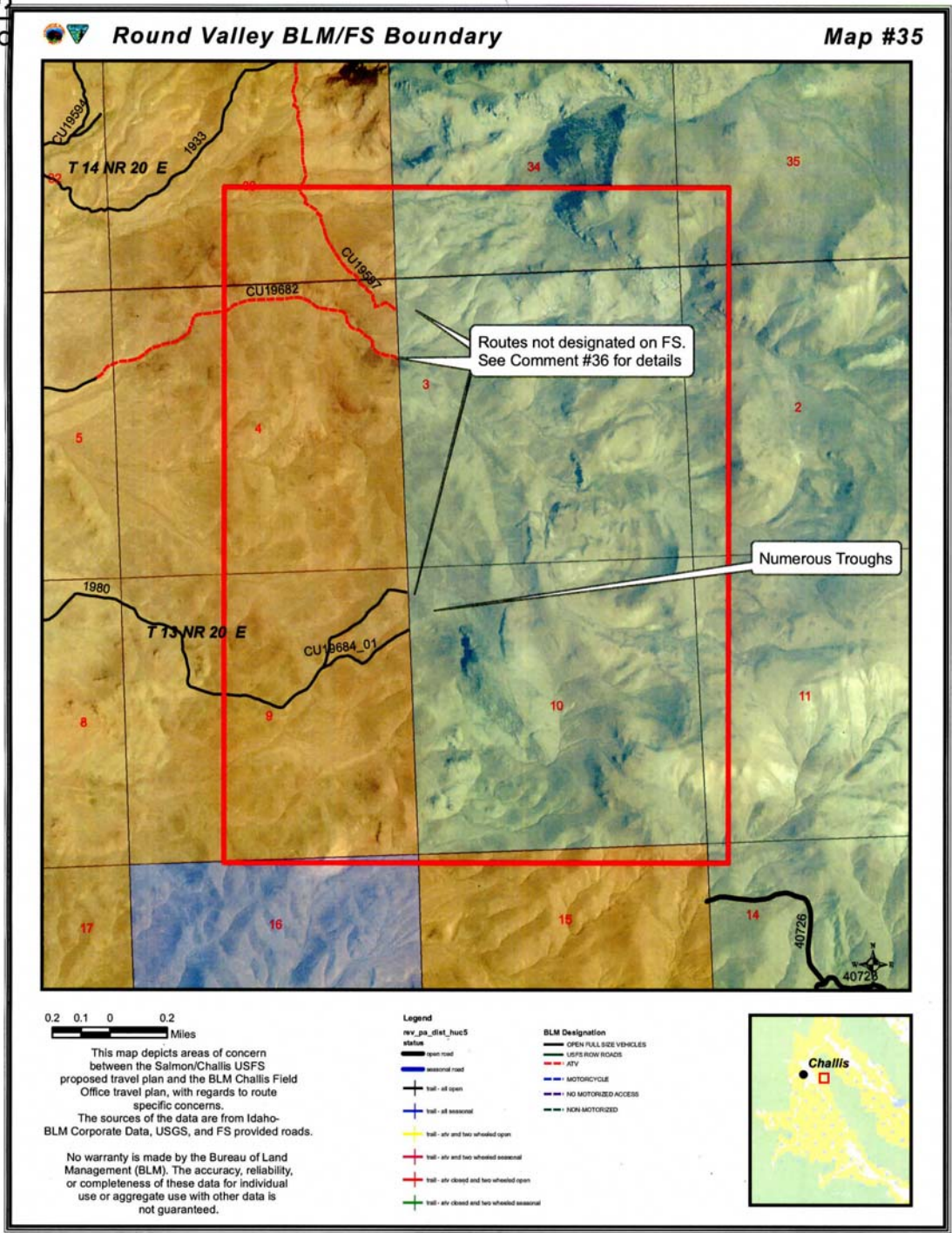
813



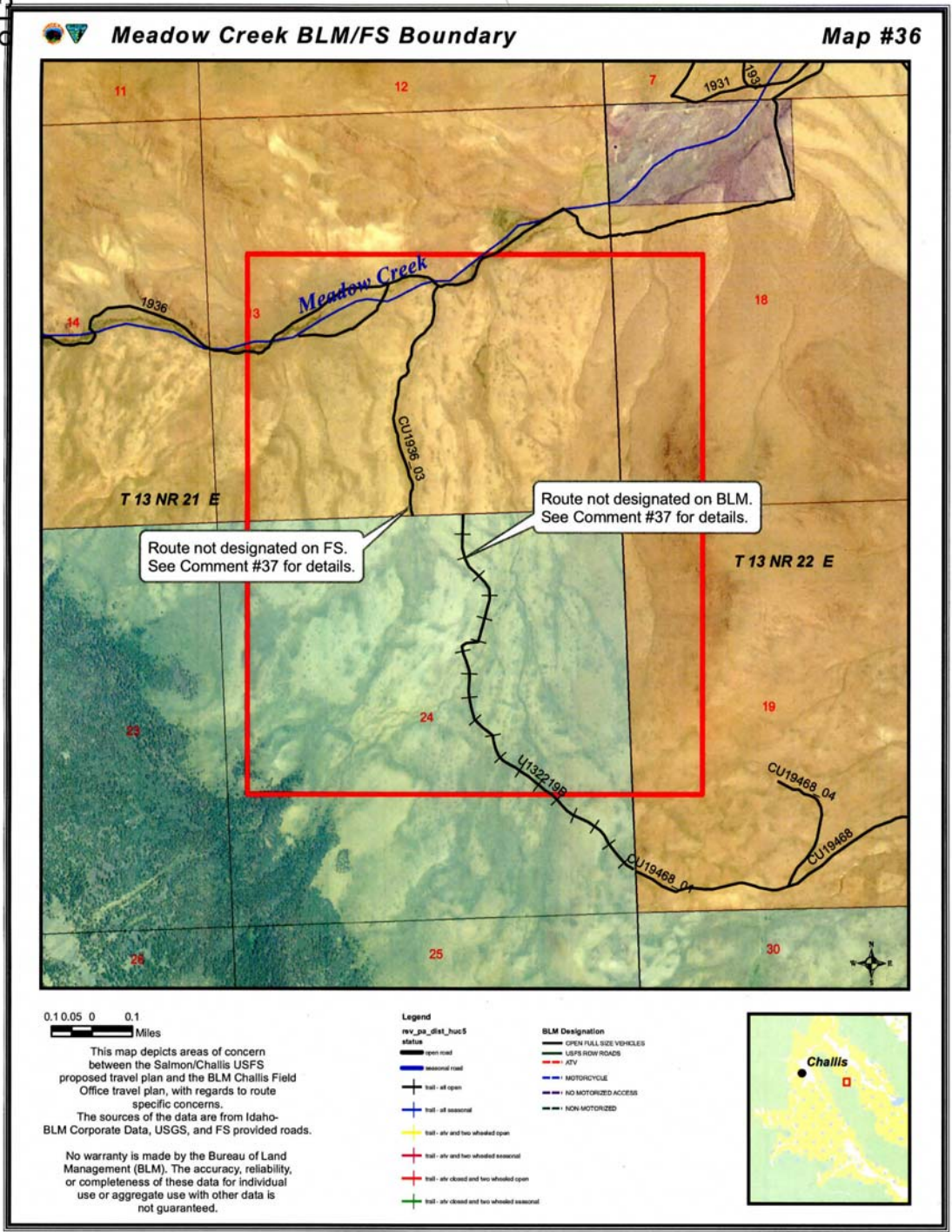
813



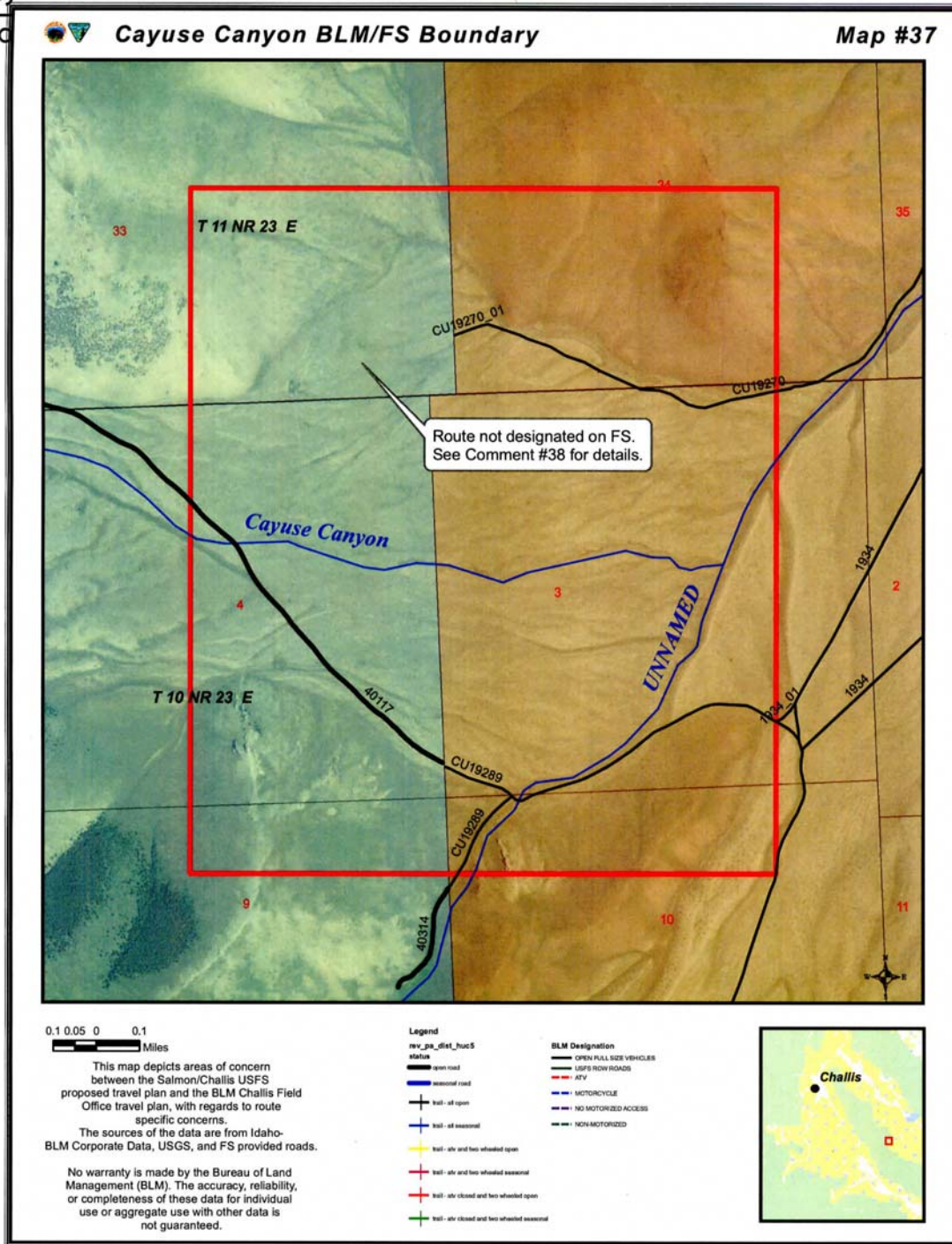
813



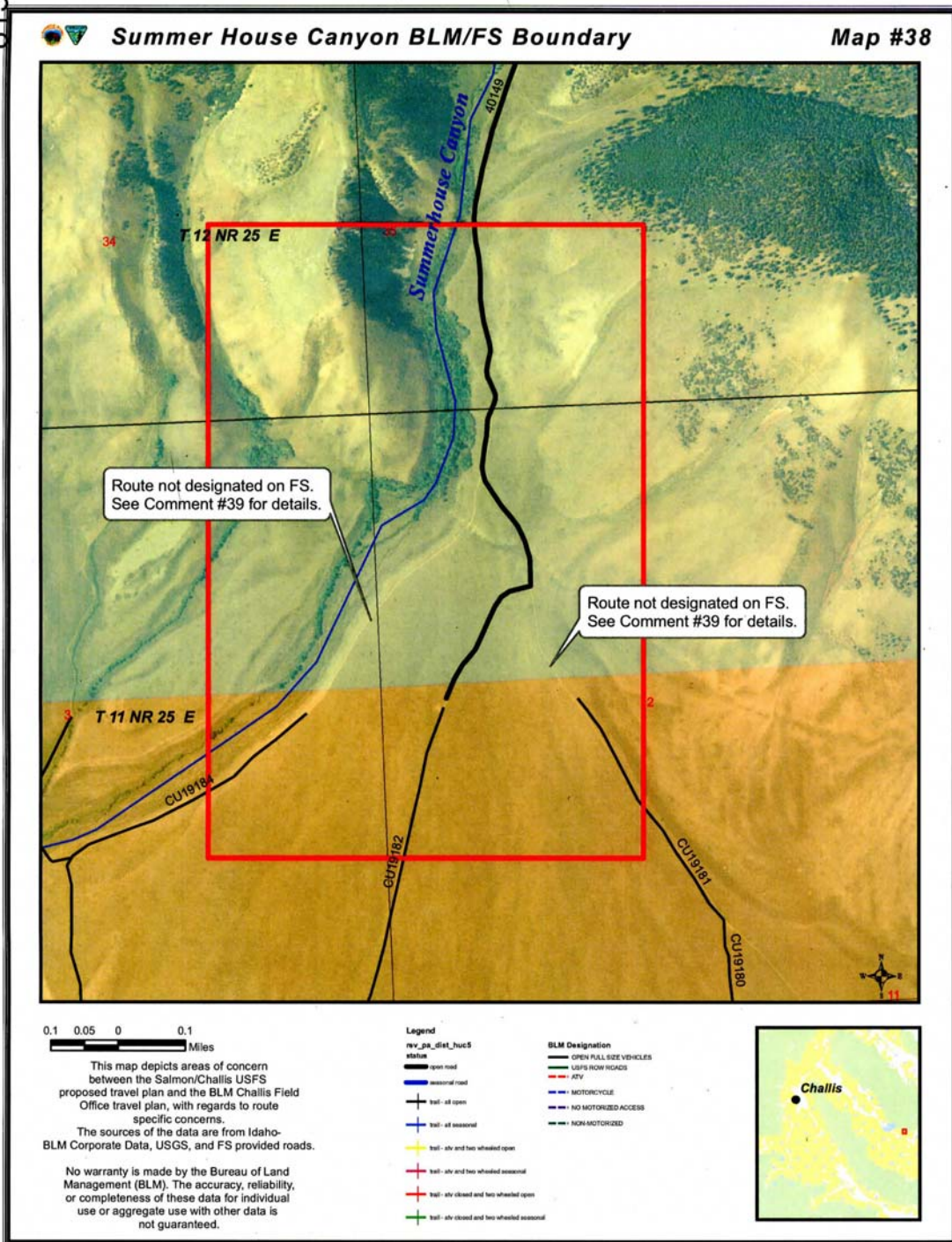
813



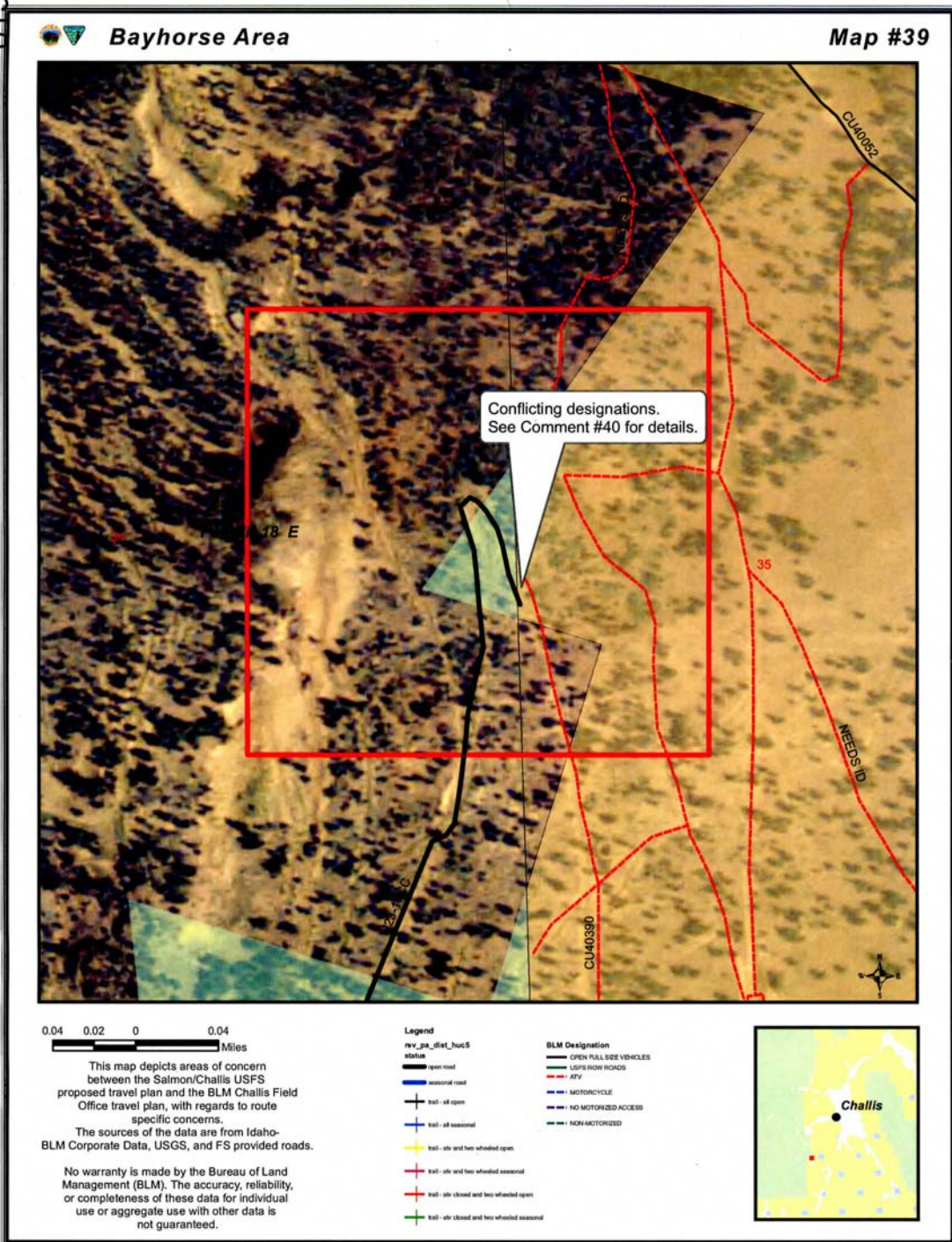
813



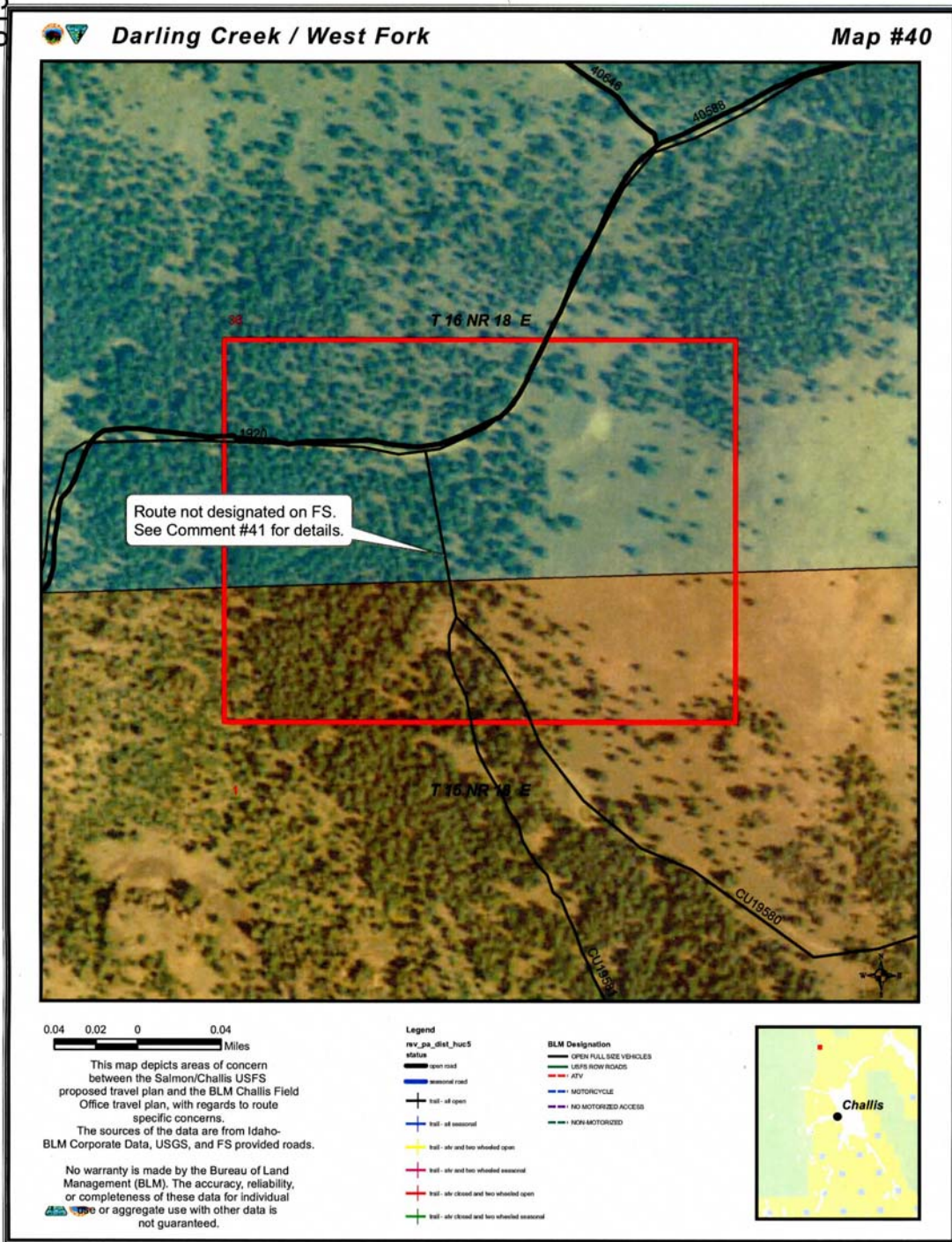
813



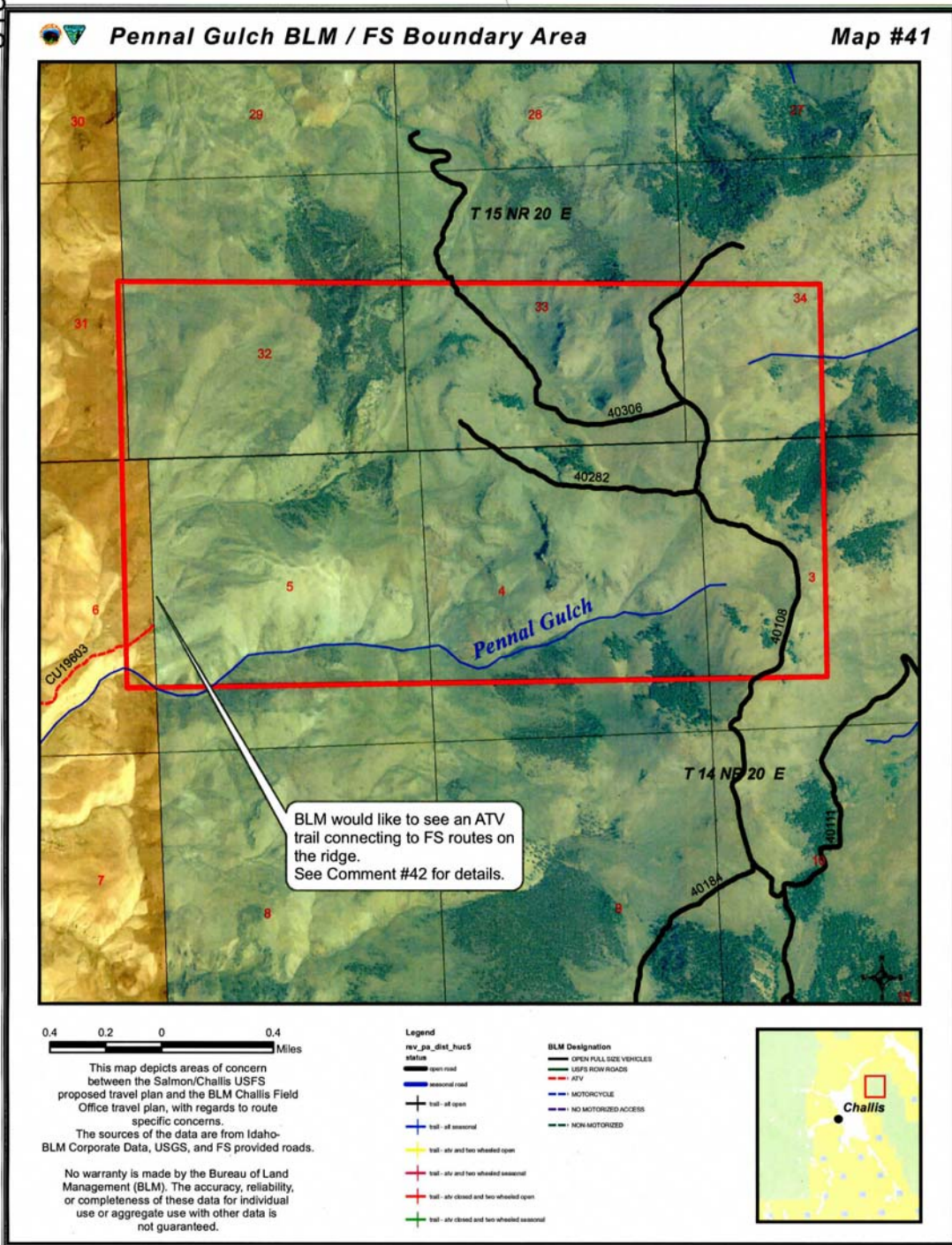
813



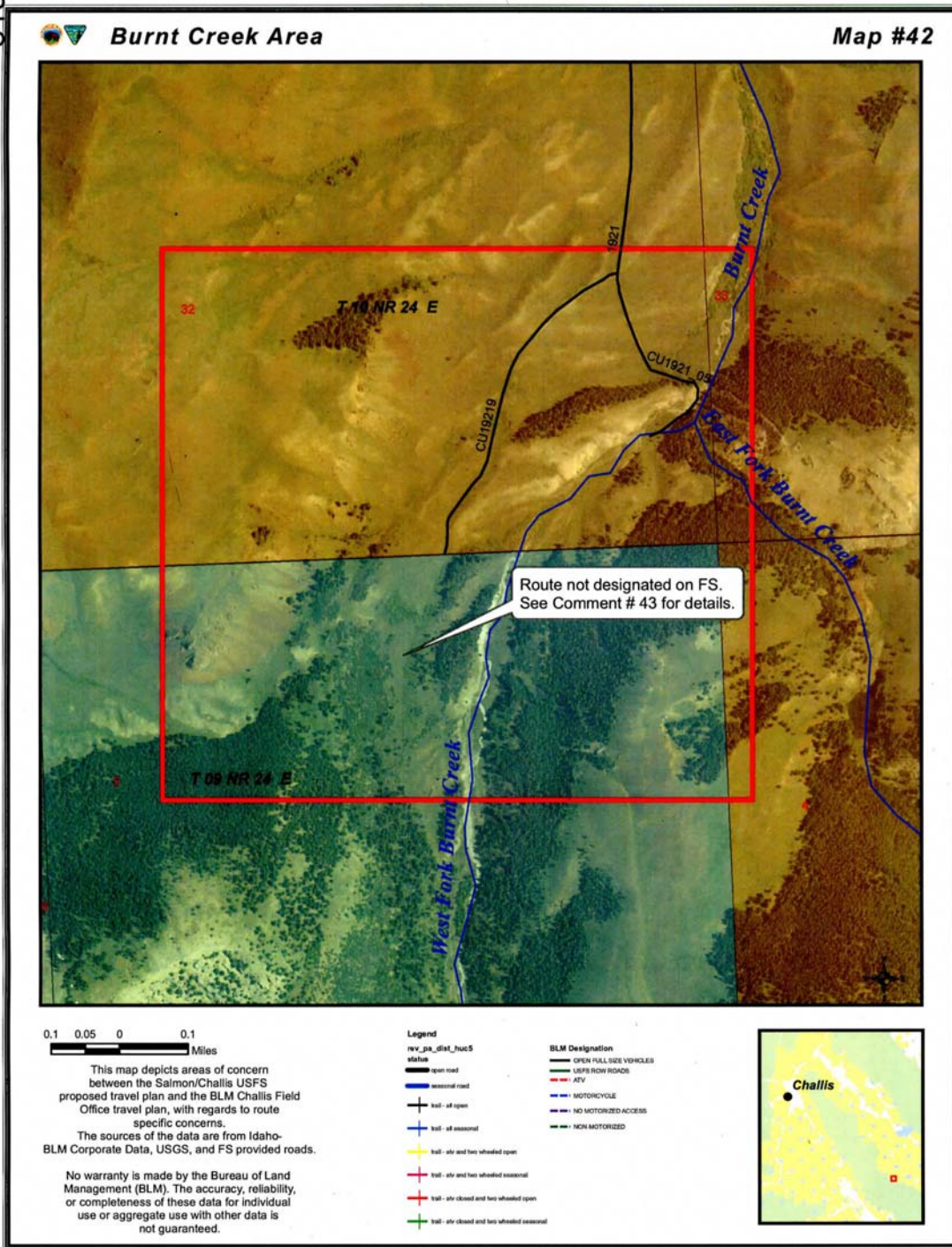
813



813



813





## CITY OF MACKAY

203 SOUTH MAIN  
P.O. BOX 509  
MACKAY, ID 83251  
208-588-2274 Phone & Fax

847

*MAYOR; Otto J. HIGBEE*

*CITY COUNCIL:*

*Cindy Kimball*

*Jared Lambson*

*Mike Foster*

*Kelly Webb*

November 12, 2008

Salmon Challis National Forest  
Travel Management Planning  
Karen Gallogly – Team Leader  
1206 South Challis Street  
Salmon, ID 83467

Dear Ms. Gallogly,

In support of the Mackay Offroad Vehicle Club members I would like to make a few comments regarding the current Travel Management planning process.

***First and foremost, we overwhelmingly support the plan identified as Alternative number 4.*** As you may know, the Lost River Valley is strongly committed to offroad vehicles as a method of promoting tourism in our area and is an economic benefit to our community. This can only be achieved with a high quality system of connecting trails. With that in mind, I make the following suggestions:

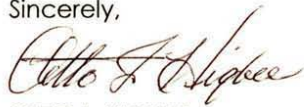
1. Trail #40493 needs to show existing connection to #40143
2. Trail #4347 needs to show existing connection to #40521 and then on to trail #40135
3. Toolbox-Herd Creek trail should remain open
4. Trail #4076 needs to show existing connection to #40101
5. Hunter Creek trail should remain open
6. Black Daisy – Needs to show existing trail connecting the mine with the BLM connector trail
7. Copper Basin – Trail #40515 needs to show existing connection to #40513
8. Cherry Creek – Need to show existing trail connecting Cherry Creek to the Antelope Pass road
9. Burnt Hollow – Need to show existing trail connecting #U042314B to #U042303B

10. Navarre – Need to show existing trail #493 connecting Navarre canyon with Mackay Reservoir

The above listed trails are very important to provide the diverse recreational opportunities that are necessary to promote tourism in our area, as well as providing access to Public Lands for local residents. We further believe there are many existing trails in "A" areas that are not currently inventoried as system trails and have been missed in the designation process.

We appreciate the opportunity to provide input into the travel planning process for the Forest. Please feel free to contact me if you have any questions or concerns on the above mentioned recommendations.

Sincerely,



OTTO J. HIGBEE  
Mayor



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Salmon Field Office  
1206 S. Challis Street  
Salmon, ID 83467

<http://www.id.blm.gov/offices/salmon>



In Reply Refer To:  
1220

October 27, 2008

William Wood, Forest Supervisor  
Salmon-Challis National Forest  
Attn: Travel Planning  
1206 South Challis St.  
Salmon, ID 83467

Dear Bill,

Below are our Field Office comments regarding the ongoing Forest Travel Management and Off-Highway Vehicle Designation Proposed Action. Where a comment addresses a specific route, I have enclosed a numbered map of the route and a corresponding legal description of the location.

Thank you for the opportunity to comment, and please encourage your staff to contact us at any time with any questions you may have. Our travel planning contact here in the Salmon Field Office is Rob Jagers, 756-5466.

### Comment # 1 (Map # 1) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – defer to FS proposed season(s) of use in the area.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

### Comment # 2 (Map # 2) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – defer to FS proposed season(s) of use in the area.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

### Comment # 3 (Map #2) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – defer to FS proposed season(s) of use in the area.

- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 4 (Map # 3) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – defer to FS proposed season(s) of use in the area.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 5 (Map # 4) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – defer to FS proposed season(s) of use in the area.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 6 (Map # 5) Recommendations:

- Recommended Vehicle Type allowed – all.
- Recommended season of use allowed – Closed from 12/16 to 4/30.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 7 (Map # 6) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of range improvements.

Comment # 8 (Map # 7) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access for maintenance of Tendoy Pipeline range improvements.

Comment # 9 (Map # 8) Recommendations:

- Recommended Vehicle Type allowed – all.

- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access. It would be helpful to keep loop connectivity to facilitate travel management and provide turn around opportunities.

Comment # 10 (Map # 9) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access. It would be helpful to keep loop connectivity to facilitate travel management and provide turn around opportunities.

Comment # 11 (Map # 10) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access to range improvements.

Comment # 12 (Map # 11) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access to range improvements.

Comment # 13 (Map # 12) Recommendations:

- Should these trails connect?

Comment # 14 (Map # 13) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access through admin site.

Comment # 15 (Map # 14) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access to Nez Perce range improvements.

Comment # 16 (Map # 15) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access. Cutoff provides logical access to and from the South.

Comment # 17 (Map # 16) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access to range improvements.

Comment # 18 (Map # 17) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access.

Comment # 19 (Map # 18) Recommendations:

- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public lands, and administrative access up Wikum trail.

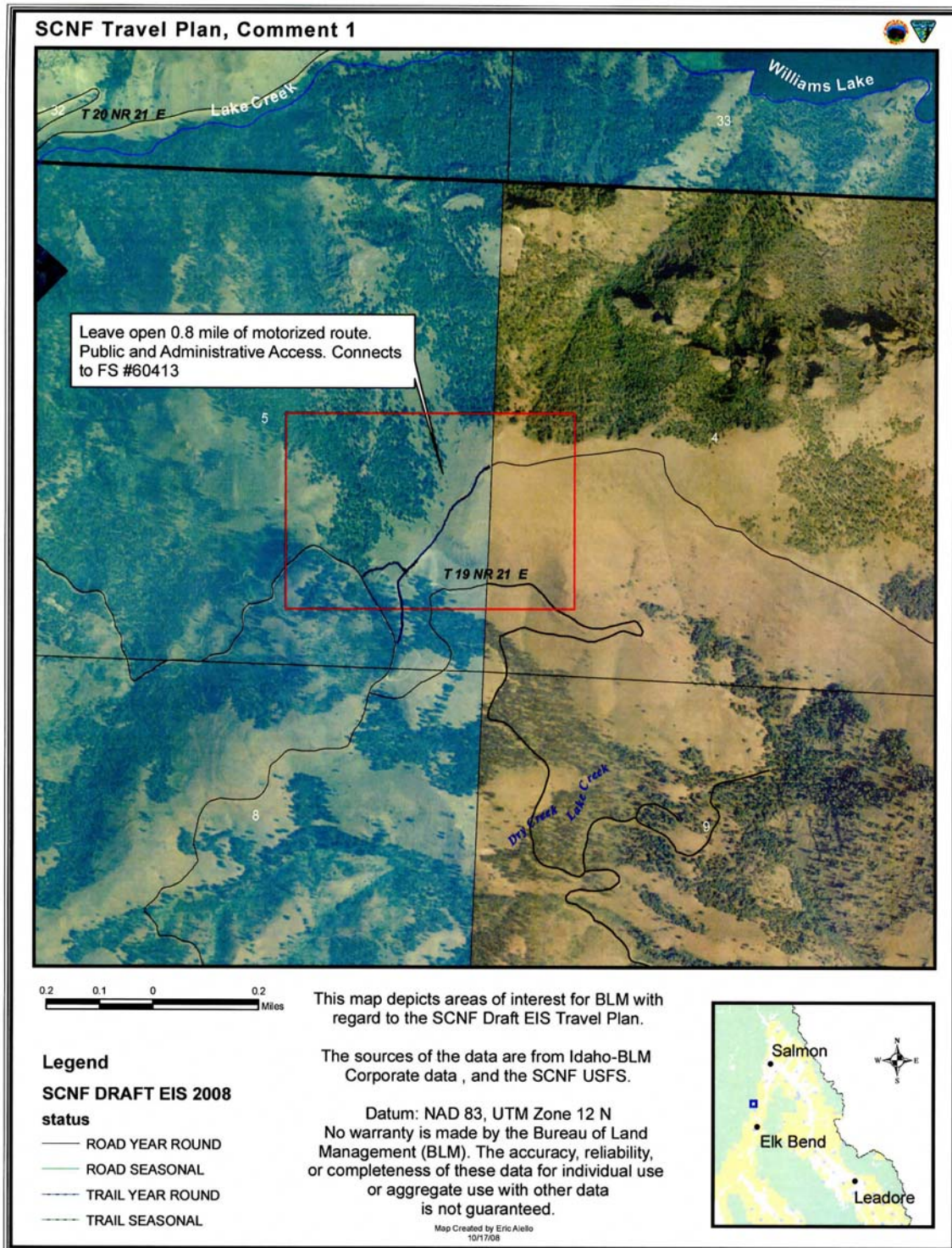
Comment # 20 (Map # 19) Recommendations:

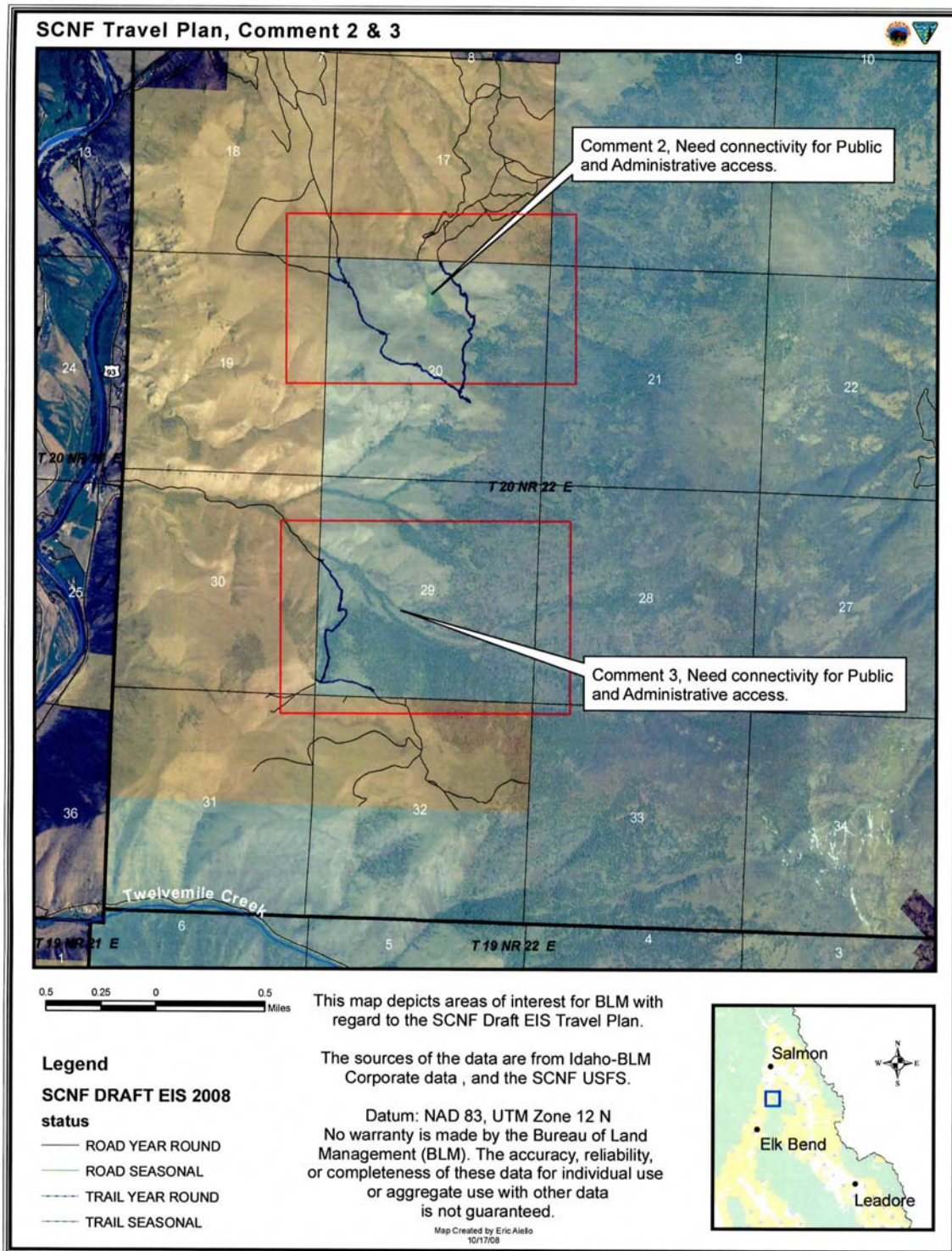
- Recommended Vehicle Type allowed – all.
- Compelling Reason if this is a change to the Proposed Action - provide recreational access for connectivity to BLM or public land.

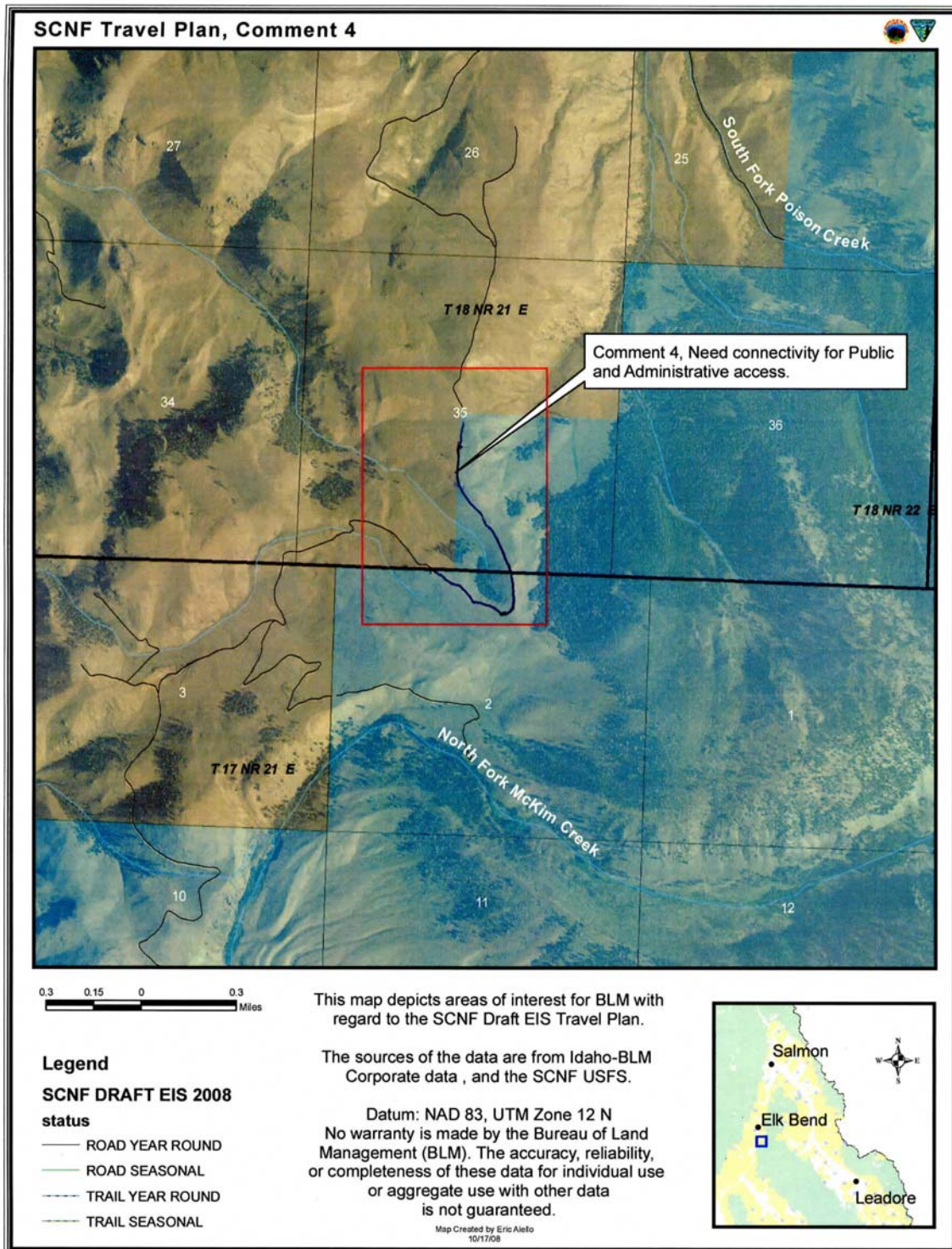
Sincerely,

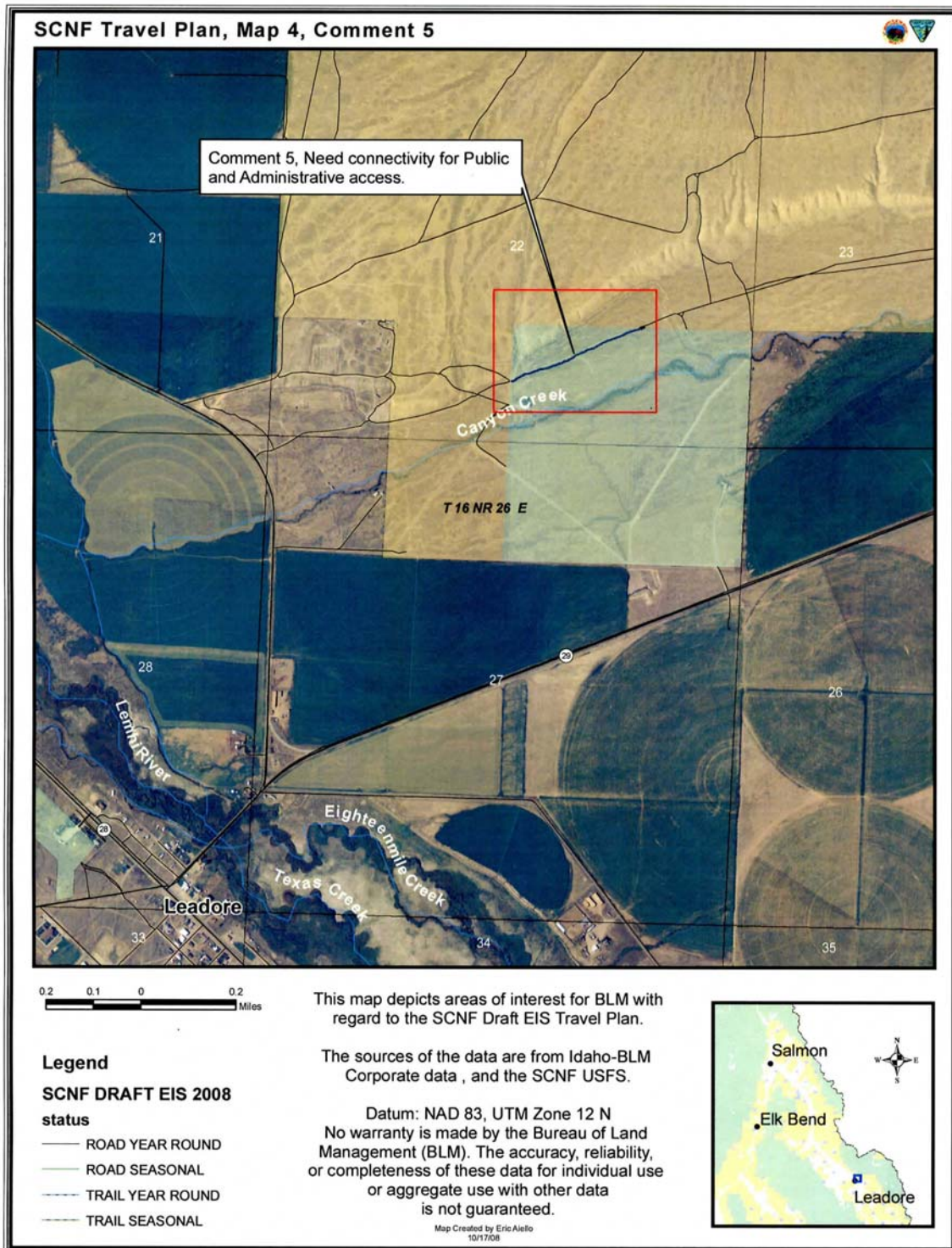
Steven Hartmann  
Salmon Field Office Manager

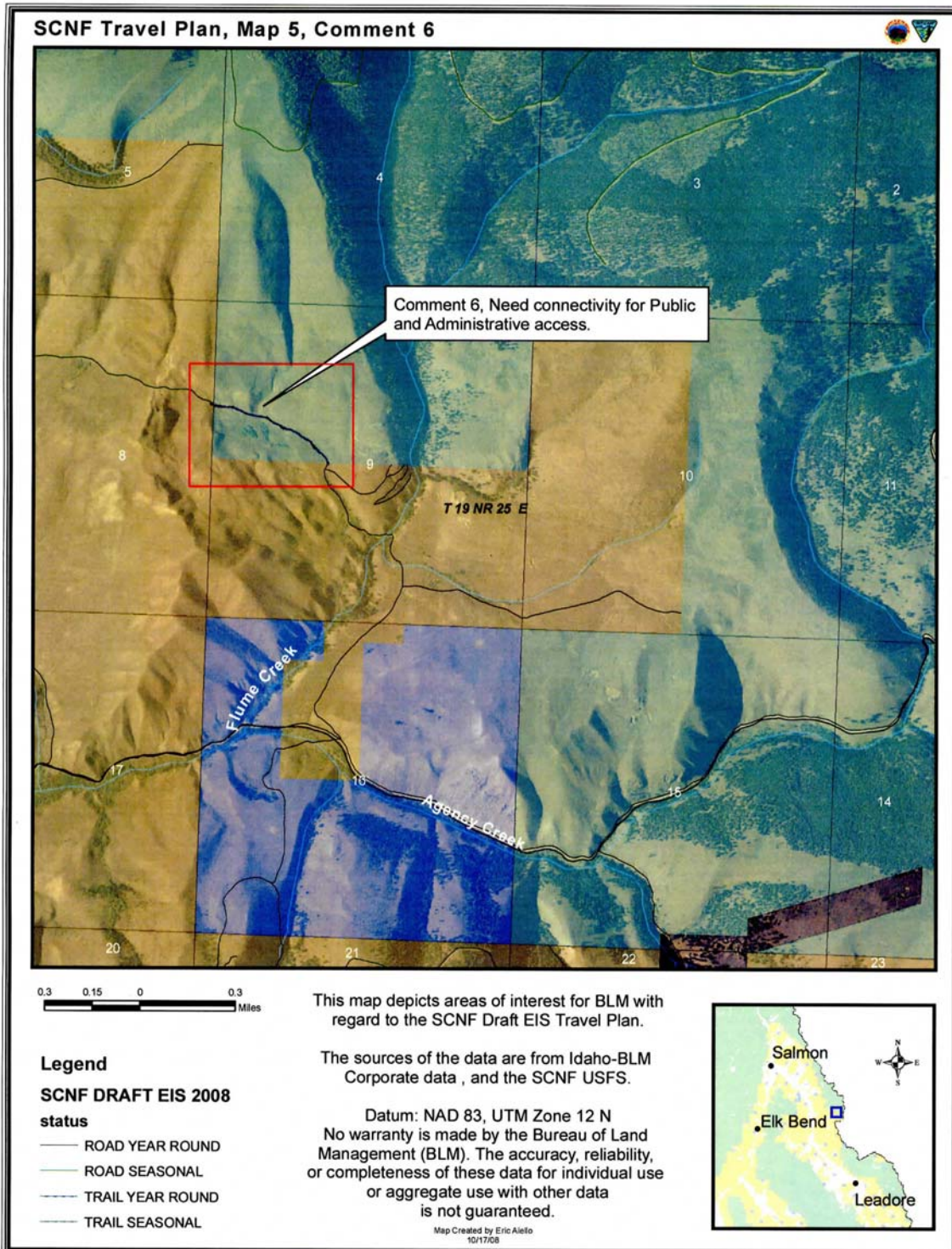
Enclosed: 19 maps – comments 1-20

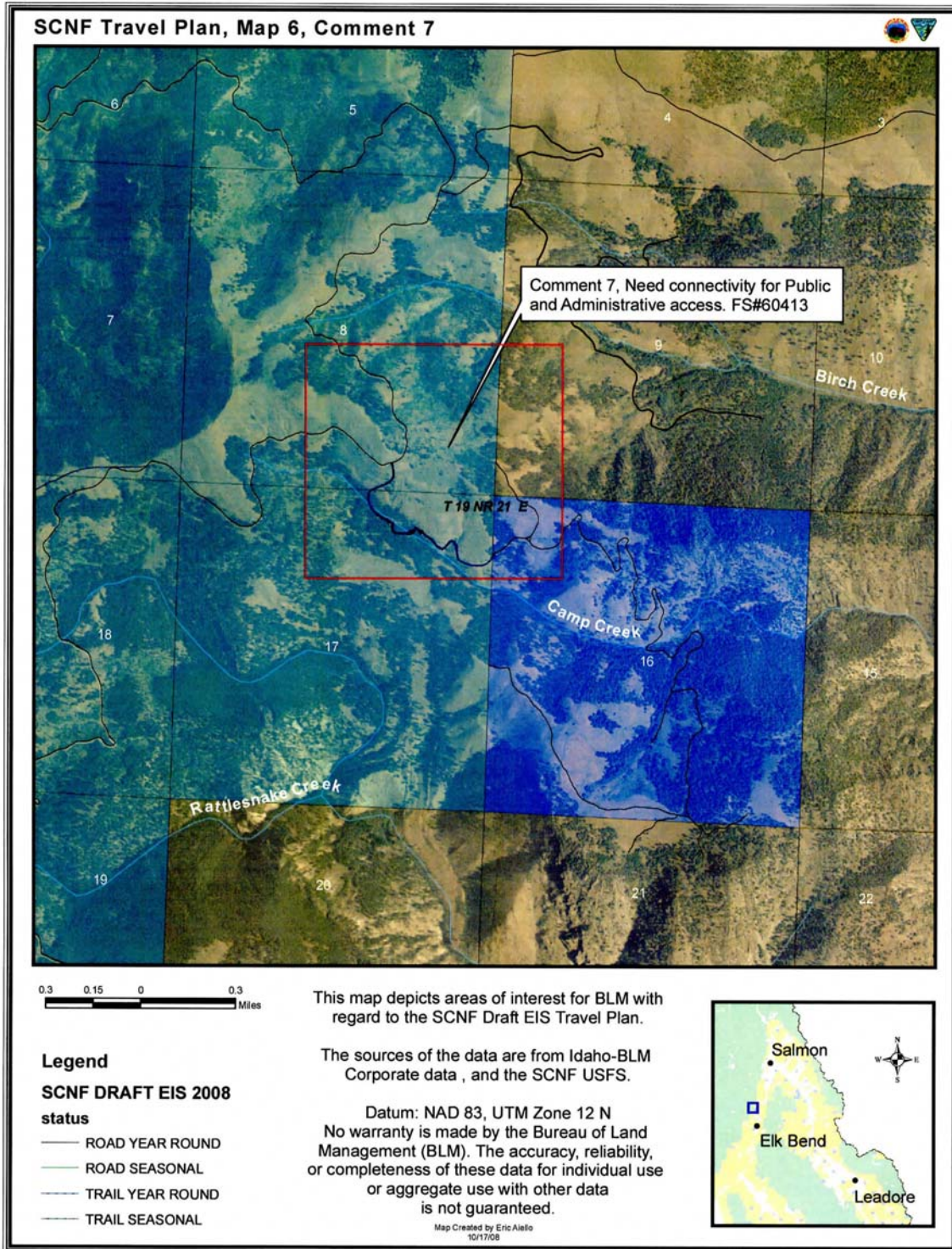


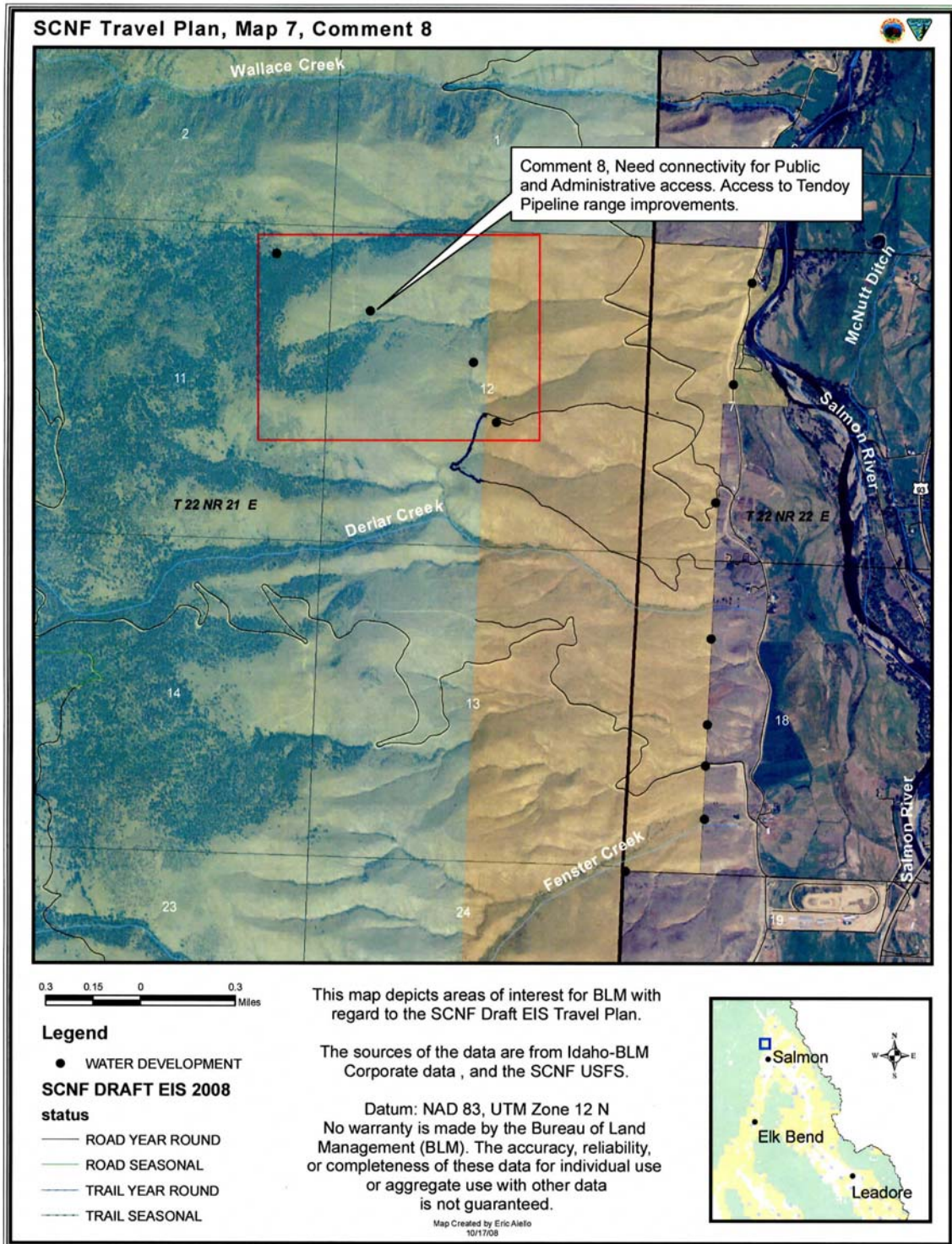


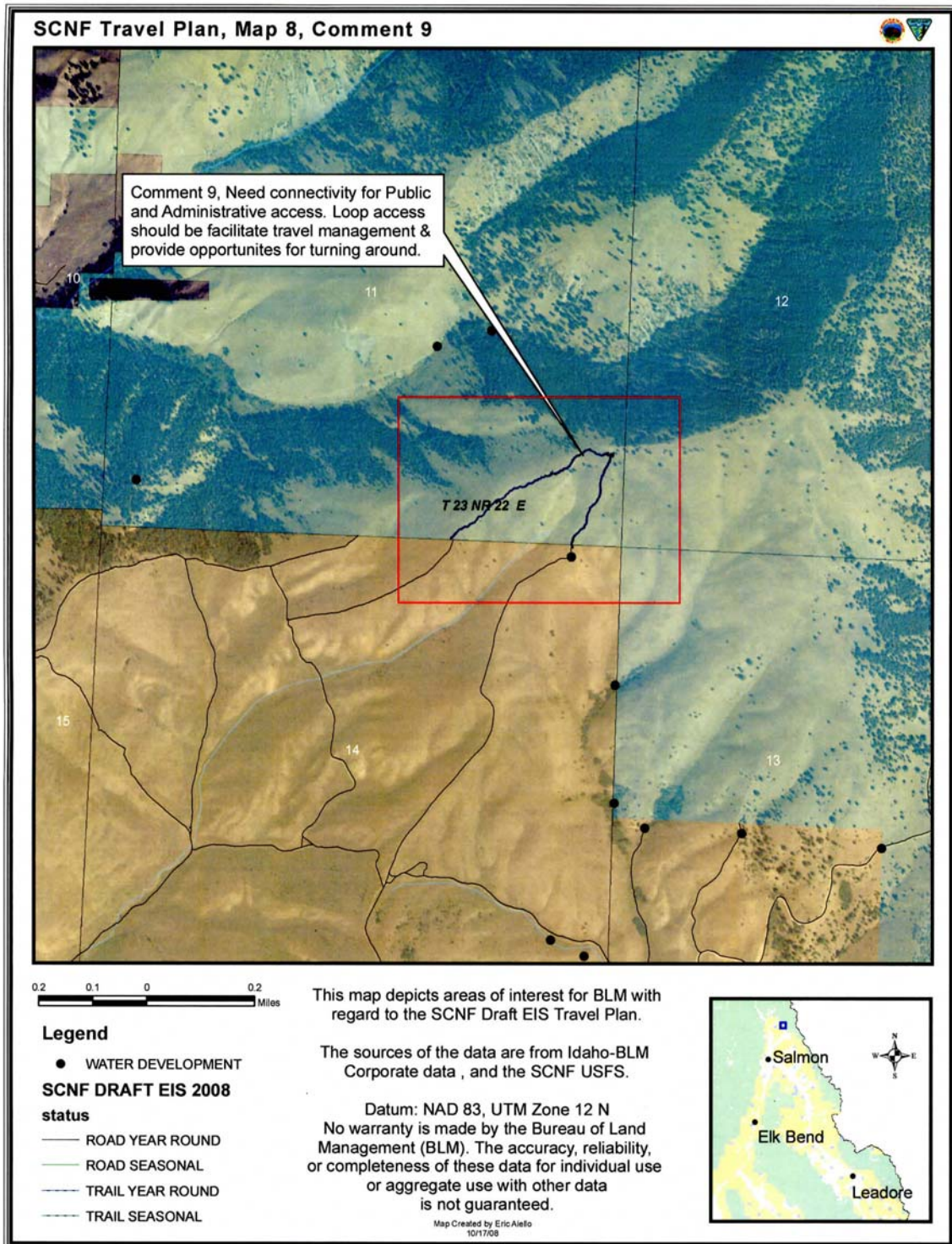


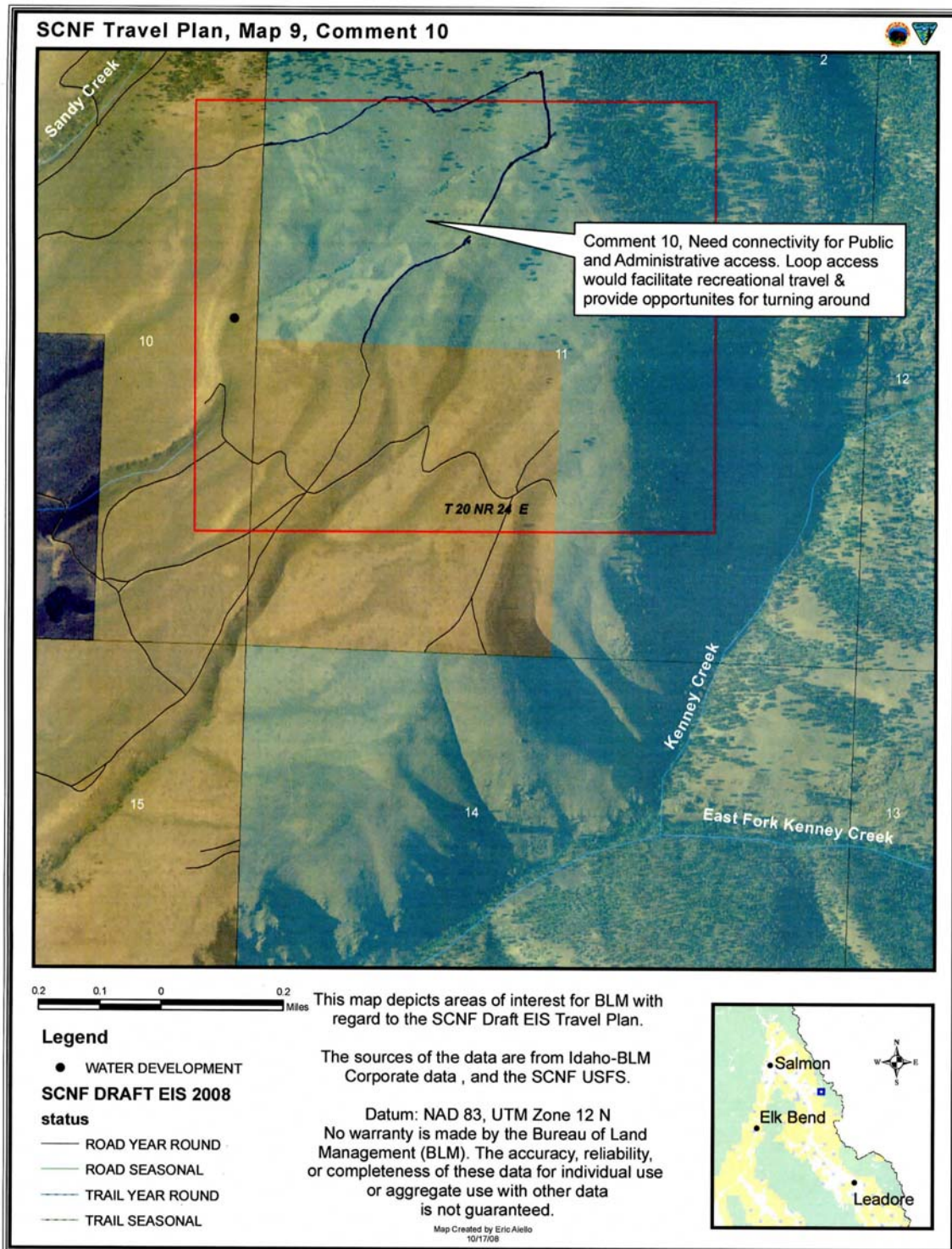


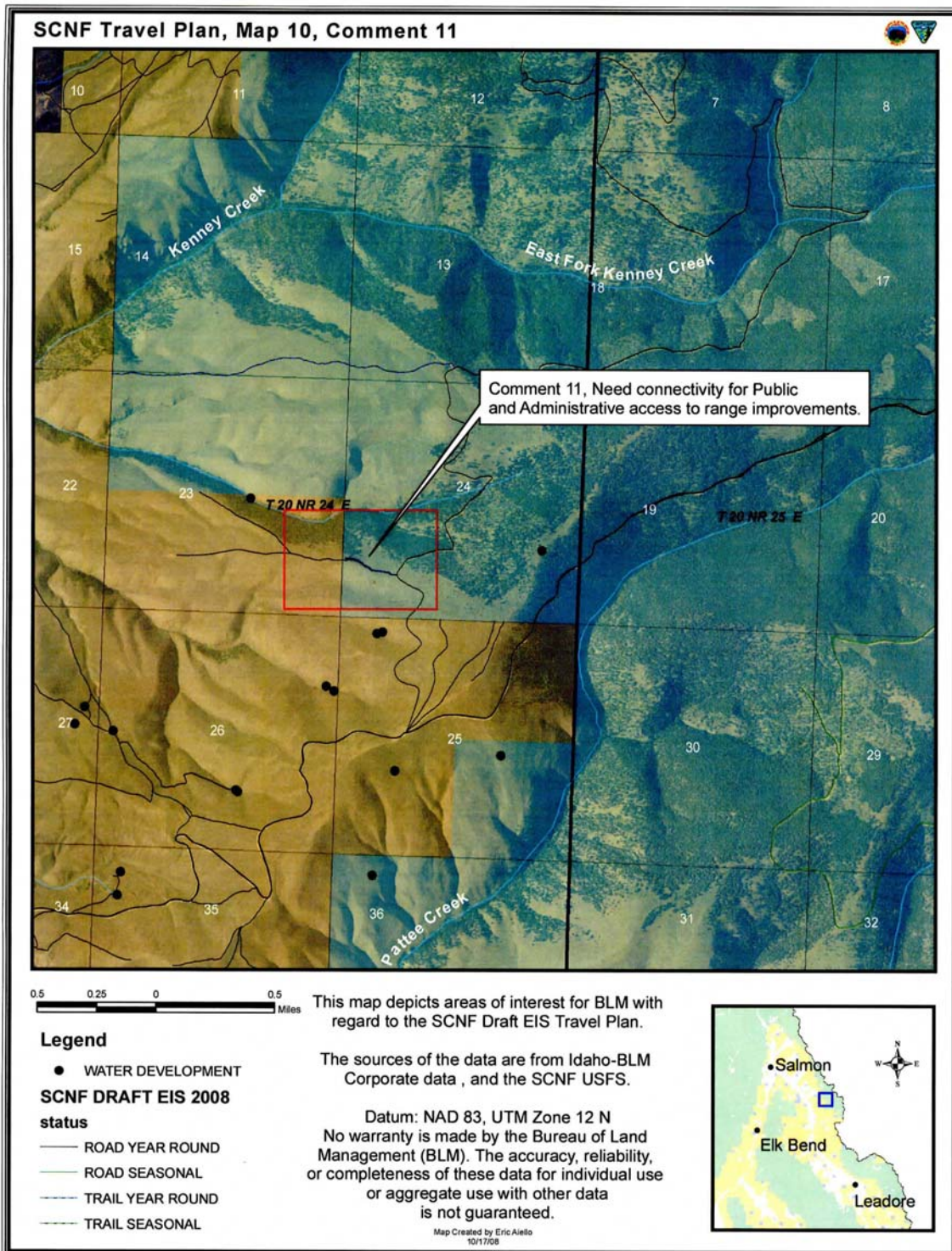


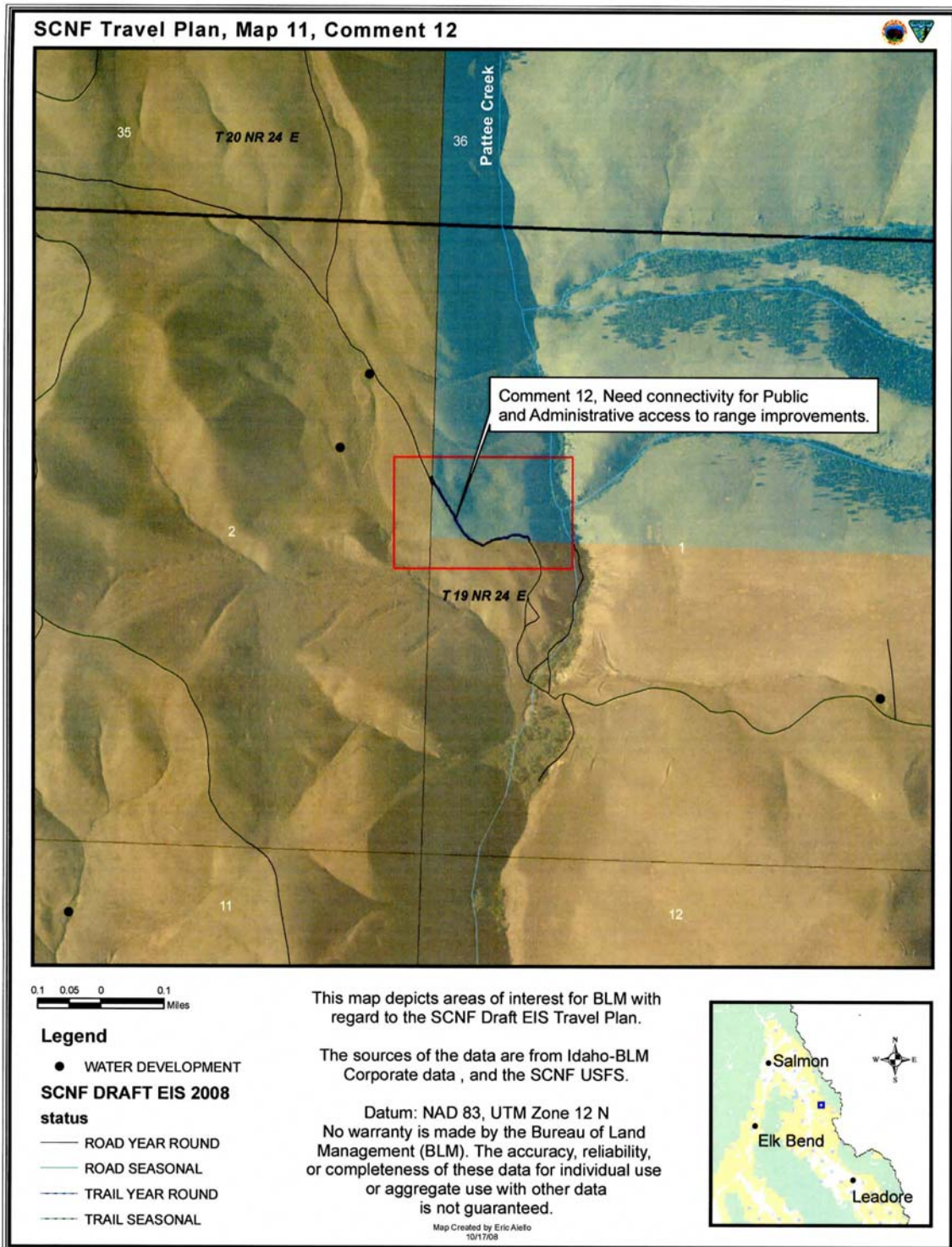


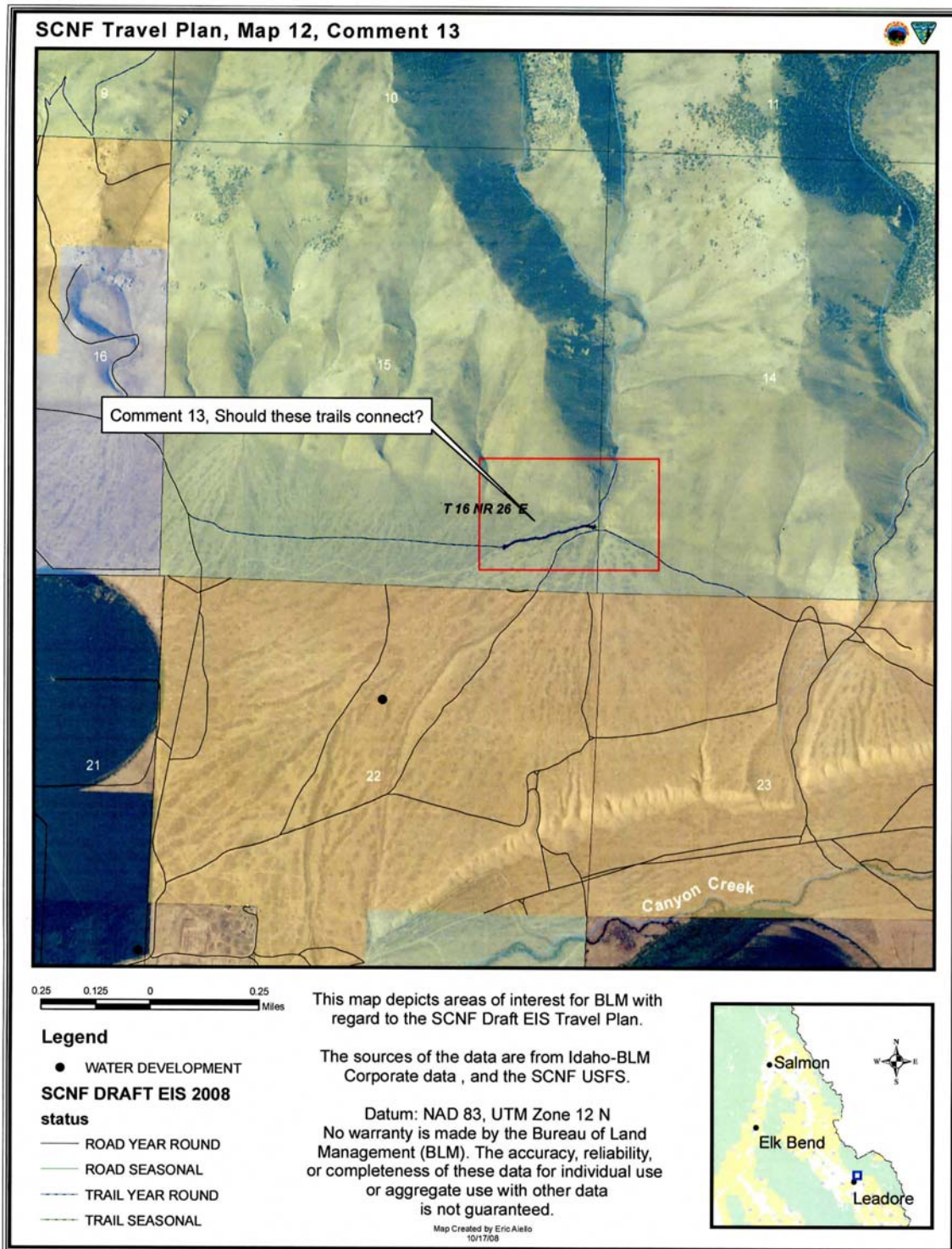


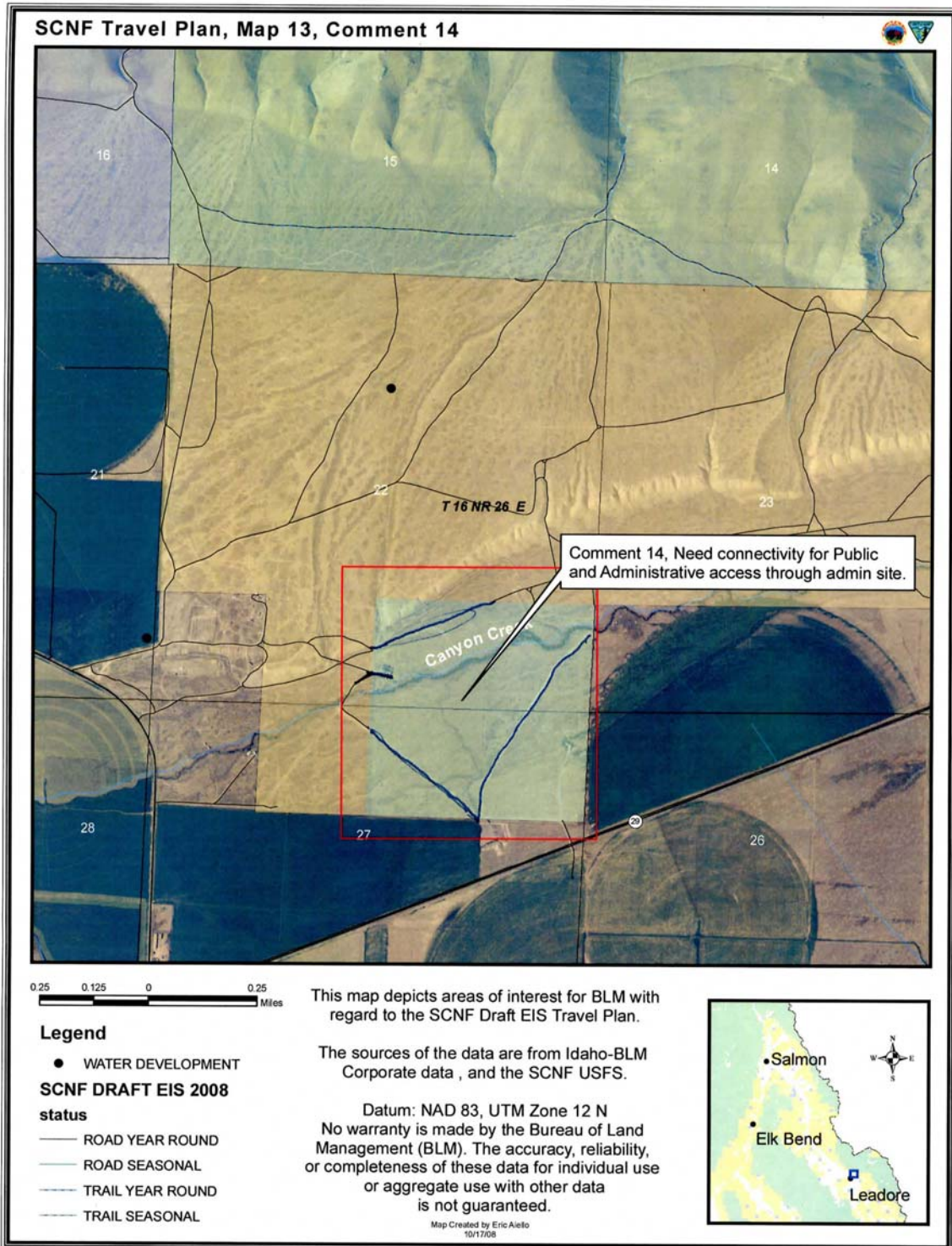


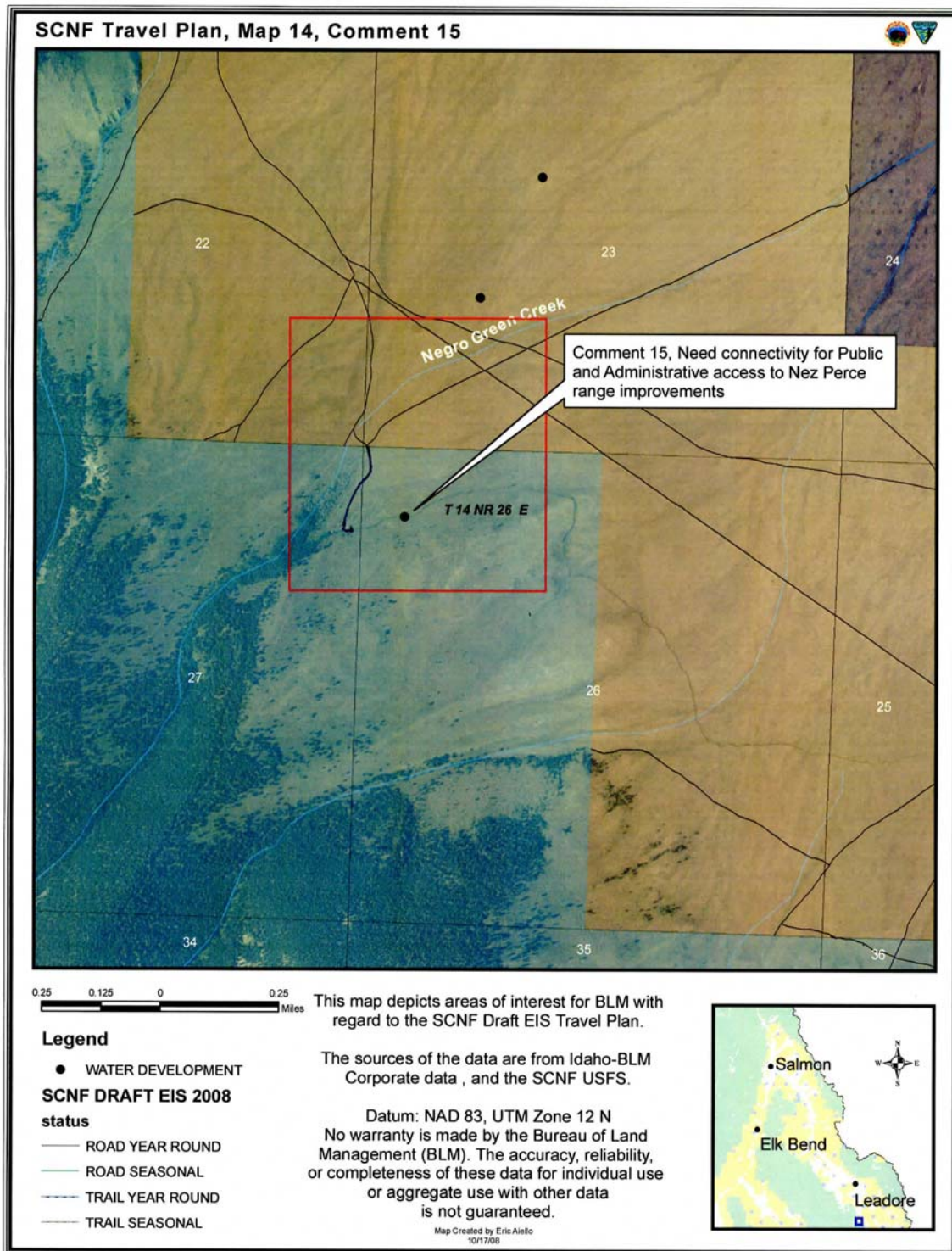


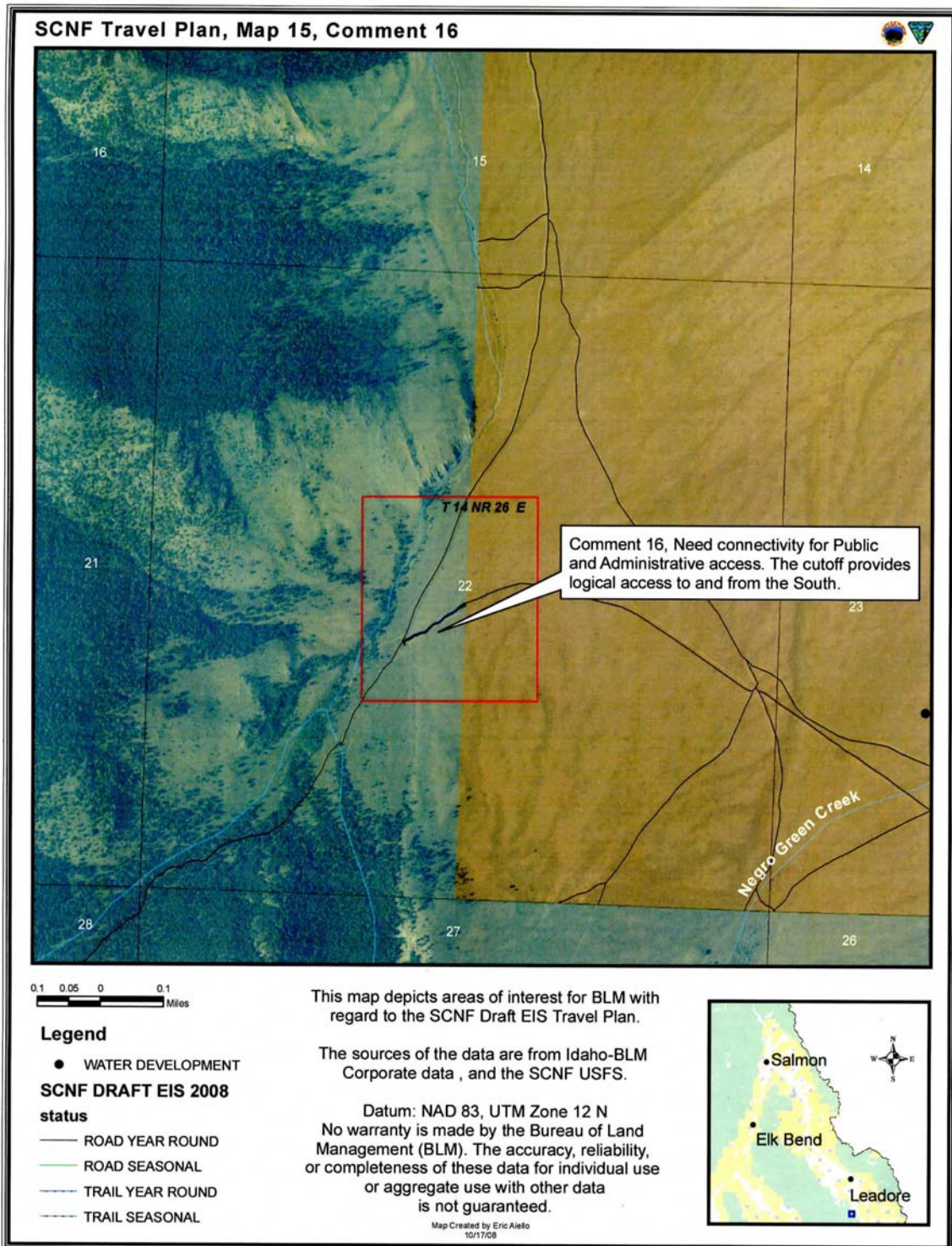


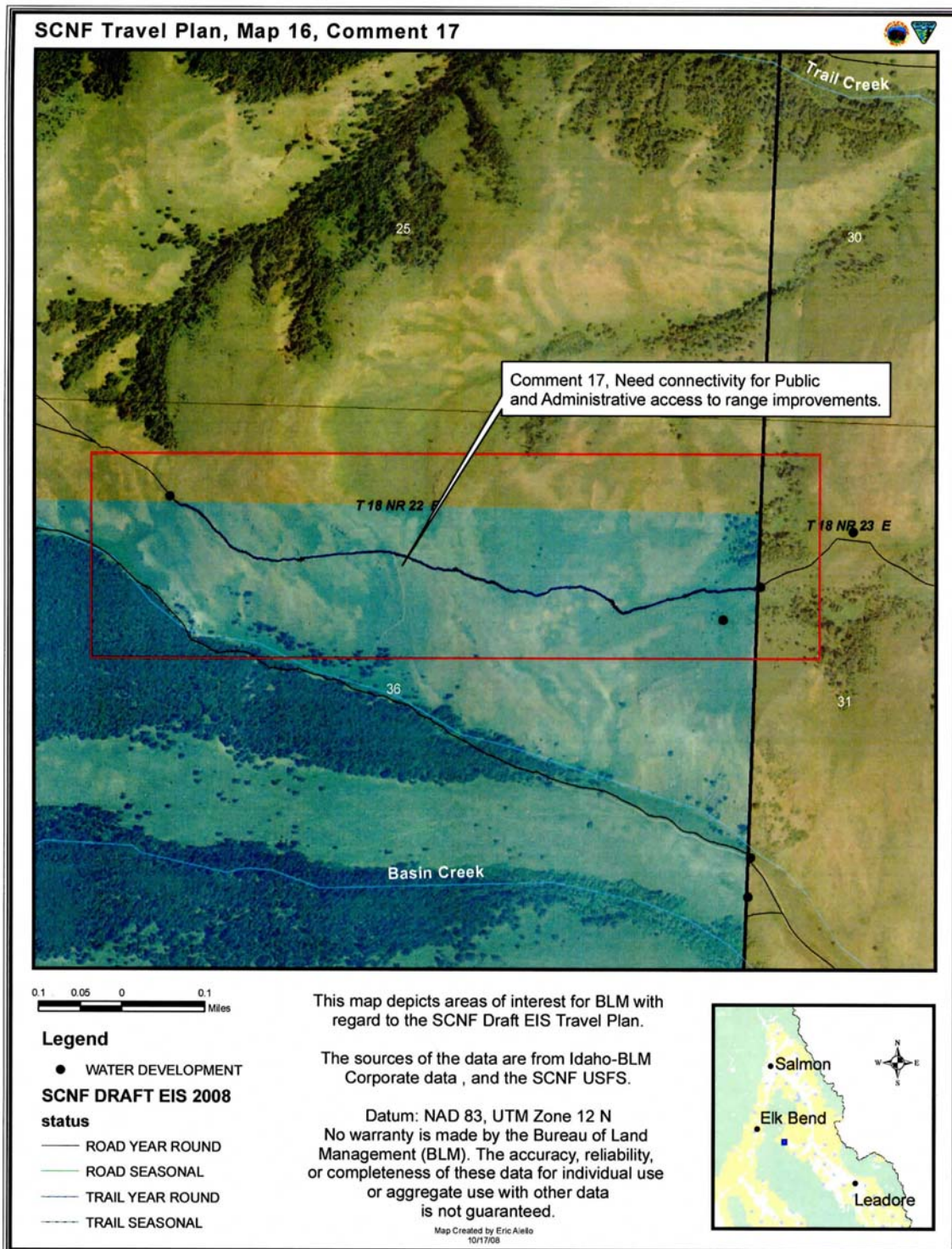


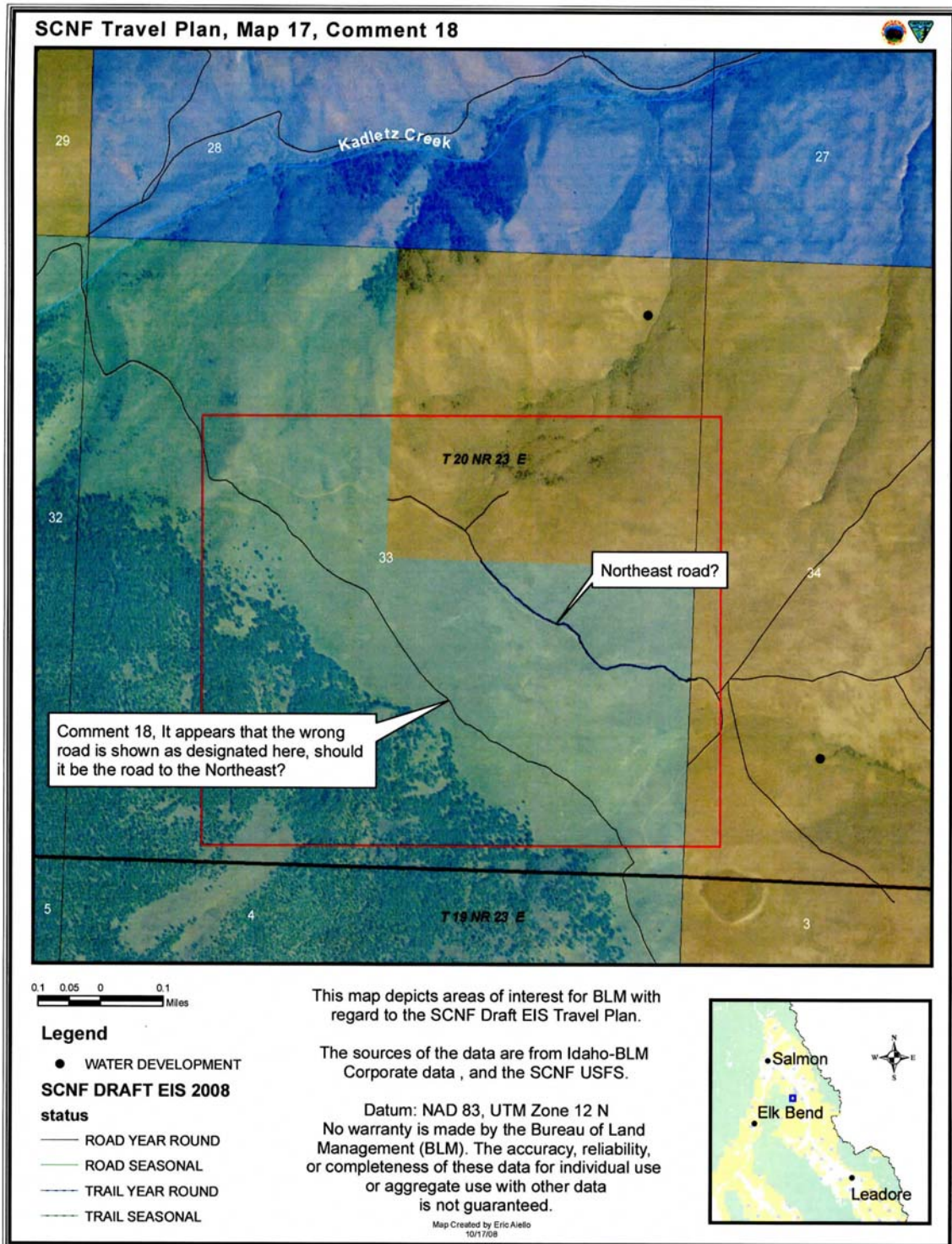


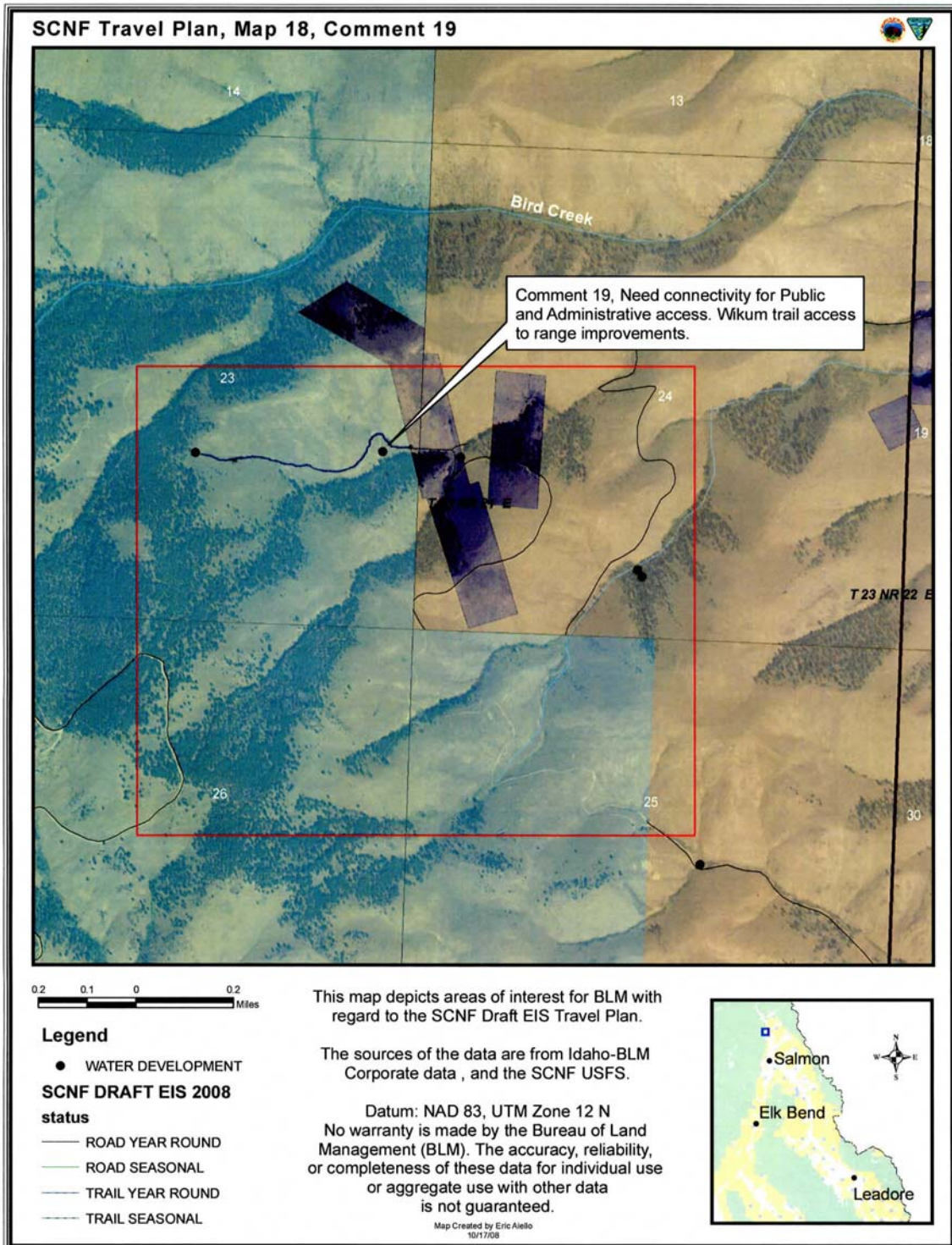


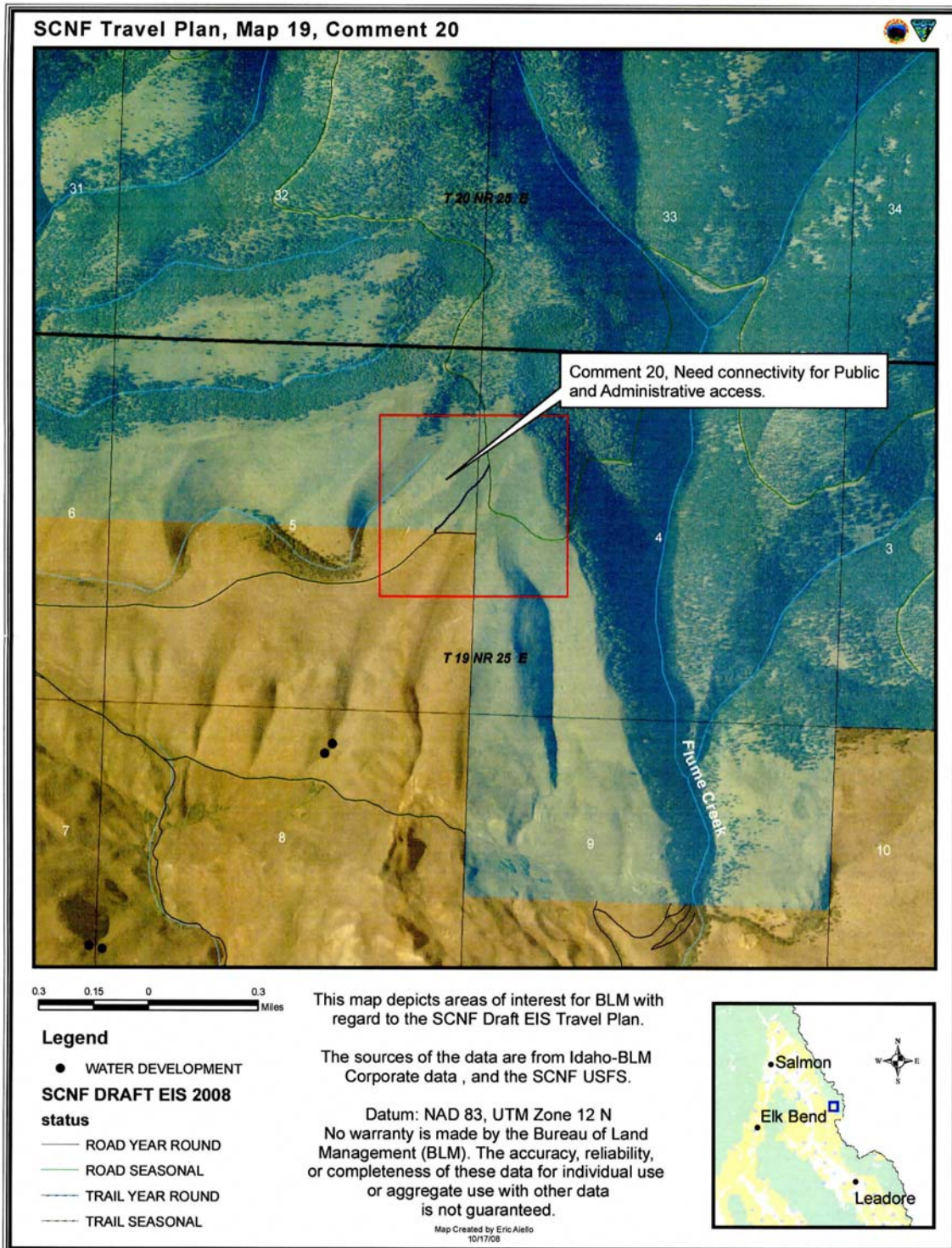














**C. L. "Butch" Otter**  
governor

**Robert L. Meinen**  
director

**Dean Sangrey, Administrator**  
operations division

**David Ricks, Administrator**  
management services division

IDAHO PARK AND  
RECREATION BOARD

**Steve Klatt**  
region one

**Randal F. Rice**  
region two

**Ernest J. Lombard**  
region three

**Latham Williams**  
region four

**Jean S. McDevitt**  
region five

**Douglas A. Hancey**  
region six

IDAHO DEPARTMENT OF  
PARKS AND RECREATION

p.o. box 83720  
boise, idaho 83720-0065

(208) 334-4199

fax (208) 334-3741

tdd 1-800-377-3529

street address  
5657 Warm Springs Avenue

[www.parksandrecreation.idaho.gov](http://www.parksandrecreation.idaho.gov)

November 26, 2008

William A. Wood, Forest Supervisor  
Salmon-Challis National Forest Supervisor's Office  
1206 South Challis Street  
Salmon, ID 83467



RE: Travel Planning and OHV Route Designation Draft Environmental  
Impact Statement (DEIS)

Dear Mr. Wood:

### General Comments

The Idaho Department of Parks and Recreation (IDPR) staff reviewed the Salmon-Challis National Forest Travel Planning and OHV Route Designation Draft Environmental Impact Statement (DEIS). The Salmon-Challis National Forest (SCNF) proposes travel planning and OHV route designation on 3.1 million acres of National Forest System (NFS) lands, excluding the Frank Church River of No Return Wilderness Area.

Travel Planning and OHV route designation for the SCNF is long overdue. The last travel plan update for the Salmon National Forest was completed in 1988. The latest travel plan update for the Challis National Forest was in 1994.

The IDPR supports responsible OHV Recreation. The department has long advocated for OHV use on designated routes. These routes also have to be designated by use type (ATV, Motorcycle, and UTV).

The Salmon National Forest Travel Plan did not designate for use types on many routes. It left large areas open to motorized cross-country travel. The Challis National Forest Travel Plan did designate for use types, but left some large areas open to motorized cross-country travel.

The USFS Motor Vehicle Use Rule requires the SCNF to designate routes for motorized use by use types. The rule also allows the SCNF to designate small discrete areas for cross-county motorized use.

The rule also allows the SCNF to designate some unauthorized routes for motorized use. These unauthorized routes have been created through a variety of different means other than just motorized recreation use. Both permitted and administrative activities also created unauthorized routes.

The IDPR supports designating unauthorized routes in certain limited circumstances. The route should provide a looping opportunity or lead to a scenic destination or dispersed camp site. Dead-end routes that don't provide these opportunities should be eliminated.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 2

The IDPR has good knowledge of many of the routes covered by the Travel Plan. Our staff has recreated and worked on the SCNF for over 30 years. We have witnessed the changes in vehicle types and the amount of use with OHV Recreation.

The IDPR has provided specific comments before the scoping period, during scoping, and the release of the revised proposed action. Our agency found and notified the SCNF of the errors in the original proposed action. At every comment opportunity, we requested cooperating agency status on either a formal or informal basis. The SCNF did not grant IDPR cooperating agency status. Lack of communication between our agencies has led to problems with some of the indicators used in the DEIS and with some of the alternatives. The interdisciplinary team should correct these errors in the FEIS. We would also encourage the development of another alternative that resolves many of the issues.

Cooperating agency status with state agencies can be of a great benefit to the Forest Service. State agencies can provide additional route knowledge, expertise with recreation activities, and additional reference sources.

The Motor Vehicle Use Rule requires National Forest to develop a free Motor Vehicle Use Map (Travel Map). The Salmon Challis National Forest has unusual boundaries that split some mountain ranges and route systems into three different Ranger Districts. Rather than relying on just one map for an entire district that was supplied in the DEIS, the SCNF should develop maps that target specific popular outdoor recreation areas like Cape Horn, Copper Basin, Bayhorse, and Sawmill Canyon. Maps like these will show the connecting roads and trails. The Caribou-Targhee National Forest did this with the development of the Big Hole Travel Plan<sup>1</sup>.

The ID Team did a great job of avoiding converting any IDPR grant funding trail projects. The IDPR looks forward to working with the SCNF to properly sign, maintain, construct, and enforce recreation route opportunities. In an era of declining federal land management agencies budgets, it is critical that our agencies work together in providing quality recreation route opportunities while protecting resources.

The new travel plans would follow National direction for signing and maps. Our staff has seen quite a few examples of the new travel plan maps. These maps are very hard for the public to understand. The maps are at a large scale and lack in significant geographic features. For the new travel plan maps to be understandable, the SCNF should place drainages and peaks on the new travel plan map. These features are much more useful for navigation than Township and Section lines.

Utility vehicle (UTV) manufacturers are starting to make UTVs that are only 50 inches wide ([RZR](#)). These vehicles meet the definition of a 50 inch trail. These vehicles are heavier and have longer wheelbases than ATVs. These vehicles may be appropriate on some ATV (under 50") routes and not appropriate for other ATV routes. The SCNF should consider designating routes by vehicle type as well as vehicle width.

One of the project design features is the ATV Trail Condition Assessment. This assessment requires qualified personnel complete an ATV Trail Condition Assessment on all new ATV routes to identify problems, recommend corrective measures and to establish a baseline for future monitoring. There are many existing routes that ATVs are currently using that also need an assessment. Many of these routes

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 3

were not specifically constructed for ATV use. These routes will need a trail condition assessment as well.

### **Specific Comments**

#### **Chapter 2 Range of Alternatives Comments**

The ID Team developed and analyzed five alternatives in detail. This is a wide range of alternatives; however, there are problems with several alternatives that should be fixed.

Alternative 0 is the no-action alternative and represents no change from current management. Alternative 1 is the designated route alternative. This alternative would only designate routes. These two alternatives provide a baseline to compare the rest of the range of alternatives. These alternatives designate many routes that can't accommodate specific vehicle types like ATVs and Jeeps. If a trail's present condition is not specifically designated, it should have been marked as undesignated for specific vehicle use types, not marked for all motorized vehicles.

Alternative 2 is the revised proposed action. This alternative designates fewer roads and trails than Alternative 1. This alternative went out for public comment this last summer. We responded to this Alternative.

Alternative 2 designates some ATV opportunities on existing single-track motorized trail opportunities like the Basin Creek Trail. The Basin Creek Trail #4032 would have to be reconstructed to accommodate ATV use.

This alternative has route designations that aren't consistent across Ranger Districts. The Sawmill Canyon area is covered by three Ranger Districts (Challis-Yankee Fork, Lost River, and Leadore). The Big Gulch Trail #4110 is seasonally designated for motorcycle use. The trail dead-ends into a non-motorized trail under the proposed action. With these opportunities conflicting, it can result in user conflict and travel plan violations.

Alternative 3 emphasizes recommended wilderness and roadless values. This alternative designates the least amount of motorized routes across the range of alternatives.

The major problem with this alternative is that it goes far beyond not designating any new motorized routes in roadless areas. This alternative removes most of the single-track motorized trail opportunities. This alternative did not need to close single-track motorized trails in order to respond to these issues.

A more moderate Alternative 3 would have removed motorized use from recommended wilderness areas. In order to protect roadless area values, this alternative should not have upgraded any motorized routes from single-track motorized to ATV use. This alternative should also have downgraded some ATV routes into single-track motorized. These actions protect roadless area values without reducing historical motorized access.

Alternative 4 maximizes motorized opportunities on designated routes. This alternative includes 2% more designated routes than currently authorized on the Salmon-Challis National Forest.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 4

This alternative does not designate dispersed campsites in the Salmon River Road Corridor. We believe that designating campsites along this corridor would be beneficial. The SCNF can map and sign these campsites along the Salmon River Road. Anyone camped outside of a signed camp site would be in violation of the designated camp site rule. Proper mapping and signing can make designated camp sites possible. We encourage the SCNF to designate camp sites in the Salmon River Road Corridor in the final decision.

Alternative 4 designates several routes for ATV use when the trail tread width is too narrow to accommodate ATV use. For example, the Peach-Cinnabar Trail #4162 would have to be reconstructed to accommodate ATV use. This travel planning process does not conduct any construction-related activities. Trails such as these should be dropped from the final decision. We will identify many of these routes in the route specific comments, but the interdisciplinary (ID) team should closely analyze the public comments to identify more of these routes.

The range of alternatives address mixed use traffic as a common feature. The DEIS states, "State of Idaho law allows for motorized mixed use of licensed drivers in registered OHVs and highway legal vehicles on unpaved NFS roads designated as open to motorized public travel." This statement is partially correct.

Idaho Law governing OHVs on unpaved NFS roads deals with vehicle registration requirements. OHVs operating on roads still have to have a licensed operator, liability insurance, and assorted equipment. Idaho Law through House Bill 602<sup>ii</sup> gives federal agencies the ability to restrict OHVs from some NFS roads. If the SCNF is going to restrict OHVs from specific open motorized roads, the IDPR requests to be a part of that discussion.

The IDPR and IDFG worked together on analyzing the range of alternatives. A major problem with all alternatives is the number of different seasonal closures. The SCNF should be trying to reduce the number of seasonal closures. Fewer seasonal closure dates will make the new travel plan much easier to understand. This will lead to fewer travel plan violations. We recommend the following closure dates:

- Season Code 1 open from Friday before Memorial Day Weekend through Labor Day (closed after Labor Day).
- Season Code 2 open from July 1st to September 30th.
- Season Code 3 open from July 1st to November 15th.

Season Code 1 provides a balance between bow hunters and motorized recreationists. The Labor Day weekend is a major holiday weekend for many motorized recreationists. It represents the last major holiday of the summer season. Relatively few bow hunters actually hunt during Labor Day weekend. The combination of numerous visitors and animals not being in the rut makes bow hunting more difficult during this time period. Some hunters might use this opportunity to haul gear into remote hunt camps, but once seasonal travel regulations are understood by the general public, this issue should be resolved.

Season Code 2 provides a seasonal motorized recreation experience that protects calving and fawning habitat as well as providing a general hunting non-motorized opportunity outside of a Wilderness

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 5

setting. This seasonal restriction would also help protect the trail tread by keeping motorized uses off of routes during wet season periods.

Season Code 3 provides a seasonal motorized recreation experience that protects calving and fawning habitat while providing a general hunting motorized opportunity. With ATV participants more than twice as likely to hunt than non-ATV participants<sup>iii</sup>, providing ATV hunt opportunities on the SCNF is important. This seasonal code also prevents motorized vehicles operating during the winter period and would protect wintering wildlife species.

The DEIS presents recreation-related issue indicators starting on Page 2-21. One issue indicator is "Miles of motorized routes w/i Primitive (P) and Semi-Primitive Non-motorized (SPNM) ROS classes". This indicator does not present the full picture of non-motorized opportunities on the SCNF.

Non-Motorized Recreation Activities can be found throughout the Recreation Opportunity Spectrum (ROS) range. For example, the Boise Greenbelt offers a non-motorized opportunity in an urban setting. Roads closed to Motorized Use in Roaded Modified and Roaded Natural also offer non-motorized opportunities.

Fortunately, there is an indicator that can present the impacts of motorized recreation on non-motorized recreation. The motorized influence zone analyzes how many acres are within ½ mile of a motorized route. This analysis shows areas where a non-motorized visitor can likely see or hear a motorized vehicle and where a non-motorized visitor can escape motorized vehicles throughout the range of ROS. The FEIS should use the motorized influence zone to show how non-motorized use is impacted through the range of alternatives. The IDPR has conducted a motorized influence zone analysis on the routes that have been proposed throughout the range of alternatives and our recommendations.

On Page 2-29, the DEIS displays the issue indicators for Roadless Areas. One of these issue indicators is "Miles of designated motorized trails in Inventoried Roadless Areas (IRA)".

This indicator is too simplistic to display the impacts to IRAs. All the action alternatives will change motorized travel in IRAs. Some alternatives would change single-track trails into ATV trails while other alternatives would close trails to motorized use. The FEIS should consider an additional indicator for this category. This indicator would track the changes in motorized travel on miles of routes in IRAs. For example, miles of single-track converted to ATV, Jeep Routes downgraded to ATV, and miles of routes closed to motorized use in IRAs are all indicators to changes to IRAs. Analyzing just the miles of motorized routes in an IRA is not sufficient.

### **Chapter 3 Affected Environment and Environmental Consequences Comments**

Section 3.2.1 covers the recreation methodology analysis on Page 3-1. The recreation analysis used the recreation opportunity spectrum (ROS) to characterize the kind of recreation available across the forest. ROS is best used to describe the setting and experience that a visitor can expect, not the kind of recreation. Non-motorized recreation can be found across the range of ROS, while motorized recreation is only found from semi-primitive motorized to urban ROS classes.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 6

The recreation analysis should use the motorized influence zone to characterize non-motorized recreation opportunities. This analysis would give decision makers and the public the ability to see the acres as well as the miles available to non-motorized activities across the range of alternatives. The motorized influence zone is displayed by how many acres are within a ½ mile of a motorized route.

Our staff commented on the original Challis Land and Resource Management Plan. This plan established ROS classes across the forest. The plan recognizes the minor shifts from non-motorized to motorized would occur over time. The existing travel plans backed this shift up. The ROS is a poor analysis indicator and should be dropped for the motorized influence zone indicator in the Final Environmental Impact Statement.

The direct and indirect effects to roadless areas and recommended wilderness are disclosed starting on Page 3-6. The DEIS references the 2001 Roadless Rule. This rule is no longer applicable to Idaho. The 2008 Idaho Roadless Rule defines management of Idaho's roadless areas. This rule does not make any route or area specific travel designations. Travel plans like this one are supposed to designate uses on routes in these areas. We were pleased to see that Appendix D did detail the miles of motorized routes (by type) in each roadless area by alternative.

Route density in roadless areas does not make much sense for an indicator. The true impacts to roadless areas are how the alternatives change uses on the different routes within the roadless areas. The DEIS recognizes that the threshold established is somewhat arbitrary, but fortunately this analysis can be changed in the FEIS.

The FEIS should disclose how many miles are upgraded from single-track motorized to ATV or full-size vehicles under the range of alternatives in roadless areas. This analysis will show a negative impact for some areas under some alternatives and positive impacts under other alternatives. This indicator gives a better picture of what is happening in the roadless areas under the range of alternatives.

#### **Ranger District Route Specific Recommendations**

The IDPR recommends the following changes to Alternative 2. We believe that these changes will better serve the recreating motorized public and also protect resources.

Roads that are a part of a grazing permit, mining access permit, or firewood gathering permit do not need to be designated under this Travel Planning Process. Dead-end routes that don't lead to a scenic destination, historic site, or dispersed campsite can be considered for permitted motorized use. The IDPR has identified the recreation-related routes that should be designated in the final decision.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 7

The table below illustrates our route specific recommendations Forest-wide.

**Table 1 IDPR Forest-wide route Designation Summary**

Route Status	Miles
Roads open yearlong	2,221
Roads open seasonally	218
Motorized trails open yearlong to all vehicles	91
Motorized trails open seasonally to all vehicles	31
Motorized trails open yearlong to ATVs and 2-wheel vehicles	195
Motorized trails open seasonally to ATVs and 2-wheel vehicles	30
Motorized trails open yearlong to 2-wheel vehicles (closed to ATVs)	407
Motorized trails open seasonally to 2-wheel vehicles (closed to ATVs)	112
<b>TOTAL of MOTORIZED ROUTES</b>	<b>3,305</b>

The table below summarizes how this alternative would designate routes by district on the Salmon-Challis National Forest.

**Table 2 IDPR Route Designation By District**

Route Status	Miles of Motorized Routes						Total
	Challis-Yankee Fork	Leadore	Lost River	Middle Fork	North Fork	Salmon-Cobalt	
Roads open yearlong	457	188	420	221	345	620	2,252
Roads open seasonally	32	16	0	0	87	83	218
<b>Total Roads</b>	<b>490</b>	<b>204</b>	<b>420</b>	<b>221</b>	<b>432</b>	<b>703</b>	<b>2,469</b>
Motorized trails open yearlong to all vehicles	27	13	13	3	2	13	71
Motorized trails open seasonally to all vehicles	11	10	0	0	0	10	31
Motorized trails open yearlong to ATVs and 2-wheel vehicles	42	20	100	7	0	23	192
Motorized trails open seasonally to ATVs and 2-wheel vehicles	14	3	4	3	0	4	29
Motorized trails open yearlong to 2-wheel vehicles (closed to ATVs)	189	23	36	29	97	41	415
Motorized trails open seasonally to 2-wheel vehicles (closed to ATVs)	39	42	18	5	0	0	104
<b>Total Motorized Trails</b>	<b>321</b>	<b>111</b>	<b>171</b>	<b>47</b>	<b>99</b>	<b>91</b>	<b>841</b>
<b>Grand Total of motorized routes</b>	<b>811</b>	<b>315</b>	<b>592</b>	<b>267</b>	<b>531</b>	<b>794</b>	<b>3,310</b>

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 8

The table below summarizes the motorized influence zone effects that this alternative would have.

**Table 3 IDPR Route Designation Motorized Influence Zone Summary**

Ranger District	Total Acres	Motorized Influence Zone Acres	Non-Motorized Acres
Challis-Yankee Fork	804,271	359,427	444,844
Leadore	329,438	147,379	182,059
Lost River	814,476	291,738	522,738
Middle Fork*	1,035,967	128,856	907,111
North Fork*	771,295	217,938	553,357
Salmon-Cobalt	642,647	332,964	309,683
<b>Total</b>	<b>4,398,094</b>	<b>1,478,302</b>	<b>2,919,792</b>

\* includes Frank Church River of No Return Wilderness

**Middle Fork Ranger District**

The IDPR staff has prepared a map with the proposed changes (Attachment #1). The text below justifies those changes to Alternative 2.

The Iron-Creek-Lola Creek Trail #4024 is designated for two-wheeled motorized use along its entire length in Alternative 2. The current travel plan designates the section of trail between Road #40083 and the District Boundary as closed to motorized use. This section of trail passes through some wet meadows. In order to protect the trail tread, this section of Trail #4024 should be seasonally open to motorcycle use from July 1<sup>st</sup> through September 30<sup>th</sup> (Season Code 2). Keeping this trail seasonally open creates a great single track trail looping opportunity for motorcyclists.

The Knapp Creek Cutoff Trail #4034 is designated for two-wheeled motorized use along its entire length. The current travel plan designates this trail for all motorized uses. The trail is currently an ATV trail which connects with the Hay-Knapp Creek Trail #4032. In order to provide a connecting trail opportunity from Beaver in the Knapp Creek-Valley Creek ATV loop, this trail should be designated for ATV use. The trail has minimal tread work that could be completed with our Trail Cat to better accommodate ATV use.

Alternative 2 does not designate the West Fork Yankee Fork Cutoff Trail #4155. Trail #4155 should be designated for single-track motorized use. The trail bypasses Hindman Lake – a popular dispersed campsite. The trail is in fair condition and can easily accommodate advanced motorcycle use. The route has minimal resource concerns. The final decision should designate the West Fork Yankee Fork Cutoff Trail #4155 for single-track motorized use.

**Challis-Yankee Fork Ranger District**

The Challis-Yankee Fork Ranger District covers one of the largest areas on the Salmon-Challis National Forest. The district also contains Land of the Yankee Fork State Park. Our Bayhorse unit is currently undergoing the master planning process. Many of the route recommendation changes relate to planning

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 9

the trail system around Bayhorse State Park. We have organized our changes by mountain ranges. We have also prepared a map with the proposed changes (Attachment #2). The text below justifies those changes to Alternative 2.

#### **Basin Creek – West Fork Route Designations**

The Hay-Knapp Creek Trail #4032 travels between two ranger districts and is an extremely long trail. Some portions of the trail are ATV-accessible while others are single-track motorized. The following segments of the Hay-Knapp Creek Trail should be designated for ATV use. These sections are currently ATV accessible.

- From Basin Creek Road #40034 to Kelly Creek Trail #4323
- From Upper Harden Creek Trail #4167 to Left Fork Rankin Creek Trail #40332

This designation will allow ATV riders to connect from the West Fork drainage into the Basin Creek drainage and Stanley Basin using a combination of trails and roads.

The Kelly Creek Trail #4323 is designated for single-track motorized (motorcycle) use under Alternative 2. This trail provides an essential connection for ATV riders between Basin Creek and the Stanley Basin. The trail is currently a single-track that would need to be upgraded to ATV use in a future analysis. The IDPR would like to see this trail designated and upgraded for ATV use.

Alternative 2 does not designate the West Fork Yankee Fork Cutoff Trail #4155. Trail #4155 should be designated for single-track motorized use. The trail bypasses Hindman Lake – a popular dispersed campsite. The trail is in fair condition and can easily accommodate advanced motorcycle use. The route has minimal resource concerns. The final decision should designate the West Fork Yankee Fork Cutoff Trail #4155 for single-track motorized use.

The Lightning Creek Trail #4156 is currently a non-motorized trail. This trail is disappearing from a lack of use. In order to get more use on the trail, the trail should be designated for single-track motorized on a seasonal basis from July 1<sup>st</sup> to September 30<sup>th</sup>. This designation would provide a challenging single-track experience for motorcyclists and still provide non-motorized hunting opportunities in the fall.

#### **Bayhorse State Park/Challis Area designations**

The ID Team did a great job identifying key routes for ATV use around Bayhorse State Park. As our master planning process has begun, we have a few changes in designations that we would like to request under Alternative 2.

Alternatives 2 and 4 do a great job outlining potential OHV opportunities around Bayhorse. One problem with Alternative 4 is that it converts present single-track trails for ATV use. These trails will need significant reconstruction before they are designated for ATV use.

The Kinnikinic Creek Trail #4096 is currently designated for all motorized vehicles. Alternative 2 designates this trail for single-track motorized use. ATVs have been using this trail and it provides a looping opportunity with the Treavor Creek Trail #4159. The Kinnikinic Creek Trail should be designated for ATV use in the final decision.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 10

The Beef Pasture Trail #4201 is currently designated for all motorized vehicles (no specific vehicle type designation). Alternative 2 designates this trail for ATV use. This trail is currently a single-track trail that would require reconstruction before the trail could accommodate ATV use. The IDPR recommends that this trail be designated for two-wheel motorized use (seasonal). After future site-specific analysis and reconstruction, this trail can be designated for ATV use.

The Buster Lake Trail #4152 is currently designated for seasonal two-wheeled motorized use (July 1<sup>st</sup> through September 30<sup>th</sup>). This trail provides an essential connector between Bayhorse Lake and Buster Lake. The IDPR requests the top portion of this trail, starting in Section 26 be designated for seasonal ATV use (July 1<sup>st</sup> through September 30<sup>th</sup>).

This trail is currently a single-track trail that would require reconstruction before the trail could accommodate ATV use. The IDPR recommends that this trail be designated for two-wheel motorized use (seasonal). After future site-specific analysis and reconstruction, this trail can be designated for ATV use. The lower section of trail going into the Squaw Creek drainage should be designated for seasonal two-wheel motorized use.

The Squaw Creek Trail #4149 is currently designated for seasonal two-wheeled motorized use (July 1<sup>st</sup> through September 30<sup>th</sup>). This trail provides an essential connector between Bayhorse and the Custer Motorway. In order to provide a long-distance ATV riding opportunity, the IDPR requests this trail eventually be designated for seasonal ATV use. After future site-specific analysis and reconstruction, this trail can be designated for ATV use.

The Pothole Road #40021 is currently designated for all motorized uses. This road has degraded into an ATV trail. The IDPR recommends that Pothole Road #40021 be designated for ATV use. This road provides an essential ATV looping opportunity around Bayhorse.

The SCNF needs to consider another existing road for designation. In Section 32, there is an old jeep trail that switchbacks between the Skylark Mine Road #40380 and the Pothole Road #40021 (see Bayhorse Map Attachment #3). The jeep trail should be designated for ATV use. The roadbed is stable for ATVs and it provides a linking opportunity with the Ramshorn-Keystone Trail #4260.

The IDPR requests foot access only on the Skylark Mine Road #40380 past the Skylark Mine (see Bayhorse Map). By only allowing foot access on this segment, it will give us better control on visitor use at the Skylark and Ramshorn Mines.

The Ramshorn Mine Road does not have a designation through the range of Alternatives. The IDPR needs administrative access on this road in order to clean up the mine site. Eventually, we would like to offer ATV access on this road after the area is cleaned up. The Ramshorn Mine Road should be designated as an administrative access road (see Attachment #3).

Near the top of Ramshorn Mountain, there is a jeep trail that should be designated as an ATV Trail (see attachment #3). This trail runs to the top of the Ramshorn Mine and offers outstanding views of Bayhorse and the surrounding mountains. While this is a dead-end route, the steep terrain does not allow for route proliferation. The SCNF should designate this route as an ATV trail.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 11

The final decision should make some modifications on access between the Keystone Mine and the Pacific Mine. The IDPR is not allowing full-size vehicle traffic through the Bayhorse town site and the Pacific Mine. The Keystone Mine Road #40245 and the West Fork Beardsley Creek Road #40378 are proposed to be designated for full-size vehicle use under all Alternatives. These roads should be designated for ATV use in order to not conflict with our designations in the Bayhorse Town site.

The IDPR concurs with most of the travel designations in the Morgan Creek drainage under Alternative 2. The IDFG noted the need for improved big game security in this region. Rather than seasonally designating the trails in the drainage, we would like to see more spur roads seasonally designated.

#### **Lost River Range Designations**

The northern end of the Lost River Range on the Challis Ranger District is fairly open which has lead to the development of several spur roads that provide limited motorized recreation opportunities. Some roads designated in Alternative 2 serve a limited recreation purpose and could be considered for undesignation.

The IDPR has identified the critical recreation-related routes in Attachment #3. These routes should remain on the system in the final decision.

#### **Lemhi Range Designations**

The IDPR concurs with most of the proposed designations in Alternative 2. The Lemhi Range is divided between four different Ranger Districts (Challis-Yankee Fork, Salmon-Cobalt, Lost River, and Leadore). Our analysis took a look at the complete route system to identify inconsistencies between the Ranger Districts.

The Iron Creek Point Trail #4193 is a short spur trail (0.93 miles) that goes to Iron Creek Point. This trail goes across a steep side slope that has sloughed the trail tread away. Alternative 2 designates this trail for seasonal two-wheeled motorized use. Before this trail is designated for this use, it will have to be reconstructed to accommodate motorcycle or non-motorized use.

The South Fork Big Creek Trail #4078 is currently designated non-motorized. Alternative 2 keeps this designation. Alternative 4 would seasonally open the trail to two-wheeled motorized use (July 1<sup>st</sup> through September 30<sup>th</sup>). This trail is one of the few non-motorized trail opportunities in the North Lemhis. It is also an extremely rocky trail that few motorcyclists would use. If the trail is disappearing because of a lack of use, it might be appropriate to designate it for seasonal motorcycle use.

#### **Lost River Ranger District**

The IDPR recommends the following changes to Alternative 2. We believe that these changes will better serve the recreating motorized public and also protect resources.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 12

Alternative 2 reduces single-track motorized trails while replacing these trails with unauthorized routes. This alternative essentially eliminates single-track motorized trail opportunities on the Lost River Ranger District.

Recreation use would occur more on the unauthorized routes (jeep trails) than single-track trails. Unauthorized routes are often poorly located. We believe the existing single-track trail opportunities are more desirable than designated short spur jeep trails.

Alternative 2 eliminates the remaining single-track motorized trail opportunities in Sawmill Canyon. This area has had a long history of single-track motorized use. The Idaho Trail Machine Association hosted its annual State Ride in the canyon twice, (once in 1976 and once in 1983). The final decision should retain the existing seasonal single-track motorized trail opportunities.

The Mud Lake Canyon Trail #4192 is a dead end ATV route. The terrain is wooded and doesn't offer much recreation utility. This route could be dropped from the trail system.

#### **Sawmill Canyon Recommendations**

The Iron Creek Point Trail #4193 is a short spur trail (0.93 miles) that goes to Iron Creek Point. This trail goes across a steep side slope that has sloughed the trail tread away. Alternative 2 designates this trail for seasonal two-wheeled motorized use. Before this trail is designated for this use, it will have to be reconstructed to accommodate motorcycle or non-motorized use.

Alternative 2 destroys the only motorcycle looping trail opportunity in Sawmill Canyon by closing the Snowbank Trail #4076. This trail is an excellent motorcycle trail that is currently seasonally open (July 1st through September 30th). The trail has had a very long history (over 30 years) of motorcycle use. The modified proposed action needs to list this trail as seasonally open to motorcycle use (July 1st through September 30th). Our Trail Rangers found this trail to be in good condition this summer with only a couple minor areas of erosion. We are willing to work with the Lost River Ranger District to fix any drainage issues associated with this trail.

Alternative 2 closes the Bear Canyon Trail #4080 to motorized vehicles. This trail provides an excellent single-track motorized looping opportunity. The trail has a long history of motorized use (over 30 years). Our Trail Ranger crews did not find any problems when they maintained the trail last month. The Bear Canyon Trail #4080 needs to be seasonally open to ATV/motorcycle use (July 1st through September 30<sup>th</sup>).

Alternative 2 closes the Iron Creek Trail #4078 to motorized vehicles. The Iron Creek Trail is a very good motorcycle trail with no maintenance problems. The trail connects to the Snowbank Trail #4076 and the Big Gulch Trail #4079. The Challis-Yankee Fork Ranger District keeps the Big Gulch Trail #4079 open to motorcycle use in the proposed action. In order to provide trail connectivity, the modified proposed action needs to list the section of trail from Iron Creek to the Snowbank Trail #4076 seasonally open to motorcycle use ((July 1st through September 30<sup>th</sup>)).

The Slide Creek Trail #4186 is a good single-track motorcycle trail that connects to the Cabin Creek Trail #6127 on the Leadore Ranger District. This proposed action closes the Slide Creek Trail #4186 to

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 13

motorcycle use. The Leadore Ranger District keeps the Cabin Creek Trail #6127 open to motorcycle use seasonally under Alternative 2. In order to provide trail connectivity, the Alternative 2 needs to list the Slide Creek Trail #4186 as open seasonally to motorcycle use.

#### **Borah Peak Recommendations**

Alternatives 2 and 4 designate the Swauger Lake Trail #4091 for yearlong ATV use. Alternative 1 identifies this trail open to all motorized uses. Forest Plan Amendment 9 specifically designated this trail for two-wheeled motorized use. In order to retain the existing condition, the trail should not be designated for ATV use. It should remain available for two-wheeled motorized use.

The proposed action closes the Shadow Lakes Trail #4194/#4094 to motorcycle use. This trail is one of the most scenic motorcycle rides in Idaho. The surrounding terrain is extremely steep and rocky, which keeps riders on the trail. The Shadow Lakes Trail #4194/#4094 needs to be designated for motorcycle use in the final decision.

#### **Copper Basin/Pioneer Mountains Recommendations**

Alternatives 2 and 3 close the Toolbox-Herd Peak Trail #4051 to motorcycle use. Alternative 1 opens this trail to all motorized uses. Forest Plan Amendment #9 designated this trail for motorcycle use. This trail is an outstanding looping motorcycle ride. It is the only single-track trail looping motorcycle experience in the Copper Basin Area. While the trail does dip into the Jerry Peak area a couple of places, it can be easily rerouted to be outside of the Jerry Peak area. The Toolbox-Herd Peak Trail #4501 needs to remain open to two-wheeled motorized use. The IDPR recommends that the trail be relocated where it intrudes into the Jerry Peak area.

The Burnt Aspen Trail #4055 is designated for ATV use under Alternatives 2 and 4. Alternative 3 designates this trail for single-track motorized use. This trail is a great single-track trail for motorcyclists. The trail provides motorcyclists with one of the few scenic single-track trail experiences in Copper Basin. The IDPR recommends this trail be open to two-wheeled motorized use as identified in Alternative 3.

The action alternatives close the Antelope Creek Trail #4067/4049. This trail is the only motorcycle single-track trail experience in the Antelope Creek drainage. This is a trail with few problems. Near the top, the trail is starting to disappear. Rather than remove more use from the trail and causing it to disappear, the IDPR recommends that the Antelope Creek Trail #4067/4049 be designated for two-wheeled motorized use on seasonal basis (July 1st to September 30<sup>th</sup>).

#### **Leadore Ranger District Recommendations**

The Leadore Ranger District staff did a great job for Alternative 2, revised proposed action. The IDPR supports most of Alternative 2, but there a few minor changes that could be made to further improve recreation opportunities.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 14

The trails in the Timber Creek drainage would be seasonally open from Friday before Memorial Day to August 25<sup>th</sup>. The seasonal restriction should change to open from Friday before Memorial Day Weekend through Labor Day (closed after Labor Day).

Closing the trails on August 25<sup>th</sup> eliminates a popular recreation long weekend opportunity. Non-motorized bow hunters are less likely to hunt during this time period because of the heavy recreation use and animals not being in the rut. A good compromise would be to keep these trails open through the Labor Day weekend. This would allow for both motorized recreation use through Labor Day weekend and the bulk of the bow season being non-motorized in the area.

#### **North Fork Ranger District**

The IDPR concurs with most of the recommendations for Alternative 2 for the North Fork Ranger District. Alternative 2 does close a portion of one trail (Divide Trail #6106) from Anderson Mountain to Big Hole Pass.

This segment of the Divide Trail is a part of the Continental Divide National Scenic Trail. While the National Trails System Act intended this trail to be established primarily for hiking and horseback use, motorized uses are permitted where previously established. The Continental Divide National Scenic Trail was designated as a Scenic Trail in 1977, not 1968 as noted in the DEIS.

The Divide Trail has had a long history of motorized use. Our Trail Rangers have continuously maintained this trail since 1990. Prior to our department maintaining this trail, local motorcycle riders have also maintained this trail (prior to its designation as a National Scenic Trail in 1977).

Alternative 2 designates the Grizzly Spring Trail #6142 for two-wheeled motorized use. Alternative 2 shows this trail connecting up with the Indian Creek Road #60036. The trail ends at Grizzly Springs. It does not continue down to the road because of the steep terrain. If motorcycle or non-motorized use is going to allow past the springs, the SCNF will have to build a trail down to the Indian Creek Road. Designating this section of trail should not be completed until the trail is constructed.

Alternative 2 shows the Keystone Gulch Trail #6123 dead ending near the top of the ridge. This trail continues all the way to the top of the ride. There is also another pack trail that connects this trail with Anderson Mountain. The IDPR recommend that this extension to the Keystone Gulch Trail be designated for two-wheeled motorized use.

#### **Salmon-Cobalt Ranger District**

The Salmon-Cobalt Ranger District has the longest history of use on the Salmon-Challis National Forest. Timber harvesting, mining, and grazing have left an extensive route system on the district. The district lies adjoins Salmon, ID. Many Salmon residents use these routes for recreation and other purposes.

Alternative 2 does a fairly good job on balancing these demands of use and protecting resources. The IDPR is willing to support Alternative 2 for this district.

Salmon Challis Travel Plan DEIS Comments  
November 24, 2009  
Page 15

Alternative 2 designates the Lime Creek Trail #6100 for ATV use. This trail dead-ends into a single-track trail system. We agree with the IDFG that this trail should be designated for two-wheeled motorized use as outlined in Alternative 1.

The Middle Fork Hat Creek Trail #6190 is a dead-end two-wheeled motorized trail that does not connect up with the Hat Creek Lakes. This route could be considered for undesignation as outlined in Alternative 3.

### Conclusion

The Idaho Department of Parks and Recreation appreciates the opportunity to review this DEIS. The planning team has done a good job of incorporating our previous comments into the range of alternatives.

The final environmental impact statement (FEIS) needs to use different indicators to display non-motorized opportunities and impacts to roadless areas. The indicators that we have proposed are easy to analyze. We are more than willing to help the ID Team with the use of these indicators. The FEIS also needs to more clearly define route designations that match the existing condition.

We look forward to working with the Salmon-Challis National Forest on the implementation of this travel plan. If you have any questions about our comments, please contact Jeff Cook, Outdoor Recreation Analyst (208) 514-2483.

Sincerely,



Robert L. Meinen  
Director

Enclosures

Cc Idaho Department of Fish & Game Salmon Region  
Idaho Department of Fish & Game Upper Snake Region  
Idaho Department of Fish & Game Headquarters  
Idaho Governor's Office

<sup>i</sup> <http://www.fs.fed.us/r4/caribou-targhee/caribou-targhee/palisades/maps.shtml>

<sup>ii</sup> <http://www3.idaho.gov/oasis/H0602.html#billtext>

<sup>iii</sup> 2004 Idaho Outdoor Recreation Survey Internal Report by Francis P. Achana, PhD



**IDAHO DEPARTMENT OF FISH AND GAME**

600 South Walnut/P.O. Box 25  
Boise, Idaho 83707

C.L. "Butch" Otter / Governor  
Cal Groen / Director

November 25, 2008

William E. Wood  
Forest Supervisor  
Salmon-Challis National Forest  
1206 S. Challis Street  
Salmon, Idaho 83467

Re: Salmon-Challis National Forest Travel Plan DEIS

Dear Mr. Wood:

The Salmon and Upper Snake Regions of Idaho Department of Fish and Game (IDFG) have reviewed the Draft Environmental Impact Statement (DEIS) for Travel Planning and OHV Route Designation for Salmon-Challis National Forest (SCNF). We appreciate the opportunities to provide recommendations for wildlife and fisheries protections during the planning process to help shape alternatives. We conclude that Alternative 2, the Revised Proposed Action, most adequately addresses considerations for wildlife, fisheries, their habitats and motorized recreation for wildlife-based recreation. However, we offer limited comments and suggestions below for improvement of this alternative from a wildlife-resource viewpoint.

General Comments

Regarding the full DEIS, IDFG finds that Alternative 2 very closely follows the intent and structure of the original Proposed Action that we supported in our November 14, 2007 correspondence. We believe that Alternative 2 would be beneficial to wildlife and fisheries populations, their habitats, and provides for reasonable access to those resources for hunting, fishing, trapping, and wildlife viewing. We wish to offer a few specific suggestions applicable forest-wide, per ranger district, and a few for further improving Alternative 2, or any other alternative enacted.

1. We strongly support "The designation of specific motorized routes to comply with the Travel Management Rule (and the consequence of eliminating cross-country travel)" (Recreational Issue 1; DEIS pages 1-18).
2. We support discontinuation of motorized use specific to the retrieval of big game after its harvest as stated on pages 1-4: "Motor vehicle use for big game retrieval off of designated roads or designated motorized trails would not be allowed". We continue to maintain, as stated in the DEIS, pages 2-3 that :

*Keeping Idaho's Wildlife Heritage*

1

Equal Opportunity Employer • 208-334-3700 • Fax: 208-334-2114 • Idaho Relay (TDD) Service: 1-800-377-3529 • <http://fishandgame.idaho.gov/>

*IDFG supports the prohibition of motorized travel off of designated routes for game retrieval. IDFG does not recognize a need to harvest game and then enlist motorized means to retrieve that game. Hunters are obliged to make a thoughtful decision prior to taking game including the hunter's ability to transport their game from the field to their home.*

3. We strongly support the simplification of travel route types by standardizing to one of 3 types of routes (each with year-long and seasonal examples) as described in the DEIS alternatives descriptions, tables 2.2, 2.4, etc.:
  - a. Motorized trail open to all vehicles;
  - b. Motorized trail open to ATVs and 2-wheeled vehicles; and
  - c. Motorized trail open to 2-wheel vehicles
4. We propose streamlining the range of seasonal closures. The DEIS lists many varied seasonal restrictions. Although many of these closures are based on best available information, we feel the public (including hunters, anglers, trappers, and wildlife watchers) would be better served by standardization of seasonal closure dates. In concert with Idaho Department of Parks and Recreation, IDFG recommends adopting a framework of 3 different "open season" dates:
  - a. Open from Friday before Memorial Day Weekend through Labor Day (closed after Labor Day);
  - b. Open from July 1 to September 30; and
  - c. Open from July 1 to November 15

We recognize that this would, for the first year or two, likely cause some confusion to archery hunters during the Labor Day weekend/last days of August. However, this framework allows greater flexibility for forest users to recreate in either a motorized or non-motorized fashion over the Labor Day holiday yet still adequately protects wildlife and fisheries resources, such as calving and fawning habitat.

5. We support motorized access to dispersed camping as stated on page 2-16 and 2-17. Access within 300 feet of a designated route would be acceptable as long as no resource damage occurs and no fish and wildlife are harassed. This would provide a wider spectrum of opportunity for hunters and anglers.
6. We strongly encourage SCNF to implement a comprehensive education and enforcement program for this travel plan. Sound and consistent enforcement of closures and vehicle type use restrictions is pivotal to the success of the plan as are public-friendly signs and maps with navigational utility.

#### Comments by Ranger District

##### *North Fork:*

1. Apply the route designations found in Alternative 3 to the two-wheel motorized trails between Spring Creek and Lost Trail Pass. This would improve hunting quality and security for big game and forest mesocarnivores, such as wolverine and fisher.

2. Adopt the closure on road 60077 in Stein Gulch as specified in Alternative 3. This would improve hunting quality and security for big game and forest mesocarnivores, such as wolverine and fisher.

*Salmon-Cobalt:*

1. Designate the two-wheel trails going to Hat Creek lakes (6092, 6093, and 6094) as seasonal routes and designate trail 6090 non-motorized. This would protect important mountain goat habitat.
2. Reclassify trail 6100 to a two-wheel motorized trail to be consistent with trail 6101.

*Leadore:*

1. Designate trails 6179 and 6081 in Bear Valley Creek as seasonal routes. This would improve big game security and hunting quality.
2. Designate trail 6343 as a seasonal route. This would protect bighorn sheep lambing habitat.

*Challis-Yankee Fork:*

1. Adopt the trail designations found in Alternative 3 to the trail system between Alder Creek and the West Fork of Morgan Creek. This would reduce disturbance to mountain goats during the sensitive kidding season and improve big game security. This portion of Game Management Units 28 and 36B consistently shows low calf to cow ratios, with hunters reporting low harvest over the last few seasons. An alternative may potentially be seasonal designation of spur roads, particularly on the east side. Assessment regarding provision of comparable wildlife protections for this alternative, particularly for the kidding season for mountain goats, is recommended prior to enacting any alternative.
2. Adopt the road and trail system found in Alternative 3 for the area between Basin Creek and Joes Gulch. This would improve big game security and hunting quality.

*Lost River:*

1. We recommend not opening Toolbox trail from the North Fork Road (40128) to the Divide at the Challis district boundary to motorized travel, which is an action only proposed in Alternative 4. This area is extremely important for back-country elk security and often has trophy-quality animals present. The closure point as depicted on Alternative 2 is appropriate and is important to carry into any alternative enacted.
2. Trail 4091 to Swauger Lake provides important access to our IDFG-stocked Trophy Trout fishery. This access should be maintained throughout any alternative enacted.
3. We concur that the closure in Alternative 2 of trails 4067 and 4049 in Antelope Creek creates needed security for important elk and mule deer ranges and is the most protective alternative for wildlife; this area is also occasionally mountain goat habitat. We believe robust wildlife protection for this area is warranted; we request that any alternative enacted provide effective wildlife security to address these issues.

4. Trail 4347 from Alder Creek to Cherry Creek is shown to stop at Lupine. However, this may be a GIS mapping error. This trail is a component of a loop. There is no negative impact to game species by continuation of this loop.
5. IDFG has had years of wildlife enforcement problems facilitated by travel on a user-created road/trail heading southwest toward BLM and private properties in the area of “the Needles”. Poaching has been an issue in this area. Designation of this route as a road is proposed as U032323A; this road was not on the previous travel plan. From a wildlife enforcement standpoint, we request consideration of not adopting this road in any alternative enacted.

In summary, IDFG reiterates its general support for Alternative 2 – the Revised Proposed Action as protective of wildlife resources yet providing for wildlife-based recreation opportunity. We hope that our comments for adjustment of Alternative 2 are considered. We appreciate this opportunity to comment on the DEIS. We thank you and your staff for your efforts to work cooperatively to develop this proposed action and your considerations of the fisheries and wildlife issues raised by IDFG. If you have any questions, please contact Salmon Region Landowner-Sportsman Coordinator Bret Stansberry at (208) 756-2271 or [bstansberry@idfg.idaho.gov](mailto:bstansberry@idfg.idaho.gov). Questions specific to the Lost River Ranger District should be directed to Gary Vecellio at (208) 525-7290 or [gvecellio@idfg.idaho.gov](mailto:gvecellio@idfg.idaho.gov).

Sincerely,



Sharon W. Kiefer  
Assistant Director-Policy

cc: B. Butler, Office of the Governor  
J. Lukens, B. Stansberry, S. Schmidt, G. Vecillio, IDFG  
B. Meinen, S. Frost, J. Cook, IDPR

933



United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
620 SW Main Street, Suite 201  
Portland, Oregon 97205-3026



9043.1  
IN REPLY REFER TO:  
ER08/1011

*Electronically Filed*

November 25, 2008

William Wood  
Forest Supervisor  
Salmon-Challis National Forest  
1206 South Challis Street  
Salmon, Idaho 83467

Dear Mr. Wood:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Travel Planning and OHV Route Designation, Salmon-Challis National Forest, Lemhi, Custer, and Butte Counties, Idaho. The Department offers the following comments for use in developing the Final Environmental Impact Statement (FEIS) for the project.

**GENERAL COMMENTS**

The National Park Service (NPS) administers the Lewis and Clark National Historic Trail, and is charged with protecting the resources and historic scene encountered by the Lewis and Clark Expedition for public use and enjoyment. The Leadore, Salmon-Cobalt, and North Fork Districts of the Salmon-Challis National Forest include landscapes through which the Corps of Discovery traveled in late August to early September of 1805.

Eighteen cultural properties occur within the Leadore, Salmon-Cobalt, and North Fork Districts near proposed new routes under the revised proposed action. Eleven of these are eligible for listing on the National Register of Historic Places. The Department requests that the U.S. Forest Service (USFS) invite the NPS to participate in any Section 106 consultation conducted prior to ground disturbing activities in these areas. Invitations to participate in Section 106 consultation in these areas may be directed to:

Dan Wiley, Chief of Resources Stewardship  
Lewis and Clark National Historic Trail  
601 Riverfront Drive  
Omaha, NE 68102  
Phone: (402) 661-1830  
Fax: 402-661-1813  
Email: Dan-Wiley@nps.gov

The DEIS examines four action alternatives and one no action alternative for designating a system of roads, trails, and areas open for motorized public use while also protecting resources and various public interests. Alternative 2 is identified in the DEIS as the revised proposed action. All the action alternatives examined in the DEIS propose to remove open cross-country motorized travel. Based on the information provided in the DEIS, the Department supports restricting motorized and mechanized travel to designated routes and to campsites within 300 feet of most designated routes.

There are, however, aspects of the revised proposed action that do not adequately protect important resources. For example, Table 3-35 shows that, under Alternative 2, there is no substantive reduction in the miles of motorized routes located within 300 feet of perennial streams or within 100 feet of intermittent streams compared to current conditions. Under the proposed alternative, the level of risk to water resources and fisheries will not be improved. In addition, Alternative 2 will introduce 45 new routes into weed-free areas that are considered to be at high risk of noxious weed infestation. Weed infestations can result in the degradation of ecosystems, loss of aesthetic values, and added costs for time and materials to fight the infestations. Further, providing new access in these areas may result in only marginally greater recreational opportunities. The FEIS should include an analysis of the risks and benefits presented by introducing these new routes.

Also, all of the action alternatives proposed in the DEIS retain some pre-existing motorized routes in designated roadless areas. While this is allowable under the 2001 Roadless Rule which only prohibits new road construction and reconstruction in inventoried roadless areas, doing so may keep such areas from fully attaining roadless area values. The Department recommends that the FEIS analyze the impacts of retaining these routes in designated roadless areas.

#### **SPECIFIC COMMENTS**

##### **Section 3.8.4 Affected Environment (Wildlife), page 3-140, last paragraph**

The FEIS should provide a reference for the following statement: "USGS Breeding Birds Survey data for Idaho, using trend estimates, shows an upward trend of 1.2% per year for pileated woodpeckers from 1966 to 2005."

##### **Chapter 4: Literature Cited, page 4-11**

The Internet link provided in the DEIS for the Sauer et al (2007) is no longer valid. The correct link is <http://www.mbr-pwrc.usgs.gov/bbs/bbs2006.html>. Note that the reference has been up-

dated and incorporation of any new information in the discussion and analysis in the FEIS is encouraged.

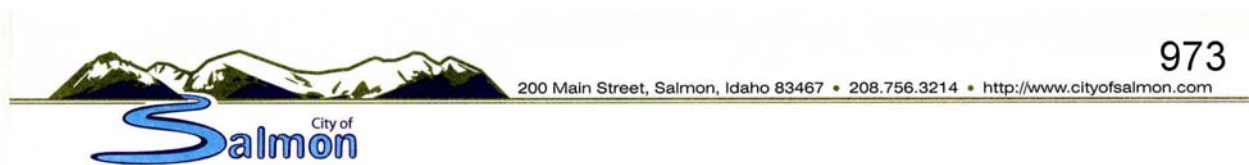
Sauer, J. R., J. E. Hines, and J. Fallon. 2008. *The North American Breeding Bird Survey, Results and Analysis 1966 - 2007. Version 5.15.2008*. USGS Patuxent Wildlife Research Center, Laurel, MD. Available online from: <http://www.mbr-pwrc.usgs.gov/bbs/>.

Thank you for the opportunity to review and comment on this DEIS. If you have any questions concerning our comments, please contact Lloyd Woosley, Chief of the USGS Environmental Affairs Program, at (703) 350-8797 or at [lwoosley@usgs.gov](mailto:lwoosley@usgs.gov), or Dan Wiley, Chief of Resources Stewardship, at (402) 661-1830 or at [dan\\_wiley@nps.gov](mailto:dan_wiley@nps.gov). If you have any other questions, please contact me at (503) 326-2489.

Sincerely,

A handwritten signature in blue ink that reads "Preston Sleeper". The signature is written in a cursive style with a large initial "P".

Preston A. Sleeper  
Regional Environmental Officer



*Rec'd 11/25/08  
JWH*

November 21, 2008

Mr. Bill Wood  
Supervisor, Salmon-Challis National Forest  
1206 S Challis Street  
Salmon, ID 83467

Dear Mr. Wood,

The Salmon Mayor and City Council would like to submit comments regarding the proposed Travel Plan.

As you know, many Salmon residents live in Lemhi County because they enjoy outdoor recreation. It is imperative that access to public lands not be so restrictive as to prevent utilization of the lands that belong to all of our residents. Severe limitations for motorized access will significantly reduce the number of citizens that can enjoy recreation on our public lands, as access by other means such as hiking is not an option for many elderly people.

Local residents would like to be involved in the process of developing a Travel Plan but find the maps confusing. They do not identify their favorite camping areas, scenic drives, or 4-wheeling expeditions by number, but by the actual names of the roads they traverse. Most of these areas are as they have been for many years and they see no reason for closing them to the public. Perhaps identifying the areas that are of concern and why nine hundred thousand acres of public land will be inaccessible would be more effective in the presentation of your Travel Plan.

We are in agreement with the Lemhi County Commissioners that there has been no specific location or amount of resource damage referenced anywhere within the documents. We also have been unable to find social, cultural and economic impacts on our community listed in the document. Without justification of any sort, we also feel that we cannot in good conscience add our support to loss of access to over nine hundred thousand acres of public land. We support the Commissioner's request that any of the proposed alternatives be postponed until such time as their true effect on Lemhi County can be demonstrated.

973

Salmon Mayor and City Council

*John W. Miller*  
*Harry Bartlett*  
*Lt. R. Marshall*  
*Jim Kluesener*  
*Arvid Redford*  
*Ken Stutzman*

*JWB*  
I firmly believe that every individual can provide comment on actions affecting themselves, i.e. Forest Service Travel Planning. Further, I believe that it is appropriate for a City Council to provide comment for the collective municipality. However, action to provide comment for a municipality can only be put forth by due process, i.e. formal discussion at a public council meeting. The council did not meet on this action and therefore the letter does not carry the weight of council but only those signing as individuals. I do not believe the "Plan" does in fact add a loss of nine hundred thousand acres.

Therefore, I continue to support the Plan's preferred alternative.

*S/ James W. Bate*

1070

CUSTER COUNTY COMMISSIONERS  
PO BOX 385  
CHALLIS, ID 83226  
(208) 879-2360  
(208) 879-5246 (fax)

November 24, 2008

Salmon/Challis National Forest  
ATTN: Travel Management Planning  
1206 South Challis Street  
Salmon, Id 83467

Re: Salmon/Challis Travel Plan

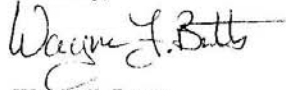
Thank you for the opportunity to comment on this travel plan. The Custer County Commissioners are concerned that the United States Forest Service has failed to consider the social economics of Custer and Lemhi Counties by not compiling an accurate inventory of roads and trails before determining the best routes to include or exclude from the travel plan.

In addition we feel that the Salmon-Challis National Forest is actually in direct violation of **43 U.S.C. 1712 Land Use Plans**. Coordination between themselves and state and local government is lacking; we the board of Custer County Commissioners do not feel we have had our voice heard when we have commented that we protest any road closures other than duplicate routes. We are also alarmed at the ratio of U.S. government employees to private citizens and local government who were involved in the decision making process.

The Idaho Department of Parks and Recreation was to be involved with both the Bureau of Land Management and Forest Service Travel Plans. The Idaho Department of Parks and Recreation has not yet produced a draft combined map that will display both BLM and Forest Service roads and trails. The lack of this information is excluding coordination with the State of Idaho and we feel it is difficult for the public to follow both plans accurately when reviewing first one map and then another.

Concern for safety issues should be first and foremost for both federal and local government. It should be set out in the plan that if authorized use is severely curtailed accessibility should be specifically allowed for fire fighting, weed spraying and rescue work.

Sincerely,



Wayne F. Butts  
Chairman

1077



rec'd  
12/1/08  
jwb

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

NOV 26 2008

Reply To  
Attn Of: ETPA-088

Ref: 07-034-AFS

Responsible Official William Wood, Forest Supervisor,  
1206 South Challis Street  
Salmon, ID 83467

Dear Mr. Wood:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the **Travel Planning and OHV Route Designation** on the Salmon Challis National Forest (SCNF) in Idaho. Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs the U.S. Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the DEIS prepared for the proposed project considers the expected environmental impacts and the adequacy of the DEIS in meeting procedural and public disclosure requirements of NEPA.

The SCNF proposes travel planning and OHV route designation on 3.1 million acres of National Forest System lands, excluding the Frank Church River of No Return Wilderness Area. The purpose of this action is to designate a system of roads, trails, and areas open for motorized public use that addresses current and anticipated recreation needs, provides a variety of recreation access opportunities, considers management concerns (such as maintenance costs and consistency with adjoining public lands), reduces impacts to forest resources, recognizes reserved or outstanding rights, and reduces conflicts between recreational uses.

EPA commends the SCNF for their efforts to address the many challenges inherent in travel planning and route designation that responds to recreation and resource management demands. We acknowledge that the Travel Management Plan process is a positive step in addressing resource impacts from motorized uses. Of special note are the proposals to decrease the number of stream crossings and route mileage in vulnerable watersheds and within 300 feet of Clean Water Act Section 303(d) listed streams. We also strongly support motorized dispersed camping restrictions on crossing streams and wet meadows.

Based on our review, we have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed “*Summary of Rating Definitions*”) due to our concerns regarding potential impacts to water resources, fisheries, and the expansion of noxious weeds into currently weed free areas.

1077

2

While we support Alternative 2 - the Revised Proposed Alternative - we recommend the SCNF modify this alternative (specific recommendations are enclosed) to further reduce the risk of adverse impacts to forest resources. Most of our recommendations involve incorporating Alternative 3's route designations in highly vulnerable watersheds and areas with high noxious weed risk. We also believe an aggressive and reliable monitoring and enforcement strategy is a key component of mitigating the risks caused by motorized access to dispersed camping near waterbodies, unauthorized travel, and the road maintenance backlog.

We appreciate this opportunity to comment. If you have questions or would like to discuss our comments in detail, please contact Erik Peterson at (206) 553-6322 or myself at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosure:  
Detailed Comments  
Summary of EPA Rating Definitions

cc: US EPA Idaho Operations Office

**EPA REGION 10 DETAILED COMMENTS  
TRAVEL PLANNING AND OHV ROUTE DESIGNATION  
SALMON CHALLIS NATIONAL FOREST, IDAHO**

**Water Resources<sup>1</sup>**

We agree with the Forest's conclusion that the interaction between forest roads and water lies at the heart of several key issues surrounding the effects of roads in the environment<sup>2</sup>. All action alternatives result in reduced route density. We support these overall reductions as they are likely to reduce sediment and other adverse impacts to nearby waterbodies.

Although the DEIS presents important information on water quality indicators and past, present and reasonably foreseeable activities for each ranger district, the DEIS does not sufficiently analyze where and how the proposed action will contribute to potentially significant cumulative water resource impacts.

**Recommendation**

In order to provide clarity on potentially significant cumulative effects we recommend the FEIS incorporate the "cumulative effects impact ratings to water resources for the existing condition and alternatives for each watershed in the analysis area"<sup>3</sup>.

Based on the DEIS's identified 303(d) streams, the Hydrologic Effects section and the key indicators for water resources presented in Tables 3-11 through 3-22 we recommend that the FEIS consider selecting the route designations from Alternative 3 for the following HUC5 watersheds: Dry Creek, Hayden Creek, Upper Lemhi River, Middle Big Lost River, Marble Creek, Pine Creek – Salmon River, Middle Panther Creek and Wet Creek.

We are also concerned that the data for the water resources indicators is inconsistently presented. Inconsistencies make a meaningful comparison of the alternatives difficult. In some cases the indicators for environmental consequences seem to be separated by watershed (e.g. the Sawmill Creek watershed – described below) and in other cases the indicators for environmental consequences to water resources are separated both by watershed and by ranger district (e.g. the Yankee Fork watershed – described below). For the first example, Sawmill Creek watershed, Tables 3-17, 18 and 19 show that Alternative 2 would designate 31.4 route miles. It is unclear whether those 31.4 miles are (i) 31.4 miles on the portion of the Sawmill Creek Watershed contained on each of three ranger districts (if so, this would be inconsistent with Maps CY-2 and LD-2), or (ii) 31.4 miles on the Sawmill Creek Watershed as a whole, most or all of which would be on the Lost River Ranger District (Map LR-2). We conclude, therefore, that the 31.4 miles referred to for three ranger districts is not separated by district but represents the total route miles in the Sawmill Creek watershed.

<sup>1</sup> Note that our review of the DEIS for Water Resources relates to the corrected Water Resources section 3.3 from the DEIS - Errata available on the World Wide Web at [http://www.fs.fed.us/r4/sc/recreation/Travel%20Plan/travel\\_plan\\_deis/deis\\_errata.pdf](http://www.fs.fed.us/r4/sc/recreation/Travel%20Plan/travel_plan_deis/deis_errata.pdf) done on the

<sup>2</sup> DEIS – Errata, p. 17-18

<sup>3</sup> See the DEIS – Errata, p. 39

However, the indicators presented for the Yankee Fork watershed do not follow the same logic as those presented for the Sawmill Creek watershed. In the case of the Yankee Fork watershed, Tables 3-11 and 14 show that there are currently 70.8 route miles in vulnerable subwatersheds. Table 3-17 shows that in the portion of the Yankee Fork watershed partially contained in the North Fork Ranger District, those 70.8 route miles are reduced to 48.4 route miles for Alternative 2. If we assume route designations are presented by watershed and not by district (as in Tables 3-11 and 14) we would expect to see 48.4 route miles in vulnerable watersheds for Alternative 2 in Table 3-20. Instead, Table 3-20 shows that Alternative 2 proposes zero route miles in the portion of the Yankee Fork watershed partially contained in the Middle Fork Ranger district (consistent with Map MF-2). This inconsistency, as stated above, makes meaningful analysis difficult.

**Recommendation**

We recommend that the FEIS present data for the four water resources indicators consistently, either separated by district and watershed (e.g. Yankee Fork watershed) or by watershed (e.g. Sawmill Creek watershed).

We are also concerned that the environmental consequences discussions for water resources contain errors that make meaningful comparisons between alternatives difficult. For example, there is an apparent error on page 3-32 of the DEIS Errata, "Alternative 3, if selected, would have 336 fewer motorized stream crossings than Alternative 1. Of the action alternatives, Alternative 1 would have the most crossings with 338 stream crossings." This statement implies that Alternative 3 proposes only two stream crossings on the North Fork Ranger District. This seems unlikely when Table 2-21 of the DEIS shows 1,085 stream crossings under Alternative 3 for the North Fork Ranger District.

The inconsistencies described above concern only two of four indicators and three of over 60 watersheds across six ranger districts. Similar issues complicate the analysis of other indicators and watersheds as well. Clarity and consistency is needed to improve readability and aid decision making.

**Recommendation**

We recommend that the discussion of environmental consequences for water resources by ranger district be consistent with information in the Tables and include explicit references to them.

**Fisheries**

We commend SCNF for the land management standards and guidelines that have been implemented over the past 15-20 years to improve aquatic habitats. We are concerned that the DEIS does not sufficiently analyze whether or not the standards and guidelines referenced have resulted in improving trends for listed endangered, threatened and sensitive fish. The DEIS states that, "on-forest aquatic habitats should be in an improving trend"<sup>4</sup>. We believe that increased supporting evidence for this conclusion would improve the FEIS's analysis of the proposed alternatives' potential impacts.

<sup>4</sup> DEIS, p. 3-97

**Recommendation**

We recommend that the FEIS include a more robust analysis of whether or not the on-forest endangered, threatened and sensitive fish species are currently experiencing - and would likely continue to experience under the No Action Alternative - a downward trend. This analysis should consider how future species specific recovery plans might effect route designations.

The analysis of the potential impacts to fisheries does not sufficiently provide a clear basis for choice among alternatives 1-4. Table 2-23 compares impacts to listed fish species for all action alternatives. However, Section 3.5.5 does not discuss the analysis which led to these useful comparisons.

**Recommendation**

We believe that a qualitative discussion on how the indicators for each alternative in Table 3-35 lead to the comparisons summarized in Table 2-23 would improve the FEIS's analysis of the proposed alternatives' potential impacts.

EPA also recommends that the FEIS describe the species distribution and critical habitat for each threatened, endangered or sensitive on-forest fish species as well as discuss how different alternatives impact critical habitat or species strongholds. We believe the above described, or similar, elements should be incorporated into the Geographic Information Systems (GIS) fisheries layer that the SCNF is currently developing.

**Noxious Weeds**

Due to the long distances traveled, soil disturbance, and the ability of weed seeds to attach to wheels, tires, undercarriages, riders' pants and boots etc., motorized vehicle use is the primary cause of noxious weed dispersal and infestation. Alternative 2 would designate 45 new routes. The likelihood of these new routes leading to the expanded establishment of noxious weeds into currently weed-free areas is high<sup>5</sup>. The Salmon-Cobalt, Leadore, and North Fork Ranger districts have the greatest noxious weed risk due to those districts having the most motorized routes (in each alternative) and also the most noxious weed infested areas<sup>6</sup>.

We appreciate that not authorizing off-road motorized travel will reduce the potential spread of noxious weeds by greatly reducing site disturbance caused by motorized vehicles. We also support the Forest's Integrated Pest Management approach for noxious weeds governed by the SCNF Noxious Weed Management Program FEIS.

**Recommendation**

In order to lessen the adverse impacts of noxious weeds we recommend selecting the route designation combinations from Alternative 3 for any HUC5 or HUC6 watershed with a "Very High" noxious weed risk rating.

---

<sup>5</sup> DEIS, p. 3-119

<sup>6</sup> DEIS, p. 3-115

### **Monitoring and Enforcement**

EPA believes that monitoring and enforcement are crucial for effective wildlife protection, vegetation management, and erosion control. While we recognize the monitoring and evaluation described on pages 2-7 and 2-8 of the DEIS, we believe the public and decision makers would benefit from more specific information on funding, monitoring and enforcement criteria, thresholds, and priorities.

We are also concerned that the monitoring programs for different resources are described throughout the document but not combined into a comprehensive monitoring and enforcement strategy. Sage Grouse, for instance, is described on page 3-142 but not in the "Wildlife" sub-section for monitoring on page 2-8. Instead the "Wildlife" sub-section for monitoring only lists monitoring for the effectiveness of closures where elk habitat security is a concern. While we support elk habitat security monitoring, we believe that it would be helpful to combine all of the monitoring and enforcement activities into a comprehensive strategy. We recommend that the FEIS describe this strategy in one section. Such an approach could lead to more effective monitoring and enforcement.

### **Recommendations:**

We recommend development of a detailed Travel Management Plan Monitoring and Enforcement Strategy. Such a strategy should include specific information on monitoring and enforcement decision thresholds, program priorities, focus areas (e.g. issues and specific locations), personnel needs, costs, and funding sources. We recommend the FEIS demonstrate that the proposed monitoring and enforcement strategy is adequate to assure that motorized vehicle use will not violate access restrictions or exacerbate already identified road-related resource problems. We recommend the Travel Management Plan Monitoring and Enforcement Strategy be annually or biennially updated.

### **Road Maintenance Backlog**

According to the 2003 SCNF *Roads Analysis Report*<sup>7</sup> deferred (backlog) maintenance was estimated at 60 million dollars to correct existing deficiencies over all maintenance levels. Since the period included in the estimate, the forest has experienced both a decline in road maintenance budget and significant increases in operating cost due primarily to large increases in the costs of fuel and materials<sup>8</sup>. We understand that the travel planning process is not intended to correct funding problems and we commend the SCNF for recognizing that limited maintenance funding can impact the sustainability of designated uses.

We are concerned that keeping roads at the low end of the assigned maintenance level may increase the risk of unexpected water quality impacts from the degradation and failure of bridges, culverts, stream crossings and road prisms. We believe that the current travel planning and OHV route designation process is an appropriate time to minimize risks from limited road maintenance funding<sup>9</sup>.

---

<sup>7</sup> Beke et. al

<sup>8</sup> DEIS, p. 3-202

<sup>9</sup> Our focus on funding is consistent with the Challis National Forest Land and Resource Management Plan (LRMP) as quoted in the DEIS on p. 1-13 and the Salmon National Forest LRMP as quoted on p. 1-8.

**Recommendations:**

To minimize the risks from limited road maintenance funding we recommend reducing the open road system, increasing the proportion of routes with seasonal restrictions, and/or changing the types of vehicles that may use routes<sup>10</sup>. We especially recommend that the FEIS consider increasing the proportion of ML (Maintenance Level) - 2 Seasonal roads. ML-2 Seasonal roads cost significantly less per year to maintain than ML-2 year round roads. We also recommend that the FEIS analyze the resource impacts and cost savings of changing ML-3 roads to ML-2.

**Dispersed Camping**

EPA believes that motorized dispersed camping has the potential to cause relatively high and concentrated adverse environmental impacts. Motorized dispersed camping has relatively high environmental impacts because of the soil and vegetation disturbance caused by long traveling, heavy and powerful wheeled vehicles. Impacts are generally concentrated around streams, lakes and other areas of special interest for forest users. We are concerned that Alternative 2 insufficiently addresses these potential motorized dispersed camping impacts.

**Recommendations**

We support Alternative 2's restrictions against crossing streams and wet meadows and on motorized access within 30 feet of streams. We recommend adding to these restrictions the following elements from Alternative 3: restrict motorized access for dispersed camping within 300 feet of perennial streams, 150 feet of lakes, and 100 feet of intermittent streams, except along the Salmon River Road<sup>11</sup>. We believe these additional restrictions would lessen sediment delivery to streams – an important threat to fisheries<sup>12</sup> – by limiting route treads that become drainage pathways near waterbodies.

EPA prefers the establishment of pull-outs (Alternatives 2 and 3) to a 300 foot dispersed camping zone along Salmon River Road (Alternatives 1 and 4). In order to increase public understanding and enforceability of this selection we recommend the FEIS include assurances that SCNF will install signs at each of the pull-outs. These signs should clearly delineate the dispersed camping area and related restrictions.

**Unauthorized Travel**

Across the SCNF there are 1,115 miles of known unauthorized routes in areas open to cross-country motorized travel and 1,598 miles of known unauthorized routes in “restricted areas”, which are violations of current travel plans<sup>13</sup>. Unauthorized routes have a high potential risk to forest resources because they have been established without consideration of the Forest's route construction BMPs or NEPA analysis.

We are concerned that the DEIS insufficiently analyzes the potential impacts of converting unauthorized routes to motorized routes. We are especially concerned that the 59

---

<sup>10</sup> DEIS, p. 3-202

<sup>11</sup> DEIS, p. 3-197

<sup>12</sup> DEIS, p. 3-98

<sup>13</sup> DEIS, p. 3-6

miles on the Leadore and 96 miles Lost River Ranger Districts have a high potential for impacts to water resources. According to Table 3-9 these districts have relatively large proportions of high vulnerability subwatersheds as well as low geomorphic integrity and low water quality integrity.

We believe the DEIS does not sufficiently describe the enforcement that will ensure closures are effective. We understand that this concern is already decided by law and that the Travel Management Rule will not increase the agency's budget or the number of law enforcement officers. However, we believe the current travel management planning process provides an opportunity to include the enforceability of route designations as a decision criterion.

**Recommendations**

We recommend that the FEIS analyze (i) any unique risks from converting unauthorized routes to motorized routes and (ii) the resource benefits of selecting Alternative 3's combination of converted unauthorized routes on the Leadore and Lost River Ranger Districts. We also recommend that the FEIS describe how enforceability was included as a criterion in the travel planning process.

EPA believes that education and cooperative partnerships support enforcement by promoting voluntary compliance. We recommend that the FEIS list current cooperative relationships related to preventing unauthorized use and discuss how benefits from these relationships could be increased in the future.

**Air Quality**

EPA is concerned that the DEIS does not analyze air quality. An unregulated two-stroke off-highway motorcycle can emit as much pollution in one hour as over 20 automobiles operating for one hour. A four-stroke ATV can emit as much pollution as five automobiles<sup>14</sup>. A relatively high proportion of the air pollution from off-highway motorized vehicles, especially from two-stroke engines, includes polyaromatic hydrocarbons – the most toxic component of petroleum products. Risks from this pollution are of particular concern in valleys that have frequent inversion conditions and periods of poor air dispersion.

**Recommendation:**

We recommend the FEIS analyze potential human health and wildlife impacts from the hazardous air pollutants produced by off-highway motorized vehicles in mountain valleys subject to frequent inversion conditions.

**Over Snow Recreation**

We recognize that the SCNF has chosen to not include over snow vehicles in this travel planning, but we note that the general direction from the SCNF LRMP directs that road use be managed by seasonal closure if, "Use causes unacceptable damage to soil and water resources due to weather or seasonal conditions"<sup>15</sup>. EPA believes that over snow recreation by both wheeled and tracked motor vehicles can potentially cause damage to soil and water resources due to weather and seasonal conditions.

<sup>14</sup> <http://www.epa.gov/otaq/regs/nonroad/2002/f02033.pdf>

<sup>15</sup> DEIS, p. 1-7

This damage can be caused by the delayed melting of snow that has been compacted by motor vehicle recreation in the winter and spring - delayed melting causes muddy conditions to persist into the late spring and summer OHV season. The persistence of muddy conditions increases rutting of native surfaced roads and trails. Ruts channel runoff and channeled water can increase soil erosion and sediment delivery to streams. Also, fragile alpine environments and sensitive plants are easily disturbed when snow cover is thin and/or inconsistent.

**Recommendations**

Due to the cumulative and potentially destructive nature of impacts from over the snow recreation we recommend that motorized spring and wintertime use be considered together with motorized use in other seasons. The Motorized Vehicle Use (MVU) map(s) should provide conditions, if any, for over snow recreation. We recommend that the Forest Service consider protecting vulnerable alpine vegetation with restrictions on motorized use when the snow is less than one foot deep.

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987

1119

# The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION  
PHONE (208) 478-3700  
FAX # (208) 237-0797



FORT HALL BUSINESS COUNCIL  
P.O. BOX 306  
FORT HALL, IDAHO 83203

March 19, 2009

Bill Woods, Forest Supervisor  
Salmon-Challis National Forest  
Supervisor's Office  
1206 South Challis Street  
Salmon ID 83467

**RE: SHOSHONE-BANNOCK TRIBES COMMENTS - SALMON-CHALLIS NATIONAL FOREST - DEIS TRAVEL MANAGEMENT PLAN -**

The Shoshone-Bannock Tribes (Tribes) thanks the Planning Team with the Salmon-Challis National Forest (Forest Service) for seeking Tribal input on the proposed Travel Planning and OHV Route Designation Draft Environmental Impact Statement (DEIS). The Forest Service initiated formal government-to-government consultation meetings with the Tribes and met with technical staff. The Tribes' offer the following comments on the DEIS and request a written response from the Forest Service indicating where the Tribal comments were incorporated into the Final EIS, and if not, then rationale for exclusion.

The Tribes stress the importance of initiating efforts to restore the Snake River system and affected unoccupied lands to a natural condition. (See Attached Snake River Policy). The Tribes agree increasing numbers of recreational users may adversely affect Treaty resources; which include native vegetation, riparian areas, waterways, fisheries and wildlife, and Tribal cultural sites. Generally, the Tribes can be supportive of Forest Service management activities which emphasize maintenance and restoration of watershed conditions, species viability, terrestrial and aquatic habitats and functioning ecosystems, while protecting the ability of the Tribes to exercise Treaty rights. The Shoshone-Bannock Tribes Policy for Management of Snake River Basin Resources states:

*The Shoshone Bannock Tribes (Tribes) will pursue, promote, and where necessary, initiate efforts to restore the Snake River systems and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions which most closely represents the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work*

*to ensure the protection, preservation, and where appropriate-the enhancement of Rights reserved by the Tribes under the Fort Bridger Treaty of 1868 (Treaty) and any inherent aboriginal rights.*

The Tribes emphasize the importance of Treaty rights reserved by the Tribes and our efforts to ensure the protection, preservation and enhancement of those rights. Article IV of the Fort Bridger Treaty of 1868 reserved off-reservation rights to hunt, fish and gather on ‘unoccupied lands of the United States’. Treaty obligations are considered ‘the supreme law of the land’ and agency actions must conform to those solemn obligations. The protection of treaty rights is a critical part of the Federal-Indian trust relationship. The lands within the Salmon-Challis National Forest (SCNF) are among those unoccupied lands within the aboriginal territories of the Tribes.

The Tribes support the efforts of the Forest Service to control and improve resource conditions in the SCNF, and advocate for the alternative that is most protective of the environment and protects the integrity of the ecosystem. The Tribes are supportive of the Forest Service erring on the side of conservation for future generations for the public; while continuing to provide for Tribal rights. The Tribes have identified several issues of concern regarding the National Travel Management Rule and its application to the Tribes.

The purpose and intent of this action is to designate roads, trails and open areas for motorized and non-motorized use for the SCNF, excluding wilderness areas. The EIS considers management concerns, reduces impacts to forest resources, recognizes reserved or outstanding rights, and reduces conflicts between recreational users on the SCNF. The need for this action is to implement the national direction published in the Federal Register, 36 CFR 212,251, 261, and 295, “Travel Management; Designated Routes and Areas for Motor Vehicle Use,” (Federal Register 2005: 70 FR 68264) (Travel Management Rule).

No government-to-government consultation was sought from the United States in the development of this National Rule. The national direction stated treaty rights would not be impacted therefore there was no need for formal government-to-government consultation between the Forest Service and individual tribes. The Tribes respectfully disagree. The Rule may impact Treaty rights, as it seeks to impose limitations and restrictions on those Tribal members who must utilize motorized vehicles to reach aboriginal areas to conduct traditional activities. The Tribes request a specific exemption from the application of this rule to avoid any impacts to the Tribal Treaty or inherent rights.

It is imperative planning documents provide complete evaluation and mitigation for impacts to resources from designating trails, roads and routes, particularly user created trails; so that when routes are designated the resources will not be further impacted. Proactive resource planning requires full discussion of baseline conditions, including Tribal ethnographic information and cultural resources, to support the eventual decision. The analysis and comparisons discussed in the DEIS is incomplete and inaccurate, due to a lack of analysis of baseline conditions, upon which a defensible decision can be made.

The Tribes raise several major issues:

1. The restrictions of travel management on individual Tribal members, exercising off Reservation Treaty rights, impacts the ability to camp, retrieve game, cut wood and other traditional activities.
2. Tribal issues, perspectives and values regarding cultural resources were not adequately addressed in the DEIS.
3. The inability of the Forest Service to adequately enforce their own existing Forest Travel Management Plans.
4. The “legalization” of illegal user-created trails, roads and routes which were not analyzed for resource impacts.

#### 1. OFF RESERVATION RIGHTS

The Purpose and Need for Action states the rationale for the national agency direction is to develop a system of roads and trails due to increasing OHV use and demand. The Forest Service Travel Planning Rule provides exemptions for those existing rights, which the Tribes interpret to include Tribal Treaty reserved rights. In accordance with the Travel Management Rule, access for those who have reserved rights can be allowed when authorized under ...other written instrument issued under federal law, including the Fort Bridger Treaty. The Rule provides for responsible officials to make accommodations those who have valid existing rights, including Tribal rights. The Tribes should not be constrained in the exercise of Treaty rights or traditional practices. The numbers and use by Tribal members is relatively low for OHV when compared to the numbers of recreational users. Historically, the Tribes have borne the burden of conservation through federal land management decisions and unfettered recreational activity due to the lack of meaningful consultation and specific exemptions for Treaty rights and traditional practices.

The DEIS proposes to limit motorized access to 300 feet of designated roads, and 100 feet of designated trails, provided there is no resource damage. Tribal members continue to exercise reserved Treaty rights by hunting, fishing, gathering and other traditional uses of Treaty resources and to conduct ceremonial activities on Forest Service lands. Motorized access for Tribal members to public lands must be protected to ensure future generations have the opportunity to exercise Treaty reserved rights and to practice traditional cultural activities. Since the Rule clearly states Treaty rights would not be impacted, the Tribes do not consider an arbitrary 300 foot restriction applicable to Tribal members who are exercising reserved Treaty rights in accordance with Tribal laws and regulations.

Tribal members often travel long distances to exercise reserved Treaty rights. The contemporary exercise of reserved and inherent rights requires motorized travel to make efficient use of the time available to the average Tribal member, especially considering the subsistence based Tribal harvesting practices and traditions. Geographic distance and travel restrictions would adversely impact Tribal members exercising reserved and inherent rights to practice traditions which would become hurried and lack involvement by elders, many of

1119

Shoshone-Bannock Tribes Comments to  
Salmon-Challis National Forest –Travel Management Plan DEIS

March 2009

whom cannot walk great distances to reach resources. The lack of access to public lands is not only limited by seasonal closures on motorized travel routes but also impeded by the development of private lands and in-holdings, further restricting the ability to access lands for Treaty hunting. Inconsistent management strategies among land management agencies often result in additional access restrictions for Tribal members, impacting the ability to exercise Treaty rights on those lands (for example, Bureau of Land Management lands which are adjacent to Forest Service lands but not subject to the same seasonal road restrictions). The Tribes understanding of reserved Treaty rights does not recognize a time limitation on treaty rights, nor technology used to harvest species for subsistence and seasonal limitations are strictly enforced by the Tribes.

Subsistence resources are often sought from areas some distance from roadways, where traditional 'wild foods' can still be found in relative abundance. The Travel Management Plan does not provide exemptions for motorized travel by persons with physical disabilities, such as Tribal elders who are essential to continuing traditional practices and passing knowledge on to Tribal youth. The Tribes consider the involvement of Tribal elders to be an integral part of the traditional practices reserved by Treaty or inherent rights and again request a specific exemption for access by Tribal members.

In the Travel Management Plan, the Tribes request the Forest Service avoid any implication that there is no Treaty right for motorized access to Forest Service lands under the Treaty. The Tribes remind the Forest Service to avoid interpreting treaties. Under the Judicial Canons of Construction for treaty interpretation, the Treaty is to be construed in a manner that is consistent with the perspectives of the signatories to the Treaty and in a manner most favorable to the tribes. The Treaty signatories contemplated a time when Tribal members would be forced to follow 'wild food' further and further from the reservation, utilizing various modes of transportation. The Tribes were not frozen in time at 1868.

Tribal members utilize modern technology to ensure efficient and effective subsistence practices for their families, including vehicular access, to hunting, fishing, gathering, camping, and ceremonial areas. It is vital to preserve the Tribal members' ability to continue returning to historic areas to carry on Tribal traditions. Locks or physical boundaries may discourage Tribal members from entering traditional areas; diminishing Tribal history and culture for younger generations. With each successive generation who pass on, or who are unable to access aboriginal areas the Tribes lose valuable cultural information. With the reduction of traditional diets and natural resources which were the basis of a healthy diet, Tribal elders encounter numerous diet-related diseases, such as diabetes, heart-related illnesses, which prevent them from walking long distances to provide education to young Tribal members learning the proper traditional ways to conduct subsistence procurement activities.

The Tribes recommend utilizing a rubric similar to the Endangered Species Act, Conservation Necessity Principals, to ensure all other users of the Forest bear the burden of conservation before Treaty or inherent rights are impacted. The Forest Service must work directly with the

Tribes to ensure continued access and avoid infringing upon Tribal rights. The Tribes do not consider the 2005 Forest Service Rule applicable to Tribal members who are exercising Treaty rights, in accordance with Tribal laws and regulations, including activities such as wood gathering, hunting, fishing, camping or gathering of other traditional resources or practicing traditional beliefs on Forest Service lands.

## 2. CULTURAL RESOURCES/ARCHEOLOGICAL ISSUES

The Tribes have an expanded definition of cultural resources, utilizing a holistic perspective that encompasses plants, water, animals and humans, and the relationship existing between them. Cultural resources located in the SCNF are highly significant because they directly contribute to the Shoshone and Bannock peoples' unique cultural heritage. Simply stated, a cultural resource is any resource of cultural character. Cultural resources are those social institutions, practices, beliefs, religious practices, sacred landscapes and objects, archaeological sites, natural resources and their use, intellectual property, oral traditions, language, historical documents and structures, secular and non secular items are cultural resources. An expanded definition of cultural resources is warranted in the EIS to ensure all resources receive an inclusive analysis for project impacts.

The DEIS insufficiently characterizes cultural resources as only archeological resources, a typical 'stones and bones' analysis of impacts. Only 5% of the SCNF has been surveyed for archeological sites, which often limits the Shoshone and Bannock history to those documented material remains. Common impacts from OHV use to archeological sites includes trampling, disturbing site stratigraphy, breakage of artifacts, soil erosion exposing buried artifacts for looting, and removal of artifacts. Unidentified archeological sites and traditional cultural properties are at risk from the same impacts.

The Tribes recommend the Forest Service conduct an ethnographic study to provide appropriate baseline information to analyze significance and intensity of impacts to cultural, visual/aesthetics, Treaty, historical, botanical, fish and wildlife resources. Until this information is obtained, an EIS without this baseline information will be considered by the Tribes as inadequate for analysis under the NEPA process. Mitigation for project impacts cannot truly be defined until a complete baseline data and analysis is provided. The Tribes request an ethnographic study be performed for the impacted area and contracted through a Tribal approved contractor.

An ethnographic study is needed for the purpose of enhancing the understanding of the Tribes' culture and relationship with the lands of the SCNF. The Tribal perspective of the cultural landscape is absent from the current analysis, including historical structures, cultural landscapes, archeological sites, and ethnographic information. The analysis used in the DEIS is inadequate, requiring further effort in alternative analysis and collection of Tribal ethnographic information.

In future consultation with the Tribes HeTO office, the Forest Service needs to provide detailed maps of all known archeological and cultural sites to the Tribes and explain the measures in place to ensure the protection of these sites. The Salmon River road, located between North Fork and Corn Creek, has been designated as a Traditional Cultural Property of the Tribes. This information serves as the basis for the informed input by our Tribal leaders and it is important the Tribes have a voice in the interpretation of their resources.

### 3. ENFORCEMENT

The Tribes strongly recommend the Forest Service develop and implement stringent Best Management Practices and monitoring requirements, along with effective enforcement for recreational users who fail to comply with the Travel Management Plan. As the Forest Service repeatedly stated, the funding is extremely limited for FS Law Enforcement Officers (LEO), and considering the huge number of acres, the Tribes question how the Forest Service can fulfill the LEO commitments with such limited staff. It is clear that the number of acres with resource damage has increased, due to the lack of enforcement – which results in lax protection and management for Forest Service lands. Without adequate LEO presence, the Tribes question if the SCNF can support elevated use without compromising the integrity of the natural and cultural resources of the area.

Without strict guidelines, motorized travel has the potential to hinder recovery efforts of other agencies and Tribes for threatened/endangered species and their habitat in the Salmon River basin. The Tribes expend significant resources and engage in intensive restoration efforts, including road/trail realignment and culvert replacement, to reduce sediment and improve functioning conditions of watercourses. The Travel Management Plan must recognize these efforts and implement protocol for designating and repairing motorized routes near critical habitat to avoid violation of the SCNF management framework for protection of the ecosystem.

The Tribes request the Forest Service actively prosecute irresponsible parties for illegal actions which result in resource damage. The adverse impacts to sensitive resources can be severe to the Tribes, limiting our ability to pass on traditional knowledge or engage in subsistence hunting.

### 4. OHV/RECREATIONAL USER CREATED ROUTES

The Tribes are concerned how the Travel Management Plan legitimizes unauthorized routes and trails created by recreational users for their own illegal purposes. Unauthorized routes and trails resulted in damage and destruction of the resources by the irresponsible OHV users on the National Forests. The routes have never been formally surveyed for potential impacts by the Forest Service. The potential impacts still exist regardless of the popularity of the route by those responsible for its creation. The Forest Service cannot avoid the obligation to make full analysis of formalizing user created trails in the DEIS and officially closing those routes which do not pass muster.

GENERAL COMMENTS:

1119

Shoshone-Bannock Tribes Comments to  
Salmon-Challis National Forest –Travel Management Plan DEIS

March 2009

Use the formal name for the Shoshone-Bannock Tribes; conduct a global check for this.

**TRUST RESPONSIBILITY:** Insert the following into the document.

*The Forest Service is under a multi-use, sustained yield mandate, to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. The Tribes remind and emphasize, the Forest Service has a federal trust responsibility to the Tribes to manage Forest Service lands under their jurisdiction in a manner to preserve and protect Treaty resources, on behalf of the Tribes.*

The Tribes request the Forest Service include a statement acknowledging federal trust responsibility to manage and protect Treaty Resources, and the Forest Service will work to ensure all proposed plans will be developed and analyzed with this responsibility paramount.

**TRIBAL HISTORY:** Insert the following to include information on Tribal History.

The Shoshone and Bannock peoples' aboriginal lands are vast and far-ranging and encompass a large geographic area of the Western United States. Rivers, including the Snake, Missouri, and Colorado River Basins, provided for the subsistence needs of the various bands, including the fish eaters, *Agai-dika*, the buffalo eaters, *Kutsu-dika*, the bighorn sheep eaters, *Tudu-dika*, and other bands who eventually ended up at the Fort Hall Reservation. Natural resources associated with a riverine ecosystem provided food, medicine, shelter, clothing and other uses and purposes, intrinsic to traditional practices. Hunting for fish, wildlife and native plant resources was an important subsistence practice. Intrinsic to these activities is transportation. The topography of the Tribes' aboriginal area required the use of a complex network of trails which crisscrossed along rivers, mountain ridges and passes.

In June 1867, an Executive Order established the Fort Hall Indian Reservation, as a collective place to consolidate the various bands of Shoshones, Bannocks and even other tribes, from their aboriginal lands, clearing the way for European-American settlements, such as ranchers and miners who desired rich resources present on aboriginal lands. The United States signed the Fort Bridger Treaty of 1868 with Shoshone and Bannock headmen, relinquishing any further claims to lands and title, but expressly reserving the right to hunt, fish and gather on unoccupied lands in the United States, in Article 4.

Today, descendants of the Lemhi, Boise Valley, Bruneau, Weiser and other bands of Shoshoni and Bannock people all reside on the Reservation as the political subdivision, the Shoshone-Bannock Tribes. Tribal member continue to exercise off reservation treaty rights and return to aboriginal lands to practice their unique culture and traditions.

The Tribes request a general history of Tribal use in this area be included in the Travel Management Plan. The old transportation trails and routes utilized by native peoples were

often developed by non-Indians into the current system of roads, trails and highways. Therefore, these areas often contain a higher density of cultural and archeological sites.

The Tribes request that due to the high level of damage to cultural resources sites, a program for cultural resource/archeological awareness and ethics training be developed specifically for OHV and recreational users. In addition, a program for the monitoring of system trails for damage to cultural sites should be implemented, with an adaptive management strategy to address issues as they arise.

For the future Forest Service projects, please ensure a stop work order is in place to prepare for the contingency of an inadvertent discovery. If any human remains are encountered or discovered, the Forest Service and the Tribes must be immediately notified to discuss the management strategy for repatriation of the remains. Prior to any further work proceeding, clearance must be obtained from both the Forest Service and the Tribes cultural resource staff.

**SPECIFIC COMMENTS:**

**Section 1.1 Introduction.**

The Introduction states that travel management plans have been developed by the Forest Service, but the Tribes question how the two existing travel management plans considered Tribal rights. Due to the large geographic scope of this travel plan, the Tribes suggest the Forest Service focus on smaller realistic planning units, working directly with the Tribes, to ensure a complete environmental analysis for Tribal resources. It is reasonable to require extensive environmental clearance prior to directing the public to environmentally sensitive areas. Equally important is the presence of adequate Forest Service law enforcement to control illegal use of motorized vehicles, upon completion of the maps.

It is unclear what management guidance provides the Forest Service direction on Tribal rights or natural resources tied to those reserved rights, in either the Challis Land and Resource Management Plan or the Salmon Land and Resource Management Plan, or the 1994 Challis Travel Plan. This makes the need for change identified in the DEIS incomplete, as it fails to include consideration or protection of Treaty rights and resources. Management direction is required to ensure consideration, protection, and sufficient management of resources will not adversely impact Off Reservation Treaty Rights and should be included in the features Common to All Action Alternatives. The EIS does not indicate what, if any, direction is available to assist Forest Service managers for specific projects and how they would impact Treaty resources. This needs to be included in the No Action Alternative.

**Section 1.10.3 Legal Requirements and Required Disclosures.**

The DEIS reiterates user preference issues related to motorized and non-motorized travel. However, it was not readily apparent where Tribal issues were incorporated, as described on page 1-29. Those specific issues included restrictions for Tribal member access for lawfully exercising reserved Treaty rights, ceremonial, traditional cultural activities. The Forest Service

has a legal obligation to include and discuss trust responsibility to the Tribes, reserved rights and the need to protect these rights in these planning documents.

### 3.1 Affected Environment & Consequences – Introduction.

The DEIS identifies how the recreational managers utilize two evaluation tools to assist in managing recreational resources within the national forests. The Recreational Opportunity Spectrum and the Recreation Niche are used to characterize the types and kinds of recreation available. However, these tools often are developed absent any Tribal input, and recognizing of Tribal uses that may affect recreational resources. It is unclear how describing the Recreation Niche can be accurate without acknowledging Tribal perspective, values and uses of the resources. It is recommended these tools be re-evaluated, including Tribal input.

The Tribes do not “recreate” as sports fishermen, or hunters. The Tribal use of trails and roads to access hunting, fishing and gathering areas is not mentioned in the ROS, the Recreational Niche, or the EIS. This activity needs to be acknowledged and analyzed to ensure appropriate management actions will occur that considers Tribal member Treaty rights activities.

### Section 3.7 Cultural Resources, Methodology.

What is the percentage of archeological coverage in the Planning area? The Risk assessment value for the 3<sup>rd</sup> bullet, when the route crosses an archeological site, needs to be modified. In this situation, the Tribes HeTO office must be consulted if the site is a Native American site; if the Tribes do not agree with the proposed mitigation, then this route must be dropped from further consideration.

Tribal consultation must be conducted with all Native American sites which have the potential to be eligible for the National Register or activities which may affect their site integrity. The Tribes agree with completing all cultural resource surveys and mitigations prior to designating motorized routes. The inventory reports should also be provided to the HeTO office in a timely manner to allow effective Tribal input. It is unclear what “high cultural site probability” is, based on what criteria?

### TREATY RESOURCES

Specific treaty resources include but are not limited to, the following resources: fish, wildlife, native botanical species, water resources (hot and cold springs), air, minerals (paint, obsidian, chert), cultural resources and the traditional cultural activities. Tribal concerns include the impacts to wildlife migratory routes or wildlife habitat.

### AIR QUALITY

A Tribal concern is the air quality and the dusty haze which results from increasing numbers of OHVs. It appears OHV users tend to ride in “packs/groups” with younger and younger ages OHV operators, who are more likely to drive erratically and fast in the dirt and gravel roads. In the forested areas of the National Forests, the dust hovers and remains in the immediate

valley much longer. This also may directly compromise fish populations and their habitat from the increasing sediment loads.

**Applicable Environmental Laws and Regulations/Legal Requirements:**

Include the 1868 Fort Bridger Treaty (15 Stat. 673) and all applicable statues, laws, and executive orders the Forest Service must abide by in regards to the Shoshone-Bannock Tribes.

**DEVELOPMENT OF ALTERNATIVES**

In this section, it first briefly introduces the various alternatives, however, it does not address in the “No Action Alternative,” any current management practices that deals with treaty rights, traditional cultural properties and other cultural resource concerns any tribes have, or the absence of such management practices. Please list this as a comparison item in the table in future chapters. Carry this analysis out with the remaining Alternatives.

**AMERICAN INDIAN RIGHTS AND INTERESTS**

Please include a statement regarding the Traditional Cultural Properties, reserved rights set forth in treaties, executive orders and the Government-to-Government Consultation requirements.

**NATIVE PLANT COMMUNITIES**

In accordance with the Tribes’ Policy for Management of the Snake River Basin Resources, the Tribes urge the Forest Service to actively restore the native plant communities, and to control and eventually eradicate exotic, invasive and non-native plant communities. Often the traditional, subsistence and medicinal plants and resources the Shoshone-Bannock Tribal members and of other tribes, rely upon have often been unduly compromised due to the introduction and invasion of non-native plants. No analysis or discussion is included for ethnobotanical uses of plants; this needs to be included.

**On Page 3-21, 3-148. WILDLIFE & RECREATIONAL ISSUES**

These sections fail to include Tribal member use of the wildlife resources and recreational resources.

Article 4 of the Fort Bridger Treaty, states:

“ARTICLE 4. The Indians herein named agree, when the agency-house and other buildings shall be constructed on their reservations named, they will make said reservations their permanent home, and they will make no permanent settlement elsewhere; but they shall have the right to hunt on the unoccupied land of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts.”

In accordance with that, the Tribes are self-regulated and enforce all off-reservation Tribal regulations for hunting and fishing through our own enforcement officers (Tribal Fish & Game Department) and judicial system. The Tribes also establish harvest guidelines separate from the

1119

Shoshone-Bannock Tribes Comments to  
Salmon-Challis National Forest –Travel Management Plan DEIS

March 2009

State of Idaho, and those Tribal seasons may not coincide with State harvest seasons. The DEIS Affected Environmental section does not reflect nor consider in the tribal hunting, fishing, and gathering. Tribal members have utilized the roads and trails, for centuries, to hunt, fish and gather. By failing to acknowledge Tribal use, the Forest Service has actually hindered Tribal exercise of Treaty reserved rights. For example, seasonal closures of roads based on state hunting season closure dates may eliminate hunting opportunities reserved by the Tribes, when State imposed deadlines are used in developing timeframes for the seven seasonal periods.

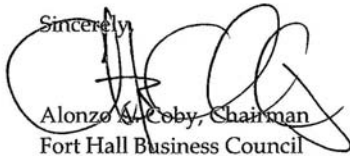
The Tribes have developed, through code, regulations for hunting, which often time do not coincide with those of the State of Idaho. Please note the only restrictions for Tribal members are applied to big game and the harvest of listed ESA species. Big game seasons are restricted to August 1 through December 31 for off reservation hunting. The use of motorized travel during these periods of time increases our efficiency during harvest and decreases the potential for waste. The concern for the Tribes is a practical one that is easily remedied by a reasonable accommodation for Tribal uses described above.

The Forest Service needs to ensure that NO impacts or minimal impacts will be made to wildlife, such as mule deer and elk, including winter ranges. Habitat for species of special status needs to be protected from direct, indirect and cumulative impacts from OHV users.

Please review and revise this NEPA document to address the concerns raised in these comments. Again, the Tribes need to be involved to review and ensure that the NEPA document adequately addresses the Tribal comments. The Tribes ask that the Salmon-Challis National Forest respond in written form, detailing how, why and where Tribal comments were or were not considered and incorporated in the FEIS.

Again, the Tribes expect the our Trustees at the Salmon-Challis National Forest to uphold their trust responsibility, and utilize a higher standard in determining what are acceptable levels of recreational and OHV uses that would result from Travel Management activities. Fulfilling the trust duty is accomplished through actions; in this case, by ensuring the Tribes have continued access to exercise treaty rights in all aboriginal areas. The Tribes look forward to continuing to work with your staff regarding this and other projects. If you have any further technical questions, please contact Claude Broncho at 208-239-4563 or at [cbroncho@shoshonebannocktribes.com](mailto:cbroncho@shoshonebannocktribes.com), or Yvette Tuell at 208-239-4552 or email her at [ytuell@shoshonebannocktribes.com](mailto:ytuell@shoshonebannocktribes.com).

Sincerely,



Alonzo A. Coby, Chairman  
Fort Hall Business Council  
Shoshone-Bannock Tribes

1119

Shoshone-Bannock Tribes Comments to  
Salmon-Challis National Forest – Travel Management Plan DEIS

March 2009

Attachments:

1. Shoshone-Bannock Tribes Snake River Policy
2. Shoshone-Bannock Tribes Position Statement Regarding Developed Campgrounds on Federal Lands

CC: Bill Bacon, Attorney's Office  
SBT Land Use Policy Commission  
SBT Land Use Department  
SBT HeTO  
SBT Fish & Wildlife Department  
File

**THE POLICY OF THE SHOSHONE-BANNOCK TRIBES  
FOR MANAGEMENT OF SNAKE RIVER BASIN RESOURCES**

November 1994  
Resolution # GAME-94-1049

**ISSUE DEFINITION**

Beginning in 1989 and continuing through 2008, many non-Federal hydroelectric projects (Projects) within the Snake River Basin (Basin) will be reviewed under the Federal Energy Regulatory Commission relicensing process. In addition, subsequent to the listing of various salmon and snail species under the Endangered Species Act as well as the initiation of other conservation efforts, the Basin is being viewed, as never before, as a valuable resource contributing to the overall Pacific Northwest regional conservation framework. The Shoshone-Bannock Tribes support efforts to conserve, protect, and enhance natural and cultural resources within the Basin and therefore establish this policy to re-emphasize previous policy statements and provide new direction with regards to recently initiated Basin actions.

**BACKGROUND AND INTRODUCTION**

Since time immemorial, the Snake River Basin has provided substantial resources that sustain the diverse uses of the native Indian Tribes including the Shoshone-Bannock. The significance of these uses is partially reflected in the contemporary values associated with the many culturally sensitive species and geographic areas within the Basin. Various land management practices, such as the construction and operation of hydroelectric projects have contributed extensively to the loss of these crucial resources and reduced the productive capabilities of many resource systems. These losses have never been comprehensively identified or addressed as is the desire of the Shoshone-Bannock Tribes.

The Shoshone-Bannock Tribes reserved guaranteed continuous use Rights to utilize resources within the region that encompasses and includes lands of the Snake River basin. The Fort Hall Business Council has recognized the contemporary importance of these Rights and resources by advocating certain resource protection and restoration programs and by preserving a harvest opportunity on culturally significant resources necessary to fulfill inherent, contemporary and traditional Treaty Rights. However, certain resource utilization activities including the operation of federal and non-federal hydroelectric projects effect these resources and consequently, Tribal reserved Rights.

It has always been the intent and action of the Shoshone-bannock Tribes to promote the conservation, protection, restoration, and enhancement of natural resources during the processes that consider the operation and management of Federal projects and during the land management activities of other entities.

This policy re-emphasizes the Tribes previous policies with regards to these processes

---

Shoshone-Bannock Tribes -- Snake River Policy

---

and activities. However, the formal relicensing process for non-federal projects (Projects) as well as other recent undertakings that will consider the overall management of the Basin represent previously unavailable opportunities to comprehensively identify and address impacts to and losses of, resources affected by these Projects.

The importance of considering Tribal goals and objectives for effected resources is specifically recognized in the regulations outlining the federal relicensing process. The Fort Hall Business Council has established the following policy for the Basin in order to provide guidance in determining these goals and objectives. This direction is intended to be consistent with existing Tribal policy for participating in processes dealing with other land and water management activities.

**STATEMENT OF POLICY**

The Shoshone Bannock Tribes (Tribes) will pursue, promote, and where necessary, initiate efforts to restore the Snake River systems and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions which most closely represents the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work to ensure the protection, preservation, and where appropriate-the enhancement of Rights reserved by the Tribes under the Fort Bridger Treaty of 1868 (Treaty) and any inherent aboriginal rights.

**CONCLUSION**

In addition to the ongoing efforts of the Tribes and its cooperating agencies, the relicensing process as well as recently initiated Basin recovery efforts provide a firm basis for striving to meet Tribal needs regarding resource conservation, protection, and enhancement. This policy will provide direction to Tribal staff for participating in regional processes as well as for the future development of resource and process specific Tribal plans and guidelines.

Tribal participation in the Project relicensing efforts will be used to identify the direct, indirect, and cumulative effects attributable to the construction, operation, and any proposed modifications of Project facilities. The Tribes expect the license applicant(s) and the Federal Energy Regulatory Commission, in consultation with the Tribes and agencies during the relicensing process, to identify alternative management strategies and develop mitigation measures to reduce or eliminate the identified impacts consistent with this Policy.

In combination with existing policy and direction, other natural and cultural resource management activities (typically those undertaken by the Tribes cooperating agencies) will be utilized to identify additional land management impacts within the Snake River Basin and will similarly identify alternative management strategies and apply mitigation measures consistent with this Policy.

All cooperating agencies will be expected to utilize all available means, consistent with their respective trust responsibility mandates, to protect Treaty rights and Tribal interests consistent with this Policy.

## **Shoshone-Bannock Tribes Position Statement Regarding Developed Campgrounds on Federal Lands**

GAME-06-0506

### **Issue**

The Federal land managing agencies have approached the Shoshone-Bannock Tribes (Tribes) with numerous proposals to address recreational uses on federal lands, including stricter and more detailed management strategies to reduce and minimize recreational user impacts. These measures include providing reservation and lottery systems in developed for campground areas, requiring user fees for campground services, designating dispersed camping areas, and other measures. The Shoshone-Bannock Tribes set forth the following position on camping, a treaty right held by the Tribes' as reserved by the Treaty of Fort Bridger, July 3, 1868<sup>1</sup>.

### **Background**

Traditionally, the Shoshone and Bannock peoples were nomadic and migrated throughout the region to sustain their livelihoods. There was no understanding of "permanent settlement" until the United States forced them to the Fort Hall Reservation. Tribal elders have indicated that when Tribal members went camping, there was no real place where the people could NOT camp, and that Tribal members would customarily camp in areas as necessary.

Little has changed in terms of traditions, customs and language, regarding camping. In the Bannock and Shoshone languages, the word to camp is "no'vithe," which are two words put together. "No'o" means to carry, and "vithe or bithe" means to arrive; or to move, a temporary type of dwelling. Another word referring to camping is "nowea." All of these words refer to temporary lodging and moving from place to place, depending on the resources available.

### **Treaty Guaranteed Rights**

The Tribes have reserved rights as set forth in the Treaty of Fort Bridger of July 3, 1868. In the treaty negotiations, Tribal leaders made it clear that they wished to continue to fish for salmon, hunt buffalo and elk, gather the plants and medicines and other cultural resources in their aboriginal areas. The Tribes relinquished millions of acres of their aboriginal homelands to the United States and retained a reservation known as the Fort Hall Reservation, and other federally recognized reserved rights. Accordingly, the Tribes retained off-reservation hunting, fishing, gathering rights and the right to camp, which they continue to exercise on unoccupied lands. That specific languages states:

*"ARTICLE 4. The Indians herein named agree, when the agency-house and other buildings shall be constructed on their reservations named, they will make said reservations their permanent home, and they will make no permanent settlement elsewhere; but they shall have the right to hunt on the unoccupied land of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts."*

The Fort Bridger Treaty is a peace treaty, different and unique from other treaties with other tribes. Although the Tribes agreed to relinquish ownership of lands beyond the exterior boundaries of the Fort Hall Reservation, the Tribes retained subsistence rights to unoccupied lands of the United States. Contrary to other treaties, the Shoshone-Bannock Tribes' exercise of Treaty rights are not limited to "usual and accustomed areas" nor does the "in common with" language apply to the Fort

---

<sup>1</sup> 15 Stat. 673.

Shoshone-Bannock Tribes

Position Statement on Camping on Federal lands

Bridger Treaty. These reserved treaty rights have been recognized and confirmed by the Idaho Supreme Court.<sup>2</sup>

The cultural resources located on many off-Reservation lands are essential to the culture and traditions of the Tribes. Notably, these resources provide subsistence to a majority of Tribal families residing on the Fort Hall Reservation. Tribal individuals, families and groups continue to travel to traditional and aboriginal territories and lands. Camping is intrinsic to these traditional activities.

Federal land developed campground reservation systems, lotteries and fees limit Tribal members' access to traditional camping and impair the exercise of their treaty reserved rights, by forcing Tribal members to compete against tourists and those who do not have a unique treaty right. Shoshone-Bannock Tribal member camping is not limited to developed campgrounds, nor is it limited to "usual and accustomed areas." The Shoshone-Bannock Tribes do not distinguish between recreational or dispersed camping, developed campgrounds or fee-based campgrounds.

#### **Federal Trust Responsibility**

It is well established that the United States has a solemn trust obligation to the Shoshone-Bannock Tribes. Under this obligation, the United States has a special fiduciary responsibility to consider the best interests of the Tribes pursuant to the Fort Bridger Treaty. Today, most fundamentally, the modern form of the trust obligation is the federal government's duty to protect treaty resources, which includes the off-reservation treaty rights reserved by the Tribes. This duty to protect treaty resources includes preserving the integrity of lands upon which the Tribal resources are located and the exercise of treaty rights.

#### **Statement of Policy**

*The Shoshone-Bannock Tribes exercise inherent and reserved treaty rights within their own authorities and responsibilities. Federal land Developed Campground fees, reservation systems, and any other fee-based campground services shall not apply to the enrolled members of the Shoshone-Bannock Tribes, in accordance with Article IV of the Fort Bridger Treaty, on all unoccupied lands of the United States. The Treaty does not state, nor was it the intent of our leaders at the time of the signing of the treaty, to impose or restrict Tribal members from exercising off-Reservation rights to hunt, fish and gather, and the corresponding right to camp. Federal permitting requirements are contrary to the rights reserved by the Tribes in the Fort Bridger Treaty.*

#### **Conclusion**

The Tribes will continue to work with federal land managing agencies in a cooperative relationship to co-manage the resources off reservation. The Tribes urge the individual federal land managing agencies to work directly with their contractors to ensure that this policy is upheld. The Tribes are always willing to offer education and informational services to the federal agencies regarding this policy.

In addition to other Tribal policies and direction, this policy shall apply to all federal agencies that own and manage federal lands and shall be utilized in the development of management strategies and implementation of federal actions. All cooperating agencies are urged to utilize all available means, consistent with their respective trust responsibility mandates, to protect Treaty rights and Tribal interests consistent with this Policy.

<sup>2</sup>State v. Tinno, 497 P.2d 1386 (Idaho 1972)

## PUBLIC COMMENTS AND RESPONSES

### SECTION I - ACCESS

**1. The Forest Service should not close routes, or should open more routes, because motorized access for multiple uses is a fundamental right, particularly where public funds were used to construct and/or maintain the route.**

**Agency Response:** The Forest Service is tasked with managing land within its jurisdiction to protect and enhance the resources on a sustainable basis. In general, the Forest Service is also charged with managing for multiple-use on a broad scale but is not obligated to provide for every use on every acre. Numerous laws and policies reiterate this responsibility. The implication that expenditure of public funds obligates the Forest Service to providing public routes is erroneous in that it contradicts Congressional intent as to the purpose of the forest road system and the fact that the Forest Service has never been delegated authority to operate a public road system. Under current laws, regulation and policy, the forest road system is operated in a manner that addresses access needs for management, utilization and protection of forest resources (16 U.S.C. 532) as well as allowing for public use of the transportation system to the extent that this use is consistent with other management objectives. The alternatives in the analysis attempt to balance resource obligations with public desire for access.

**2. The Forest Service should focus primarily on providing adequate sustainable routes for motorized visitors.**

**Agency Response:** As stated in the preamble of Travel Management Rule: "Advance planning based on public involvement, careful design, and site-specific environmental analysis provide the best hope for a sustainable, managed system of motor vehicle routes and areas addressing user needs and safety with a minimum of environmental impacts." This environmental impact statement has been prepared in compliance with the Travel Management Rule to

designate a system of roads and trails for public motor vehicle use.

**3. The Forest Service should not close routes, or should open more routes, in order to provide access to/for fuelwood, permitted uses, emergency services and private land.**

**Agency Response:** Page 1 of this FEIS explains that: "The following uses would not be affected by this decision and are outside the scope of this project: (1) aircraft; (2) over-snow vehicles; (3) watercraft; (4) non-motorized uses (e.g. hiking, equestrian, mountain bikes); (5) search and rescue operations; (6) law enforcement operations; (7) fire fighting operations; (8) permitted uses (e.g. wood cutting, livestock herding/fence maintenance; (9) limited administrative access; (10) legal ingress and egress to private land; (11) new or non-national forest roads; and (12) use of roads with legally documented rights-of-way held by state, county or other public road authority."

**4. The Forest Service should not close routes, or should open more routes, to provide equal access to the elderly and disabled.**

**Agency Response:** See FEIS p. 1-21, for the discussion of this issue. The Agency is bound by Federal law to protect the rights of disabled individuals in a non-discriminatory manner; therefore all alternatives address this issue by assuring that reasonable restrictions on motor vehicle use are applied to everyone.

In conformance with section 504, wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle, even if they are battery-powered.

All alternatives provide a diversity of access options including open roads and motorized trails for those with physical limitations. The selecting official will have the choice of the five Alternatives in respect to access by motorized means.

**5. The Forest Service should not close routes, or should open more routes, to provide access to**

***recreation and other opportunities like camping, education, fishing and photography.***

**Agency Response:** The Forest Service believes that the Agency should provide access for both motorized and non-motorized users in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the National Forests to provide contrasting opportunities for recreation.

Access to the Forest is maintained in various degrees in all alternatives in the FEIS. The selecting official will choose from them to provide access for future recreation activities.

***6. The Forest Service should not close routes, or should open more routes, because they provide for individual and community economic benefits.***

**Agency Response:** We recognize that motorized system routes provide opportunities for motorized activities that provide economic benefits to the local community; however, so do a wide variety other forms of recreation, including non-motorized activities. A negative impact to motorized activities may provide a beneficial effect to non-motorized activities, and vice versa. The economic contributions of motorized recreation activities are discussed in the social and economic section of Chapter 3.

***7. The Forest Service should not close routes, or should open more routes, in order to disperse motorized use for safety, accommodate more users, reduce user conflicts, improve the quality of motorized recreation experiences, and have an enforceable travel plan.***

**Agency Response:** Access to the Forest is maintained in various degrees in all alternatives in the FEIS. The selecting official will choose from them to provide access for future recreation activities.

***8. The Forest Service should not attempt to manage game security through the travel management process, because other laws and***

***regulations provide for sufficient protection of wildlife resources.***

**Agency Response:** The Idaho Department of Fish and Game is responsible for managing population numbers of big game species through hunting regulations. The Forest Service is responsible for managing habitat for big game, as well as other wildlife species. Many wildlife species are negatively affected by roads and the human activities facilitated by road access (Wisdom et al. 2000). By managing motorized route density, through designation or seasonal openings, habitat effectiveness for big game species can be enhanced. Hunting is a recreational opportunity and route designation also serves to provide forests users both motorized and non-motorized hunting opportunities.

***9. The Forest Service should not close routes, or should open more routes, to facilitate management of Forest resources such as timber and wildland fuels.***

**Agency Response:** The purpose of this project is to designate a system of roads and motorized trails for public motor vehicle use consistent with the Travel Management Rule. Management of Forest resources and wildland fuels are not part of this designation process although it is likely that resource management activities may use some of the roads designated for public motor vehicle use.

***10. The Forest Service should not close routes, or should open more routes, because enough areas are already available for "quiet users."***

**Agency Response:** The FEIS analyses quiet recreation as part of the spectrum of recreation opportunities available on the forest across the range of alternatives. The recreation section provides assessment of cumulative effects which includes a discussion of the neighboring wilderness areas where motorized recreation is prohibited.

***11. The Forest Service should close routes to motorized travel to ... provide opportunities for visitors seeking quiet forms of recreation.***

**Agency Response:** See #10 Above.

**12. The Forest Service should improve enforcement of the current travel plan and limit the number of additional routes that are opened to motorized travel to reduce erosion, weed infestation and off trail motorized use.**

**Agency Response:** The Travel Management Rule, Sec. 212.50 provides for a system of National Forest System roads, National Forest System trails, and areas on National Forest System lands that are designated for motor vehicle use. After these roads, trails, and areas are designated, motor vehicle use, including the class of vehicle and time of year, not in accordance with these designations is prohibited by 36 CFR 261.13. Motor vehicle use off designated roads and trails and outside designated areas is prohibited by 36 CFR 261.13.

Current regulations prohibit operation of vehicles in a manner damaging to the land, wildlife, or vegetation (Sec. 261.13(h)). However, these regulations have not proven sufficient to control proliferation of routes or environmental damage. This insufficiency is due in part to the nature of OHV travel. The first vehicle driving across a particular meadow may not harm the land. However, by the time 50 vehicles have crossed the same path, there may be a user-created trail and lasting environmental impacts. Determining which particular vehicle caused the damage can sometimes represent a challenge to law enforcement officers.

The Travel Management Rule is intended to improve enforcement since it will prohibit the operation of motor vehicles off the designated system. The number of new routes that will be added to the system is much less than the number of existing unauthorized routes that are violations of the current travel plan. Limiting cross-country motorized use and designating roads, trails, and areas where motorized use can occur will reduce erosion and weed infestation.

**13. The Forest Service should minimize motorized routes in proposed wilderness and Inventoried Roadless Areas to prevent user conflicts, water quality degradation, wildlife disturbances, erosion, trail widening, spreading of noxious**

**weeds, habitat degradation and reduction in roadless character.**

**Agency Response:** The Wilderness/ Roadless Values Emphasis Alternative (Alternative 3) was designed to provide a minimum motorized route system in proposed wilderness and Inventoried Roadless Areas as well as address resource concerns brought forward by the public and Forest Service specialists.

The presence or absence of invasive species is not a criterion for the designation of Wilderness or Roadless Areas. Noxious weed management priorities are not based on the designation of land as Wilderness or an Inventoried Roadless Area. However, the SCNF has implemented an Integrated Weed Management program and will continue to manage invasive plant species in conjunction with the local Cooperative Weed Management Areas in an effort to minimize their impact on these areas and all forest resources.

**14. The Forest Service should not open routes currently impassible to motorized travel to reduce conflicts with horse users, maintenance issues, wildlife impacts, erosion and weed infestation.**

**Agency Response:** Ground disturbance, including road and/or trail construction or clearing is not part of this proposal. Based on available information, the Forest Service does not plan to designate any routes that are not currently impassible to motor vehicles.

**15. The Forest Service should close roads and trails that contain stream crossings that negatively impact bull trout and other salmonids.**

**Agency Response:** Most crossings on Forest System roads consist of existing bridges and culverts, with a few fords, while most crossings on trails consist of existing fords, with a few bridges and culverts. The forest has already inventoried approximately 150 to 200 culvert stream crossings to determine if they present an impact to fish migration and will propose remediation of those that are identified to be causing negative impacts to fish migration. Therefore, while current agency direction is for the timely correction of these

problems, the reality is that funding continues to be a limiting factor. To date, many major crossings creating fisheries impacts have already been corrected over the past 20 years, as opportunities and funding were available.

**16. The Forest Service should allow ATVs (all terrain vehicles) use only for ingress and egress in Forest campgrounds.**

**Agency Response:** Consistent with Sec. 212.51 of the Travel Management Rule, the responsible official may include the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping and big game retrieval. The Preferred Alternative would designate limited motor vehicle use for the purpose of dispersed camping within 300 feet of most routes. Some routes will not have a designated corridor and motorized access to dispersed camping will be specifically designated. ATVs can be used to access Forest campgrounds. A complete description of motorized access for dispersed camping is included in the FEIS.

**17. The Forest Service should place bridges over stream crossings to avoid deterioration of the streams.**

**Agency Response:** The construction and improvement of routes is outside the scope of this project which only addresses the designation of open routes and areas. If unacceptable resource damage resulting from designation is probable, then not designating the route or limiting the designation to specific vehicle types or season of use may be appropriate.

**18. The Forest Service should provide more and better loop opportunities for all types of motorized vehicles to increase opportunities reduce user conflicts and decrease congestion**

**Agency Response:** The range of alternatives gives the deciding official ample opportunity to select from an array of combinations of various trail experiences. This travel decision does not preclude future route development with additional analysis.

**19. The Forest Service should designate more routes by vehicle type to include RTVs and side-by-side UTVs on trails closed to full sized vehicles but open to ATVs and motorcycles.**

**Agency Response:** RTV and UTV use may be designated on motorized trails greater than 50 inches wide or on designated Forest System Roads provided the use is consistent with State Law for vehicle type. In Idaho, the driver must be at least 16 years of age, possess a valid driver's license and have insurance to travel on Forest System Roads open to highway vehicles.

**20. The Forest Service should keep roads open to full size vehicles use as well as all terrain vehicles.**

**Agency Response:** Forest system roads will be open to full-sized vehicles. All terrain vehicles (ATV) and motorcycles may travel on Forest system roads provided the vehicle is licensed, insured and operated by a person 16 years of age or older possessing a valid driver's license. Motorized trails will be designated for the vehicle type allowed to travel on the trail. Only wheeled vehicles will be allowed on motorized trails. Vehicle types may include motorcycles, ATVs, jeeps and/or full-sized vehicles.

**21. The Forest Service should designate a sufficient network of sustainable Off-Highway Vehicle and All Terrain Vehicle routes to meet current and projected future public recreation needs.**

**Agency Response:** The range of alternatives gives the deciding official ample opportunity to select from an array of combinations of various trail experiences. This travel decision does not preclude future route development with additional analysis

**22. The Forest Service should provide more single-track riding opportunities.**

**Agency Response:** The range of alternatives gives the deciding official ample opportunity to select from an array of combinations of various trail experiences. This travel decision does not preclude future route development with additional analysis.

**23. The Forest Service should allow All Terrain Vehicle and Utility Terrain Vehicle use on two-wheel drive trails.**

**Agency Response:** Two-wheel drive trails will be designated for motorcycle use and displayed on the Motor vehicle Use Map. The Travel Management Rule prohibits the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that are not consistent with the designations.

**24. The Forest Service should refrain from converting single-track trails to ATV (all-terrain vehicle) trails at the expense of single trail users and to minimize the resource impact of four-wheeled vehicles.)**

**Agency Response:** The Motor Vehicle Use Map will designate the vehicle type allowed to travel on motorized trails. Under existing travel plans ATVs can travel on motorized trails in “open areas”, unless the route is marked on the map on the ground indicating two-wheeled motorized use only. The Forest Service is proposing to designate 498 single-track trails to ATV use in the Preferred Alternative.

**25. The Forest Service should restrict off-road-vehicles to prevent excessive dust, noise and trail damage.**

**Agency Response:** The Travel Management Rule requires the Forest Service to designate roads, trails, and areas open to motor vehicle use. As stated in Sec. 212.55 of the Travel Management Rule, the responsible official shall consider effects on the following, with the objective of minimizing:

- (1) Damage to soil, watershed, vegetation, and other forest resources;
- (2) Harassment of wildlife and significant disruption of wildlife habitats;
- (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
- (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands.

In addition, the responsible official shall consider:

- (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.

**26. The Forest Service should only allow off road ATV (all terrain vehicles) access to hunters that are disabled or elderly.**

**Agency Response:** See FEIS p. 1-21, for the discussion of this issue. The Agency is bound by Federal law to protect the rights of disabled individuals in a non-discriminatory manner; therefore all alternatives address this issue by assuring that reasonable restrictions on motor vehicle use are applied to everyone.

In conformance with section 504, wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle, even if they are battery powered.

All alternatives provide a diversity of access options including open roads and motorized trails for those with physical limitations. The selecting official will have the choice of the five Alternatives in respect to access by motorized means.

Also see responses to comments 4 and 232.

**27. The Forest Service should implement seasonal route designations, rather than blanket closures, when managing routes for wildlife protection.**

**Agency Response:** Seasonal openings were developed with the input of the Idaho Department of Fish and Game to address wildlife issues, primarily hunting and calving/fawning seasons. Further refinement of the seasonal openings will be included in the preferred alternative to improve consistency and enforceability across the SCNF.

**28. The Forest Service should streamline seasonal closures to three or four choices to improve public understanding and enforceability of the plan, protect necessary habitat value for big game, and reduce soil impacts.**

**Agency Response:** Seasonal openings were developed with the input of the Idaho

Department of Fish and Game to address wildlife issues, primarily hunting and calving/fawning seasons. The Preferred Alternative further refines the seasonal open periods to five seasons of use in addition to year-long use to improve consistency and enforceability across the SCNF.

**29. The Forest Service should continue to allow off-route travel to retain the local community's custom and culture.**

**Agency Response:** The Travel Management Rule, Sec. 212.50 provides for a system of National Forest System roads, National Forest System trails, and areas on National Forest System lands that are designated for motor vehicle use. After these roads, trails, and areas are designated, motor vehicle use, including the class of vehicle and time of year, not in accordance with these designations is prohibited by 36 CFR 261.13. Motor vehicle use off designated roads and trails and outside designated areas is prohibited by 36 CFR 261.13. Existing Travel Plans include areas where motorized travel is unrestricted; however the Travel Management Rule does not allow motorized use off the designated system.

**30. The Forest Service should allow motorized cross-country travel 300 feet off designated routes or clearly identify rationale for not allowing that use.**

**Agency Response:** The SCNF is proposing to allow motorized access to dispersed campsites via routes that terminate in dispersed camp sites as well as limited motorized access within 300 feet of designated system roads and motorized trails where slope, vegetation type, and resource conditions would permit such use without causing unacceptable levels of damage. Unacceptable levels of damage may include but would not be limited to excessive soil compaction and displacement; damage to wet meadows, seeps, springs, bogs and streams; crushed and uprooted vegetation; damage to cultural and archaeological resources; and disturbance and/or harassment to fish and/or wildlife.

No motorized access would be allowed off previously unauthorized routes until archaeological surveys are completed. After

surveys and consultation with the State Historical Preservation Officer are completed, corridors for the purpose of dispersed camping may be designated and delineated on subsequent publications of the MVUM. A schedule for conducting surveys will be included in the project design features.

Parking would be allowed as part of the designations of all motorized routes where it is safe to do so, where it does not cause resource damage, and where all parts of the vehicle are within one vehicle length of the road edge (Proposed Washington Office Directive FSM 7716.1). Parking is also allowed in attendant facilities such as trail heads, short dead road segments leading to gates, pull offs, turn outs, and other terminal facilities. Parking would not be acceptable on steep cut and fill slopes, within 30 feet of a stream, lake or pond, in wet meadows and in other locations that may be signed prohibiting parking. Once parked in a reasonable and safe location forest visitors may engage in a full range of non-motorized activities. Motorized activities must comply with designations on the MVUM.

A complete description of motorized access for dispersed camping is included in the FEIS.

**31. The Forest Service should provide for a sufficient network of available motorized routes to accommodate anticipated future demand, including designation of special dedicated areas, such as dunes or rock crawls, for off-road travel.**

**Agency Response:** Specific areas for these activities were not identified during this analysis, and were not considered as part of the range of alternatives. This decision does not prevent establishment of these specialized areas in the future with proper analysis and decision.

**32. The Forest Service should designate specific cross-country travel areas to provide training opportunities for off-road riders.**

**Agency Response:** Off-road travel will not be allowed after the Forest designates roads, trails and areas open for motor vehicle; therefore off-

road training areas will not be part of the designated system.

**33. The Forest Service should restrict motorized travel to designated roads and trails to minimize erosion and wildlife impacts.**

**Agency Response:** The Travel Management Rule requires the Forest Service to designate roads, trails, and areas open to motor vehicle use. Section 212.55 of the Travel Management Rule, provides that the responsible official shall consider the effects on the following with the objective of minimizing damage to soil, watershed, vegetation, and other forest resources; harassment of wildlife and significant disruption of wildlife habitats.

**34. The Forest Service should not close areas or routes to motorized use as it will result in concentrating use in smaller areas, denying access to public lands, diminishing visitor experience, and creating unsafe conditions on roadways.**

**Agency Response:** The Forest recognizes the valuable resource all trails, motorized and non-motorized provide to the public, and believes the miles of motorized trails through all alternatives provide an acceptable array of manageable (safe, affordable) opportunities. This reflects part of the purpose and need for the project.

Some motorized trails already receive heavy use, especially on peak weekends during the summer. But many motorized trails on the SCNF, receive little use because they are not known or are not located next to a popular campground or trailhead. Closing a popular trail within a popular area could concentrate use on the remaining trails. Closing some “little used” motorized routes in “low use” areas would have little effect on trail use patterns.

**35. The Forest Service should not close areas and/or routes to motorized use as it causes higher use density on open routes and areas, which will increase resource damage.**

**Agency Response:** See #34 above.

**36. The Forest Service should allow adequate access for wood gathering, grazing and mining due to the importance of these activities in Lemhi County.**

**Agency Response:** Wood gathering, grazing and mining are activities that require a permit on the SCNF. These activities will still be allowed and adequate access will be provided as part of the permitting process.

**37. The Forest Service should allow cross-country travel to gather firewood because it reduces the wildland fire fuel load and dependency on non-renewable resources.**

**Agency Response:** Fuelwood gathering is an activity that requires a permit on the SCNF. The distance off designated routes that an individual would be allowed to travel to gather fuelwood will be addressed in the fuelwood permit.

**38. The Forest Service should leave roads open for woodcutting and camping.**

**Agency Response:** Fuelwood cutting is a permitted activity on the SCNF and is not part of the Travel Plan Revision. Designated routes may be used for fuelwood gathering and additional fuelwood gathering areas may be provided as part of the permitting process. Limited motor vehicle use off designated routes for the sole purpose of dispersed camping varied by route and location on the Forest and will be displayed on the motor vehicle use map.

**39. The Forest Service should prohibit cross-country travel including that for firewood gathering to reduce the ability to do significant damage to our public lands by off road vehicles.**

**Agency Response:** Fuelwood cutting is a permitted activity on the SCNF and is not part of the Travel Plan Revision. Designated routes may be used for fuelwood gathering and additional fuelwood gathering areas may be provided as part of the permitting process.

**40. The Forest Service should allow dispersed camping in all parts of the forest; dealing with problem areas on a site by site basis.**

**Agency Response:** The Preferred Alternative proposes limited motorized access within 300 feet of either side of **most** designated routes for the purpose of dispersed camping. Specific dispersed camping sites will be designated in certain areas of the Forest where a proliferation of routes is causing unacceptable levels of resource damage. A complete description of motorized access for dispersed camping is included in the FEIS.

**41. The Forest Service should allow motorized travel to dispersed camping within 300 feet of designated roadways and at least 30 feet from streams.**

**Agency Response:** The Preferred Alternative proposes to allow motorized access to dispersed campsites via routes that terminate in dispersed camp sites as well as limited motorized access within 300 feet of designated system roads and motorized trails where slope, vegetation type, and resource conditions would permit such use without causing unacceptable levels of damage. Unacceptable levels of damage may include but would not be limited to excessive soil compaction and displacement; damage to wet meadows, seeps, springs, bogs and streams; crushed and uprooted vegetation; damage to cultural and archaeological resources; and disturbance and/or harassment to fish and/or wildlife.

No motorized access would be allowed off previously unauthorized routes until archaeological surveys are completed. After surveys and consultation with the State Historical Preservation Officer are completed, corridors for the purpose of dispersed camping may be designated and delineated on subsequent publications of the MVUM. A schedule for conducting surveys will be included in the project design features.

Parking would be allowed as part of the designations of all motorized routes where it is safe to do so, where it does not cause resource damage, and where all parts of the vehicle are within one vehicle length of the road edge (Proposed Washington Office Directive FSM 7716.1). Parking is also allowed in attendant facilities such as trail heads, short dead road

segments leading to gates, pull offs, turn outs, and other terminal facilities. Parking would not be acceptable on steep cut and fill slopes, within 30 feet of a stream, lake or pond, in wet meadows and in other locations that may be signed prohibiting parking. Once parked in a reasonable and safe location forest visitors may engage in a full range of non-motorized activities. Motorized activities must comply with designations on the MVUM.

A complete description of motorized access for dispersed camping is included in the FEIS.

**42. The Forest Service should allow dispersed camping at least 1,000 feet from designated routes to let people get away from the road, and minimize damage from people camping in tight areas.**

**Agency Response:** The Preferred Alternative proposes to allow motorized access to dispersed campsites via routes that terminate in dispersed camp sites as well as limited motorized access within 300 feet of designated system roads and motorized trails where slope, vegetation type, and resource conditions would permit such use without causing unacceptable levels of damage.

Dispersed camping is allowed anywhere on the Forest, it is the motorized access that is restricted. The SCNF does not agree that 1,000 feet is necessary for campers to get away from the road and minimize damage.

**43. The Forest Service should retain the current "300 foot" rule for camping off of designated routes. Designated camp locations are not necessary due to the low use densities.**

**Agency Response:** Eight areas of concern were identified in the fall of 2008, after the release of the DEIS. These areas would be closed to any motorized travel off designated routes including dispersed camping due to sensitive resource protection needs and are analyzed in the Preferred Alternative. Areas with sensitive resources proposed for closure to motorized off-route travel include the Sawmill Canyon, Antelope, Wildhorse, Pass Creek, and North Fork Big Lost River areas of the Lost River Ranger

District, and the Thatcher Creek, Beaver Creek and Cape Horn areas of the Middle Fork Ranger District. Both a corridor along the Salmon River Road from North Fork to Corn Creek and designated dispersed camping sites are analyzed in the FEIS.

In the eight areas analyzed in the Preferred Alternative, all dispersed camping would be restricted to designated sites which would be displayed on the Motor Vehicle Use Map (MVUM) and signed on the ground. A proliferation of unauthorized routes off Forest system roads and trails has adversely impacted cultural and natural resources in these high-use areas. These areas are typically within a few hours of major cities in southern Idaho. Forest visitors park motor homes and campers in concentrated groups along both authorized and unauthorized routes, many of which are directly adjacent to streams and rivers. ATV and motorcycle riding is a popular recreation activity that often accompanies dispersed camping in high-use areas. Table 2-12 on page 27 of the FEIS displays the areas and routes where cross-country travel for the purpose of dispersed camping would **not** be part of route designation. Dispersed campsites would be designated and signed on the ground.

***44. The Forest Service should allow dispersed camping on all open "U" routes, regardless of whether they have "clearances."***

**Agency Response:** Natural, cultural and safety clearances are part of the analysis required for route designation. Limited motor vehicle use for dispersed camping is part of the route designation, therefore dispersed camping would not be allowed off U-routes unless the appropriate clearances have been obtained.

***45. The Forest Service should limit dispersed camping to slopes less than 20 or 30 percent along stream segments that provide spawning or rearing habitat for bull trout, salmon or steelhead."***

**Agency Response:** For practical reasons, most dispersed camping normally occurs in flat areas with little to no slope. The 30-ft. "no disturbance buffer strip along stream banks" provides bank

protection and filters runoff or sediment from adjacent camping areas, according to Watershed program criteria outlined in the Salmon Forest Plan for required filter strips along streams, relative to slope and ground cover.

***46. The Forest Service should limit dispersed camping to one vehicle length off designated travel routes to avoid creation of unauthorized side roads.***

**Agency Response:** The SCNF has analyzed various scenarios for dispersed camping as part of route designation. The Preferred Alternative proposes to include limited motor vehicle use within 300 feet of **most** routes, although designated dispersed camping is proposed in some areas. Parking is allowed as part of the designations of all motorized routes where it is safe to do so, where it does not cause resource damage, and where all parts of the vehicle are within one vehicle length of the road edge (proposed Washington Office Directive FSM 7716.1)

***47. The Forest Service should not continue to authorize general off-route motorized travel for dispersed camping, and should designate routes to dispersed camping areas only where there is no potential for environmental impacts.***

**Agency Response:** The Preferred Alternative proposes to include limited motor vehicle use within 300 feet of **most** designated routes, for the sole purpose of dispersed camping although designated dispersed camping is proposed in some areas.

Eight areas of concern were identified in the fall of 2008, after the release of the DEIS. These areas are would be closed to any motorized travel off designated routes including dispersed camping due to sensitive resource protection needs and are analyzed in the Preferred Alternative. Over the long-term the SCNF may designate more routes to dispersed camping sites, require camping in designated sites only in some locations, or change the 300-foot corridors for dispersed camping in size and distribution across the landscape (FEIS Chapter 2 page 26) to address environmental impacts.

**48. The Forest Service should allow motorized access on routes terminating at dispersed campsites.**

**Agency Response:** Limited motor vehicle use for the sole purpose of accessing dispersed camping would be allowed to via routes that terminate in dispersed campsites for all action alternatives.

**49. The Forest Service should implement the same travel management strategy proposed for the Salmon River Corridor in other high-use corridors on the Forest.**

**Agency Response:** See responses for comments 43 and 47.

**50. The Forest Service should designate clearly identified dispersed camping sites.**

**Agency Response:** See response to comment 47.

**51. The Forest Service should designate dispersed camping sites, in accordance with the intent of the Travel Management Rule.**

**Agency Response:** The Travel Management Rule (Sec 212.51 (b)) states: In designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal.

Proposed designations for limited motor vehicle use for the purpose of dispersed camping are consistent with the rule.

**52. The Forest Service should provide more dispersed camping opportunities for full-sized recreational vehicles.**

**Agency Response:** Dispersed camping opportunities for full-sized vehicles are available off most designated routes where full-sized vehicles are allowed to travel, with the exclusion of eight high-use areas having sensitive resource protection needs (FEIS Chapter 2 pp. 26-27).

**53. The Forest Service should designate a limited number of dispersed camping sites well removed from highly traveled areas.**

**Agency Response:** Most areas of the Forest are well removed from areas that are considered “highly traveled”. Dispersed camping is allowed anywhere on the Forest, it is the motorized access that is restricted.

**54. The Forest Service should continue to authorize the “300 Foot Rule” to allow for prudent use motor vehicles for game retrieval and to accommodate an aging hunter population.**

**Agency Response:** Technically, there is no “300-foot rule.” As explained in Chapter 2 pp 13-14 of the FEIS, The current Salmon Forest Travel map does not indicate if game retrieval is allowed or prohibited. Idaho Fish and Game management unit boundaries are illustrated on the map to aid sportsman in locating boundaries. Fish and Game vehicle restrictions specific to management units apply.

The current Challis National Forest Travel Plan allows motorized travel to campsites, for game retrieval and fuelwood cutting within 300 feet of designated roads and to campsites and for game retrieval within 300 feet of designated trails.

**55. The Forest Service should consider public desires equally with government agency positions in deciding cross-country game retrieval policy.**

**Agency Response:** The Travel Management Rule includes language in Sec. 212.51 stating “... that in designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of big game retrieval or dispersed camping.”

Idaho Fish and Game and Idaho Forest Supervisors met in 2006 and determined that a consistent approach was needed across Forests in Idaho. Notes from the meeting highlight that IDFG preferred no exceptions, and hunters must stay on the route when retrieving game. Allowing motorized use off the route for 300 feet would result in damage.

**56. The Forest Service should allow off-route cross-country access for game retrieval as expressly authorized by the Travel Management Rule.**

**Agency Response:** See response to comment 55.

**57. The Forest Service should discontinue authorization of motorized off-route travel for game retrieval.**

**Agency Response:** As explained in Chapter 2 pp 13-14 of the FEIS, The current Salmon Forest Travel map does not indicate if game retrieval is allowed or prohibited. The current Challis National Forest Travel Plan allows motorized travel to campsites, for game retrieval and fuelwood cutting within 300 feet of designated roads and to campsites and for game retrieval within 300 feet of designated trails.

Motorized access off the designated system for the purpose of game retrieval would not be allowed under any of the action alternatives.

## SECTION II – ALTERNATIVES

### ALTERNATIVE 0

**58. The Forest Service should choose Alternative 0 (No Action-Keep as is) because it provides equal access to all age groups and ability levels.**

**Agency Response:** See #4 above.

**59. The Forest Service should choose Alternative 0 (No Action – Keep as is) because it does not close access to traditional routes, provides for personal and community economic benefits, and recognizes fundamental personal and legal rights.**

**Agency Response:** The social and economic effects of Alternative 0 are considered in the Social and Economic section of Chapter 3. The analysis considers the economic and social contributions of the existing system of routes and the importance of these routes to members of the community.

**60. The Forest Service should choose Alternative 0 (No Action – Keep as is) because existing laws**

**and regulations provide for regulation of use and protection of resources.**

**Agency Response:** As stated in the need for the Travel Management Rule “the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel. Soil erosion, water quality, and wildlife habitat are affected. Some National Forest visitors report that their ability to enjoy quiet recreational experiences is affected by visitors using motor vehicles. A designated and managed system of roads, trails, and areas for motor vehicle use is needed.

**61. The Forest Service should choose Alternative 0 (No Action – Keep as is) because it best provides for “wise” multiple use of the Forest and the Forest should not be managed as wilderness.**

**Agency Response:** As stated in the response above the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel. The non-wilderness portion of the Forest is not managed as de-fact wilderness. Congress has mandated wilderness areas for non-motorized use.

**62. The Forest Service should choose Alternative 0 (No Action – Keep as is) because it allows motorized users to disperse across the Forest, reduces user conflicts, minimizes unsafe crowding and congestion, limits the potential for violations, and improves the quality of the motorized recreational experience.**

**Agency Response:** The FEIS p.1.3 addresses the primary reason for the travel management rule and the reason for the analysis of a designated system of roads and trails and areas for motorized use. As stated in the need for the Travel Management Rule “the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel.

**63. The Forest Service should choose Alternative 0 (No Action – Keep as is) because any changes will be too difficult and expensive to implement and enforce.**

**Agency Response:** The Travel Management Rule will not increase the agency's budget or the number of law enforcement officers. However, The Travel Management Rule “will enhance enforcement by substituting a regulatory prohibition for closure orders and providing for a motor vehicle use map supplemented by signage.”

**64. The Forest Service should send back comments to any party who express the NO-Action as their choice and allow them to send in revised comments because of public confusion over whether the No-Action Alternative is a valid alternative or not.**

**Agency Response:** The No Action Alternative is the current, authorized management displayed on existing travel plan maps, travel management decisions made through other NEPA analyses since the existing Travel Plans were developed, and existing closure orders. The No Action Alternative is required by NEPA and serves as the baseline for analyzing effects. This alternative would maintain current management direction however; it would not implement the Travel Management Rule. The No Action Alternative is a valid alternative but it is not consistent with agency policy.

**65. The Forest Service should not select Alternative 0 because it is not legally sufficient.**

**Agency Response:** The No Action Alternative is the current, authorized management displayed on existing travel plan maps, travel management decisions made through other NEPA analyses since the existing Travel Plans were developed, and existing closure orders. The No Action Alternative is required by NEPA and serves as the baseline for analyzing effects. This alternative would maintain current management direction and would not comply with the Travel Management Rule. It is a legally sufficient alternative; however it would not comply with agency policy.

**66. The Forest Service should modify Alternative 0 (No Action – Keep as is) by removing all non-system routes.**

**Agency Response:** The No Action Alternative is the current, authorized management displayed on existing travel plan maps, travel management decisions made through other NEPA analyses since the existing Travel Plans were developed, and existing closure orders. Also included in this alternative are unauthorized routes in areas of the Forest currently open to cross-country travel. Removing all non-system routes from Alternative 0 would not keep management as it currently exists. The No action Alternative is required by NEPA.

#### **ALTERNATIVE 1**

**67. The Forest Service should choose Alternative 1 (Current Designated Routes) because it keeps roads open during the summer and closes them seasonally.**

**Agency Response:** Alternative 1 as well as the No Action Alternative and all other action alternatives include routes that are open yearlong and routes that are open seasonally. Table 2-13 (FEIS p. 2.28) shows a comparison of yearlong and seasonal routes by alternative.

**68. The Forest Service should not choose Alternative 1 (Current Designated Routes) because it does not meet the current and anticipated “need” for motorized access and recreation.**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest.

#### **ALTERNATIVE 2**

**69. The Forest Service should choose Alternative 2, the Revised Proposed Action, because it provides a balanced approach to motorized access to the forest for recreation while addressing considerations for wildlife, fisheries, cultural and vegetative values.**

**Agency Response:** The Responsible official has not made a decision and may select components from various alternatives. The Preferred Alternative (Alternative 5) is based on the Revised Proposed Action and also strives to provide a balanced approach to motorized access to the forest for recreation while addressing considerations for wildlife, fisheries, cultural and vegetative values.

**70. The Forest Service should not chose Alternative 2, the Revised Proposed Action, because it does not provide for current and future recreation demands, seeks to eliminate single-track motorized use in some areas, and is not consistent with the Forest Plan or Travel Management Rule.**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest.

**71. The Forest Service should not choose Alternative 2 because it fails to explain how crowding a rapidly-growing population of forest visitors into smaller and smaller areas is good for the Forest.**

**Agency Response:** Pg. 3.16 of the FEIS explains that prohibiting motor vehicle use off the designated (and the loss of cross-country travel) may potentially cause crowding on to some motorized trail systems. All other resource analyses, however, indicate that providing a designated system of roads and trails and prohibiting unmanaged motorized recreation will provide needed resource protection.

**72. The Forest Service should eliminate cross-country travel as identified in Alternative 2 to minimize environmental damage.**

**Agency Response:** The Travel Management Rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The Travel Management Rule will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is

not consistent with the designations. Section 212.51 (b) of the Travel Management Rule provides that "In designating routes, the responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or game retrieval.

### ALTERNATIVE 3

**73. The Forest Service should choose alternative 3 for the protection of habitat, water resources, wildlife and roadless/wilderness area values.**

**Agency Response:** The Responsible official has not made a decision and may select components from various alternatives. The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation while protecting habitat, water resources, wildlife and roadless/wilderness area values.

**74. The Forest Service should not choose alternative 3 because it is too restrictive to motorized use.**

**Agency Response:** The Responsible Official has not made a decision and may select components from various alternatives. The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation while protecting habitat, water resources, wildlife and roadless/wilderness area values.

**75. The Forest Service should implement restrictions against crossing streams and wet meadows, and incorporate Alternative 3's restrictions on dispersed camping within 300 feet of perennial streams, 150 feet of lakes, and 100 feet of intermittent streams into the other alternatives.**

**Agency Response:** Restrictions against crossing streams and wet meadows are included in all alternatives. Motorized access to dispersed camping would not be allowed within 300 feet of perennial streams, 150 feet of lakes, and 100 feet of intermittent streams in Alternative 3 and is

within the range of alternatives selectable by the Deciding Official.

#### **ALTERNATIVE 4**

**76. The Forest Service should select Alternative 4 to keep trails open; providing they are maintained, for the community of people who respect the Forest, including senior citizens, the handicapped and people without horses**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest. Page 1.21 of the FEIS explains the agencies responsibilities regarding individuals with disabilities. Page 1.22 of the FEIS explains how the SCNF addresses access for all individuals including an aging population.

**77. The Forest Service should select Alternative 4 to allow for dispersed camping, wood gathering, and game retrieval up to 300 feet off designated routes.**

**Agency Response:** Consistent with Sec. 212.51 of the Travel Management Rule, the responsible official may include the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping and big game retrieval. The Preferred Alternative would designate limited motor vehicle use for the purpose of dispersed camping within 300 feet of most routes. Some routes will not have a designated corridor and motorized access to dispersed camping will be specifically designated. ATVs can be used to access Forest campgrounds. A complete description of motorized access for dispersed camping is included in the FEIS.

Fuelwood gathering is an activity that requires a permit on the SCNF. The distance off designated routes that an individual would be allowed to travel to gather fuelwood will be addressed in the fuelwood permit.

The SCNF does not propose to include limited use of motor vehicles off designated routes for the purpose of game retrieval.

**78. The Forest Service should select Alternative 4 since it provides sufficient motorized recreation access and reduces impacts.**

**Agency Response:** The Responsible Official has not made a decision and may select components from various alternatives. The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation while protecting habitat, water resources, wildlife and roadless/wilderness area values.

**79. The Forest Service should select Alternative 4 and add longer quality ATV (all-terrain vehicle) loop routes.**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest.

**80. The Forest Service should not choose Alternative 4 because it would drastically increase the use of the entire trail system and would cause adverse impacts.**

**Agency Response:** See response to #79, above.

**81. The Forest Service should not designate ATV use on trails where trail tread is too narrow, as in several routes in Alternative 4.**

**Agency Response:** Pages 2.7 and 2.8 of the FEIS identify the Project Design Features, route standards and public safety requirements necessary for newly designated roads and motorized trails.

#### **CONSIDER ADDITIONAL ALTERNATIVES**

**82. The Forest Service should defer a decision on the Travel Plan until it considers and discloses a complete analysis of social and economic impacts of each alternative.**

**Agency Response:** The economic effect of the alternatives were disclosed in the DEIS. An analysis of the social impacts of the alternatives has been added to the FEIS. Both the social and economic effects of the alternatives are disclosed in the Social and Economic section of Chapter 3.

***83. The Forest Service should expand the range of alternatives to consider an alternative that meets the obligation to minimize resource effects caused by the use of off-road vehicles on the forest as described in the ORV Executive Orders and the Travel Management Rule.***

**Agency Response:** The FEIS (p. 1.3) addresses the primary reason for the Travel Management Rule and the reason for the analysis of a designated system of roads and trails and areas for motorized use. As stated in the need for the Travel Management Rule “the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel. All action alternatives minimize effects of off-road vehicles because the Travel Management Rule prohibits use of motor vehicles off the designated system, and implement E.O. 11644 as amended by E.O. 11989.

***84. The Forest Service should consider an alternative which addresses management of specific routes with identified resource impacts.***

**Agency Response:** All routes proposed for designation in all action alternatives that are different than those in the No Action Alternative were evaluated using a set of criteria to identify resource impacts. These evaluations are included in the Project Record. Therefore alternatives address management of specific routes and resource impacts.

***85. The Forest Service should analyze an alternative which allows no motorized uses in inventoried roadless areas and closes trails leading to or entering adjacent designated Wilderness, to address resource related concerns and non-motorized recreation opportunities.***

**Agency Response:** Chapter 2 (FEIS pg. 2.2) discusses alternatives considered but eliminated

from detailed study. An alternative that would eliminate all motorized travel in Inventoried Roadless Areas (IRAs) was considered but was dismissed from detailed analysis. About 80 percent of the Forest is within IRAs and/or Forest Plan Recommended Wilderness Areas and eliminating all motorized travel within IRAs would fragment the existing transportation system. Neither the 2001 Roadless Rule nor the recently promulgated Idaho Roadless Rule precludes motorized travel on existing system routes in IRAs. Alternative 3 however, does analyze the effects of eliminating motorized travel within Forest Plan Recommended Wilderness Areas.

***86. The Forest Service should consider an alternative that minimizes the miles of unauthorized motor routes (U-routes) added to the travel plan to avoid rewarding motorized users who created these illegal trails, and discusses the route conditions and how to close, prevent or control further motorized use of these routes.***

**Agency Response:** Alternative 1, Designated System Routes, proposes to designate slightly over one mile of unauthorized routes. Unauthorized routes in areas open to motorized cross-country travel on existing Travel Plan maps were not considered illegal when route mileages were calculated in the No Action Alternative. The Travel Management Rule provides a consistent framework for motor vehicle use on all NFS lands. Once designation is complete, and the motor vehicle use map (MVUM) is published, the rule prohibits use of motor vehicles inconsistent with those designations.

***87. The Forest Service should consider an alternative that does not significantly reduce motorized recreation opportunities because the agency has allowed members of the public to use numerous routes and portions of the Forests during "open" vehicle management.***

**Agency Response:** The Travel Management Rule no longer allows motor vehicle use off the designated system. The Preferred Alternative and the Maximum Motorized Emphasis Alternative both propose to designate unauthorized routes in

areas of the Forest that are currently open to motorized cross-country travel under current Travel Plans. The Travel Management Rule contains a prohibition at 36 CFR 261.13 pertaining to motor vehicle use. Under this provision, after NFS roads, NFS trails, and areas on NFS lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a ranger district, it is prohibited to possess or operate a motor vehicle on NFS lands in that unit or District other than in accordance with those designations. At that point, motor vehicle use off designated routes and outside designated areas will be prohibited under Sec. 261.13.

**88. The Forest Service should consider an alternative that would keep open a significant percentage of the established non-system routes, regardless of whether they currently exist in restricted or unrestricted areas because they are widely used and provide needed access.**

**Agency Response:** The Travel Management Rule no longer allows motor vehicle use off the designated system. The Preferred Alternative and the Maximum Motorized Emphasis Alternative both propose to designate unauthorized routes in areas of the Forest that are currently open to motorized cross-country travel under current Travel Plans.

**89. The Forest Service should expand the existing condition (Alternative 0) to include all the non-system system routes in the baseline data for analyzing vehicle use, in order to evaluate impacts in a fair and unbiased manner and with a relative sense of magnitude.**

**Agency Response:** The existing condition is **not** an alternative. The No Action alternative is Alternative 0. This is explained on page 2.11 of the FEIS.

Many public comments expressed confusion and frustration about the Existing Condition and No Action Alternative. Some respondents stated the Existing Condition *is* the No Action Alternative; however this is not the case for this particular analysis. The Existing Condition is the actual situation of roads and trails, including unauthorized routes and motorized cross-country

travel on the ground while the No Action Alternative represents the current authorized management situation.

About 2,700 miles of **known** unauthorized routes have been inventoried on the SCNF. Unauthorized routes in restricted areas of existing travel plans (1,594 miles), and unauthorized routes causing resource damage in areas open to cross-country travel on existing travel plans are violations of current management. Many public comments requested the Forest “leave things the way they are” without recognizing that many routes currently existing on the landscape are not authorized and are causing adverse resource impacts. Effects of both the existing condition and the No Action Alternative are discussed in the FEIS in Chapter 3.

**90. The Forest Service should use the “new” existing condition baseline to fix the “errors” found throughout the Draft Environmental Impact Statement, concerning:**

- **Inaccuracies that minimize benefits and maximize the impacts of Alternative 4,**
- **Fisheries impacts**
- **Wildlife disturbance and big game security habitat**
- **Stream crossing**
- **Soils and erosion**
- **Cumulative effects**
- **Maintaining current level of motorized roads and trails**

**Agency Response:** The No Action Alternative and the existing condition are not the same for this analysis and are explained on pp. 2.12-2.13 of the FEIS. Many public comments expressed confusion and frustration about the Existing Condition and No Action Alternative. Some respondents stated the Existing Condition *is* the No Action Alternative; however this is not the case for this particular analysis. The Existing Condition is the actual situation of roads and trails, including unauthorized routes and motorized cross-country travel on the ground while the No Action

Alternative represents the current authorized management situation. The No Action Alternative is required by NEPA and serves as the baseline for analyzing effects. Both the existing condition and the No Action Alternative are discussed in the resource analyses sections of Chapter 3.

Analysis was conducted by comparing effects of the different alternatives. The Existing Condition section of the DEIS for the water and soil resources did include the existing transportation system as well as known non-system routes. Numerical results were displayed in a tabular form, and effects determinations were made based upon the water and soil resource indicators as well as expected results to the resources from literature review.

**91. The Forest Service should remove from the Draft EIS representations that the Travel Management Plan flatly bars all cross-country travel and consider an alternative that would designate some percentage of the 980,700 acres currently open to motorized cross-country travel as "areas" open for continued ORV access.**

**Agency Response:** The DEIS stated that cross-country motorized travel would be eliminated as a consequence of designating routes and implementing the Travel Management Rule. Some respondents to the DEIS objected to this characterization. The explicit language from the rule states "After National Forest System roads, National Forest System trails, and areas on National Forest System lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a Ranger District of the National Forest System, and these designations have been identified on a MVUM, it is prohibited to possess or operate a motor vehicle on National Forest System lands in that administrative unit or Ranger District other than in accordance with those designations" (70 FR 68289).

The preamble of the Travel Management Rule references prohibition of cross-country travel stating in response to comments "The Department expects that some administrative units or Ranger Districts will complete route and area designation before others and that the

prohibition on cross-country motor vehicle use in Sec. 261.13 will go into effect on different units and ranger districts at different times" (70 FR 68270).

References to the elimination of cross-country travel have been clarified to use the explicit language in the Travel Management Rule and are no longer included as "the elimination of cross-country travel" in the issue statement for Recreation Issue 1.

**92. The Forest Service should consider an alternative, or modifications to the present alternatives, that would fulfill the letter and spirit of the Executive Order 13443 to facilitate opportunities for hunting, including cross-country use of motor vehicles for game retrieval.**

**Agency Response:** Page 1.27 of the FEIS provides a discussion of E.O. 13443. All alternatives provide ample hunting opportunities; the alternatives provide a range between predominantly motorized hunting opportunities to more non-motorized hunting opportunities in an attempt to take in to account the various methods of hunting.

**93. The Forest Service should consider an alternative that would include new road or trail construction or improvements which can minimize adverse impacts while assuring continued public access.**

**Agency Response:** Page 2.6 of the FEIS explains that No new road or trail construction or improvements involving ground disturbance would occur under any of the alternatives. A consequence of designating routes open for motorized travel is that those routes not designated as open would be identified as closed to motorized travel. Road closure procedures that involve ground-disturbing activities would not be part of any action alternative and would require separate and distinct site-specific NEPA decisions regarding the implementation aspects of road closures. The environmental effects of having roads closed to motorized travel will be evaluated in this analysis. Several new routes that meet the objectives for a motorized transportation system have been identified; however, separate site-specific NEPA decisions would be required to

implement ground disturbing activities associated with new route construction.

## SECTION III – PROCESS and DOCUMENT

**94. The Forest Service should manage motorized recreation in a manner which focuses more on public need than regulatory need.**

**Agency Response:** The SCNF has conducted extensive public involvement in the form of meetings, comment periods

**95. The Forest Service should manage motor vehicle use to minimize damage to soil, watershed, vegetation, and other forest resources, in accordance with national direction.**

**Agency Response:** All of the action alternatives address this concern by proposing to confine motorized travel to established routes with limited exception. SCNF has implemented an Integrated Weed Management program and will continue to manage invasive plant species in conjunction with the local Cooperative Weed Management Areas in an effort to minimize their impact on these areas and all forest resources in accordance with national direction.

**96. The Forest Service should not reconsider previous decisions which have produced the current travel management strategy, as reconsideration of these decisions is not required under the Travel Management Rule.**

**Agency Response:** An agency response in the preamble of the Travel Management Rule states: “Nothing in this Travel Management Rule requires reconsideration of any previous administrative decisions that allow, restrict, or prohibit motor vehicle use on NFS roads and NFS trails or in areas on NFS lands and that were made under other authorities, including decisions made in land management plans and travel plans. The Travel Management Rule adds a new paragraph (b) to Sec. 212.50 to clarify that these decisions may be incorporated into designations made pursuant to this Travel Management Rule.

The SCNF is reconsidering some previous decisions made under existing Travel Plans. For example, motorized uses of some routes in Forest Plan recommended wilderness areas are being reconsidered to change the vehicle type or designation for motorized use.

**97. The Forest Service should clarify the differences among the data given in the original Notice of Intent, the Revised Notice of intent and the Draft Environmental Impact Statement including justification for excluding routes that are “inconsistent” with Forest Plans or Travel Plans.**

**Agency Response:** Mileages and maps of the Proposed Action presented in the NOI were incorrect for several reasons: database errors, calculation errors, mapping errors, and consistency errors. For example, trail mileages for the Leadore District were counted twice; therefore it appeared the miles of travel were reduced by half. Also some routes appeared on the route and mileage tables but did not appear on the map and visa versa; this causes errors in reporting mileages. Discrepancies between the Proposed Action and the Revised Proposed Action were explained on page 1-4 of the DEIS. Also, a spreadsheet detailing the mileage and mapping errors is in the Project Record.

Routes must be consistent with management direction and standards and guidelines in the Forest Plans unless the Forest Plan is amended. Forest Plan amendments merely to accommodate route designation for Travel Plan revision would be not be appropriate. For example; revising the Forest Plan to redraw Recreation Opportunity Spectrum delineations to designate routes within semi-primitive non-motorized ROS class would not be acceptable; this is an action best undertaken at Forest Plan Revision. Many routes that are not consistent with current travel plan restrictions are being proposed for designation based on a thorough analysis of resource impacts.

**98. The Forest Service should reconsider its decision regarding signing requirements on closed roads.**

**Agency Response:** The Travel Management Rule is designed to identify routes that are open for motor vehicle use (not closed) and display them on a Motor Vehicle Use Map (MVUM). The MVUM is the primary enforcement tool for implementing the Travel Plan. Although not required, the SCNF will sign routes to the extent possible to indicate they are open for motor vehicle use.

**99. The Forest Service should provide an accurate and complete inventory of existing roads and trails before attempting to designate travel routes.**

**Agency Response:** Routes displayed for Alternative 0 in Appendix H in both the DEIS and the FEIS display the most accurate inventory of Forest System roads and trails.

In response to the Travel Management Rule, some respondents requested that the Forest Service complete a full inventory of all existing motor vehicle routes, regardless of origin, prior to making a designation decision. Many of these respondents asked the Forest Service to cooperate with user groups in conducting this inventory, but some also insisted that the agency take ultimate responsibility for including all user-created routes. The Department of Agriculture disagrees that a complete inventory of user-created routes is required in order to complete the designation process. As a practical matter, such an inventory may never be fully complete, as new routes will continue to be created during the inventory process. A complete inventory would be very time-consuming and expensive, delaying completion of route designation.

**100. The Forest Service should ensure that travel management decisions are in accordance with Challis National Forest Plan direction of "providing a broad spectrum of recreation opportunities."**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest. The selected alternative will comply with the Challis Forest Plan.

**101. The Forest Service should include an indicator which links motorized road and trail density to hunting and trapping opportunities.**

**Agency Response:** Motorized road and trails are linked to hunting and trapping opportunities. However, hunting and trapping are recreational activities. The indicators developed for Recreation Issue 1 (DEIS 1-18) provide adequate measures for the analysis of motorized recreational opportunities for the considered alternatives.

**102. The Forest Service should provide an indicator which measures how well travel plan alternatives meet the needs of motorized forest visitors.**

**Agency Response:** Recreation analysis was expanded in the FEIS to include information about the acres within a motorized influence zone (½ mile from motorized routes). See the Recreation section in Chapter 3 for this analysis and a comparison between alternatives specific to each ranger district.

**103. The Forest Service should use additional issue indicators to better display impacts and track changes in motorized travel on miles of routes in Inventoried Roadless Areas.**

**Agency Response:** A more thorough analysis of routes in Idaho Roadless Areas has been included in the FEIS. The Idaho Roadless Rule was promulgated between release of the DEIS and FEIS.

**104. The Forest Service should abandon analysis of the Recreation Opportunity Spectrum and use a motorized zone to display the impacts to non-motorized users across the range of alternatives.**

**Agency Response:** In addition to using the comparison of inconsistencies with the established recreation experience zoning that is part of the Forest Plan guidelines (ROS); recreation analysis was expanded in the FEIS to include information about the acres within a motorized influence zone (½ mile from motorized routes). See the Recreation section in Chapter 3 for this analysis and a comparison between alternatives specific to each ranger district.

**105. The Forest Service should disclose the relative numbers of miles converted from single-track motorized to ATV (all-terrain vehicle) designation across the range of alternatives.**

**Agency Response:** Table 2-13 (FEIS p. 2.29) displays the relative change in route miles by vehicle type for all alternatives. Also Appendix H displays the various types of motor vehicle use proposed by alternative. As explained in the FEIS (p. 2.12) all NFS trails in open areas displayed on current travel plan maps are interpreted as motorized trails in the calculation of miles of motorized trails in the No Action Alternative because no official designations allowing or prohibiting motorized use on these trails are currently in effect. This causes the miles of motorized trails to be artificially high in the No Action Alternative making it difficult to track the miles of trail conversion from the No Action Alternative with the action alternatives.

**106. The Forest Service should include a measure of “Miles of motorized routes within Semi-Primitive Motorized Recreation Opportunity Spectrum” in tables 3-2 through 3-8.**

**Agency Response:** Motorized routes are part of the Semi-primitive motorized recreation experience on the forest. These are described in the recreation specialist report, and summarized for the FEIS Chapter 3 analysis of recreation resources.

**107. The Forest Service should revise elements of the Recreation Indicators to better reflect the loss of public access associated with the prohibition of cross-country travel.**

**Agency Response:** This is discussed in detail in Chapter 3, Recreation analysis of the FEIS. It is the main premise of the purpose and need that the change from acres open to cross-country travel under current travel decisions to designated routes will change the way people access the national forest for recreation purposes. This has been decided by the Travel Management Rule.

**108. The Forest Service should provide a qualitative discussion on how the indicators for**

**each alternative in Table 3-35 lead to the comparisons summarized in Table 2-23.**

**Agency Response:** The Fisheries section has been improved in the FEIS and the table in Chapter 2 has been updated in the comparison summary.

**109. The Forest Service should present data for the four identified water resource indicators in a consistent manner.**

**Agency Response:** The comment is noted and has been corrected in the FEIS.

**110. The Forest Service should not limit the range or alternatives through narrow consideration of issue criteria.**

**Agency Response:** The EIS documents the examination of reasonable alternatives to the proposed action. All alternatives meet the purpose and need and address one or more significant issues related to the proposed action. Since an alternative may be developed to address more than one significant issue, no specific number of alternatives is required or prescribed. (36 CFR 220.5(e))

**111. The Forest Service should identify Recreation Issue #3, Roadless Character #1 and Wilderness Issue #1 as Non-significant Issues in the Environmental Impact Statement.**

**Agency Response:** The issue of motorized uses in recommended wilderness areas and roadless areas is analyzed in depth in the FEIS because of strong public concern regarding protection of wilderness attributes and roadless characteristics. Hundreds of respondents commented on this issue. Since the release of the DEIS, Forest Service Manual and Handbook direction have been revised and no longer require the identification of significant issues. New guidance directs the agency to identify issues to be analyzed in depth. This is described on page 1.17 of the FEIS.

**112. The Forest Service should identify Access as a Significant Issue in the Environmental Impact Statement.**

**Agency Response:** A general topic of “Access” was used as a heading to list some aspects of access that were non-significant issues in the DEIS. Page

1.20 of the FEIS explains that access is addressed by the purpose and need and is analyzed in detail in the FEIS.

**113. The Forest Service should not limit the ability to manage, protect and utilize forest resources by closing roads and trails.**

**Agency Response:** The designation of roads, trails and areas for public motor vehicle use will not limit the agency's ability to protect and manage forest resources.

**114. The Forest Service should acknowledge the relatively minor contribution of effects of motorized travel in its cumulative effects analysis in the Environmental Impact Statement.**

**Agency Response:** Each alternative was analyzed based on resource specific indicators and cumulative effects so the Deciding Official could evaluate the differences between alternatives and determine which alternatives have the least potential for impacts resources. Cumulative effects are discussed for each resource in the FEIS and are also addressed in Appendix F.

**115. The Forest Service should identify the cumulative social effects of reduced forest access in the Environmental Impact Statement.**

**Agency Response:** An analysis of the direct, indirect, and cumulative social effects of the alternatives has been added to the FEIS and are disclosed in the Social and Economic Section of Chapter 3 of the FEIS.

**116. The Forest Service should complete a Trail Condition Assessment of existing and proposed new ATV (all-terrain vehicle) routes to identify problems, recommend corrective measures and establish a baseline for future monitoring.**

**Agency Response:** Although not a part of this analysis, this condition assessment is done routinely based on the need to report accomplishments based on budget allocation. In addition, our partners who provide funding and/or volunteer work contribute substantially to our ability to accomplish trail maintenance.

**117. The Forest Service should not implement the proposed Project Design Features for Newly**

**Designated Roads and Motorized Trails as they are arbitrary and capricious.**

**Agency Response:** The term arbitrary and capricious means "the absence of a rational connection between the facts found and the choice made." (Natural Resources. v. U.S., 966 F.2d 1292, 97, (9th Cir.'92) or a clear error of judgment; an action not based upon consideration of relevant factors and so is arbitrary, capricious, an abuse of discretion or otherwise not in accordance with law or if it was taken without observance of procedure required by law. (5 USC. 706(2)(A) (1988)). The project design features for newly designated roads and motorized trails are necessary to meet existing laws and protect important natural resources. These design features are based on professional judgment, and scientific information.

**118. The Forest Service should consider impacts of non-motorized recreation and apply the same resource protection standards to both motorized and non-motorized users.**

**Agency Response:** The purpose and need for this proposal is to designate a system of roads, trails and areas on FS lands for public motor vehicle use to comply with the Travel Management Rule and therefore is not directed at non-motorized uses. Information about the Travel Management Rule and the purpose and need are included in the Summary and in Chapter 1 of the FEIS.

**119. The Forest Service should draw on all departments to conduct the level of analysis needed to add trails to the classified system, and identify any needed mitigation or maintenance needed for such routes.**

**Agency Response:** This FEIS was developed by an interdisciplinary team and adds new trails to the designated system. This is displayed in Appendix H of the FEIS. Mitigation and monitoring are discussed in Chapter 2.

**120. The Forest Service should utilize existing resource condition and suitability information to identify routes with significant resource impacts.**

**Agency Response:** As described in Chapter 2 and in Appendix G, 28 criteria, which address a broad

spectrum of management and resources conditions, were used to evaluate potential resource impacts related to route designation.

**121. The Forest Service should provide an understandable explanation of land allocation by Recreational Opportunity Spectrum and use by the public comparison in the Environmental Impact Statement.**

**Agency Response:** The Recreation section in DEIS/FEIS Chapter 3 shows the allocation by district of the ROS. Visitor use monitoring was done in 2003 as snapshot for a Forest-wide evaluation of types of activities, and visitor satisfaction; but it was not done at a site-specific level, nor was it done based on relative location to the ROS areas.

**122. The Forest Service should provide opportunities for longer travel routes in semi-primitive settings.**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest.

**123. The Forest Service should consider the completeness of the Environmental Impact Statement in addressing all appropriate issues and aspects of travel management on the Forest.**

**Agency Response:** The Forest Service has considered the completeness of the EIS and conducted the appropriate level of analysis based on CEQ Regulations

**124. The Forest Service should provide a map of ATV (all terrain vehicles) trails prior to completion of the Travel Management Plan, and identify the reasons for closures of any classified or unclassified roads.**

**Agency Response:** The Forest Service has provided maps and rationale for route designation throughout the entire analysis process as documented in the FEIS.

**125. The Forest Service should leave roads open to avoid the additional National Environmental**

**Policy Act analysis required when reopening previously-closed roads.**

**Agency Response:** The purpose and need is to designate a motorized transportation system that addresses current and anticipated recreation needs, provides a variety of recreation access opportunities, considers management concerns (such as public safety, maintenance costs, and consistency with adjoining public lands), reduces impacts to forest resources, recognizes reserved or outstanding rights, and reduces conflicts between recreational uses. This involves designating some previously closed and unauthorized routes; therefore the necessary environmental analysis has been conducted.

**126. The Forest Service should analyze the potential impacts to human health and wildlife from air pollutants produced by off-highway motorized vehicles.**

**Agency Response:** The EPA's Office of Transportation and Air Quality (OTAQ) is responsible for protecting public health and the environment by regulating air pollution from motor vehicles, engines, and the fuels used to operate them, and by encouraging travel choices that minimize emissions. These "mobile sources" include non-road recreational vehicles. There is no feasible method to measure emissions produced by off-highway vehicle use on the SCNF. If the amount of air pollutants produced by off-highway vehicles being used on the SCNF are believed to be impacting human health and wildlife, then emission standards would be revised by the EPA.

**127. The Forest Service should balance the competing interests of forest users in the development of its Travel Plan.**

**Agency Response:** The Preferred Alternative strives to balance competing public interests regarding motorized and non-motorized uses on the SCNF. This is described in the Summary and in Chapter 2 of the FEIS.

**128. The Forest Service should base motorized trail decisions on the ... impacts on the quality of other forms of recreation.**

**Agency Response:** Section 212.55(a) of the Travel Management Rule states that “(w)hen designating roads, trails, and areas for motorized use the responsible official shall consider effects on National Forest System natural resources. Section 212.55(b)1 continues with designation of trails and areas stating “(t)he responsible official shall consider effects on the following, with the objective of minimizing: damage to soil, watershed, vegetation, and other forest resources. To minimize damage to soil seasonal operating periods were incorporated into the SCNF Travel Management Plan. Prior to inclusion in the transportation system routes were screened through a matrix that included water quality and soil erosion hazards. Indicators were chosen so that the Deciding Official could evaluate the differences between alternatives and determine which alternatives have the least potential impact to forest resources.

See the Recreation Section of Chapter 3 (FEIS), which describes the impacts to recreation experiences, and defines the amount of area on each district within each alternative that is within the area influenced by motorized use.

**129. The Forest Service should adopt the term “non-system routes” in place of “unauthorized” routes when identifying non-system roads and trails.**

**Agency Response:** The Travel Management Rule dictates use of the term unauthorized route. Language from the preamble of the rule states: The Department believes that the term “unauthorized or unclassified road or trail” is cumbersome and that “unauthorized” more accurately captures the nature of these routes than “unclassified.” Accordingly, in the Travel Management Rule, the Department is changing “unauthorized or unclassified road or trail” to “unauthorized road or trail.”

**130. The Forest Service should simplify the Environmental Impact Statement to provide for better public understanding.**

**Agency Response:** Designating a system of roads motorized trails and areas for public motor vehicle use is a complicated analysis and decision process.

A summary of the analysis is included in the FEIS to enhance public understanding.

**131. The Forest Service should analyze any unique risks associated with converting unauthorized routes to motorized routes.**

**Agency Response:** The Forest Service has analyzed the environmental risks associated with designating previously unauthorized routes. This is described in Chapter 2 and evaluation of routes based on specific criterion for designation is included in the project record.

**132. The Forest Service should designate some suitable, well-sited user-created routes as open. Some provide excellent opportunities for all users and involve less environmental impact and enhance the travel system.**

**Agency Response:** The Forest Service has designated some suitable, properly located unauthorized routes for motorized uses.

**133. The Forest Service should reconsider its proposal not to include newly designated roads and trails in the Motor Vehicle Use Map prior to completion of ground assessments.**

**Agency Response:** Designation of U-routes or trails whose use will change from non-motorized to motorized use in the SCNF Travel Management Plan is considered a Federal undertaking. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process includes the identification and evaluation of historic properties that might be affected by an undertaking. Identification and evaluation must occur prior to the undertaking. Cultural Resource surveys of all U-routes and trails whose use will change from non-motorized to motorized use for the Maximum Alternative was not conducted due to fiscal constraints. Cultural Resource surveys of the user-created routes or trails whose use will change from non-motorized to motorized use has been completed for the Revised Proposed Action with no appreciable reduction in the number of routes available for use. The Preferred Alternative adds 74.45 miles of motorized U-routes to the

Revised Proposed Action Alternative. Cultural Resource surveys of those additional routes will occur in the spring of 2009. Given the results obtained during surveys for the Revised Proposed Action, most of the additional routes will be available for use once the surveys have been completed.

**134. The Forest Service should reconsider its interpretation of the Travel Management Rule relative to the designation of roads and trails.**

**Agency Response:** The designation of roads and trails are consistent with the Travel management Rule.

**135. The Forest Service should seek and incorporate motorized user group information identifying recreational demand when considering management of "user-created" routes.**

**Agency Response:** The Forest Service received numerous comments from motorized user groups during the development of the Draft Environmental Impact Statement and during the comment period. The information identifying recreation demand was carefully considered by the IDT while developing the alternatives for the Final EIS.

**136. The Forest Service should acknowledge the benefits of motorized access in facilitating the management of wildlife and providing for implementation of hunting, fishing and trapping activities.**

**Agency Response:** Motorized road and trails are linked to hunting and trapping opportunities. However, hunting and trapping are recreational activities. The indicators developed for Recreation Issue 1 (DEIS 1-18) provide adequate measures for the analysis of motorized recreational opportunities for the considered alternatives.

**137. The Forest Service should acknowledge that traditional levels of access are not producing measurable adverse impacts on Forest wildlife populations.**

**Agency Response:** The wildlife analysis utilized measurable indicators to determine effects to

analyzed species (FEIS 1.19-1.20). Indicators are used to identify potential impacts to habitat or habitat effectiveness. For most of the species analyzed, population estimates are not available, so making determinations whether populations would increase or decrease are not possible.

**138. The Forest Service should not assume that closing roads and trails to motorized uses will dramatically improve the effectiveness of wildlife habitat, decrease sedimentation, improve rangelands, and enhance vegetation.**

**Agency Response:** Many wildlife species are negatively affected by roads and the human activities facilitated by road access (Wisdom et al. 2000). The analysis for effects of motorized routes and access on wildlife utilized extensive literature research and specific effects were identified for each species as appropriate (FEIS 3.99 to 3-130, Wildlife Specialist Report). The literature supports the conclusion that management actions that reduce road density, through designation or seasonal openings, increase habitat effectiveness for many species of wildlife.

We agree that the reduction in sedimentation associated with eliminating motorized use on roads would not be dramatic but rather incremental. Sedimentation associated with roads is a chronic non-point source problem. Results of closing motorized routes will be seen over the long term.

**139. The Forest Service should identify and discuss site-specific and activity-specific issues when adopting road density standards related to potential impacts to wildlife.**

**Agency Response:** The road densities used in this analysis area are from science generated from the Interior Columbia Basin Ecosystem Management Project. A Memorandum of Understanding (03-RMU-11046000-007) directs the Forest Service "to implement the *Interior Columbia Basin Strategy* to guide the amendment and revision of forest (FS) plans. This strategy incorporates the analyses supporting or developed as part of the ICBEMP." The analysis area for the Travel Planning is the non-wilderness portion of the SCNF; the analysis is

completed at that level of site-specificity. Each alternative has miles of motorized routes by vehicle class displayed. For the purpose of wildlife analysis, motorized routes are weighted equally in regards to impacts to wildlife.

**140. The Forest Service should utilize the list of priority streams from the Bull Trout Recovery Plan for the Salmon River Recovery Unit to prioritize where the agency should address dispersed camping issues in the Travel Management Plan, and should apply the same approach used along the Salmon Wild and Scenic River corridor to streams listed under Task 1.1.2 of the Recovery Plan.**

**Agency Response:** An approved and signed bull trout recovery plan does not exist. The plan currently closest to completion has been the “draft Bull Trout Recovery Plan” (USFWS, 2002). However it has never been signed and begins with the specific agency disclaimer that; “Recovery plans represent the official position of the U.S. Fish and Wildlife Service only after they have been signed by the Director or Regional Director as approved.”

Therefore, the only official plans with existing direction for management of on-Forest resources continues to be the Challis and Salmon Forest Land Use and Resource Management Plans, which were signed in 1987 and 1988.

**141. The Forest Service should provide evidence supporting the stated conclusion in the Draft Environmental Impact Statement of a link between increased motorized access and increased levels of illegal wildlife poaching.**

**Agency Response:** The analysis for effects of motorized access on wildlife utilized extensive literature research. When impacts from illegal harvest were mentioned in the document, literature citations were provided.

**142. The Forest Service should provide a more thorough evaluation of wildlife impacts from travel management in the Environmental Impact Statement, including discussion of wildlife movements and habitat connectivity through important wildlife linkages.**

**Agency Response:** See response to 141.

**143. The Forest Service should provide a more thorough evaluation of wildlife impacts from travel management in the Environmental Impact Statement, including discussion of wildlife movements and habitat connectivity through important wildlife linkages.**

**Agency Response:** Habitat effectiveness was analyzed by modeling habitat 0.5 miles away from motorized routes. However, the connectivity of those areas was not analyzed. This aspect will be reviewed in the FEIS.

**144. The Forest Service should provide in the Final Environmental Impact Statement, a reference for the following statement, “USGS Breeding Birds Survey Data for Idaho, using trend estimates, shows an upward trend of 1.2 percent per year for Pileated Woodpeckers from 1966 to 2005.**

**Agency Response:** The reference indicated was cited in the document as Sauer et al. 2007 (DEIS 3-140) (Sauer, J. R., J. E. Hines, and J. Fallon. 2007. The North American Breeding Bird Survey, Results and Analysis 1966 - 2006. Version 10.13.2007. [USGS Patuxent Wildlife Research Center](http://www.mbrpwrc.usgs.gov/bbs/bbs.html), Laurel, MD. Available online: <http://www.mbrpwrc.usgs.gov/bbs/bbs.html>). The reference has been updated to reflect 2007 data.

**145. The Forest Service should consider applying seasonal restrictions to motor vehicle use on roads and trails which intersect 5 kilometer buffer areas around active sage grouse leks.**

**Agency Response:** A seasonal opening was considered, but not analyzed, for a road system near an active lek. The road accesses and leaves the Forest via a BLM road system. There was no feasible manner to implement a seasonal opening due to differences in agency management. The 5 km buffer mention is cited from an unpublished white paper and is not based upon a recognized mitigation protocol.

**146. The Forest Service should expand its analysis of potential impacts to sage grouse beyond the single indicator of road density and consider the**

***indirect effects of motor vehicle travel on sage grouse across the range of alternatives.***

**Agency Response:** The analysis of effects of motorized access on sage-grouse will be expanded in the FEIS from what is in the DEIS. Additional indicators will not be developed specifically for sage-grouse.

***147. The Forest Service should strengthen its analysis of the indirect effects of motor vehicle travel on sage grouse across the range of alternatives.***

**Agency Response:** The analysis of effects of motorized access on sage-grouse will be expanded in the FEIS from what is in the DEIS.

***148. The Forest Service should use Idaho Department of Fish and Game wildlife herd health data, population trend data, hunting seasons and tag objectives in the Environmental Impact Statement, to better determine whether motorized use is impacting forest wildlife populations.***

**Agency Response:** Data from the Idaho Department of Fish and Game was used extensively in the wildlife analysis. The 2007 status reports for each ungulate analyzed (elk, mule deer, bighorn sheep, mountain goat, and pronghorn) were utilized and current populations and management objectives (as appropriate for each species) were displayed in a tabular format in the wildlife specialist report. The tables were not included in the DEIS to reduce the length of the wildlife portion of the document. Seasonal openings were developed with the input of the IDFG to address wildlife issues, primarily hunting and calving/fawning seasons. The exact dates of hunting seasons and the tag objectives are not relevant to the development of the travel plan.

***149. The Forest Service should describe species distributions and critical habitat for each threatened, endangered or sensitive on-forest fish species to better determine how the various alternatives impact critical habitat or TES species strongholds.***

**Agency Response:** This information was analyzed and presented in the Fisheries specialists report

table comparing listed species and habitat distribution by HUC 5, along with a qualitative estimate of the risk for non-attainment of PACFish/INFish Riparian Management Objectives.

***150. The Forest Service should identify the documentation which identifies the gray wolf as a "Sensitive Species."***

**Agency Response:** The Rocky Mountain Distinct Population Segment (DPS) population of grey wolves is listed under the Endangered Species Act as of January 20, 2009 as a result of a memorandum directing all federal agencies to withdraw all proposed and final decisions that had not yet been published in the Federal Register. When the DEIS was published, the Endangered Species Act protections for gray wolves in the northern Rocky Mountains were reinstated as a result of a preliminary injunction issued on July 18, 2008 by the U.S. Federal District Court.

***151. The Forest Service should provide documentation to support the claim that various recreation activities (e.g., off-highway vehicle use, camping, equestrian use, hunting etc.) pose significant threats to any sensitive, threatened or sensitive species or species of concern.***

**Agency Response:** The DEIS does not make any claims that recreational activities pose "significant threats " to sensitive, threatened, endangered, or other species of concern (DEIS 3-149 – 3-172).

***152. The Forest Service should determine if Forest standards and guidelines have resulted in improving trends for listed endangered, threatened or sensitive fish and identify this information in the Environmental Impact Statement.***

**Agency Response:** Forest Plan Standards and guidelines generally applied to all Forest-wide activities and conditions across the landscape. These are difficult to monitor and/or ascertain for anything more than overall trends across the landscape. Initially forest plans identified all salmonids and macroinvertebrates as aquatic management indicator species (MIS) and a Stream Ecosystem Environmental Baselines Survey was performed at 100 monitoring stations between

1991 and 1993, compartmentalizing most major watersheds of the Salmon Forest in order to establish aquatic environmental baselines from which to ascertain stream and watershed trends in the future. Nothing of this nature was implemented on the Challis Forest.

Subsequently, in the early 2000's the decision was made to modify the total number of previously classified terrestrial and aquatic MIS species and reduce them to only four representative species, with aquatic habitats be represented by a single individual representative species, the Bull trout; which would be monitored and reported on at approximately 35 locations throughout the combined Salmon and Challis forests.

The general status and trends of all TES listed species are reported on in the Biological Assessment for the EIS. The results of which found that trends for individual species and/or species within individual streams or watersheds fluctuate up and down from year to year, being up in a few places, stable in many places, and down in still other locations.

Given the wide range of factors limiting listed species, especially many limiting factors existing below forest boundaries, it is difficult if not impossible to determine species' trends at landscape scales, specifically as a result of on-forest activities in general, or anyone individual activity, in particular.

While comprehensive assessments of the degree of compliance with fisheries Standards and Guidelines for Recreation Travel and Recreation related actions has not been performed, the specialist report for both the draft and final EIS did develop metrics for assessing relative trends and influences from these actions on fisheries, based upon changes from the existing conditions (i.e. whether the incidences of motorized Travel related recreation actions affecting the fisheries indicators would be increasing, stable, or declining).

Specific indications of these trends are provided in the Table 5a,b,c Series, within the Final EIS Fisheries Specialist Report. Summarization of species trend information is also contained within

the companion Fisheries Biological Assessment for ESA listed species, and is specifically available for bull trout, within North and South Zone fisheries five-year trend monitoring reports for bull trout.

**153. The Forest Service should provide a more robust analysis of the trend of on-forest endangered, threatened and sensitive fish species to determine how future species-specific recovery plans might effect travel route designations.**

**Agency Response:** There no signed species-specific recovery plans and there are no trend studies available.

**154. The Forest Service should identify the effects of stream ford use, cross-country travel, motor vehicle-assisted camping, unauthorized motor vehicle use of trails, and poorly maintained routes on water quality and fisheries resources.**

**Agency Response:** This is covered in the effects analysis, especially in the watershed discussions of impacts to soil and water.

The hydrology specialist report in the Project Record discusses the effects of stream ford use, cross-country travel, motor vehicle-assisted camping, unauthorized motor vehicle use of trails, and poorly maintained routes on water quality and fisheries resources.

**155. The Forest Service should provide a comparison in the Environmental Impact Statement of the relative significance of watershed impacts from motor vehicle use compared to impacts from other natural and human-induced disturbances (wildfires, normal erosion, climate change).**

**Agency Response:** While natural and human-induced disturbances that impact watersheds do occur on the SCNF, the Travel Planning and OHV Route Designation EIS is for the purpose of managing motorized use on forest roads, trails and areas as mandated by 36 CFR 212 (Travel Management Rule). As such, the focus of watershed impacts is due to motor vehicle use. Other disturbances, natural or human-induced, are outside the scope of this project.

**156. The Forest Service should not consider the Travel Management Plan to meet the definition of a “Federal Project” for the purposes of the Federal Water Pollution Control Act.**

**Agency Response:** The Salmon-Challis Travel Management Plan is considered a Federal Action not a Federal Project.

**157. The Forest Service should consider closures of routes and areas only to an extent commensurate with the percentages of Forest watersheds identified as having “high” vulnerability to cumulative watershed effects.**

**Agency Response:** Cumulative watershed effects rating is one of many criteria in the decision matrix used to inform motorized route designation in the alternative development process.

**158. The Forest Service should develop a range of alternatives that includes prohibition of off-route motorized use within riparian-influenced zones around all streams, lakes and ponds.**

**Agency Response:** The prohibition of off-route motorized use within Riparian Habitat Conservation Areas around all streams, lakes and ponds is included in the Wilderness/Roadless Values Emphasis Alternative (Alternative 3).

**159. The Forest Service should provide documentation to support the claim of a correlation between motorized route density and degradation of water quality.**

**Agency Response:** Documentation to support the claim of a correlation between motorized route density and degradation of water quality can be found in the hydrology report located in the project record.

**160. The Forest Service should disclose whether the various alternatives meet Total Maximum Daily Load (TMDL) sediment waste load allocations, or will improve water quality in sediment-listed 303(d) streams.**

**Agency Response:** We agree that this is an important analysis and disclosure. Compliance with the requirements of state approved TMDL sediment waste load allocations can be found in

the hydrology report in the travel plan project record.

**161. The Forest Service should ensure that route designations do not contribute new or increased sources or sediment or water pollutants to 303(d) water quality impaired streams not covered by approved Total Maximum Daily Loads (TMDLs).**

**Agency Response:** Motorized route proximity to 303(d) water quality impaired sections was used as a decision making criteria for designing the motorized route systems for each alternative. Potential for new or increased sources of sediment or water pollutants to water quality impaired streams segments as a result of this action are discussed in the hydrology specialist report in the travel plan project record.

**162. The Forest Service should determine whether the Environmental Impact Statement alternatives meet the requirements of the Clean Water Act.**

**Agency Response:** We agree that this is an important analysis and disclosure. Compliance with the requirements of the Clean Water Act can be found in the hydrology specialist report in the travel plan project record.

**163. The Forest Service should incorporate the cumulative effects impact ratings to water resources for the existing condition and alternatives for each watershed in the analysis area.**

**Agency Response:** A cumulative impact rating to water resources for the existing condition and alternatives for each watershed in the analysis area was conducted and can be found in the hydrology specialist report in the travel plan project record.

**164. The Forest Service should analyze where and how the proposed action will contribute to potentially significant cumulative water resource impacts.**

**Agency Response:** An analysis of cumulative impacts to water resources was conducted for each alternative including the proposed action

and can be found in the hydrology specialist report in the travel plan project record.

**165. The Forest Service should implement actions to reduce general sediment production in the Upper Salmon River Core Area, the Pahsimeroi River Core Area and the Middle Salmon River-Panther Creek Core Area.**

**Agency Response:** Designating roads, motorized trails and areas for public motor vehicle use is expected to reduce sediment when compared to unmanaged motorized recreation and cross-country travel which is occurring now.

**166. The Forest Service should include livestock impacts in their analysis of environmental impacts and erosion control in the Environmental Impact Statement.**

**Agency Response:** The impacts associated with livestock are considered in the cumulative effects analysis for soil resources.

**167. The Forest Service should provide and analysis of the risk and benefits associated with designating new travel routes in weed-free areas with an identified high risk of noxious weed infestation.**

**Agency Response:** There is not an existing variable that can be used to compare the benefits to the public of allowing motorized travel and dispersed camping for recreational purposes as well as wood gathering and game retrieval against the risks associated with that use and the associated potential for the establishment or spread of invasive and/or noxious weed infestations. However, prior to inclusion in the transportation system routes were screened through a matrix that included water quality, soil erosion hazards and other variables to minimize environmental risk. Routes were excluded that did not meet criteria. Indicators were chosen so that the Deciding Official could evaluate the differences between alternatives and determine which alternatives have the greatest potential impact invasive and/or noxious weed management. The watershed risk assessment was part of the methodology used in the DEIS and was not carried forward to the FEIS. The methodology used for the

FEIS was done at the district level and did not include the same risk assessment analysis method.

**168. The Forest Service should reconsider its interpretation and application of the Travel Management Rule relative to direction regarding historical and existing motorized access within Inventoried Roadless Areas or Recommended Wilderness Areas.**

**Agency Response:** The Forest Service has improved and expanded its analysis of motorized uses within Idaho Roadless Areas and Recommended Wilderness Areas in the FEIS.

**169. The Forest Service should analyze the impacts of retaining existing motorized travel routes in designated roadless areas to assure that these actions do not prevent these areas from fully attaining roadless area values.**

**Agency Response:** The Forest Service has improved and expanded its analysis of motorized uses within Idaho Roadless Areas and Recommended Wilderness Areas in the FEIS.

**170. The Forest Service should set a timeline to move all trails out of sensitive habitat areas and should expressly prohibit the expansion of motorized trails in roadless areas and in PACFISH and INFISH designated Riparian Habitat Conservation Areas.**

**Agency Response:** The prohibition of off-route motorized use within Riparian Habitat Conservation Areas around all streams, lakes and ponds is included in the Wilderness / Roadless Values Emphasis Alternative (Alternative 3); however no timeline to move trails out of sensitive habitats has been planned.

**171. The Forest Service should not use the 2001 Roadless Rule as the standard for analysis of Inventoried Roadless Area Management in the Environmental Impact Statement. Even if the 2001 Roadless Rule is deemed to be the applicable standard, the agency must not interpret the Forest's authority in an unduly restrictive manner, concluding that existing unclassified (or unauthorized) routes effectively can not or should not be added to the designated route network.**

**Agency Response:** The Idaho Roadless Rule was promulgated between the release of the DEIS and FEIS. Consistency with the Idaho Roadless Rule is discussed in the FEIS Summary and in Chapter 1 – Legal Requirements and required Disclosures.

**172. The Forest Service should ensure that travel management decisions in the Environmental Impact Statement reflect the direction in Executive Order 11644/11989 to minimize the impacts of off road vehicle use on forest resources and other recreationists.**

**Agency Response:** The Travel Management Rule implements Executive Order 11644 as amended by Executive Order 11898. A thorough analysis to designate roads, trails and areas for motor vehicle use is addressed in the FEIS and supporting documentation.

**173. The Forest Service should defer a Travel Management Plan decision until additional site-specific information provided by outside parties can be analyzed and considered.**

**Agency Response:** The Forest Service has provided extensive and ample opportunity for outside parties to provide site-specific information. Information provided by outside parties has been considered and analyzed when appropriate.

**174. The Forest Service should remove issues associated with “wilderness values degradation” from consideration in the Travel Plan Environmental Impact Statement and address these issues separately on a route-specific basis.**

**Agency Response:** The issue of motorized uses in recommended wilderness areas and roadless areas is analyzed in depth in the FEIS because of strong public concern regarding protection of wilderness attributes and roadless characteristics. Hundreds of respondents commented on this issue. The impacts to wilderness attributes are analyzed in-depth in the FEIS both by recommended wilderness area and on a route-specific basis.

**175. The Forest Service should not attempt to make any wilderness-specific management**

**directives within the framework of the Travel Plan Environmental Impact Statement.**

**Agency Response:** Impacts of motorized uses to Forest Plan recommended wilderness areas are analyzed in the FEIS. No wilderness-specific management directives are made in the FEIS.

**176. The Forest Service should include a comprehensive discussion of non-motorized opportunity within the forest and on adjacent lands including wilderness acres and wilderness trail miles in its analysis of impacts of Travel Plan alternatives on the Forest.**

**Agency Response:** The purpose of this proposal is to designate a system of roads, trails and areas for public motor vehicle use. Wilderness areas are congressionally designated as non-motorized.

**177. The Forest Service should not attempt to manage Recommended Wilderness Areas as de-facto wilderness which excludes motorized recreation.**

**Agency Response:** The Forest Service analyzes a range of motorized uses in Forest plan Recommended Wilderness Areas including those uses allowed by existing Challis Forest Plan Amendment 9, to no motorized use as analyzed in Alternative 3 and an increase in motorized uses in Alternative 4.

**178. The Forest Service should identify its proposed travel management strategy for any new recommended wilderness areas.**

**Agency Response:** The Forest Service is not revising its Forest Plan and is not proposing any new Forest Plan recommended wilderness areas. Motorized use in existing recommended wilderness areas is analyzed in the FEIS. Wilderness areas can only be designated by Congress. Forest Plan Recommended wilderness areas and designated wilderness areas are two different entities.

**179. The Forest Service should emphasize trail maintenance and improvement actions, rather than trail closures, to address and correct resource concerns in sensitive areas.**

**Agency Response:** Trail maintenance and improvement are ongoing commensurate with appropriated money and partner cooperation. This is not part of the motorized travel plan decision process. See #116 above.

**180. The Forest Service should keep all currently open routes in proposed wilderness areas and wilderness study areas open to continuing motorized use unless there is documented resource damage.**

**Agency Response:** See response to comment 174.

**181. The Forest Service should identify and quantify the location and extent of resource damage related to motorized vehicle use in the Environmental Impact Statement.**

**Agency Response:** The Forest Service has considered the location and extent of resource damage related to motor vehicle use in the designation of routes.

**182. The Forest Service should base trail management decisions on the affordability of maintenance costs.**

**Agency Response:** Maintenance costs were a management consideration in the designation of routes.

**183. The Forest Service should attempt to identify the potential effects of further reductions in road maintenance funding on future motorized recreation opportunities.**

**Agency Response:** Road maintenance and improvement are ongoing commensurate with appropriated money and partner cooperation. This was discussed in the analysis done in DEIS Chapter 3 page 202.

**184. The Forest Service should identify its long term plan for non-motorized trail maintenance.**

**Agency Response:** Trail maintenance and improvement are ongoing commensurate with appropriated money and partner cooperation. This is not part of the motorized travel plan decision process. See #114 above.

**185. The Forest Service should not use projected road maintenance funding shortfalls to further**

***exacerbate the adverse impacts on existing motorized recreational use and opportunities.***

**Agency Response:** The forest manages nearly 4000 miles of road, most of which is open to the public either seasonally or yearlong. Given the weak funding of the recent past along with the outlook for continuing low funding levels, the forest cannot completely ignore the potential for serious maintenance shortfalls. Since the Forest Service is charged with stewardship of the land for multiple uses and resource conservation, some balance needs to be struck between our capability to continue to provide motorized opportunities and the various resource concerns. In reality, at current funding levels we are already seeing a reduction in some opportunities and increasing resource concerns as the result of the continuing budget shortfalls. Over a longer period, failure to address this particular issue may result in even greater impacts to the recreational opportunities if lack of maintenance leads to road failures and unacceptable resource damage that necessitates closure of the affected routes until funding to correct these problems is secured.

**186. The Forest Service should not consider funding availability for implementation monitoring, maintenance and enforcement as decision criteria for route designations.**

**Agency Response:** Monitoring and maintenance will be conducted through the program of work associated with the type of monitoring. For example, cultural resource monitoring would be funded through the Heritage Program, and fisheries monitoring would be funded through the Fisheries program.

**187. The Forest Service should not bias its travel management proposals toward maintenance of an extensive system of motorized trails when off-road motor vehicle users comprise only 2.75 percent of all forest users.**

**Agency Response:** The range of alternatives was developed to give the Deciding Official a wide array of choices for providing an appropriate mix of sustainable recreation, both motorized and non-motorized across the national forest. Converting unauthorized routes, or maintaining

those used by motorized recreationists in areas which were formerly open to cross-country travel is part of what we were already doing on the land within our appropriated budget and with partners. A system of motorized routes can also be used by non-motorized recreationists.

**188. The Forest Service should implement the “trouble spots” approach identified in the Environmental Impact Statement which would retain open routes in an open status, and apply corrective actions when and if appreciable site specific resource problems are identified.**

**Agency Response:** The Forest Service used extensive public input to help identify routes for designation and considered site-specific information about resource problems in the designation process.

**189. The Forest Service should ensure that travel route designations reflect appropriate location, provide for reasonable enforcement, and encourage the voluntary cooperation of recreational users.**

**Agency Response:** Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting National Forest resources. The Forest Service also maintains cooperative relationships with many state and local law enforcement agencies that provide mutual support across jurisdictional boundaries. Education and cooperative relationships with users support enforcement efforts by promoting voluntary compliance.

The Travel Management Rule will not increase the agency's budget or the number of law enforcement officers. However, the Travel Management Rule “will enhance enforcement by substituting a regulatory prohibition for closure orders and providing for a motor vehicle use map supplemented by signage.”

**190. The Forest Service should reconsider its assessment of the value and importance of motorized access on recreation opportunity.**

**Agency Response:** The Agency recognizes these values. Public comment periods for the proposed

action and the DEIS allowed for the public to bring forward roads and trails that have historical value to them. These roads and trails could then be analyzed for inclusion in one of the alternative proposals.

**191. The Forest Service should provide a more meaningful analysis of the current and projected need for motorized routes and the impact on Forest resources if these needs are not met as part of the Travel Plan.**

**Agency Response:** Providing recreational opportunities and access needs are two of several criteria the responsible official must consider under federal regulations when designating routes for motor vehicle use. The SCNF is popular with many people for many uses. It is not possible to accommodate all user demands on all acres while also protecting water quality, wildlife habitat, and other natural resources that people come to enjoy and which laws have been enacted to protect. Forest Service managers need to balance user interests against these other criteria when designating routes and areas.

Different alternatives provide for different degrees of motorized uses, and are analyzed in Chapter 3 FEIS.

**192. The Forest Service should acknowledge that while the Draft Environmental Impact Statement purports to show that new routes will be established under a variety of the Alternatives, the “disclaimer” on page 2-6 indicates new routes may or may not be open as a result of the required “ground assessments.”**

**Agency Response:** This is a correct statement and the outcome of cultural resource surveys will determine which new unauthorized routes can be designated for motorized public use.

**193. The Forest Service should acknowledge the Travel Management Rule’s authorization to provide for limited cross-country travel associated with dispersed camping, and its continuing need given the lack of formally-administered camping facilities and public desire for dispersed camping experiences.**

**Agency Response:** The Travel Management Rule includes a provision in Sec. 212.51(b), which allows the responsible official to include in the designation of a road or trail the limited use of motor vehicles within a specified distance of certain designated routes solely for the purposes of big game retrieval or dispersed camping. The alternatives analyze a range of options to provide limited use of motor vehicles within a specified distance of certain designated routes solely for the purpose of dispersed camping.

**194. The Forest Service should acknowledge the additional opportunities provided to non-motorized users by motorized routes.**

**Agency Response:** Motorized routes are available for use by non-motorized users. See Recreation section in Chapter 3 for quantification and discussion of this comparison between alternatives.

**195. The Forest Service should acknowledge the impacts of non-motorized as well as motorized use in its analysis of impacts of road and trail use.**

**Agency Response:** The design of the alternatives and analysis of environmental effects in the FEIS in Chapter 3 consider impacts from both forms of recreation.

**196. The Forest Service should provide documentation supporting allowance of continued non-motorized use of areas closed to motorized travel, and identify its long-term plan for trail maintenance in these areas.**

**Agency Response:** Chapter 2 of the FEIS explains that non-motorized trails are routes available for hikers, bicyclers (except in Wilderness Areas) and horseback riders. Use by motorized wheelchair is allowed when feasible within the defined trail-bed. Also, roads and motorized trails are also available to non-motorized users and hikers, bicyclers, and horseback riders are encouraged to travel safely along road edges.

See comment #181: Trail maintenance and improvement are ongoing commensurate with appropriated money and partner cooperation.

This is not part of the motorized travel plan decision process.

**197. The Forest Service should revise the Environmental Impact Statement to correct overstatements of the extent of motorized versus non-motorized user conflicts.**

**Agency Response:** See 36 CFR §212.55, Criteria for designation of roads, trails, and areas, of the national motor vehicle use rule (Federal Register 2005: 70FR68264) for a complete listing of criteria the Deciding Officer must evaluate prior to making his or her selection for route designation.

If nothing else, the sheer volume of responses on either side of the motorized/non-motorized issue should be an indication that we did NOT make any overstatements as to the polarized nature of these user conflicts.

**198. The Forest Service should identify all known specific instances where user conflict has been listed as a justification for travel management decisions and revise any such decisions where user conflict has not been specifically documented.**

**Agency Response:** See 36 CFR §212.55, Criteria for designation of roads, trails, and areas, of the national motor vehicle use rule (Federal Register 2005: 70 FR 68264) for a complete listing of criteria the Deciding Officer must evaluate prior to making his or her selection for route designation. Although this criteria lists “resolving user conflict” as one of the criteria, there is NOT ONE single instance where user conflict is the SOLE reason for a trail management decision.

**199. The Forest Service should determine whether its unanalyzed authorization of recreational use was properly disclosed during the scoping phase, and disclose the direct indirect and cumulative impacts of those provisions.**

**Agency Response:** No decision is being made with respect to non-motorized uses. The purpose of this FEIS is to designate a system of roads, trails and areas for public motor vehicle use in accordance with the Travel Management Rule.

**200. The Forest Service should recognize that Federal lands are of national significance and ensure that Travel Plan scoping efforts reach out beyond just the local public.**

**Agency Response:** The Forest Service recognizes that the National Forest System Lands are of national significance. In addition to our local news releases and meetings scoping efforts included news release to six regional news papers surrounding central Idaho. The Salmon-Challis National Forest website published all new the new releases and featured a section devoted to the travel planning effort which was updated throughout the scoping process. In addition to ten "local" open house meeting the Forest Service held four regional meetings in Idaho Falls, Black Foot and Pocatello, which are well beyond the "local" area. The Forest Service received written comments o the Draft EIS from interested individuals and groups located in 11 states besides Idaho. We received 102 electronic comments, not all of which could be identified by geographical origin. We also received comments from regional and national organizations interested in motorized travel management on the forest.

**201. The Forest Service should acknowledge that the travel management issue is too large and complex to manage and enforce.**

**Agency Response:** The Travel Management process is large and complex; however, that does not relieve the Agency from complying with the Travel Management Rule and enforcing the provisions of the rule to the best of its ability.

**202. The Forest Service should ensure that its Travel Management Plan includes an effective enforcement program.**

**Agency Response:** Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting National Forest resources. The Forest Service also maintains cooperative relationships with many state and local law enforcement agencies that provide mutual support across jurisdictional boundaries. Education and cooperative relationships with users support enforcement efforts by promoting

voluntary compliance. The Travel Management Rule will not increase the agency's budget or the number of law enforcement officers. However, the Travel Management Rule "will enhance enforcement by substituting a regulatory prohibition for closure orders and providing for a motor vehicle use map supplemented by signage."

**203. The Forest Service should increase its field presence in support of travel management enforcement.**

**Agency Response:** See response above.

**204. The Forest Service should develop a detailed Travel Management Plan Monitoring and Enforcement Strategy which identifies specific information on monitoring and enforcement decision thresholds, program priorities, focus areas, personnel needs, costs and funding sources.**

**Agency Response:** The SCNF will develop an implementation to plan that includes public information and education, monitoring, personnel needs and necessary funding. See response to Comment 200 regarding enforcement.

**205. The Forest Service should identify how enforceability was included as a criterion in the travel planning process.**

**Agency Response:** Appendix G of the FEIS explains how route enforceability was used as a criterion. Ease of enforcement was a qualitative criterion that considered route location, type of route (loop, spur, arterial route, etc.) vehicle designation and history of use.

**206. The Forest Service should not attempt to function in an enforcement capacity.**

**Agency Response:** See response to Comment 200.

**207. The Forest Service should include analysis of social and economics impacts of the Travel Management Plan in the Environmental Impact Statement.**

**Agency Response:** The social and economic effects of the alternatives are analyzed and disclosed in the Social and Economic section of Chapter 3 of the FEIS.

**208. The Forest Service should address the economic impacts of reduced motorized vehicle access on forest visitors.**

**Agency Response:** The economic impacts of the alternatives are disclosed in the Social and Economic section of Chapter 3 of the FEIS.

**209. The Forest Service should include an evaluation of the social and economic impacts of the Travel Plan, as required by the National Environmental Policy Act.**

**Agency Response:** The social and economic impacts of the alternatives are disclosed in the Social and Economic Section of Chapter 3 in the FEIS.

**210. The Forest Service should identify and analyze the indirect concomitant economic consequences associated with reduction of motor vehicle use opportunities on forest lands.**

**Agency Response:** The direct, indirect, and cumulative economic impacts of the alternatives are disclosed in the Social and Economic section in Chapter 3 of the FEIS.

**211. The Forest Service should consult with State and other Federal agencies in development of its Travel Management Plan.**

**Agency Response:** The Forest Service has formally consulted with US Fish and Wildlife Service, National Oceanographic and Atmospheric Administration (NOAA) Fisheries Division, the Shoshone-Bannock Tribes, Nez Perce Tribes, and the State Historic Preservation Office. Informally, the Forest Service has consulted with the Salmon Office of Idaho Department of Fish and Game, and Idaho Department of Parks and Recreation. Butte, Custer and Lemhi counties have Cooperating Agency status.

**212. The Forest Service should coordinate between districts and forests on route connectivity.**

**Agency Response:** The Forest Service has engaged in extensive coordination between districts, adjoining forests, and BLM lands regarding connectivity of routes.

**213. The Forest Service should consult with and consider the input of local county government in development of its Travel Management Plan.**

**Agency Response:** The Forest Service has consulted and considered the input of local county government during the entire planning process. Butte, Custer and Lemhi counties have cooperating agency status in the development of the EIS.

**214. The Forest Service should develop a Forest Travel Management strategy in cooperation with local county government and in accordance with the principles of the Lemhi County Land Use Plan.**

**Agency Response:** Butte, Custer and Lemhi counties have Cooperating Agency status with the Forest Service to develop a Travel Management Plan. The Lemhi County land use plan regards cross-country travel as part of its local custom and culture; however the Travel Management Rule does not allow unrestricted cross-country travel.

**215. The Forest Service should work with user groups on Travel Planning.**

**Agency Response:** The Forest Service has held extensive public meetings and considered the comments of many different user groups during the travel planning process. These are described in detail in Chapter 4.

**216. The Forest Service should correct apparent errors in the travel plan maps.**

**Agency Response:** The Forest Service is continually refining, improving and correcting the Travel Plan maps. As stated in the FEIS, "Information included in the text and tables and displayed on the maps is based on the best available information. Corrections and adjustments will be made during project implementation Motor Vehicle Use map production.

**217. The Forest Service should provide justification for why individual routes are included or not included in an Alternative; such as routes designated for motorized travel in Alternative 2 and/or Alternative 3 but not**

**designated in the "Motorized Friendly" Alternative 4.**

**Agency Response:** Each route considered in the action alternatives was evaluated based on 28 different criteria which are explained in Appendix G. Alternative 3 is an alternative that emphasizes roadless areas and recommended wilderness area protection; therefore no new roads in roadless areas were proposed for designation in Alternative 3. The route-by-route evaluation of individual routes is in the Project Record.

**218. The Forest Service should either correct or explain apparent repetition of data in some tables. Pages H10 - H12 repeat data presented on pages H7-H9, and pages H58-H59 appear to repeat data on pages H54-H55.**

**Agency Response:** This is apparently an error made during copying and collation of the document. Not all copies of the document have this problem.

**219. The Forest Service should correct apparent errors in the environmental consequences discussion for water and insure such discussions by ranger district are consistent with the Tables and include explicit references to them.**

**Agency Response:** This error has been corrected in the FEIS.

**220. The Forest Service should use the most current and relevant data.**

**Agency Response:** The Forest Service has used the most current and relevant data available and will continue to improve mapping information in subsequent iterations of the Motor vehicle use map.

**221. The Forest Service should ensure decisions to close routes are related to the facts on the ground and that assumptions and conclusions are supported by scientific facts and does not conflict with the document's own impact analysis.**

**Agency Response:** The Travel Management Rule requires the Forest Service to designate those roads, trails, and areas open for public motor vehicle use. Extensive public input and analysis were used in the designation of routes. The

route-by-route evaluation to designate routes is included in the project record. Routes that are not designated as open for motorized use will be closed.

**222. The Forest Service should prepare better maps including adding traditional names for roads and trails; not just by a number. It is essential to identify where legal Forest access exist.**

**Agency Response:** Mapping standards for production of the Motor vehicle Use Map are dictated by national protocols. The SCNF will include as many identifying features as possible to make maps more informative.

**223. The Forest Service should modify the definition of an All Terrain Vehicle to account for technical advancements such as side-by-side seating and steering wheel control in four-wheeled vehicles less than 50" in width.**

**Agency Response:** The definitions of vehicle types are included in the glossary. The SCNF chooses not to change the definition of ATV to include side-by-side seating and steering wheel controls.

**224. The Forest Service should not allow ATV (all-terrain vehicle) use on single-track trails.**

**Agency Response:** Some routes are available to both ATV and 2-wheeled vehicles (single-track vehicles) and some routes are open strictly to 2-wheel vehicles.

**225. The Forest Service should more clearly specify the classes of vehicles, such as "wheeled vehicles of 50 inches or less" or "two-wheeled vehicles," permitted on designated routes.**

**Agency Response:** The classes of vehicles permitted on routes will be clearly displayed on the Motor Vehicle Use Map.

**226. The Forest Service should consider the varying capabilities of the growing variety of Off Road Vehicles when designating routes by vehicle type.**

**Agency Response:** The Forest Service has considered the varying capabilities of off-road vehicles in the designation process.

**227. The Forest Service should not modify the current definition of an ATV (all terrain vehicles) to accommodate side by side seating or steering wheel control.**

**Agency Response:** The definitions of vehicle types are included in the glossary. The SCNF chooses not to change the definition of ATV to include side-by-side seating and steering wheel controls.

**228. The Forest Service should work to educate the public about possible economic and environmental consequences of irresponsible motorized use.**

**Agency Response:** Public information and education regarding the economic and environmental consequences of irresponsible use have been part of the analysis process and will also be included during the implementation phase of the project.

**229. The Forest Service should seek out new methods for maintenance and enforcement.**

**Agency Response:** The agency will continue to seek partnerships for road and trail maintenance. See response to Comment 200 regarding enforcement.

**230. The Forest Service should work with the public to form a "Citizens against Forest Damage" group and make harsher penalties for infractions.**

**Agency Response:** This is outside the scope of this project.

**231. The Forest Service should implement new rules and technologies such as vehicle licensing, and trail cameras to aid in enforcement.**

**Agency Response:** Vehicle licensing and specific enforcement plans are outside the scope of the project. The Forest Service does not have the authority to implement a vehicle licensing program. Law enforcement personnel have at their disposal any number of enforcement tools (including cameras) and have the discretion to use those tools deemed most effective and likely to withstand challenge in the courtroom.

**232. The Forest Service should implement a comprehensive education and enforcement program for this travel plan, including tread lightly information, more user-friendly signs and maps and added law enforcement.**

**Agency Response:** The Forest is committed to proceed with education and enforcement of the travel management decision using articles in the local papers, signing, extra on-site patrol, and by producing and making available maps of motorized designations. The Forest will also rely on continued cooperation with the Idaho Department of Fish and Game, the public, and local county law enforcement.

**233. The Forest Service should develop new plans to work with volunteer programs to expand trail systems for ATV (all-terrain vehicle) use to keep up with growing demand.**

**Agency Response:** Forest staff acknowledges the importance of the use of volunteers and user groups to the success of the new travel designations. The SCNF will encourage and rely on help from all users to implement the new designation decision.

**234. The Forest Service should make special travel considerations for the handicapped and elderly.**

**Agency Response:** See FEIS p. 1-21, for the discussion of this issue. The Agency is bound by Federal law to protect the rights of disabled individuals in a non-discriminatory manner; therefore all alternatives address this issue by assuring that reasonable restrictions on motor vehicle use are applied to everyone.

In conformance with section 504, wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle, even if they are battery-powered.

All alternatives provide a diversity of access options including open roads and motorized trails for those with physical limitations. The selecting official will have the choice of the five Alternatives in respect to access by motorized means.

See also response to #4.

***235. The Forest Service should develop more specific maps to target popular recreation areas.***

**Agency Response:** Thank you for the interest in our project; the SCNF continues to work with the Idaho State parks and recreation department and with the Idaho tourism interests to make visitor information user friendly and to play on the unique strengths of our forest and it's recreation opportunities.

This page intentionally left blank.