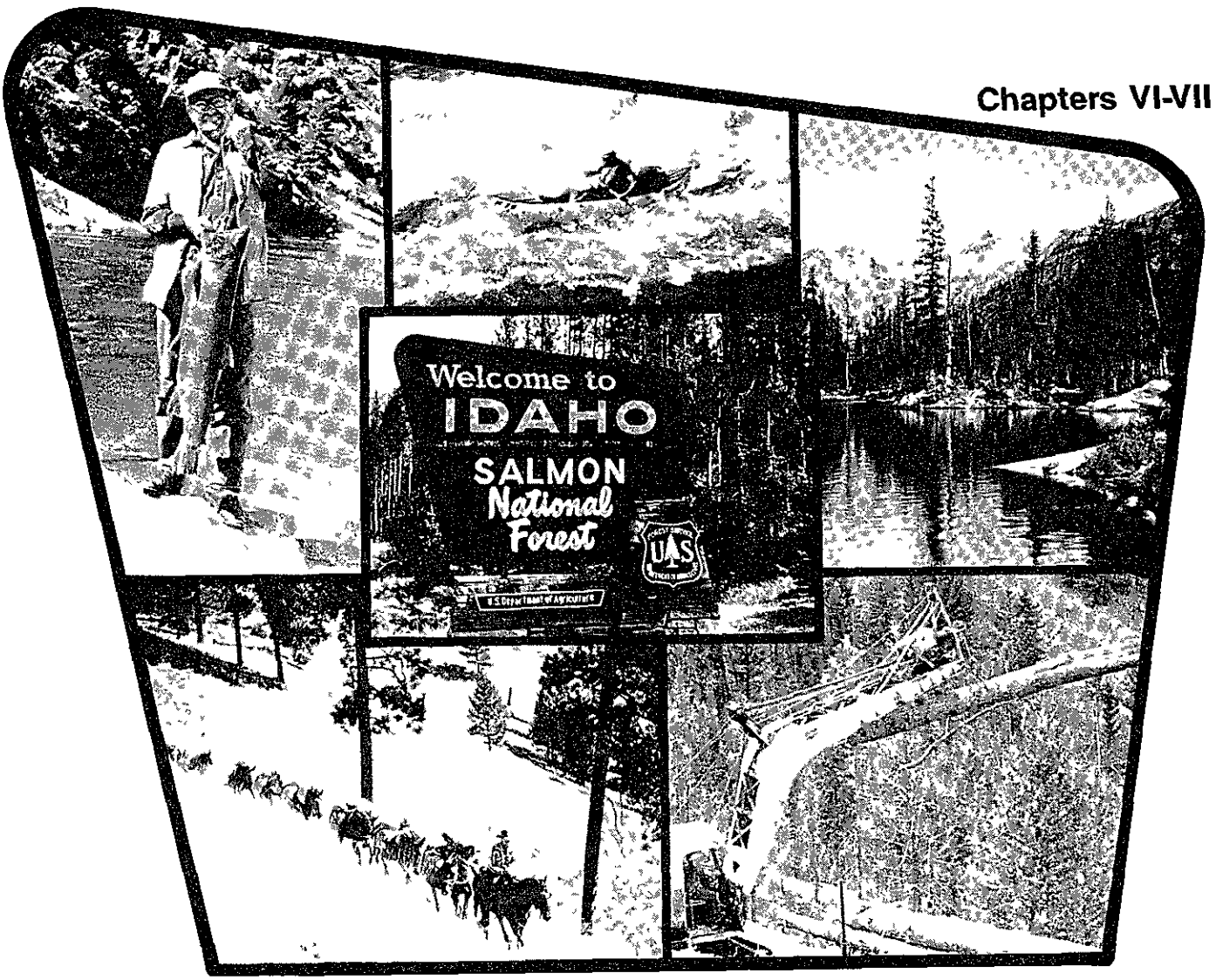
United States
Department of
Agriculture

Forest
Service

Salmon
National
Forest

FINAL ENVIRONMENTAL IMPACT STATEMENT for the SALMON National Forest

Land and Resource Management Plan



Chapters VI-VII

VI. CONSULTATION WITH OTHERS

A. Introduction

This chapter discusses efforts to involve and consult with a variety of publics during formulation of the Forest Plan and Final Environmental Impact Statement (FEIS). It also lists and responds to comments received during the public comment period for the proposed Forest Plan and Draft EIS.

The Forest Service has conducted an active public involvement program throughout the forest planning process. Federal, State, and local agencies have been informed and consulted. Individual forest users and interest groups, as well as other interested persons, have had an opportunity to participate.

Section A of this chapter is this introduction.

Section B describes the public involvement efforts undertaken since the release of the Proposed Forest Land and Resource Management Plan.

Section C summarizes the number and origin of the responses received regarding the Proposed Forest Plan and DEIS, including a list of those who commented.

Section D lists commentors on the DEIS by affiliation.

Section E describes the variety and intensity of comments received.

Section F is a listing of major public concerns and the Forest Service response to those concerns.

Section G is a list of agencies, organizations and individuals to whom copies of the Forest Plan and FEIS were sent.

Section H reproduces the substantive letters and the Forest Service response to those letters. All other public responses to the Proposed Forest Plan, and the Forest Service reply to those responses, are in the Forest Planning Files located at the Salmon National Forest Supervisor's Office, P.O. Box 729, Salmon, Idaho 83467.

B. Summary of Public Participation Activities

The Notice of Intent was published in the "Federal Register" on October 4, 1985, and the Proposed Plan and Draft Environmental Impact Statement were filed with the Environmental Protection Agency. News releases announcing the availability of the documents and schedule of informational public meetings were distributed on September 24, 1985, to media locally and in southern Idaho and western Montana.

Since the neighboring Bitterroot and Beaverhead National Forests both had Roadless Areas adjoining those on the Salmon National Forest and were ahead of the Salmon's planning schedule, those Forests displayed

the wilderness/nonwilderness proposals for the contiguous Roadless Areas in their Draft Plan Appendices. The portions of those appendices pertinent to the Salmon National Forest Roadless Areas were copied and mailed to those on the Salmon's forest planning mailing list, along with a letter of explanation. The letters invited comment on the Salmon portions, to be mailed to either Forest Supervisor.

The Salmon National Forest Proposed Land and Resource Management Plan public comment period was from September 19 until January 10. The schedule for preparation of the Plan and Final EIS was such that all letters received on or before January 31, 1985, were used in the content analysis; even though the letters were received after the closing date.

There were 559 letters addressing the Salmon National Proposed Forest Plan and Draft EIS received before January 31, 1986. In addition, there were an additional 169 letters received by the Bitterroot and Beaverhead National Forests which commented on Roadless Areas contiguous with the Salmon National Forest.

Informational public meetings were scheduled in the Idaho towns of Salmon, North Fork, Idaho Falls, and Leadore between October 29 and November 7, 1985. Notices of the meetings were published in the "Federal Register," "Recorder-Herald" weekly newspaper of Salmon, the "Post-Register" daily newspaper of Idaho Falls, and aired on KSRA radio in Salmon. The meetings were attended by a total of 65 members of the public. Informational presentations were also requested by several organizations. Informational programs were presented for the Salmon Valley Chamber of Commerce, Salmon Rotary Club, Salmon City Council, Lemhi Cattle and Horse Association, Idaho Department of Fish and Game, Lemhi Soil Conservation District Board of Directors, and for two public meetings sponsored by the Citizens for Multiple Use. Approximately 300 people attended these meetings.

Approximately three hundred copies of the Proposed Forest Land and Resource Management Plan were distributed to known interested individuals, organizations and agencies.

C. Summary of Comments Received

Demographics and Form of Response

There were 729 pieces of input were received, logged in, and reviewed for information to be analyzed. Nine were removed from the analysis after initial review because they were determined to be duplicate letters. The total number of signatures on the 720 letters was 803. There were 5,019 comments identified and analyzed from these letters.

Of those, 559 letters were written to the Salmon National Forest regarding the Proposed Land and Resource Management Plan and Draft Environmental Impact Statement. The total number of signatures on these letters was 634. The origin of these letters is as follows:

From Within Lemhi County.....224
From Within Custer of Ravalli County.....10
From the Remainder of Idaho.....265
From the Remainder of Montana.....10
From Outside Montana and Idaho, or Unknown.....50

A listing of these by category of respondent follows in a separate section.

These respondents used a variety of forms in order to respond to the plan.

Personal Letters.....239
Petitions.....0
Recorded Oral Comments.....1

In addition, there were responses which appear to have been generated by an organized effort of a number of groups.

Idaho Environmental Council and Idaho Conservation League....95
Idaho Sportsmen's Coalition.....72
Hailey Medical Center (form letter).....12
Citizens for Multiple Use.....139
(101 form letters and 38 personal letters)

The remaining 161 letters analyzed were written addressing either the Bitterroot or Beaverhead National Forests' Proposed Plan and Draft Environmental Impact Statement. The letters were counted as Salmon National Forest input because these letters specifically mentioned one or more of the six Roadless Areas which are on one of these forests as well as the Salmon National Forest (contiguous Roadless Areas). These letters contained a total of 169 signatures. The geographical origin of these letters is as follows:

From Within Lemhi County.....7
From Within Custer or Ravalli County.....42
From the Remainder of Idaho.....11
From the Remainder of Montana.....72
From Outside Idaho and Montana, or Unknown.....29

All of the responses were coded as personal letters.

D. Listing of Commentators by Affiliation

1. Federal Agencies and Elected U.S. Officials

Animal and Plant Health Inspection Service, Plant Protection and Quarantine
U.S. Department of Transportation, Federal Aviation Administration
U.S. Department of Transportation, Federal Highway Administration
Advisory Council on Historic Preservation
U.S. Department of Agriculture, Soil Conservation Service

U.S. Department of the Interior, Office of the Secretary
U.S. Department of the Interior, Fish and Wildlife Service
U.S. Environmental Protection Agency, Region 10
U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service.

2. State Agencies and Elected State Officials

Honorable John V. Evans, Governor
State Senator Ann Rydalch
State Senator Vearl C. Crystal
State Senator Dane Watkins
State Representative Ray Infanger
State Representative JoAn E. Wood
Idaho State Historical Society
Cooperative Extension Service, University of Idaho
Idaho Department of Fish and Game
State of Idaho, Department of Health and Welfare
Idaho Department of Parks and Recreation

3. Local Agencies and Elected Local Officials

City of Salmon
Salmon Schools
Office of County Commissioners

4. Citizen Organizations

Idaho Falls Trail Machine Association
American Fisheries Society
The Nature Conservancy
Idaho Trail Machine Association, Inc.
Idaho Environmental Council
Continental Divide Trail Society
Idaho Wildlands Defense Coalition Alert
Wildlife Management Institute
E. W. Dirt Riders Association
Portneuf Valley Audubon Society
Salmon River Back Country Horsemen
Idaho Conservation League
American Wilderness Alliance
Sierra Club, Northern Rockies Chapter
The Wilderness Society
Idaho Alpine Club
Idaho Natural Areas Coordinating Committee
Lemhi Soil and Water Conservation District
Magic Valley Fly Fishermen
Salmon River Motorcycle Association
Outdoors Unlimited, Inc.

5. Businesses

Rocky Mountain Oil and Gas Association, Inc.
Idaho Petroleum Council

Pacific Northwest Natural Resource Consultants
Steve Bublitz, General Contractor
Pomeroy Brothers Construction
Salmon Oil Company
William H. Mullins, Outdoor Photography
Resource Planning and Management Associates, Inc.
Associated Logging Contractors, Inc.
Panther Creek Timber Falling
Aggipah River Trips
Idaho Natural Resources Legal Foundation, Inc.
Rocky Mountain River Tours
McFarland Livestock Company, Inc.
Silver Cloud Expeditions
Salmon Intermountain, Inc.
Lemhi Livestock and Wool Marketing Association, Inc.
Camp Jude
Wilderness River Outfitters and Trail Expeditions, Inc.
Treasure Valley Realty
Craig Mathews, guide and outfitter
Turner Ranch
Teton Rod Manufacturing Company
Stoltze-Conner Lumber Company
Gehrke-U.S.A.

6. Indian Tribes

Nez Perce Tribal Council Committee
Columbia River Inter-tribal Fish Commission

7. Individuals

Abbot, Robert C., Jr.
Abbott, Zane
Adams, Bob
Adams, Vestal
Affolter, Quince
Aikens, Clover
Aikens, Varnie
Aitken, Bruce
Aitken, Tana
Aiuppy, Laurance B.
Alder, Ronald
Aldin (?), Kenneth, M.D.
Aldous, Darrell
Aldous, Lynn
Allen, Bill
Anderson, Dare R.
Andrews, Boyd
Andrews, Christine M.
Andrews, Edward Charles
Andrews, Lorna C.
Andrews, Rex C.
Andrus, Anita
Angel, Tom
Angle, Ted
Anglin, Viola B.
Argast, Gene
Armstrong, Jack D.
Armstrong, M. L.
Atwood, Duane L.
Bach, Paul J.
Bagley, David
Bagley, Edeltraud
Bagley, Larry
Bailey, Donna
Baird, Dennis
Barbee, Carl A., M.D.
Barton, D. Michael, Jr.
Bateman, Julie
Bean, Judy
Beautrow, Brian
Becker, Kurt
Bennington, Mary Lou
Benoit, Shirley
Best, Michael R.
Bird, Kathryn
Bird, Roy

Bistline, Bruce S.
Bolander, E. C.
Bollman, Vernon L.
Bowers, Chet
Bowler, Bruce
Bowler, Peter
Boyer, Jeffrey K.
Bradberry, B.
Bradford, Carol
Bradford, Margaret
Bradshaw, Bernard
Braese, John L
Britton, Jim
Brooks, William
Brigham, Morton R.
Brown, Russell
Brown, Steven L.
Buhl (?), Gordon S.
Burbank, Arthur L.
Burke, Stoney
Bushmaker, Robert J.
Butikofer, Reed L.
Butterfield, Cal
Buy, David F.
Bybee, Clenden
Callen, David
Campbell, Lewis W.
Cano, Philip N.
Capps, Royden
Carey, Randy
Carlson, Robert E.
Carson, M. E.
Casey, William V., Jr.
Casperson, Nancy
Catis, Kurt
Caywood, Joe
Clark, Bill
Clark, C.
Clark, Minnie
Cochnauer, Tim
Cockrell, Awanda
Cockrell, Beverly
Cockrell, Charles
Cockrell, Daniel
Cockrell, Kester
Cockrell, LaMar
Cockrell, Mrs. Kester
Cockrell, Raymond
Cockrell, Suzie
Coleman, Harry
Compton, Glenn
Connolly, Mary K.
Cook, R. W.
Cooley, John
Cooper, Cathy
Cooper, Michael
Cooper, Roger L.
Coriell, Randy M.D.
Cote, Joseph A.
Crabtree, Margot D.
Craig, Erica
Crandall, Christine B.
Cranney, Cathy
Cranney, John
Crawford, Don L.
Crawford, Tim
Crawshaw, Alfred
Crockett, Roberta
Crowley, Mike
Cushing, Dr. C. E.
Davies, Denise L.
Davis, Stanley
Day, Ernest
Day, Max B.
DeMain, Jim
DeNiro, Jim
Debree, Mark
DiGrazia, Robert E.
Dorman, Heidi I.
Dowton, Sydney
Drucker, Phil
Dudley, David
Eastman, Jerry
Eder, William
Edlefsen, Bruce
Edwards, Edgar S.
Edwards, Eugene
Eiriksson, Charles E., Jr.
Erickson, Lil
Erickson, Michael
Evans, Tim
Evarts, Katherine B.
Evarts, Keith
Farman, Richard F.
Fiala, Charley
Filek, Jim
Finley, Ann
Fisher, Erik
Fisher, Karen
Fisher, Paul
Fitzsimmons, Nancy
Flying Up, Sharon
Foland, Maurice
Ford, Pat
Foster, Brent
Foster, Jerry
Fraser, Joe
Frazee, Steve

French, Dan
Friedman, Toby
Fritz, Daniel L.
Fullerton, Tim
Gantt, Gamewell D.
Garrett, Roger C.
Garritson, Nell
Gay, Maxine G.
Gehrke, Craig J.
Gilpin, C. L.
Gosack, Janet
Goydun, Bob
Grace, Stan
Grantham, Steve
Green, Carolyn
Green, Frank
Greenwood, V. J.
Groether, Sheila
Haak, Amy
Hackney, Stephen
Hade, Gertrude D.
Hanson, Robert D.
Hanson, Wes
Harmon, Dr. Philip M.
Harper, Randy W.
Harris, Richard
Hart, Cheryl
Harvey, Eugene V.
Hawley, Denny E.
Hawley, Rosalie
Hayes, Scott M.
Hayes, William S.
Henderson, Thomas G.
Henkelman, N. A.
Herbst, Lynn A.
Hickey, William O.
Hickok, Jeffrey
Hill, Adrian A.
Hitesman, Jerry
Hitesman, Stan
Hobbins, Richard R.
Hollander, Vincent J., Jr.
Horan, John R.
Hosfield, David J.
Hoyt, Marvin E.
Hurley, Bud
Hutchison, Andrew
Hyde, Kenneth E.
Ihrig, R. R.
Isom, Charles
Iwen, Wayne
Janes, Bennie W.
Jarman, Ron
Javorka, Ed
Jeffrey, Eleanor
Jeppersen, V. Reid
Johnson, Diane
Johnson, Monty
Johnson, Orlo
Johnson, Rick
Johnston, James
Jones, Ivan L.
Jones, Mike
Jones, Phyllis
Jones, Roscoe L.
Jones, Thomas N.
Katsma, K. R.
Kauer, Blair
Kauer, Melody
Keating, Earl
Keele, Wilfred L.
Keller, Pamela
Kelley, Patsy
Kent, Jerald
Kerns, Rich
Kimball, Steve
Kittams, Walter H.
Kittrell, Susie
Knauff, Daryl
Kochaver, James T.
Kohl, Michael
Korpi, Jerry
Kortan (?), Larry
Korte, Erick
Kossler, Galen J.
Kozacek, Russell
Krings, Duane
Kroos, Judith
Kroos, Robert J.
Kurtz, Gene
Lagerstrom, Mark
Lahr (?), James A.
Lambrecht, Keith
Larson, Nancy Mae
Laverty, Denise
Layshure, Glenn S.
Leach, Jacquelyn
Leavell, Bill
Leone, Joann
Lewis, Carla
Lewis, K. Duncan
Lilburn, Bert
Liles, Homer
Lipovac, Peter A.
Lish, Everett
Lish, Judith
Locatelli, Frank
Lockes, Bonnie

Lockes, Jim
Longstroth, Alma G.
Love, Josephine
Love, W. B.
Lucier, Lorraine H.
Lufkin, Elise G.
Lung, John A.
Lung, Mark
Mace, Judith L.
Mahaffey, Dale
Mantel, Burk
Marse, Barbra
Martin, Carol A.
Martonen, Everett
Mason, Don C.
Mathews, Dave
Maughan, Ralph
McCarthy, Patrick
McCarthy, Paul B.
McConnaghy, John
McConnaghy, Pat
McConnaghy, Peggy
McConnaghy, Walter J.
McCue, Jim
McDonnell, Nancy
McFarland, Dave
McGlinsky, Alfred M.
McGown, John Jr.
McKinney, Mark
McMahan, William A.
Meiers, Richard E.
Mel (no last name given)
Michnevich, Larry
Miller, Hubert
Miller, Warren
Millimaki, Gail
Mills, Archie
Minnick, Walter C.
Mitchell, William T.
Moats, Lawrence J.
Morgan, Curt V.
Morgan, Robert
Morris, William F.
Mulkey, Bruce L.
Murdock, Kerry
Myers, LaNora
Neal, Bill
Neal, John A.
Neal, Marcy
Neff, Darrell
New, Scott
Nichols, Glen
Nichols, John C.
Noftz, Jeff
Nottestad, Elizabeth R.
Nottestad, Roger
O'Neal, Ben
O'Neal, Don M.
O'Neal, Ted L.
O'Neal, Viola M.
Olden (?), Jonathan
Olson, Dallas
Olson, DeLos
Olson, Jody B.
Olson, Kathleen
Olson, Shirley
Olson, V. Don
Osborn, Calvin
Osborn, John
Ottonello, Gino J.
Palmer, Peter L.
Papp, Lawrence A.
Paul, Liz
Pavia, Jerry
Payne, Rogert G.
Peacock, Eric A.
Perry, Jerry A.
Perry, Virginia
Pinch, Mark
Playfair, Jim
Ploger, Scott
Pollard, Cecil P.
Porter, Charles
Porter, Joyce
Purcell, Allan
Quire, Mark
Rackham, Jack
Raeber, Hildegard
Rau, Donald G.
Rector, Nancy
Rector, William R.
Reynolds, Alan
Reynolds, Joan
Richards, Nancy
Richards, Theresa
Richman, Melodie
Rieder, R.
Rieffenberger, Betsy
Rieffenberger, Vicki
Roberts, Bruce C.
Roberts, Hadley B.
Robinson, F. Roland
Rogers, Ken
Rose, Kay R.
Rose, Wesley G.
Russell, M. L.
Sager, Bill
Sager, Mrs. Maxine

Savageau (?), Paul R.
Schaller, Edward
Scherr, Emanuel
Schwartz, Charles W.
Searle, Tresa
Secsewi (?), Kenneth
Severson, Marc
Shaffer, Tom
Shaggs, F. K.
Sherman, Ken II
Shiner, Charles
Shokal, Edward C.
Silva, Robert
Skeen, Jay
Skinner, Judy
Skinner, Richard A.
Skriletz, John
Slifer, Betty
Smith, Audrey M.
Smith, Dan M., Jr.
Smith, Grace
Smith, Jennie
Smith, Joe
Smith, John
Smith, Kent G.
Smith, R. J.
Smith, Ric
Smith, Richard R.
Smith, Tari Pardini
Smith, Vicky
Smith, William R.
Snook, Edward
Sorensen, Rick
Spilver, George
Spotts, Richard
Spuehler, Carol R.
Spuehler, Shirley
Stahl, Louise M.
Staples, Eric
Starbuck, Elizabeth
Starry, Ron
Steele, Joanne
Stein, Brad
Stevenson, Andrew B.
Stone, Lynne K.
Strand, Floyd
Strong, Robert
Stroud, Dee
Stutzman, Glenn
Swanson, John R.
Swift, Ralph
Tabert, Tony
Tamarelli, James M.
Tanner, John
Thomas, Kelly J.
Thompson, Charlie
Tidwell, Steven B.
Tobias, Marlene
Tobias, Nelle
Tobias, Ronald
Tomlinson, Curtis
Tonsmeire, Fran
Torf, Mark
Tripplehorn, Hugh J.
Trogden, Connie D.
Trogden, Warren
Trost, Jim
Trueblood, Ellen
Tucker, Dan
Tully, Jerry E.
Tulpinsky, Joseph F.
Tyler, Margarete E.
Ulshafer, Bob
Unkel, Margot B.
Van De Graaff, Dave
Vaterlaus, Bret J.
Veldman, Leslie
Walker, Lucinda P.
Walker, Ron
Walton, Leo
Ward, Frederick R.
Waters, Harold T.
Waters, Marlene
Watters, Ron
Wearden, Joe
Wegman, Jerry
Weigold, Ted
Werdinger, Leon
Westfall, Mike
Wheeler, John A.
White, Marsha
Whitson, Walter B.
Whittaker, Calvin
Whittaker, James
Whitworth, David
Will, George
Williams, Karen
Wise, Ron
Woan (?), Leon K., Jr.
Wood, Susan
Woodward, Laura
Wyatt, Jill
Wyman, Pete
Yakovac, Evelyn
Young, Bing
Young, Roger
Yount, Stuart L.
Zimmerman, Brenda

E. Public Response Analysis

Public Comments regarding the proposed Forest Plan were considered individually, by type of group/organization, and geographic location in order to determine common areas of concern. The results of the analysis are used as one element in decision making.

The variety and intensity of expressed viewpoints is summarized in this section. Several categories received very light comment and summaries for these are not written. These categories are: Insects and Disease, Firewood, Pesticides and Herbicides, Timber Utilization, Lands Ownership, Special Land Uses, and Law Enforcement. These comments are part of the planning records.

Of the 559 comments received on the Salmon National Forest Proposed Plan, 200 favored the published Preferred Alternative (with or without reservations), 322 did not favor the Preferred Alternative (with or without reservations), and 37 did not have either a stated or apparent preference.

The 161 who commented on other Forests' public involvement efforts which included contiguous Roadless Areas did not have a preference on the Salmon National Forest Preferred Alternative, since it was unpublished when they were commenting. Those individuals commented on the six contiguous Roadless Areas as follows:

Blue Joint.....133
Anderson Mountain.....7
West Big Hole.....15
Goat Mountain.....5
Italian Peak.....6
Allan Mountain.....53

A breakdown of what was recommended by these 161 regarding these areas is as follows:

Blue Joint*
101 Wilderness
1 Wilderness or semi-primitive nonmotorized management
10 Some form of semi-primitive management (semi-primitive motorized or nonmotorized, or roadless)
19 Nonwilderness
1 Deferred comment until the release of the Salmon Forest Plan

* One of the comments was a second recommendation regarding the area by the same individual--this recommendation was not counted twice.

Anderson Mountain
3 Wilderness
3 Some form of semi-primitive management (either roadless, semi-primitive motorized or semi-primitive nonmotorized)
1 Nonwilderness

West Big Hole*
11 Wilderness
1 Wilderness or semi-primitive management
1 Some form of semi-primitive management
1 Nonwilderness

* One comment was a second recommendation by the same individual and was not counted twice.

Goat Mountain
2 Wilderness
1 Wilderness or semi-primitive management
1 Semi-primitive management
1 Nonwilderness

Italian Peak
2 Wilderness
1 Wilderness or semi-primitive management
1 Semi-primitive management
1 Nonwilderness
1 No preference or deferred comment

Allan Mountain
2 Wilderness
37 Semi-primitive nonmotorized
1 Semi-primitive motorized management
9 Semi-primitive management
3 Nonwilderness
1 Deferred comment until the release of the Salmon Forest Plan

The variety and intensity of expressed viewpoints is summarized below.

1. Minerals and Energy

Of the coded comments, 30 addressed the minerals and energy issue. Comments ranged from "Mineral rights should be developed in all areas if they do not pollute streams or watersheds," to comments regarding tradeoff analysis and monitoring.

Comments included concerns of:

-- Effects on wildlife and fish.
-- Wanting site specific plans to indicate areas with mining restrictions.
-- The need to address the effect of managing other resources on mineral resource development.
-- The need to address energy and mineral resources in the benchmark analysis and address their associated costs and benefits.
-- The need to impose terms and conditions which assure protection of other resources from the effects of hydroelectric development.

2. Wildlife and Fish Habitat Management

Of the coded comments, 419 addressed wildlife and fish habitat management. Comments ranged from "low value resources like timber should never be allowed to affect the highest value wildlife habitats," to stating that based on the high number of elk in the area, timber harvesting must be complimentary to elk habitat," to technical comments regarding computer generated sedimentation predictions.

Comments included the following points:

-- Not believing that Alternative 12 adequately protects the elk summer range on the forest.
-- Opposition to roading and logging elk migration corridors, particularly at Sheep Creek and Dahlonega Creek.
-- Opposition to the Preferred Alternative because they believed it did not meet Idaho Department of Fish and Game management objectives for deer and elk.
-- Logging produces good game habitat.
-- Ranchers are feeding geese, deer and antelope at the expense of their livestock and the wildlife population should not be increased.
-- Manage key elk summer range principally for elk, and leave it in a semi-primitive and unroaded condition.
-- Those who harvest game should cover winter feeding costs, not those raising cattle.
-- Wildlife are worth very much to the economy.
-- Concern of the effects of logging on the spawning ability of anadromous fish.
-- The section treating old growth habitat and species diversity is shallow. The likelihood of maintaining sensitive species at minimum viable population levels seems small.
-- Many species require vast stands of old growth to maintain adequate population numbers.
-- Further degradation of streams will harm an already precarious situation regarding stream siltation.
-- Follow the Central Idaho Elk-Logging Guidelines.
-- Fisheries is the beneficial use which has the greatest potential to be impacted by forest management activities.
-- The plan would greatly increase the rate of sedimentation in important spawning streams.
-- Bring impacts on fisheries into compliance with standards set forth by treaty rights, because the Forest has the obligation to protect Indian fishing rights.
-- Remove cattle from important elk habitat.
-- Mapping and analysis of watershed and fisheries resources should be developed by starting with small watersheds... Only in this manner can site specific impacts be described for small drainages and their cumulative effects be developed.
-- No roads should be built into elk raising areas.

-- Problems with anadromous fish numbers are cumulative effects of dams, fish harvest, disease, and habitat degradation.
-- The anadromous fish runs can only be restored if state, federal and tribal land, water and wildlife managers adopt a coordinated gravel-to-gravel approach.
-- Unprofitable logging should only be done to improve habitat.
-- Present game populations are all we have winter feed for.
-- Maintain trout, steelhead and salmon streams at 90% of potential, and repair past damages.

3. Timber Management--Quantity

Of the coded comments, 147 addressed the Timber Management Quantity issue. Comments ranged from "there should be more timber available," to "I am totally against removing any timber from the Salmon National Forest.

Comments regarding this issue included:

-- The Forest's contribution to the national timber supply is almost nothing. Therefore, why should it be emphasized forestwide as a major product at the expense of water, fish, wildlife and recreation?
-- The timber base in the forest needs to be increased so that timbering will continue to be a feasible operation.
-- Logging is a renewable resource. Where no logging is allowed, trees are diseased and the brush so thick no new trees can grow.
-- The timber industry is part of the community, but needs to be kept in perspective. It should not dominate other uses of the forest.
-- Cut no trees anywhere until needed. It is time to think of our environment, not the timber companies. Let our wildlife live.
-- Your implication in the "Timber Management, Existing Situation Summary" is that older and/or unmanaged stands of timber are unproductive. This is true if one only manages for timber production.
-- The Salmon National Forest has been badly over-cut for years.
-- The Forest should reduce their backlog of sales and reduce the average annual cut to approximately 15 MMBF.
-- The only reason timber is cut on the forest is that the federal government has been giving it away in the form of subsidy to timber interests.
-- Senseless clearcutting of our forests may have more than a local effect on the atmosphere.
-- Road building and timber harvest should be cut back drastically to accommodate the state goals for wildlife.
-- Logging should only be planned where downfall and mature or diseased stands present fire danger, or for well established and profitable markets.

-- I support continued timber management on the Salmon National Forest to adequately supply the local mill.
-- The vegetative diversity standard and guideline of old growth retention should be set at exactly 10 percent overall with a minimum of 5 percent for any identifiable type. This will allow for a maximization of the Frank Church--River of No Return Wilderness to contribute at its maximum potential to this old growth requirement while reducing the restriction on the tentatively suitable forest lands.
-- For a semi-primitive motorized recreation objective a timber/recreation prescription should be identified vice a single use recreation objective.
-- Most old growth Douglas-fir and natural vegetation should remain, even if it means less timber harvest and livestock grazing.
-- I have heard the timber industry proclaim that timber is a renewable resource. I think it is time they worked on the renewed and left the pristine alone.
-- The problems of regeneration and slow regrowth make timber "harvesting" more timber "mining."
-- The huge amount of timber to be offered for sale under the Preferred Alternative is totally unjustified by current or by foreseeable market conditions.
-- Neither the U.S. nor Idaho need the excess timber harvest proposed. There is already an over supply of timber.

4. Transportation System Management

Of the coded comments, 261 addressed the Transportation System Management issue. Comments ranged from closing logging roads when the sale is completed, to being opposed to any roadsbuilding at all.

Comments regarding the issued include:

-- Roads in any of the forest should be kept to a minimum and consideration should be given to whether to close or leave them open with consideration given for values and effects of them overall.
-- The proposed road system is larger than necessary. Roads should be closed to start bringing the area back to a more ecologically sound state.
-- Many roads currently exist that are unnecessary for proper forest management.
-- I am happy the plan includes a policy for closing newly constructed roads once timber harvest has been completed. Extend this policy to currently existing roads that are no longer needed which adversely impact wildlife habitat.
-- I have found five different references to miles of road that would be built during the life of the plan. Which is correct?
-- I would like to see your road closure program applied equally across the board, including adequate law

enforcement. Maintaining road closures in high wildlife habitats is the most efficient and cost effective method for rehabilitating these areas.

-- We ask that road construction be kept to a bare minimum, both as to miles and types of construction.

-- Cattle like quiet calm as does wildlife and as the use of motorcycles and snowmobiles has increased, we feel in some areas there may be a need for some restrictions in respect for other uses. Wildlife is more inclined to come down to the ranches when the forests are humming with snowmobiles and motorcycles.

-- Road access should be expanded within normal resource constraints such that resource benefits can be maximized over time.

-- I don't want any more of my dollars to subsidize road building.

-- By preventing access through lack of roads, the wilderness or any forest is impenetrable by poor people who can't afford a four week vacation, horses, a guide service, or an airplane... The forests are here for all to enjoy. The forest is no more than God's garden of trees. I believe he intends for us to do its thinning and fire protection to foster a better forest through management. Roads are an essential part of that thinning and protection process.

-- All trails now open to motorized recreationists should remain open, seasonal closures where necessary to protect wildlife at particularly vulnerable times of the year.

5. Recreation

Of the coded comments, 98 addressed the Recreation issue. Comments on recreation covered developed and dispersed recreation.

Comments included the following:

-- Recreation is more valuable to Idaho than timber and other commodity programs. Therefore the plan should protect those resources important to recreation (fish, wildlife, water quality).

-- Maintain quality trail bike recreational opportunities.

-- In addition, several members of the public were in favor of not enlarging the Meadow Lake Campground at its present location. Instead, they called for moving the campground away from the lake to less fragile areas with room to handle the recreational volume.

6. Watershed Management

Of the coded comments, 220 addressed the Watershed Management issue. Comments addressed water rights, water quality, and included some technical comments.

Comments regarding watershed management included the following:

-- We cannot support federal rights to instream flow.
-- There needs to be a greater emphasis put on protecting existing state water rights and individual rights to such water.
-- Federal water quality requirements should be modified to coincide with state standards to save confusion. Instream flows should not be considered if they will harm private water rights in any way. The flood waters on nearly all these small mountain streams are appropriated proportionately to all the decreed waters. We need this flood water in order to get irrigated, as we do not have the full decree all the time.
-- I oppose the degradation of our streams and think that sheep and cattle grazing and logging should be eliminated if and where necessary to stop future degradation and that past damage be mitigated.
-- Because of the very steep topography in your forest, we do not feel that your disregard for erosion hazards is justified. We suggest that a careful evaluation by a competent hydrologist be used to identify erosion hazardous areas and that any activities which would adversely affect anadromous fish spawning areas be off limits to disturbances of any nature.
-- We are concerned about the in-court decision in Colorado and how it could affect local water rights. We do not want to see present in place water rights prior to the 1976 Wilderness bill cut. Anything after 1976 could be disallowed.
-- The proposed alternative is objectionable because of the adverse affect it would have on water quality. The projected sedimentation level of our streams is totally unacceptable, and works directly against the efforts made to enhance our fisheries.
-- You cannot specifically guarantee no massive soil erosion will result under your DEIS.
-- Water--this resource is being better managed on the forest than on private lands. Forest Service management is good and improving. Water concerns are generally overstated by fish, wildlife and some recreational groups because they work with only preferred facets of the larger resource management picture.
-- Logging and road building would also cause degradation to the Salmon and its tributaries.
-- The goals of meeting state water quality standards and increasing habitat capacity are excellent.
-- The Salmon National Forest should give an objective of reducing sediment yields in all important fish habitats.
-- "We support the statements made in the Draft Plan regarding protection of public water supply watersheds. We would like to see more specific standards and guidelines developed for these watersheds in the final plan..."

7. Timber Management--Treatment Methods

Of the coded comments, 29 addressed the Timber Management--Treatment Methods issue. Comments addressed regeneration, slash disposal, harvest methods and logging systems.

Comments included the following:

-- Leaving slash disposal to the contractor is like trusting a fox in the chicken coop.
-- Regeneration of Douglas-fir is also a problem. The National Forest Management Act requires that regeneration can reasonably be expected in five years. The plan should indicate the historical success rate of regenerating Douglas-fir stands to show whether or not this requirement can be met.
-- More protection should be given to wildlife and fisheries in areas to be logged. Helicopter logging might be one way of protecting streams and decreasing the amount of road building.
-- Silvicultural prescriptions--we are pleased that the standards for tractor skidding (for allowable percent slope) are tied to land type. The final documents should include the rationale for selection of the specific percent slopes mentioned.
-- Never cut in wet areas, or any area which will not recover without the aid of Foresters.
-- Clearcutting means "extermination."
-- A major timber/wildlife conflict is the Salmon's poor track record in reforesting Douglas-fir habitats. Harvesting many of the severe sites with the shelterwood system certainly has to be contributary to this problem.

8. Rangeland Resource

Of the coded comments, 203 addressed the Rangeland Resource issue. Comments involved the quantity of domestic grazing, the conflicts between domestic animals and wildlife, and the domestic animal effects on riparian areas.

Comments included the following:

-- I believe cattle should be moved out of important elk habitats and domestic sheep kept away from bighorns.
-- An increase in Animal Unit Months for livestock is logical as allotments have been under improved management for some time. Also, as there are no sheep left on the forest, some ranges suitable for cows must have become available.
-- The range hasn't been overused by this plan and supports plenty of wildlife too.
-- It is only natural for livestock to feed out bottoms of draws before they climb away from waterholes. Why don't the range inspectors pay more attention to inspecting the tops of ridges.

-- We would like to see cattle rights kept at their present levels.
-- The valley is a livestock producing area, we feel that the effects of forest management upon the ranches should have very thoughtful consideration in the new management plan.
-- Sensible management practices should be maintained for grazing of domestic animals, as this is one of the basics of the local community.
-- Overgrazing and development of spring water for cattle has adversely affected big game populations.
-- When I go into my National Forests I don't want to see cattle in and around my camp.
-- Grazing--this is compatible with other forest uses.
-- Is it true that the plan will actually increase the amount of cattle grazing in the forest? If this is so it is completely unacceptable. They have damaged enough watercourses and natural flora.
-- The impact of livestock grazing on water quality, the riparian ecosystem, fish habitat, recreational values, and many other public values is legion, yet the Land and Resource Management Plan does little more than to give this misuse of land lip service. There are solutions, but the Land and Resource Management Plan/Draft Environmental Impact Statement does not identify or address either the problems or solutions in a meaningful manner.
-- Contrary to my own interests as a rancher and stockman, I see the definite need to reduce, if not eliminate, all federal grazing permits for domestic livestock. Permits are enjoyed by a relative few and at the expense of vegetation and wildlife.
-- I want less cattle on the forest.
-- Would like to see a long term phasing out of all cattle grazing.
-- Elk, antelope and bighorn sheep should be given priority over cattle and sheep in grazing conflicts and allotments.

9. Visual Resources

Of the coded comments, 13 specifically addressed the Visual Resource issue.

Comments included:

-- I am familiar with the natural beauty of this region and would hate to see it changed.
-- Visual Resource--This resource is more a matter of the aware mind than any other discipline. Basic resource education will help this area, coupled with good management techniques.
-- There is no such thing as visual quality in contrast to the finest remaining virgin timber.

10. Management of Undeveloped Areas

Of the coded comments, 2,366 addressed the management of undeveloped areas. The greater part of these (1,785) addressed 13 individual Roadless Areas. These 13 were: Camas Creek, Lemhi Range, Blue Joint, Anderson Mountain, West Big Hole, Goat Mountain, Italian Peak, Allan Mountain, West Panther Creek, Little Horse, Oreana, Duck Peak and Long Tom Roadless Areas. The remaining Roadless Areas received less than five comments each, except for Taylor Mountain Roadless Area which received 13. The remaining comments were in categories of general Wilderness, general Roadless and semi-primitive categories.

Comments in the general Wilderness category (413) ranged from not wanting any more Wilderness, to asking for more area to be recommended to Congress for Wilderness.

Comments in the general Roadless category (29) ranged from "Alternative 12 also settles the Roadless Area issue by returning those acres back to multiple use management," to "Recommend all Roadless Areas be Wilderness." Another 35 coded comments mentioned geographic areas of the forest--rather than specific Roadless Areas--on which they favored management ranging from Wilderness to releasing them as recommended in the Conference Committee Report of the Central Idaho Wilderness Act. Geographic areas included: Beaverhead and Bitterroot Ranges, those Roadless Areas around the Frank Church--River of No Return Wilderness, as well as "any other Roadless Areas that are under the threat of the bulldozer," and "areas near Gilmore Summit and Big Eighteen Mile Creek and adjoining areas I could see from the flat below."

Comments on the semi-primitive category (62) ranged from wanting a semi-primitive nonmotorized category, to wanting to assure there will be areas available for trail bike use. Some people liked the flexibility of the semi-primitive area designation--since it could be assessed later for a change in management. Others expressed that the flexibility was the reason they did not like the designation--because management could change.

Comments on specific Roadless Areas ranged from wanting the area Wilderness in order to protect wildlife values, to wanting the area available for multiple use purposes. The bulk of the comments recommended either Wilderness or other roadless management for these lands.

11. Community Stability

Of the coded comments, 417 addressed Community Stability. Comments ranged from wanting to utilize our natural resources for the maximum benefit of the community, to questioning why the Forest Service was involved in stabilizing communities.

Comments received included the following:

-- The Salmon Valley needs the volumes of timber to support our local mill and to help the mills in the Bitterroot survive.

-- The Salmon forest (trees) is a crop. The Salmon forest is our "ace in the hole" and should be utilized to the maximum benefit of the community.

-- Our economy is more dependent upon farming and ranching than on tourism. We must allow for both, not at the expense of our year-round stable population.

-- The Salmon area's "ace in the hole" will be its great outdoor scenic and recreational opportunities. Rather than relying on marginal timber sales and wavering mining markets, Salmon should begin focusing on "nonmarket" outputs and values such as its water, fish and wildlife and dispersed recreation as stated in Alternative #3.

-- We need more tax base industries such as timber, cattle and mining. These should be the first consideration of our National Forests.

-- Recreation is becoming a more important part of the local economy.

-- I realize one of the main focuses of the preferred alternative is the protection of the local economy. The recreation industry has been proven as a major source of income in this area. I don't think the Forest Service is adequately protecting this viable industry with the Preferred Alternative. I don't think we should lean so heavily towards supporting a taxpayer subsidized timber industry (especially since it is rated in the lowest category for timber growing potential on a national scale).

-- Plans should seriously consider the people who live and make their living here.

-- Alternative 12 is workable where an operator of livestock can gear an operation to balance and not have to make drastic changes in operation. This approach will give the younger generation a secure enough feeling to invest time and money on an operation and maybe help save the family farm.

-- The cost of running a forest wilderness is way too much and the amount of people who would be affected should be a major consideration.

-- My family and I love living here in Salmon and feel it is a good place to raise our children. We want to enjoy the beautiful outdoors and also be able to make a living.

-- Many people have went to great lengths to try to solve the conflicting interests between the land users. I feel that the proposal is well rounded for this and surrounding communities.

-- "The Preferred Alternative will help stabilize the economy of dependent communities while protecting the basic resources..."

-- The Forest Service is in the business of managing a public resource, not ensuring financial stability to local communities. Where does the Salmon National Forest get its direction to influence community stability?

-- If the emphasis was placed on dispersed recreation, wildlife, and other nonmarket outputs, the tourist industry might become a larger part of the city of Salmon's support.

-- I think your proposed plan has some merits, but errs vastly by placing too much emphasis on two rapidly declining industries--timbering and ranching--with little thought to how Idahoans will have to make a living in the future period shorter than your Forest Plan.

-- There should be a continuous ongoing concern for the people that are affected by any decisions affecting the resources of the Salmon National Forest. In considering ongoing costs against timber, mineral and water, the wage, tax base and the well-being of the citizens need to be addressed. An overall effect upon not only the people of the community, those on down the line whose livelihood is affected, along with the taxes directly or indirectly paid by the people need to be figured in when determining the actual benefits to the forest.

-- The game animals need to be considered, but should be done so with the domestic animals that use the forest and what the real revenue generated within the community does as far as keeping the community in the black.

12. Fire Management

Of the coded comments, 25 addressed the Fire Management issue. Comments addressed fire suppression (including the need to implement mechanized fireline construction guidelines) and prescribed fires.

Comments included:

-- Firefighting last summer could have been much better facilitated with more back roads. What a waste that so much timber (even poor quality for firewood) went up in smoke.

-- Grazing and the removal of dead wood helps to lower fire danger. Cattle topping the foliage when green in the spring prevents it from becoming rank and dry and flammable.

-- Bulldozers did more to damage the land than any fire could have. Develop and include in the final plan standards and guidelines not only for actions taken during fire suppression, but for soil and other resource recovery after the fire has taken place.

-- Develop guidelines on where and when mechanical equipment will be used for fireline construction.

-- I encourage you to address the potential uses of prescribed fire, both planned and unplanned ignitions for wildlife habitat improvement, fuels reduction, and timber stand improvement.

13. Threatened and Endangered Species Habitat Management

Of the coded comments, 40 addressed Threatened and Endangered Species Habitat Management. Comments addressed the peregrin falcon, bald eagle, gray wolf, and grizzly bear.

Comments included the following:

-- Believing the plan will not affect bald eagles or peregrin falcons.

-- Believing the plan will not jeopardize the existence of the gray wolf, but adding suggested management guidelines which outline important areas for wolves and include coordination with and education of forest users.

-- Believing the gray wolf will lose habitat through implementation of the plan.

-- Suggesting raptor "no cutting areas" be utilized only if these species become Threatened and Endangered Species.

14. Riparian Areas

Of the coded comments, 23 specifically addressed riparian areas. Comments addressed the need to protect these areas from damage by timber harvesting and livestock use because of their fish, wildlife and water quality values; some said that there were problems in these areas, but that the areas should be protected through range management techniques; there were

requests for more detailed information in a more expanded section on riparian areas, and a call for strengthened standards and guidelines regarding these areas.

15. Special Areas

Of the coded comments, 26 addressed Special Areas. Comments addressed the Salmon Wild and Scenic River, Research Natural Areas, and the Lemhi Pass National Historic Landmark.

Comments included concerns of:

-- Wanting all 10 areas recommended for Research Natural Area designation to be granted RNA status.

-- Pointing out the omission of the Sheep Mountain Research Natural Area (located on the Challis and Salmon National Forests) from the Salmon National Forest Plan.

-- Management of the jetboat traffic on the Salmon Wild and Scenic River after the recreational float season.

-- Nominating properties along the Salmon River to the National Register of Historic Places.

16. Timber Economics

Of the coded comments, 235 addressed the Timber Economics issue. Comments mainly addressed the below cost sale issue and included reasons for being opposed to below cost sales and ways to improve timber sale economics.

Comments regarding the Timber Economics issue included the following:

-- I strongly oppose logging that has to be subsidized.

-- Timber sales in Idaho are known to be money-losers. It does not make sense to continue this practice.

-- Cutting marginal timber stands on steep, mountainous terrain and road construction and reconstruction through fragile, unstable soils didn't then and doesn't now make good economic sense to me. Too much emphasis has been placed on red-ink, low value timber harvesting at the expense of other (what I consider) higher value resources in the forest--its waterways, fish and wildlife and accompanying scenic and recreational opportunities.

-- The existing Forest Plan is highly inefficient as to cost. The lumber industry has no market at this time and is most likely to be considered a dying industry.

-- We do not support in concept below-cost timber sales. There may be occasions when sales critical to the local sawmill and which do not contain significant amenity values should be sold for below cost, but these occasions should be the exception. It is our belief the huge federal debt is the cause of the economic woes plaguing Idaho, not Wilderness.

-- Uneconomical timber harvests that undermine investments under the Lower Snake River Compensation Plan, Northwest Power Act, and Salmon and Steelhead Conservation and Enhancement Act, don't seem to make much sense.

-- Logging of unneeded timber resources should not be planned, especially at the expense of taxpayers.

-- To manage the forest to maximize timber production is a waste of your time and the taxpayers money.

-- Nor should too much emphasis be placed on timber when timber harvest constitutes welfare for the timber industry.

-- Why should we log areas that have to be subsidized by taxes? Especially when the areas to be logged are in key elk range.

-- The Forest has overlooked a major economic opportunity to address below cost sales and mortality salvage. It is recommended that the Forest integrates uneven managed stands between even-aged stands. This will allow the Forest to treat the entire area accessed upon the first or next entry where this is economically viable. The forest benefits attributable to wildlife, visual quality, recreation, etc., can be met while allowing timber harvesting prescriptions to operate on the entire sale area which is economically viable. Economies of scale in logging costs will be fully employed while harvestable volume per mile of road will dramatically increase.

-- The planned harvest is too large and destructive of wildlife and fisheries values that are worth much more than the values of the timber to be cut. Every sale planned will be a below cost, subsidized sale--a loss to the taxpayers. I oppose any logging in the Lemhi Mountains from Gilmore Summit to Hayden Creek. I oppose the proposed sales in Alder, Deer, Big Eightmile, Mill, and Hayden Creeks. These areas have tremendous nontimber values that would be sacrificed for lousy timber worth far less than the cost of logging it.

17. Other

This category was used for storing comments which did not readily fit into the previously mentioned divisions. Of the comments received, 445 were placed in this category.

Comments ranged from "I support the proposed alternative," to highly technical and legal points addressing the proposed plan and DEIS. Major points in the comments included:

-- Cultural resources need protection.

-- Requests for maps of 10 year timber sale plans, suitable and unsuitable timber lands, and important wildlife areas.

-- Support for various alternatives, including 3 and 12.

-- Comments on the planning process which included: economic values, the effects of the budgeting process on the proposal, not displaying Decision Criteria in the draft documents, and verifying computer model outputs by field measurements.

F. Public Comments and Forest Service Responses

Major public concerns, based upon volume of comment, are listed below. Included with each is the Forest Service response to that concern.

-- I am opposed to logging elk migration corridors, particularly at Sheep Creek and Dahlonega Creek.

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

protection from road encroachment and cover removal. The final plan includes a considerable increase in the amount of semi-primitive emphasis area between Sheep Creek and Lost Trail Pass.

-- I am opposed to the Preferred Alternative because it does not meet Idaho Department of Fish and Game management objectives for deer and elk.

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

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

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

-- I believe cattle should be moved out of important elk habitat and domestic sheep kept away from bighorns.

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

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

— I do not believe the Preferred Alternative adequately protects the elk summer range on the forest. This is a very valuable resource since recreational hunting is an important part of the economy of the area.

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

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

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

undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game.

-- Fisheries is the beneficial use which has the greatest potential to be impacted by forest management activities.

5. The proposed Plan presents detailed information in chapter IV regarding fish habitat management goals, forestwide management direction, associated standards and guidelines and specific management area prescriptions. Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species. The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals. The sediment oriented objectives are also linked with attainment of fishery objectives. Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis.

-- Roads in the forest should be kept to a minimum and consideration should be given to whether to close or leave them open with consideration given for values and effects of them overall.

6. All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA). Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan. This travel plan is updated periodically using both public input and information gathered by monitoring the current travel plan. Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range. The guidelines for transportation system management are located in the Draft Forest Plan on pages IV 65-68.

-- There needs to be a greater emphasis put on protecting existing state water rights and individual rights to such water.

7. Federal instream flows (Federal Water Rights) are claimed by the Forest Service to fulfill the responsibilities described in the Organic Administration Act of June 4, 1897, and the Multiple-Use Sustained Yield Act of 1960, as well as other legislation. The Organic Administration Act specifically states that the securing of favorable water flow is primary a purpose for establishing National Forests. Instream flows are needed for maintaining stream channel stability, providing adequate flow for the transport of sediment, and the protection of associated riparian

habitat. Instream flows are also important in maintaining stream channel conditions in a way that provides downstream users with high quality water, proper distribution and timing, and protection against flooding.

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

-- The Forest Service is in the business of managing a public resource, not ensuring financial stability to local communities. Where does the Salmon National Forest get its direction to influence community stability?

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

-- Develop guidelines on where and when mechanical equipment will be used for fireline construction.

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

-- Timber sales in Idaho are known to be money-losers. It does not make sense to continue this practice.

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

-- Cutting marginal timber stands on steep, mountainous terrain and road construction and reconstruction through fragile, unstable soils didn't then and doesn't now make good economic sense to me. Too much emphasis has been placed on red-ink, low value timber harvesting at the expense of other (what I consider) higher value resources in the forest--its waterways, fish and wildlife and accompanying scenic and recreational opportunities.

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

    a. Meeting Idaho Department of Fish and Game goals for big game.

    b. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.

    c. Protecting soil productivity in accordance with the National Forest Management Act.

    d. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.

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

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

-- I request maps of 10-year timber sale plans, suitable and unsuitable timber lands, and important wildlife areas be included in the Final Plan.

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

-- An expressed concern was that the Preferred Alternative contained no recommendation for additional Wilderness on the Salmon National Forest.

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

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

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

-- Another expressed concern was that the preferred alternative did not set aside any areas for semi-primitive nonmotorized management.

14. The plan has been changed so that areas will be managed for semi-primitive nonmotorized recreation emphasis including: all of the Long Tom Roadless Area #13521 and portions of the Camas Creek Roadless Area #13504, West Big Hole #13943, Italian Peak Roadless Area #13945, Jesse Creek Roadless Area #13510, Lemhi Range Roadless Area #13903. All areas receiving semi-primitive nonmotorized recreation emphasis provide opportunities for solitude and scenic landscapes with the exception of Jesse Creek, which was designated nonmotorized to protect Salmon's municipal watershed.

Additional opportunities for those who prefer nonmotorized use areas has been provided by limiting motorized use in some areas to designated routes only. Approximately 120,000 acres of the forest will be managed in this way.

-- I do not support the proposed timber harvest increase and do not believe it is sustainable.

15. A decrease in the volume of timber to be offered for sale on the Salmon National Forest is proposed in the selected alternative. Timber volumes offered under the current program were approximately 35 million board feet versus 21 million board feet under the selected alternative. The volume as proposed in the selected alternative is considered to best meet all of the interdependent issues considered in the Forest Plan.

There also seems to be a perception that the level of harvest is artificially high under the preferred alternative and could not be produced while still meeting the statutory standards for resources such as water, air, threatened and endangered species, and soil productivity. An important point is that the alternatives may differ in the outputs produced, but none of them cause irreversible reductions in basic resource productivity. Maintenance of the basic productivity of the resources under our stewardship remains a constant for all alternatives. The highest timber offer level considered was 36.8 million board feet (Alternative 5).

G. List of Agencies, Organizations, and Individuals to whom Copies of this Document are Sent

Elected Officials

Senator James McClure
Senator Steve Simms
Congressman Richard Stallings
Congressman Larry Craig
Governor Cecil Andrus
Idaho State Attorney General
State Senator Ann Rydalch
State Senator Vearl C. Crystal
State Senator Dane Watkins
State Representative Ray Infanger
State Representative JoAn E. Wood
Lemhi County Commissioners
Salmon Mayor
Leadore Mayor

Media

Arizona Daily Star
Forest Watch
High Country News
Idaho Falls Post Register
Idaho State Journal
KSRA Radio
Recorder Herald
The Idaho Statesman

Federal Agencies

Advisory Council on Historic Preservation
Agriculture, U.S. Department of
- Animal and Plant Health Inspection Service
- Forest Service
  - Beaverhead National Forest
  - Bitterroot National Forest
  - Boise National Forest
  - Challis National Forest
  - Payette National Forest
  - Targhee National Forest
- Office of Equal Opportunity
- Rural Electrification Administration
- Soil Conservation Service

Bonneville Power Administration
Commerce, U.S. Department of
- NOAA Ecology and Conservation Division
- National Marine Fisheries Service

Energy, U.S. Department of
Environmental Protection Agency
Federal Energy Regulatory Commission
Interior, U.S. Department of
- Bureau of Land Management
- Fish and Wildlife Service
- U.S. Gelogical Survey

Interstate Commerce Commission
Transportation, U.S. Department of
- Federal Aviation Administration
- Federal Highway Administration

Organizations

American Fisheries Society
American Mining Congress
American Wilderness Alliance
Associated Logging Contractors, Inc.
Blue Ribbon Coalition, Inc.
Carmen Grange
Columbia River Inter-tribal Fish Commission
Continental Divide Trail Society
E.C.I.P.D.A.
E.W. Dirt Riders Association
Earth First!
Hawley Creek Cattle Association
Idaho Alpine Club
Idaho Cattle Association
Idaho Conservation League
Idaho Environmental Council
Idaho Falls Trail Machine Association
Idaho Mining Association
Idaho Natural Areas Coordinating Committee
Idaho Natural Heritage Prog.
Idaho Natural Resources Legal Foundation
Idaho Petroleum Council
Idaho Sportsmans Coalition
Idaho State Historical Society
Idaho Trail Machine Association
Idaho Trails Council
Idaho Wildlife Federation
Intermountain Forest Industry Association
Lemhi Livestock and Wool Marketing Association
Lemhi Soil and Water Conservation District
Magic Valley Fly Fishermen
Montana Wilderness Association
National Audubon Society
National Forest Recreation Association
National Off Road Bicycle Association
National Wildlife Federation
Natural Resources Committee
Nez Perce Tribal Council Committee
Nez Perce Tribe of Idaho
Outdoors Unlimited
Portneuf Valley Audubon Society
Rocky Mountain Oil and Gas Association
Salmon Chamber of Commerce
Salmon Grange
Salmon Motorcycle Club
Salmon River Back Country Horsemen
Shoshone-Bannock Tribes
Shoshone-Piute Tribes
Sierra Club
Sierra Club Legal Defense Fund
The Nature Conservancy
Virginia Four Wheel Drive Association
Wilderness Society
Wildlife Management Institute

Academic Institutions

Boise State University
Hood College
Idaho State University
University of California
University of Idaho
University of Wyoming

Businesses

Aggipah River Trips
Anaconda Minerals
Arco Oil and Gas Co.
Argonne National Laboratory
Atlantic Richfield Co.
Boise Cascade Corp
Champion Building Products
Champion Timberlands
Chevron USA, Inc.
Conoco, Inc.
Exxon Co. USA
FMC Minerals Corp.
Idaho Power Co.
Keller Environmental Assoc.
Noranda Exploration, Inc.
Panther Creek Timber Falling
Salmon Intermountain, Inc.
Silver Cloud Expeditions
Spectrum Sciences and Software
Stoltze-Conner Lumber Company
Texaco, Inc.
Yellowjacket Mines, Inc.

State and Local Agencies

Cooperative Extension Service
Dept. of Health and Welfare
Department of Lands
Department of Mines
Dept. of Parks and Recreation
Department of Water Resources
Division of Environment
Idaho Department of Fish and Game
Idaho Division of Highways
Lemhi County Planning Commission
Salmon City Planning Commission
School District - Leadore
School District - Salmon

Individuals

Zane Abbott
Dennis Baird
Richard Barney
Kurt Becker
Larry Blasing
Peter Bowler
Lewis Campbell
William V. Casey, Jr.
Thomas W. Chappel
Glenn Compton
Kathryn Coston
Don L. Crawford
Jeffery Crook
Max Day
Eugene Edwards
Lil Erickson
Pat Ford
Tim Fullerton
Craig J. Gerhke
Frank Green
Graig and Sheila Grother
Norman Guth
Stephen Hackney
John R. Horan
Shirley Hoy
Marvin Hoyt
Ed Javorka
Gerald Jayne
V. Reid Jepperson
Orlo Johnson
James T. Kochaver
Johnathon Kusel
Burt Lillis
Ralph Maughan
William Meiners
LaVerne Nelson
Pete Peters
Scott Ploger
Tom Pomeroy
Elizabeth Powers
Allan Purcell
Mark Quire
Mel Reingold
Betsy Rieffenberger
Hadley Roberts
Ken Rogers
M. L. Russell
Cliff Schneider
Richard R. Smith
Richard Spotts
Ron Starry
Floyd Strand
John R. Swanson
Charlie Thompson
Joe Tonsmeire
Phillip Waterman
Ron Watters
Charles A. Wellner
Calvin Whittaker
James Whittaker
Elaine Wright
Pete Wyman
Bing Young

Libraries

Blackfoot, Idaho
Boise State University
Boise, Idaho
Caldwell, Idaho
Challis, Idaho
Dillon, Montana
Elko, Nevada
Idaho Falls, Idaho
Idaho State University
Lewiston, Idaho
Logan, Utah
Missoula, Montana
Ogden, Utah
Pocatello, Idaho
Rexburg, Idaho
Salmon, Idaho
Twin Falls, Idaho
University of Idaho
University of Montana
Utah State University
Washington State University

H. Public Responses and Forest Service Replies

The following letters were received from government agencies, Indian tribes, organizations and individuals. Only representative samples of letters that appeared to have been generated through organized efforts are reproduced here since the repetative nature of those letters would have added only to the bulk of the document. All the letters, along with the Forest Service response to them, may be reviewed at the Salmon National Forest Supervisor's Office.

0550

U S ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE WASHINGTON 98101

JAN 22 1986

SALMON N F

JAN 27 '86

Info ☐		Action ☐
~~Supv~~		
LMP	1 2 3 4 5 6	
TAF	1 2 3 4 5 6	
ELM	1 2 3 4 5 6	
RRWW	1 2 3 4 5 6	
AO	1 2 3 4 5 6	
CC's TO		

REPLY TO ATTN OF M/S 443

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

Dear Mr. Hauff

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) and proposed Plan for the Salmon National Forest, prepared by your staff. The DEIS presents several alternatives for management of the Forest's 1 8 million acres while the proposed Plan expands on the DEIS preferred alternative. Our detailed comments concerning both documents are enclosed. Our review was conducted in accordance with the National Environmental Policy Act, and our responsibility under Section 309 of the Clean Air Act to determine whether the impacts of proposed federal actions are acceptable in terms of environmental quality, human health, and welfare

We wish to thank you for providing us with additional time for our review. The Forest Plan/EIS is a major planning document which deserves both the efforts put into its development by your staff and the close attention of the public and of other agencies.

The draft documents raised some significant concerns and the proposed Plan, if implemented as written, could lead to some serious environmental impacts We have therefore rated the DEIS and proposed Plan EO-2 (Environmental Objections-Insufficient Information). A summary of the EPA rating system for draft EISs is enclosed for your reference. This rating reflects our primary concern that the DEIS did not clearly show that State of Idaho Water Quality Standards could be satisfied under the preferred alternative (and therefore the proposed Plan). The major reasons for this are.

1) insufficient presentation of existing conditions,
2) insufficient analysis of risks to water quality and beneficial uses posed by specific soil erosion and instability conditions,
3) riparian area standards that are too general to assure protection of riparian-related resources, and
4) an unclear commitment that adopted standards and guidelines will in fact apply to all activities which occur on the SNF.

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United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to 1920

Date·

Robert S Burd
Director, Water Division
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr Burd

Thank you for your thorough review of the Draft Salmon National Forest Plan and Draft Environmental Impact Statement I have reviewed your comments and suggestions with our planning staff. Some of your suggestions have been adopted and will be included in the final Plan and Environmental Impact Statement.

Fisheries and Water Quality

Existing Conditions

The proposed Plan presents detailed information in chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions. Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals The sediment oriented objectives are also linked with attainment of fishery objectives Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis

Many of the tables presented in the planning documents provide information that is in combined form. In many instances, wildlife and fish values are presented jointly, in other cases the values represent a combination of yearly or decadal values. This was done to provide a summarization of information and to reduce, through consolidation, the volume of information Outputs displayed were consistent with units (lbs. and user days) to be used by other Forests in an effort to standardize and simplify comparisons Specific management levels were also given in the analysis procedures Use of the minimum viable population levels is but one example.

FS 6200 28(7 82)

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We believe that much of the information and analyses that were not in the draft documents exist, and that the Final EIS and Plan can adequately and reasonably address our concerns. In doing so, some significant revisions to the preferred alternative may be necessary. Once you have had a chance to consider these comments, we will contact you to offer our assistance during the revision process. We are confident that we will be able to work together effectively so that the Final EIS and Plan will be the adequate planning documents we all desire

Thank you for the opportunity to review the DEIS and Plan Continued coordination and any questions should be directed to Brian Ross of our EIS and Energy Review Section at (206) 442-8516 or FTS 399-8516.

Sincerely,

Robert S. Burd
Director, Water Division

Enclosure

cc. USFS, R-4 (Tixier)
USFS, R-1
USFS, R-6
USFWS
NMFS
IDHW
IDFG
CRIFC
TWS

Fishery Standards

The sediment/resident fish response relationship was based on information given in the fish response document co-authored by Stowell and from information given in a brief report outlining the computations of minimum fisheries requirements also developed by Stowell The basic link used to identify effects was the influence of fine sediment on emergent fry survival Sedimentation rates were limited according to the relationship of sediment estimated over projected natural rates and the amount of fine sediment anticipated in the spawning gravels Associated embeddedness values were also identified. Reproduction survival values were used rather than rearing habitat because of a current lack of validation associated with rearing habitat values

Stream Recovery

The objective is to maintain aquatic habitat capability at a level sufficient to meet water quality and species production goals In those site specific areas where current conditions do not allow these goals to be met, management activities will not be planned which will reduce the rate of recovery

Best Management Practices

In the Draft Forest Plan and DEIS, management direction to which you refer as BMP's are called Forest Standards and Guidelines. Numerous specific standards and guidelines are found within the Forest Management Direction. Chapter IV of the Draft Forest Plan, Forest-wide Direction. Much of this Forest-wide Direction addresses specific environmental conditions As discussed below, in our Cumulative Effects and Soil/Slope Hazard comments, I agree that simple implementation of "BMP's" does not guarantee protection of downstream beneficial uses. Combined with the use of cumulative assessment modelling techniques and onsite monitoring, these uses can be protected.

Cumulative Effects on Fisheries and Water Quality

Cumulative sedimentation analyses were performed in all alternatives during the development of the preferred action. Major anadromous basins were analyzed individually for cumulative sedimentation and water yield changes. Environmental factors, such as soil type, climate, slope, vegetative cover and other significant onsite parameters were used to determine the effects of road construction, and timber harvest The relationships developed in these key watersheds were used throughout the rest of the Forest for general guidance. Relative density of road construction and other activities in these key watersheds was projected onto other areas of the Forest, so that watershed goals and associated downstream beneficial uses would be protected

The preferred action provides general direction and scheduling of land management activities. Project level environmental assessments will continue to use cumulative assessment techniques as well to evaluate sedimentation effects within specific watersheds.

U.S. Environmental Protection Agency
DRAFT ENVIRONMENTAL IMPACT STATEMENT
AND PROPOSED FOREST PLAN FOR THE SALMON NATIONAL FOREST
REVIEW REPORT

General

The EIS describes the affected environment and analyzes the environmental consequences of implementing alternative schemes for managing the SNF's natural resources, it is meant to support the reasonableness of the selected Forest Plan The Plan itself is designed to establish the framework for planning during the next 10 to 15 years, we recognize, however, that Forest Plans typically do not provide the detailed planning for individual projects Given the projected outputs of the EIS preferred alternative, the Plan describes how these outputs may be achieved. The key is that the outputs are targets The standards and guidelines presented in the Plan (both forestwide and management area-specific) are interpreted as the primary "rules."

In order to determine whether the standards and planning framework in the proposed Plan will sufficiently protect environmental quality, public health, and welfare, the associated EIS should include more detailed descriptions of the affected environment and environmental consequences In general, too little information regarding existing conditions on the SNF is presented. Without adequate descriptions of existing conditions (including any current degradation) an adequate environmental consequences analysis is difficult to perform Similarly, it is difficult to determine whether any impacts that are evaluated may be acceptable, or whether the proposed standards sufficiently avoid or minimize impacts

Many of the following discussions should be read with this background, additional discussions of existing conditions and the processes the Forest Service will utilize during implementation of the SNF Plan will help provide the necessary support for later specific planning decisions We believe that much of what we suggest for inclusion in the Final EIS and Plan is readily available or can be reasonably obtained. We are optimistic that the final documents will be adequate for decision making and for planning future activities on the SNF that are environmentally sound

Fisheries and Water Quality

Existing Conditions

The DEIS and Plan generally discuss anadromous fish without separating steelhead trout from chinook salmon The latter populations are presently critically depleted and below "minimum viable" levels It is

Soil/Slope Hazards

Areas identified as having significant mass failure and slope instability potential have been identified during the Forest Planning process Large areas of mass failure or severe erosion areas have been designated as "forest land physically unsuitable," and are not scheduled for roading, timber harvest or other site disturbing activities These areas are also designated on Forest Land System Inventory maps, which are continuously updated and used during project level analysis The Land System Inventory maps are working maps, and continuously updated with new field information They were not included in the Forest Plan document, but were used extensively in the planning process These maps, as well as other support documents are a part of the planning record and are available for review at the Salmon National Forest Supervisor's Office in Salmon

You are correct in suggesting that significant potential exists in large areas of the Salmon National Forest for adverse impacts to occur as a result of timber sales and road construction, however, the amount of significant mass movement activity that has occurred as a result of road construction and timber harvest on the Salmon National Forest is slight The potential for these impacts have been considered throughout the analyses in the Forest Plan. Areas with high erosion potential have been evaluated as such in cumulative sedimentation analyses. Land management activities in areas with high erosion potential are scheduled far less frequently than in areas that are not as subject to onsite erosion. Numerous geology-specific standards and guidelines are found in Chapter IV of the Forest Plan which provide further watershed protection in areas which are subject to higher erosion levels.

Localized areas of instability and high erosion potential will continue to be addressed during the environmental assessment process for specific projects, using site specific data

Domestic Water Supplies

Municipal watersheds, or watersheds providing a water supply for several individuals are located in Jesse Creek (City of Salmon), Spring Creek (Cobalt townsite), and Anderson Creek (Gibbonsville). The Salmon municipal watershed is administered through a Municipal Watershed Plan, based on a 1939 Cooperative Agreement between the Secretary of Agriculture and the City of Salmon. Most land management activities, such as logging, and grazing are restricted in this drainage.

The Cobalt townsite watershed (Spring Creek) is managed for a variety of uses as the water supply source is entirely springs and not stream flows Timber harvest and other activities are constrained such that watershed stability is maintained. Density of activity will continue to be constrained such that water yield characteristics of the basin are not significantly altered from current conditions. Since no surface flows are involved in providing water to the Cobalt townsite, major management concerns are the maintenance of infiltration rates and subsurface flows.

important that the final documents treat anadromous fish species fully and individually

Estimates of existing numbers for fish species should be provided in the EIS, for example in Table III-10 Also, the definition for fish populations equated to State Objective in DEIS Table III-11 is confusing How different are the levels described? Perhaps an additional population level definition is needed for fish

Critical habitat areas for anadromous fish (in particular chinook salmon) and for species of special concern should be identified on maps It would be most useful for these maps to be indexed by management area designation so that the standards and guidelines that apply to these habitats can be easily found and understood We believe that critical fish habitat areas on the SNF should include those having any spawning or rearing habitat for anadromous fish (especially chinook salmon) or species of special concern Eliminating or minimizing adverse water quality impacts (e g , regarding temperature, sediments, etc) in these critical habitat areas should be a key aspect of the Final Plan Standards and guidelines for all activities which could affect these areas should be especially protective and clear For example, we believe that chinook salmon should be managed for recovery, and that standards for "no effect" on their habitat should be included in the Final Plan

The existing quality of fish habitat in individual drainages should also be presented. This could be accomplished by preparing a List of Specific Streams and Assigned Standards as an appendix to the final documents The appendix would present the existing habitat condition of individual streams, along with the standards which would be applied to them, measured as percent of biological potential Presenting the information in this way would make readily apparent whether a stream is to be managed for recovery versus a specific (acceptable) level of degradation By showing whether existing conditions are above or below the fisheries-related standards for specific drainages, this approach would eliminate the possibility of masking water quality impacts by averaging among affected and unaffected drainages It would also help describe both the basis and the need for such potential management decisions as deferring particular drainages from timber harvesting or other activities Since the DEIS describes fish (in terms of habitat condition) only forestwide, we cannot determine whether the proposed Plan adequately protects this beneficial use.

Existing water quality conditions should be discussed not only in terms of fish and fish habitat, but also relative to other beneficial uses such as domestic water supply (see **Domestic Water Supplies**, below) The DEIS mentions three domestic water supplies on the SNF. The Final EIS should identify water supply intake locations, and the existence of any other special or protected beneficial uses on the Forest. The Final Plan should then apply management standards which afford the necessary protection to the watersheds in which those uses occur. For example, the Municipal Watershed Plan for the City of Salmon will guide activities in its referenced watersheds How, specifically, will the other two domestic supply watersheds be managed?

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Water is temporarily stored in a small pond near the mouth of Anderson Creek, where it is then distributed by an open ditch system to several residences No water quality treatment (bacterial or turbidity) is applied to the water A private land and Forest Service trespass incident caused damage to stream channel conditions in the lower reaches of the watershed. Timber harvesting practices provided no protection to the watershed resource. Any timber harvesting activity on National Forest lands within Anderson Creek will include extensive mitigation measures to protect surface water quality Through the use of field reviews, and cumulative sedimentation and water yield modelling, watershed stability and water quality will be maintained at a high level, however, with no water quality treatment, and the use of open ditch transmission systems, seasonal water quality degradation will continue to occur, until the community installs a water treatment facility and a closed distribution system.

Riparian Area Management

The riparian issue identified during the planning process included many facets associated with coordination of resource management activities that affect riparian dependent values The specifics on how these activities would be managed are outlined in Chapter IV of the Plan Standards and guidelines specific to grazing, timber and other activities are intended to provide riparian zone protection and maintenance of riparian dependent resources such as water, fish and wildlife.

The final Plan will show the number of riparian zones which are not meeting policy and direction as a result of livestock grazing. Also, the final Plan will present an objective to bring 3 to 5 percent of riparian zones which are presently in a degraded condition up to Forest Service direction and policy standards each year In the first decade, 30 to 50 percent of degraded riparian zones will be improved to a condition which meets these standards.

Standards and Guidelines

General

The statement on page V-1 of the Plan regarding the Forest's ability to meet the programmed schedules and apply all standards and guidelines was not meant to imply the Forest would carry out projects without meeting the standards and guidelines. The final Plan has been reworded to affirm our commitment to the standards and guidelines and to indicate that reduced budgets could result in fewer projects, but those projects would be accomplished within the requirements of the standards and guidelianes.

Silvicultural Prescriptions

Research and experience on the Forest have shown that the slope percent limitations for tractor skidding are appropriate. The higher slope percent limitations for tractor skidding are appropriate. The higher slope allowance in the quartzite landtypes is due primarily to the high percent of rock fragments throughout the soil profile. Soil scientists and hydologists have observed skid trails on a variety of landtypes to verify this. Fisheries

Fishery Standards

The general standards relative to sediment given on DEIS pages III-24 and III-25 generally appear to be appropriate However, we do not understand the origin of some of numbers The sediment yield numbers appear to originate from Stowell et al (1983), Appendix D But the corresponding population levels are not supported in that document For example, data in Appendix E, page 70, of Stowell relates a 30 percent embeddedness level to approximately a 50 percent loss in winter carrying capacity of pools for cutthroat trout. How is this compatible with the "State Goals" population level shown on DEIS page III-25?

The different sediment standards are applicable in different circumstances Sediment yield is useful in planning It is appropriate for determining whether an activity may cause increased sedimentation, but is not useful for implementation and monitoring Percent in-gravel fines is a measurable standard, appropriate for monitoring during and after activities In this sense, the word "approximately" has no place in a measurable standard At the same time, however, the technology for measuring percent fines is not presently capable of accurate differentiation at the one half of one percent level We suggest a standard of "20 percent or less" would be most appropriate for fish spawning and rearing areas Chinook salmon may require the more stringent protection afforded by a "no effect" or "maximum potential" standard.

The basis for selection of the fry survival criteria mentioned (e.g DEIS page II-72) should be explained and related to the sediment standards, which are meant to protect the populations. What level of fry survival does this relate to for chinook salmon?

We suggest deleting reference to "legal level" in discussing fish and fish habitat (e g , DEIS Table IV-WL1)

Stream Recovery

For presently degraded streams, the Final EIS should discuss the degree to which they could recover or be enhanced. The Final Plan should then apply appropriate standards so that long-term recovery occurs (This is especially important where habitats for anadromous fish or species of special concern are at issue.) The Final Plan should also discuss how recovery will actually be measured and taken into account before new activities are permitted to occur

Best Management Practices

The DEIS and proposed Plan do not specifically mention the use of BMPs in implementing projects on the SNF Often in planning, BMPs have been assumed to provide adequate protection of beneficial uses We recognize that BMPs are an important tool for helping to meet standards However, use of BMPs does not automatically mean that standards have been met. The importance of monitoring (see **Monitoring**

objectives can be met without classifying lands adjacent to critical fish habitat as "unsuitable for timber management." These objectives can be met with the standards and guidelines included in Forest-wide direction. Note that additional applicable standards are included under Water Resources and Soils Resources, and for areas covered by prescription 3A, Anadromous Fish, there are additional standards.

Water Resource Improvement and Maintenance

For Forest planning purposes, third and fourth order streams were identified to have the greatest range of beneficial uses, and were most closely associated with critical fishery habitat. While the Forest Plan emphasizes the larger basins, all project level environmental assessments and associated project level cumulative sediment assessments will continue to evaluate stream channel stability and sedimentation levels in the smaller first and second order tributaries.

Regarding your comments about the preferred action in municipal watersheds, it is Forest Service policy to not generate disturbances which will necessitate the increase or mode of water quality treatment, however, in cases on the Salmon National Forest, a water source (Anderson Creek; used by the unincorporated community of Gibbonsville, Idaho) currently has no treatment Salmon National Forest policy in the basin is to provide water at a level which, when treated in a conventional measure, can provide a safe and satisfactory water supply. Currently, the "existing" treatment does not provide such a source.

The general objective to prevent channel instability is supported by numerous specific standards and guidelines, including those described for the management of riparian areas, minerals, transportation systems, timber harvest and water rights and uses management, and cumulative sedimentation and water yield analyses

Standard C of guideline 12, (page IV-48) addresses the general protection of lands adjacent to bodies of water, where the guideline described on page IV-32 specifically addresses the protection of immediate streamside habitat which provides overhanging vegetative cover to fisheries. The guide to filter strip requirements on pages IV-60 through IV-62 is intended to guide silvicultural activities.

Due to current negotiations regarding adjudications in the State of Idaho, a specific time frame for completion of stream quantifications is not finalized at this time, however, individual actions by the Forest Service, as well as those proposed from outside the Forest Service are being evaluated on a project level basis, until all streams are quantified

Minerals Management

Due to the wide variability of mining activities and types of watershed disturbances, the technology to model the cumulative effects of mining on watershed conditions and water quality has not been developed, however, cumulative effects of mining activities are being evaluated through the use of onsite measurements of stream conditions and water quality.

Plan, below) cannot be overemphasized in this regard The DEIS and Plan discuss significant activity on lands that have not previously been developed Much of this land may present a significant risk due to soil and slope conditions (see **Soil/Slope Hazards**, below), and can be considered as being more marginal than that on which harvesting has occurred in the past For marginal lands, generally applied BMPs may not be adequate to protect the aquatic environment, monitoring must be emphasized in these cases if practices are to be modified in time to prevent serious injury from occurring to protected beneficial uses

Cumulative Effects on Fisheries and Water Quality

The DEIS (page IV-40) mentions that cumulative effects of timber harvesting will be evaluated relative to water yield Would cumulative effects analyses also be performed regarding fisheries and water quality? Regarding other resources? We have discussed the use of "area analyses" with other national forests in Regions 1 and 4 and generally support their use. It would appear that much of the detailed analysis we believe to be necessary, but which the Forest Plan cannot provide and is often missed by individual project evaluations, would be included in this new level of study Area analyses would be the most appropriate vehicle for evaluating the cumulative effects of many similar activities, and the combined effects of different types of activities, occurring in a fairly large area and over a period of time

Because detailed and specific analysis of these types of impacts are extremely important, the Final Plan should discuss in some detail the process for assessing them on the SNF For example, on what level (3rd order drainages?) would such analyses be performed? What period of time between projects would be considered? Would all activities producing sediment in the area to be analyzed be included (e g , timber harvests, plus roads, mines, grazing, etc)? How will multiple ownership drainages fit into these analyses? Will documents be prepared and available for public review and comment?

There is potential for conflicts to occur over significant portions of the SNF between development activities and important aquatic resources Large acreages are proposed to be developed for the first time The DEIS points out (page III-57) that "Since most of the easily accessible timber has been harvested, the areas left are in steeper, less stable, and less productive sites." For such reasons, we believe that area analyses would be appropriate to perform for all areas in which development is planned near important aquatic resources We further believe that such analyses should generally receive public review as draft EAs or EISs, depending upon the resource conflict potential of the projects.

Soil/Slope Hazards

The Final EIS must present a thorough discussion of high hazard soil and slope conditions on the SNF The SNF's Land Type Association System should provide an appropriate basis for the discussion. It

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Special Use Management

The Forest Service may issue special use permits for onsite studies of feasability in conjunction with preliminary FERC permits, however, special use permits for construction will always be subject to interdisciplinary review and NEPA decision process

Arterial, Collector, and Local Road Construction and Reconstruction

If significant erosion and sedimentation is discovered, surfacing is one of many mitigative measures which may be implemented to reduce the impacts to watershed stability and downstream beneficial uses of streamflow The specific measure would be based upon local conditions.

Air Resource Management

Following the State and Federal air quality standards will provide adequate air resource protection.

Hydropower Development

Protection of instream flows will be addressed for all hydropower developments. Stream flows which maintain downstream beneficial uses as well as stream channel stability will be protected through the assertion of Federal water rights, as described in the standards and guidelines for water use/rights managements

Uniform Forest Management Prescription

Due to the extensive volume of support materials used in the Forest planning process, it was impossible to include maps of all critical reaches within the 3A prescription areas Identification of critical reaches is accomplished during individual project reviews

Monitoring Plan

Fish

The intent of monitoring and evaluation is to provide an assessment of the progress achieved toward meeting the goals, objectives and standards expressed in the plan. At present, a detailed monitoring program has not been identified. Allocation of available funds can and will have an influence on the scope and intensity of monitoring and evaluation efforts. Specifics on the monitoring program will be determined during development of annual monitoring programs Habitat features that could be monitored include both rearing and spawning components.

In the Final Plan, the monitoring of soil stability has been added. Photo points and ground measurements in areas of natural and man-caused instability areas. Monitoring priorities will be based on the magnitude of erosion occurring, and land uses, as well as affected downstream beneficial uses of adjacent streams.

should be summarized in the Final EIS in such a way that readers can easily compare the soils information with information on such critical habitats as spawning and rearing areas for anadromous fish and species of special concern on the Forest Plan maps that show management area designations In this way potential large scale resource conflicts would be immediately apparent, as would the SNF's mechanism (management area designation, including standards and guidelines) for dealing with them

The DEIS mentions the most unstable soils as being the volcanics, and the highest erosion hazards being associated with the Idaho Batholith granitics It goes on to state that the erosion hazard is "high to very high for disturbed areas" on most of the Forest These statements indicate that there is a significant potential over large areas of the SNF for road construction and timber harvesting activities to result in serious adverse impacts to water quality and critical fish habitat from both increased sediment yields and mass failures Analyses have not been presented in the DEIS and Plan which adequately consider these potential impacts The proposed Plan (page IV-40) does classify lands as unsuitable for harvest where irreversible resource damage is likely to occur, as identified by "major areas of recent mass soil movement " The DEIS and Plan do not map or otherwise identify such areas, but many acres are likely to present either high erosion or high mass failure risks, or both Identification of only "major" and "recent" mass soil movement does not identify all areas where significant risk would result from disturbance, nor does it necessarily identify problem areas regarding erosion Taking into account the additional information that we suggest above be included, the Final Plan should present standards that adequately protect against hazards from both mass movement and erosion, wherever such hazards may occur on the Forest

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The effort to identify specific areas having a significant mass failure risk, and to identify and require special management direction for those lands, is important for two primary reasons First, one large mass failure can result in more water quality and fish habitat degradation than a wide variety of other activities occurring in a watershed over a long period of time Second, to the extent that high hazard areas are known and can be managed appropriately, mass failures or excess erosion resulting from planned activities on the Forest would have to be considered avoidable We believe that sufficient information is available for these discussions to be included in the Final EIS and Plan

The chinook salmon population in particular is dangerously depleted It is essential that remaining high quality habitat be protected BMPs for high hazard lands will require very expensive road construction or harvesting techniques in order to adequately reduce mass failure and erosion risks We are concerned that, in the past, many Forest Service roads have not been built to appropriate standards, and the proposed Plan itself states (page V-1) that "the ability to apply all the standards and guidelines depends upon receiving an adequate budget " If poor roads are constructed and timber harvesting occurs on steep, unstable slopes the mass failure and erosion

Air Quality

The issue of air quality standards associated with wood stove burning of slash is outside the scope of the Forest Plan and would best be addressed and regulated by State and local governments

Herbicide Use

Our noxious weed program is covered by a programmatic regional environmental impact statement and worst case analysis This is supplemented by site specific environmental assessments, work plans, safety plans and monitoring plans. Another potential herbicide use is for site preparation for tree regeneration Operational use for site preparation is currently prohibited If the prohibition is lifted any proposed operational use would be covered in the same manner as noxious weeds. We will insure that you are included on our 6-month Environmental Assessment schedule. If there is a herbicide use project listed on this announcement with which the EPA would like to be involved, we will send you additional information on the project

Again, thank you for your review of our Proposed Forest Plan.

Sincerely,

RICHARD T HAUFF
Forest Supervisor

risks will be greatly increased. The Final Plan should therefore discuss how management may be affected by budgetary constraints. Would activities still occur in areas with sensitive soil or slope conditions if the budget did not allow the Plan's standards and guidelines to be met? The answer to this question will directly affect EPA's ability to determine that the Final Plan is environmentally acceptable.

Domestic Water Supplies

Forest Service Guidance (2543.1) dictates that Forest Plans include planning considerations for watershed control, however, the DEIS and Plan discuss only a plan for managing the City of Salmon's drinking water supply. This discussion should be expanded to include all three water supplies identified on the SNF, since any of the alternatives presented in the DEIS could have significant effects

For all water supplies on the Forest, the Final Plan should discuss the following:

1 Background information, including

- Name, location, size, source, and existing treatment of each system.
- Historical water quality information (ambient and drinking water). This would be available from the municipalities, local and state health departments, and the US Geologic Survey.
- Past and present watershed usage, including whether the watershed is open or closed to public access and ground disturbing activities.
- Reference to applicable federal, state or local regulations regarding ambient and drinking water quality

2 Identify any watersheds or areas within watersheds which are particularly sensitive to activities which might have a detrimental effect on water supplies. Sensitive areas may be defined by such factors as the physical features of the watershed, the number of water users in the watershed, the type of water treatment employed, the location of water intakes, and past history of water quality problems.

3 Identify activities which have the potential to degrade potable water quality. These would include such things as timber harvesting, road construction, mining, livestock grazing, herbicide or pesticide usage, recreational development, etc. Increased sediment input as a result of timber harvesting and road construction, and the effects of livestock grazing are of particular concern The cost and effectiveness of treatment and disinfection (e.g , for Giardia lamblia) are greatly compromised as turbidity

increases. Grazing along streambanks can cause an increase in turbidity as well as serious bacterial contamination.

4. Assess the impact on the watershed and municipalities of planned forest activities Quantification of the expected impact is desirable; however, we realize that this may not always be possible with the data available.

5. Discuss the process the SNF will use for protecting all domestic water supplies It would be desirable to designate domestic water supply watersheds as separate management areas in the Final Plan. For these areas appropriate management goals and standards should be developed per 2543 1 of the Forest Service Manual Municipal watershed management plans should be cited or developed which allow the water users, the land management agency, and the state agency responsible for public water supply standards to cooperatively monitor the watershed

The above recommendations apply primarily to surface water supplies. There may also be effects on ground-water supplies. The potential impact of the Forest Plan on drinking water aquifers should be considered

To determine how effective the planning and management of the SNF has been in protecting water quality, a monitoring component should be included (see Monitoring Plan, below). Such a monitoring program should address both ambient water quality and finished drinking water quality Sampling parameters for water systems would include those specified in the National Interim Primary Drinking Water Regulations, and for ambient water quality would include turbidity and coliforms (total and fecal). Site specific parameters may also be valuable additions; for example, pH should be monitored where acid mine drainage is a concern Monitoring information will provide data about the effectiveness of management actions, and will also create a reference base for future management decisions regarding appropriate activities in municipal watersheds

Riparian Area Management

Riparian areas are designated in the proposed Plan for providing timber and other outputs. Although the intent of the proposed Plan is to provide for long-term maintenance or improvement of riparian area quality while providing other outputs, we are concerned that the existing condition of the SNF's riparian areas and the impacts of grazing and timber harvesting activities on them have not been adequately addressed. We are also concerned that the standards presented in the proposed Plan do not provide adequate protection for riparian resources and values.

The importance of riparian zones to water quality and fish and wildlife habitat quality greatly exceeds the actual area occupied by

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riparian vegetation Any evaluation of the cost effectiveness of timber production or grazing in these areas should reflect this fact For example, the DEIS (page IV-42) states that timber harvest within riparian areas was not included in the FORPLAN analysis, and that riparian acres were removed from the timber base This implies that timber outputs from riparian areas are above and beyond those discussed elsewhere in the Plan Coupling this with the statement on DEIS page II-73 that, due to economic conditions, only about 11 million board feet per year is expected to sell of the 21 million board feet offered, we must question whether any riparian timber harvest is reasonable on the SNF In our view, the most appropriate management for most riparian areas would be their classification as unsuitable for timber harvest If such activities are to occur, they should be done in such a way that impacts are minimized More severely restricting other activities in riparian areas, such as grazing, would also have important water quality and channel stability benefits In addition, the risk of bacterial contamination of domestic water supplies would be reduced

The Final EIS and Plan should more thoroughly address riparian areas (see **Standards and Guidelines**, below) It is essential to carefully consider how activities such as timber harvest and livestock grazing can be made compatible with other riparian area resource values (e g , protecting and enhancing water quality and fish habitat potential), keeping in mind that it may not be possible to replace these other resource values elsewhere on the Forest

Standards and Guidelines

General

The standards and guidelines adopted in the Plan define the bounds within which individual activities on the Forest must be undertaken They are designed to assure that all of the SNF's resources are managed as described in the Plan The ultimate acceptability of activities depends on their being implemented under appropriate standards It is with this in mind that we reviewed the Standards and Guidelines proposed in Chapter IV of the Plan Along with the proposed monitoring program (which is intended in large part to ensure that standards are being met), we consider the adoption of standards and guidelines to be the heart of the Plan

The Plan states on page V-1 that "implementation of the Forest Plan, especially the ability to meet the programmed Forest Action Schedule and apply all standards and guidelines depends upon receiving an adequate budget " (emphasis added) The Final Plan and **Record of Decision** must include a firm commitment that the adopted standards and guidelines will be applied to all activities Budget constraints certainly may limit the number or type of activities, but those that take place must do so within appropriate standards

Riparian management should receive separate treatment in this chapter Standards and guidelines should be presented that adequately protect riparian resources and values from any activities which may affect them

Following are specific comments on the standards and guidelines presented in Chapter IV of the proposed Plan, by Management Activity

Wildlife and Fish Resource Management

Most of the standards and guidelines presented (pages IV-19 and IV-20) are appropriate In some cases, the "standards" are actually "General Direction " This is especially true of Standards "c" and "d" (page IV-19) Specific standards relating to the General Direction need to be included For example, a standard stating that water quality standards will not be violated would address the "cool, clean " guidance regarding temperature and turbidity Also, chinook and steelhead should be treated separately under anadromous fish

General Direction for both anadromous and resident fish should include "ample instream flow and streamside cover" (only resident fish habitat receives this General Direction in the proposed Plan) Sediment standards for resident and anadromous fish streams should appear here as well (e g , as percent fines and as percent over natural sediment yield, as given on DEIS pages III-24 and III-25) This section should make reference to individual drainage standards (see our suggestions for presenting this under **Fisheries and Water Quality**, above)

Wildlife Habitat Improvement and Maintenance

Standards should be presented that guide prioritization of habitat improvement efforts, including the existing backlog Also, the R-4 GAWS should be described somewhere in the final documents

Range Resource Management

As stated earlier, riparian areas should be comprehensively discussed separately The General Direction in number 6 regarding resolution of grazing conflicts in riparian areas should include standards by which that resolution could be measured The standards and guidelines listed, particularly numbers 10 and 11 are so "qualified" that they are essentially no more than general direction Standards regarding maintenance of a "productive stage of vegetation," and allowing it to "provide positive influences" on bank stability and cover, for example, are too general Similarly, "preserving vegetation vigor" that "should" provide protection of aquatic values does not outline how this may be done Statements similar to these also appear on page IV-32 We suggest that standards presented under this category relate to potential effects of grazing that are measurable, and that the monitoring program reflect those standards For example fish habitat and

water quality should be reflected in this section, even if the appropriate standards for their protection occur elsewhere and are merely referenced.

Silvicultural Prescriptions

We are pleased that the standards for tractor skidding (for allowable percent slope) are tied to land type The final documents should include the rationale for selection of the specific percent slopes mentioned. Regarding Guideline number 7 (page IV-36), see the comments above regarding riparian areas Standards for achieving the goals should be given or referenced here. Guideline number 13, Standard "a-6" (page IV-40) was discussed under Soil/Slope Hazards, above For Standard "b-1" on the same page, lands adjacent to critical fish habitat should be included as unsuitable. To the extent that they are not included, specific standards defining acceptable activity near them should be presented, including reference to the need for monitoring

Water Resource Improvement and Maintenance

The proposed Plan states that mitigation measures would be provided to prevent increased sediment yields from exceeding threshold limits identified for each fourth order watershed (page IV-45) Identification of problems only on a fourth order drainage basis would not adequately protect beneficial uses (see comments under **Cumulative Effects on Fisheries and Water Quality**) Fish spawning areas are often in headwater tributaries, for example Sediment thresholds should be identified and monitored, and mitigation measures applied, where the fish habitat exists This may even be in first order drainages at times.

Guideline number 3 (page IV-45) is generally appropriate and well stated. We believe high erosion risk should be included The usefulness of this guideline, however, depends on soil hazards being adequately identified (see comments under Soil/Slope Hazards)

For Standard "a" (page IV-46) "adequate treatment" should be changed to "existing levels of treatment." Forest Service activities should not affect a municipality's need for additional treatment of its drinking water. If activities affect the existing, otherwise adequate, level of treatment, mitigation would be necessary

Standards to prevent and/or measure and mitigate stream channel instability, etc., (Guideline number 11, page IV-48) should be presented Guideline number 12, Standard "c" (page IV-48), states that 60% of potential ground cover will be maintained in all riparian areas This appears to be at variance with page IV-32, which describes up to 50% removal of overhanging vegetation. Also, the relationship to the filter strip discussion on pages IV-60 through IV-62 requires clarification. An overall discussion of activities that may occur in riparian areas, including the management concepts embodied in all three of these standards, is needed in the Final EIS and Plan.

Water Use/Rights Management

A general time frame for the stream quantification needs given in Guideline "c," page IV-50, should be shown. What activities can occur in these drainages prior to completion of this work?

Minerals Management

This section is particularly well done, it provides clear and comprehensive standards and guidelines for minerals management We are particularly pleased that standards relate only to the availability of technology to protect water quality, etc., rather than to the economics of that technology (e.g , Guideline number 8, Standard "a," page IV-53). Some guidance relating to cumulative analyses of mining operations and proposals (e g., area analyses) should be included in this section.

Special Use Management

Regarding Guideline number 2, page IV-58 how would hydro applications fit into this direction?

Arterial and Collector Road Construction and Reconstruction

For Guideline number 2, "or discovered" should be added.

Local Road Construction and Reconstruction

For Guideline number 2, "or discovered" should be added here, as well

Air Resource Management

Standards should be included that outline how air quality is to be managed.

Hydropower Development

Under License Issuance, stream flows should be maintained which are capable of supporting anadromous as well as resident fish. Reference to requirements for flushing flows would also be appropriate here. If such flows are not periodically allowed, any sediment yield predictions made for the watershed may not correctly predict sedimentation effects on fish habitat behind the diversion or in the diversion reach, i.e , thresholds could be exceeded in these areas by lower sediment yields than would otherwise be required.

Uniform Forest Management Prescription

Prescription 3A (emphasis on anadromous fish habitat) critical areas under this (and all) prescriptions should be mapped so that the public may see whether the acres identified (286,000 acres in this prescription) are reasonable and sufficient Standards should be more specifically stated For example, monitoring is not mentioned in this section. How will the success of General Direction number 2 under Timber Resource Management (page IV-10) be measured? For prescription 5A (Base TM), base standards for fisheries and water quality should be given or referenced

Monitoring Plan

General

The Forest Management Direction discussed in the proposed Plan (Chapter IV) includes appropriate and laudable goals The Monitoring Requirements section (Chapter V) should be greatly expanded in the Final Plan in order to show the Forest Service's capability to adequately meet those goals As stated earlier environmental monitoring should key on the standards that SNF activities must meet (whether federal, state, or those adopted in the Plan)

The adequacy of the monitoring plan for environmental impacts is central to our ability to determine whether the activities proposed for SNF lands adjacent to critical aquatic resources or having high soil and slope hazards can be achieved without significant environmental degradation We recognize that the type of monitoring we suggest would not be possible for the Forest Service to undertake in conjunction with each activity on the SNF We would encourage a Forest Service-led effort at coordinating the work of all agencies, tribes, and other groups who may engage in specific monitoring on SNF lands To the extent that methods and parameters can be agreed upon and sampling stations and timing coordinated, a forestwide data base could be developed that could be effectively used for decision making Ideally, such monitoring would be coordinated under the umbrella of a comprehensive monitoring program for the entire Forest Until such coordinated monitoring occurs, the Forest Service can still maximize the usefulness of its own efforts by focusing its environmental monitoring on activities and in areas which are most likely to result in significant resource conflicts For example, we would not suggest undertaking major monitoring efforts in drainages that are so important to fish species of special concern that the drainages have been deferred or excluded from the timber harvest base Similarly, where other resources of concern do not occur or are not highly sensitive, the highest degree of monitoring would not be required

Monitoring should play its key role where planned activities could be in direct conflict with other important resources Many such possibilities exist, given that much of the previously roadless land on the SNF has been proposed for development, and given the critical status

of certain resources (chinook salmon in particular) Adequate monitoring is important for other reasons as well The limitations and uncertainties associated with the sediment and fish models, for example, render them inadequate by themselves for implementing the Plan (i e , for planning specific actions) Modeling must be coupled with on-the-ground monitoring and evaluation when it predicts any degradation affecting aquatic resources of concern.

Monitoring cannot be effective unless mechanisms exist for using the information gathered to modify activities in a timely manner where necessary This section of the Final Plan should discuss how monitoring data will be used For example, for any particular activity, when would "further evaluation" trigger a change in direction? If a multi-year timber contract were at issue, could changes be implemented immediately? If multi-year contracts cannot be modified, we would suggest that the Forest Service consider offering timber sales or issuing grazing permits that are of shorter duration in areas where a potential for significant resource conflict exists (such as near anadromous fish habitat) Also, how will monitoring activities be prioritized? For what percentage of critical fish streams will sediment and stream channel stability be measured, and what would be the intensity of this monitoring?

The potential recommendations for further action listed on page V-3 should include modification of an activity, or its cancellation if it cannot meet appropriate standards

Riparian areas should be given a separate heading in this section Treatment of riparian areas is fragmented among different categories in the proposed monitoring plan, and does not reflect the activities which can effect these areas, nor the importance of this resource

Following are specific comments on the proposed Monitoring Requirements, by activity category

Fish

This section, given on page V-7, should be expanded to reflect the importance of the fish populations on the SNF, and the variety of forest management activities that can affect fish habitat Under Anadromous Fish steelhead and chinook should be separated to the extent that the monitoring program may differ between them (whether in terms of intensity, priority, or parameters measured) Similarly, resident species of special concern may need separate treatment In all cases, both spawning and rearing habitat should be included as should other parameters relating to the standards and guidelines (such as temperature and turbidity) Because state water quality standards have been written in part to protect fisheries as beneficial uses, reference should be made to monitoring of those water quality standards most directly affecting fisheries

Fisheries/water quality monitoring should be synthesized and reported more frequently Five years is too infrequent to allow efficient public and agency involvement, and would not provide for timely

modification of problem projects The conditions triggering further evaluation should also be revised Sediment approaching threshold or objective levels deserves close attention through monitoring Sediment five or ten percent in excess of standards should preclude further sediment-producing activity in the drainage until recovery or habitat improvement can alleviate the situation (This would be a much more serious problem if monitoring were only performed on a fourth order drainage basis, significant cumulative effects would have already occurred if an overall sediment level exceeding standards by five to ten percent were to be allowed)

Finally the mention of 20 percent change in habitat quantity or quality should be explained How would this be measured, and how does it relate to the standards and guidelines (for example, to maintaining 90 percent of potential smolt production)? This seems to assume that any area can absorb a 20 percent decrease in habitat quality or quantity An evaluation of the existing habitat in individual drainages is needed to determine whether this assumption is valid, and the specific standards for each drainage should be the indicators of need for further evaluation

Soils

Soil stability should be referenced here, as well as soil productivity and erosion How will the Forest Service prioritize the ten percent of ground disturbing activities to be monitored? What "evidence of watershed damage" could lead to area closures? The "local soil loss level evaluation" should be described

Water

The description of monitoring for water quality (first element of this section) should be expanded What will be the parameters and intensity? How will this monitoring be prioritized? What is the implication of a "poor" rating for stream channel stability? Further evaluation would seem to be needed if stability decreases, prior to being classified "poor " Finally, for riparian area changes, stream channel stability, and deposition, the three to five year reporting period is too long

Facilities

Further evaluation reflects only road mileage Effects of roads, and proper implementation of standards, etc (BMP's?), should appear here as well

Meeting Water Quality Standards

The DEIS and Plan do not establish that water quality standards can be met under the preferred alternative The major reasons for this include

1 insufficient discussion of existing conditions,

2 *insufficient discussion regarding risks to water quality* posed by specific soil erosion and instability conditions,

3 riparian area standards that are too general to assure protection of riparian-related resources, and

4 an unclear commitment that adopted standards and guidelines will, in fact, be applied to all activities which occur

We are confident that, by addressing our concerns and comments, the Final EIS and Plan will clearly show that water quality and important aquatic resources will be adequately protected, while providing SNF personnel with the necessary flexibility to manage day to day activities on the ground We recognize that in doing so, some of the output levels presented in the DEIS and Plan will have to be revised (e g , for streams where the Final Plan presents a standard of "No Effect" on fish habitat, less timber harvesting may be possible than under the proposed Plan)

Air Quality

The DEIS and Plan indicate that approximately three million board feet per year of fuelwood will be removed from the SNF The documents also imply that air quality degradation in local communities due to wood smoke may be offset by a decrease in slash burning needs on the Forest However, shifting slash disposal from burning on-site to the same volume of use in woodstoves can increase the net air quality impacts for several reasons

First, the timing of burning is changed so that it occurs when colder air and temperature inversions are more likely The location of burning is also changed from generally higher in altitude, more favorable to dispersion, and removed from other air pollution sources to lower elevations, in less dispersive conditions, and in proximity to other sources of pollution Next, the potential impacts may be of a different nature in that slash burning usually occurs in remote locations and is thus primarily a visibility issue Use in woodstoves is more likely to be a human health concern since people are more directly exposed to particulates Smoke particles emitted from incomplete combustion of wood may have relatively high concentrations of compounds that are known and suspected carcinogens *The FEIS and Plan should* more accurately address air quality impacts in consideration of these points

Forest land managers have a unique opportunity to advance the public's education regarding fuelwood use and air pollution This is because unique access to the woodburning public is provided through the permit process. Pamphlets discussing the association between woodstoves, air pollution, and health concerns, or providing tips on efficient woodstove operation, for example, could be distributed with each *wood cutting permit issued If appropriate literature is not readily*

available, we would be happy to provide examples that are being used elsewhere.

Herbicide Use

The DEIS and Plan do not evaluate the impacts of potential herbicide use in the noxious weed control program. Will such use be evaluated with site specific EA or EIS? We would appreciate being involved in the review of any evaluations of herbicide use on the SNF

Goals and Objectives of State Wildlife Agencies

(DEIS, pages III-32 and 33) This section will help the public to identify some of the opportunities and problems involved with managing the SNF The concerns/goals of local and regional tribes should be discussed here as well

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

ENVIRONMENTAL & TECHNICAL SERVICES DIVISION
847 NE 19th AVENUE SUITE 350
PORTLAND OREGON 97232 2279
(503) 230 5400

January 30, 1986 F/NWR5:808

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

Re Salmon National Forest Plan DEIS

Dear Mr. Hauff:

The National Marine Fisheries Service has reviewed the draft environmental impact statement.

In order to provide as timely a response to your request for comments as possible, we are submitting the enclosed comments to you directly, in parallel with their transmittal to the Department of Commerce for incorporation in the Departmental response. These comments represent the views of the National Marine Fisheries Service. The formal, consolidated views of the Department should reach you shortly.

If you have questions concerning our draft comments, please contact Rollie Montagne (503) 230-5425 or FTS 429-5425. Your continuing coordination efforts are appreciated.

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Sincerely,

Dale R. Evans
Division Chief

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FEB 3 - '86

Info ☐ Action ☐
SUP
LMP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
ELM 1 2 3 4 5 6
RRV/W 1 2 3 4 5 6
AO 1 2 3 4 5 6
CC's TO Jensen

Enclosure

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Dale R Evans, Division Chief
National Marine Fisheries Service
Environmental and Technical Services Division
847 NE 19th Avenue, Suite 350
Portland, Oregon 97232-2279

Dear Mr Evans

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

The Proposed Plan presents detailed information in chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions. Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species and in all drainages. The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals in all drainages. The sediment oriented objectives are also linked with attainment of fishery objectives through the influence of fine sediment. The sediment/fish response relationships used in planning analysis indicated that steelhead are influenced to a greater degree by sediment than are chinook salmon. Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis.

Many of the tables presented in the planning documents provide information that is in combined form. In many instances, wildlife and fish values are presented jointly, in other cases the values represent a combination of yearly or decadal values This was done to provide a summarization of information and to reduce, through consolidation, the volume of information The analysis, however, was done using species specific and habitat specific information. Outputs displayed were consistent with units (total pounds for adults, and user days) to be used by other Forests in an effort to standardize and simplify comparisons

Reference to hatchery production in the DEIS and Plan was in the context that demand for anadromous species, both steelhead and salmon, will continue in the future to exceed supplies. The intent was to highlight the fact that

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DRAFT COMMENTS

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Salmon National Forest Land and Resource Management Plan. Our review has concentrated on the technical information as it relates to anadromous fish, and broad policy aspects of the DEIS.

General Comments

The Salmon National Forest has dealt with an extremely complex task in an effective and professional manner. The DEIS is well organized and is presented in a clear and effective fashion. The appendix provides a comprehensive description of Sediment Analysis Methodology and Fish Response Analysis. The general background information and the discussion on the "Reliability of Fish Response Models" is appreciated. The Forest's approach throughout the DEIS and plan, using habitat quality as a measure of viable population status, is a positive feature of the plan. This approach should provide a clear mechanism to document and monitor habitat quality and productive potential. The DEIS and plan should, however, provide specific information so that.

1) assessment of current habitat quality and potential impacts can be made and

2) future monitoring programs will ensure that the Forest can meet its habitat management goals.

The information should include gravel embeddedness and projected benefits/impacts for salmon and steelhead. The benefits/impacts information should also be listed by sub-basin or major spawning stream.

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The anadromous fish issues on the Salmon National Forest are complicated because certain streams have degraded habitat and there is a diminished resource base. We believe the DEIS and plan would be significantly strengthened if the quality of the existing anadromous fish habitat were described by drainage basin and impacts and enhancement defined on the same basis. If the more specific information we have requested continues to support the Preferred Alternative (12) we would support the Forest's choice as a positive direction. We believe the additional information we have requested will enhance the document's defensibility and provide greater assurances that the plan and guidelines are effectively implemented.

NMFS believes the planning effort is a continuing process which should be upgraded and modified as new technology or administrative/legal changes occur It is probable that current non-timber harvest land use demands will increase and that their impact will become increasingly significant. Future planning

both natural and artificial production levels will be needed to support an ever increasing demand. In many cases the use of hatchery production will be instrumental in re-establishing populations in natural habitats

Stringent standards and guidelines listed in Chapter IV of the preferred action will be implemented to protect streams from the sedimentation effects of mining development Stream stability and maintaining the sediment transport ability of the channel will be primary objectives during the assessment of proposed hydropower developments. Federal water rights will be claimed where applicable, to ensure protection of instream flows. The nature of the influence of hytdropower (flow reduction) makes fishery impacts unavoidable when projects are approved.

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

Presentation of sedimentation levels in the Forest Plan are listed as averages for large areas, over an extensive period of time, however, as explained on page B-24 of the appendix to the Draft EIS, the supporting data used to calculate these values were developed in a way which minimized the opportunity for certain watersheds to sustain sediment levels in excess of those defined in the fisheries goals.

All sediment data presented for each 10-year period does not represent an average for the decade Instead, a modelling process was developed that assumed two large, concentrated road entries would occur in an area during the 10 years. Consequently, the watershed would likely experience two peak sediment periods, following each large construction period. In other words, the values presented represent what is estimated to be a peak sediment rate during the year following each construction phase. So the decade sedimentation rates listed in the support papers are really the peak values estimated to occur for 1 year, followed by 4 years of significantly lower sedimentation rates Therefore, for each decade, the values calculated for each planning area would occur only 2 out of each 10 years.

Again, these figures are shown to demonstrate relative differences between alternatives. Sediment rates have been limited in all alternatives so that the fisheries goals for that alternative are met in all years In most years, however, fisheries goals may be exceeded due to sedimentation rates being considerably lower than the peak years' levels which were constrained to meet these goals

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

efforts should address such issues as the impact of mining (recreational or commercial) on fish, a firm economic value for anadromous fish, and special management practices (sediment traps, etc.) designed to reduce impact of both timber harvest and mining activities on anadromous fish. Factors such as small hydro development, mining, and other forest land uses need to receive more discussion and be broader elements in future planning processes.

We offer the following specific comments on the DEIS.

Specific Comments

Summary page S - 7 Table S-1 states that alternative 12 (the preferred alternative) would produce an average of 18 percent sediment over "natural." The current depressed anadromous fish stocks, the sensitivity of anadromous fish to small changes in habitat quality, the long planning horizon, and the size of the forest management area makes it impossible to assess potential impacts using average values for the Forest. We suggest that the values in the table be listed by sub-basin or major tributary by decade The value for "Natural" should also be defined using the same breakdown

Summary page S - 9. Table S-1 lists the "Preferred Alternative 12" as producing an estimated 357.9 thousand pounds of anadromous fish. This value should be broken into its components (steelhead and chinook) and further defined in terms of numbers of fish. It is also unclear whether the number represents adults or smolts. The single poundage value makes the evaluation of impacts or benefits impossible as average weights vary between species as does the proportion of each species in the total population.

Page II-8. In the discussion of "Wildlife and Fish" the description of existing conditions includes a value (Alternative 1) for the survival objective for steelhead (60 percent). There is no value listed for chinook.

Page II-72. The comments listed for Page II-8 above would also apply to the "Wildlife and Fish" section on this page.

Page II-73. The statement under Soil and Water implies that sediment entering 4th order streams will not impact fisheries' objectives. Management objectives should consider all sources of sediment. There are numerous examples illustrating the downstream impacts of sediment flushing from small tributary streams.

Page II-91. Table II-3 lists "RPA - Anad. Comm. Fish Use Day." The term "Fish Use Day" may not be appropriate when describing commercial fisheries. We are assuming the intent of the values given to be the value per pound ex-vessel. The value would be different for ocean troll, river gillnet, and chinook or steelhead. There is a significant Indian commercial fishery for steelhead in

For Forest Planning purposes, third and fourth order streams were identified to have the greatest range of beneficial uses, and were most closely associated with critical fishery habitat. While the Forest Plan emphasizes the larger basins, all project level environmental assessments and associated project level cumulative sediment assessments will continue to evaluate stream channel stability and sedimentation levels in the smaller first and second order tributaries.

The anadromous streams identified on page IV-50 of the plan include all streams on the Forest presently having suitable anadromous habitat Most of Panther Creek was excluded because of current mine related pollution, however, we recognize the possibility that some portions of the drainage may become suitable in the near future. We have modified the plan to provide for a high level of anadromous fish habitat capability in Panther Creek above the mouth of Blackbird Creek.

Ground verification of modelling is a continual commitment on the Salmon National Forest As described in Chapter V, Table V-1 Monitoring Requirements, new data will continuously be collected For example, fishery habitat will continue to be evaluated using core sampling, redd surveys and other quantitative methods These data will be compared on a project basis with conditions projected by the use of fishery and sediment modelling

Other monitoring described in Chapter V, including soil erosion troughs, and channel stability evaluations will also be integrated into model coefficients to further correlate model output with on-the-ground conditions

The question of funding is a concern to all those involved in natural resource management (i.e., timber, range, recreation, etc), however, the standards and guidelines were intended to maintain and provide for a high quality resource management program. Funding levels will influence levels of resource activities more specifically than they will quality of resource management General direction and the associated standards and guidelines are intended to apply to resource management at all funding levels.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

the Columbia River above Bonneville Dam, thus commercial steelhead value is important.

Page II-96 Table II-4D needs clarification. The numbers on the right hand side of the figure, corresponding to the trend lines, should be defined. In general the habitat potential is rarely equal between salmon and steelhead. The species should be separated and numbers of fish used in place of pounds to address this concern.

Page II-139. Table II-6B(12) lists, under benefits for Alternative 12, "Wildlife and Fish Use MWFUD." The single values listed should be separated into wildlife and fish (anadromous and non-anadromous).

Page II-140. The continuation of Table II-6B(12) lists values, under "BENEFITS M$," for wildlife only. Anadromous and non-anadromous fishes should be broken out and listed separately The anadromous fish should also be separated into their harvest components (sport and commercial).

Page II-163. Table II-11. The statement relating to anadromous fish under Alternative 12 states "Anadromous Capability would stay the same State goals would be met." This statement is supported by the values listed in Table S-1 (page S-9). Throughout the document the "State Goals will be met" statement is repeated. Table III-10 Page III-22 suggests that current anadromous fish populations are below minimum viable (MVP). State objectives represent a significant increase from the minimum viable level; a 12 percent increase for salmon and 51 percent increase for steelhead. Given these facts a "no gain" scenario does not seem reasonable if the Forest expects to meet State objectives.

Page III-21. Table III-9 lists indicator species. The line beginning with "Anadromous Fish" has the parenthesis left open. The word steelhead may have been omitted.

Page III-22. Table III-10 lists "Anadromous Species (Pounds)." The splitting of anadromous fish into their salmon and steelhead components is excellent We suggest further upgrading of this information to:

1) reflect numbers of adults or juveniles and

2) listing of an estimated "Existing" population.

Page III-23. Table III-11 provides an excellent description of terms and clarifies their meaning.

Page III-24 The discussion of the qualitative components related to spawning habitat is good. The table at the bottom of the page however does not relate the "Sediment Yield From Drainage" to "Amount of Fine Sediment." The standards listed for the various population levels may be appropriate but they cannot be the

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generalized or averaged over the entire Forest. The relationship would have to apply to tributaries or drainage basins.

Page III-30. The only negative influences on anadromous fish are listed as downstream dams. The downstream dams have had a major impact on anadromous fish as have sport and commercial harvest, disease (IHN and kidney disease) and the loss of habitat and habitat quality.

Page III-31. The statements in the first and second paragraph on this page suggest that hatcheries will be the major mechanism triggering improved anadromous fish runs on the Forest. We believe that hatcheries will certainly contribute to improved runs but there are significant opportunities for major improvement in habitat quality on the Forest as evidenced by the values listed in Table II-10 Page III-22.

Page III-33. The goals and objectives of NMFS under the 1983 Habitat Conservation Policy includes working closely with State and Federal agencies to improve and expand anadromous fish spawning and rearing habitat.

Page IV-15. The discussion under "a Fisheries" and the data listed in Table IV WLI are not verified by Table III-10 page III-22 and the table at the bottom of the page III-24. The substance of these tables indicates that current habitat conditions are below minimum viable. "Min. Viable" is defined as habitat with 25 percent or less sediment (6.3mm) in spawning gravels. The content of these tables indicate that current habitat condition is below minimum viable but Table IV WLI would seem to indicate "Existing" condition is at 92 percent.

Page IV-16 and IV-17. The in-gravel sediment percent values listed in the Table IV WL2 (pages IV-16 and IV-17) should be referenced to a "natural" value. We are not certain whether "natural" equates to "Existing Condition", listed in Table IV WLI, or an ideal state of nature.

The statement in the last paragraph on page IV-17 that ". . . projected sediment levels could interfere with meeting State agency goals in specific drainages during some decades." should specify which drainages Excess of sediment levels in key drainages could have a major impact on anadromous fish; particularly if the drainage has an existing habitat quality problem.

Page IV-18. The statement regarding placer mining and hydropower development accurately reflects the potential problems. Developments of this nature can add significant amounts of sediment to the system. Unanticipated sediment sources may require subsequent reduction or modification of other Forest uses so that Forest goals and State and/or Federal water quality standards can be met. We would suggest that hydropower development not be lumped

with mining as the activities are not treated the same in a legal sense. Hydropower development may be controlled or denied by the Forest if potential damage is identified

The statement under Threatened, Endangered and Sensitive Species reads "Chinook salmon are being considered for the list ...." It should be noted that National Marine Fisheries Service has administratively suspended its consideration of chinook salmon for listing at this time.

Page IV-19. The paragraph under Habitat Enhancement suggests that under Alternative 12 the habitat capability gains would only partially mitigate for negative habitat influences in specific streams. We would suggest this statement be clarified to explain whether this conclusion is based upon "Existing Condition" (Page IV-15), "on ground" conditions in specific drainages or is based on projected impacts from Forest management practices.

The term "population control" may not be appropriate in the enhancement measures listing.

Under Other Agency Goals it should be noted that NMFS, under the broad Habitat Conservation Policy of 1983, is directed to work toward maintaining the highest level of anadromous fish habitat. We would also suggest that what you have stated as "goals" of the Environmental Protection Agency (EPA) and Idaho Department of Health and Welfare may be enforceable standards and not simply target levels.

Page IV-24. Table IV-WL4 lists "Minimum Viable Population" (MVP) for anadromous fish as 273,900 pounds, "Maximum Habitat Potential" (MHP) as 301,000 and "State Goal" (SG) as 345,800. These values should be separated into chinook and steelhead. Further Table III-10 (page III-22) lists poundages (chinook and steelhead combined) as MVP - 268,906, MHP - 381,000 and SG - 345,800. The values listed in these tables need to be reconciled. It would further improve the understanding of these values if they were converted to numbers of salmon and steelhead.

Page IV-42. The sedimentation rates in anadromous streams (Table IV-W53) are difficult to interpret without a listing of "natural levels." A listing of anadromous fish streams and their existing sediment levels coupled with a value for "natural level" would improve the general understanding of this table.

Page IV-43. The statement discussing unavoidable, irretrievable losses under "Hydropower" implies that hydropower development is unavoidable. We would disagree on the basis that hydropower development is not mandated by statute as is mining under the 1872 Mining Act. Proposed hydropower development can be denied if probable damage to anadromous fish is clearly evident.

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Page IV-98. The statement under Wildlife and Fish only speaks to wildlife. We would suggest fish be added to insure consistency with the remainder of the DEIS

Appendix pages B-24 through B-26. This section discusses the general methodology for the sediment analysis model and the fish response to sediment levels analysis. The Forest Service should be commended for developing both of these statistical tools Our general concern is that these first generation models need to be upgraded and field tested The models should be verified before major resource commitments are made based upon untested conclusions. This is particularly critical where specific levels of sediment are being predicted based upon the model, and these values used for planning purposes.

FOREST PLAN

Page II-21 and II-22. The sediment values to be used as standards are acceptable, however, the best approach would require a sub basin approach. If some drainage basins are below acceptable levels at this time averaging of all drainages could mask the problem areas and not identify serious impacts

The first paragraph, page II-22, discussing habitat quality and quantity represents an excellent approach to the problem.

Page II-29. The statement following "Anadromous Fish" lists the negative influence of Snake River and Columbia River dams. Our prior statements suggesting the problem to be the cumulative effect of dams, harvest, disease, and habitat degradation apply.

The last sentence of the third paragraph under "Anadromous Fish" implies that the increases of anadromous fish are tied to artificial propagation The results of the U.S./Canada Pacific Salmon Treaty and improved passage at the downstream dams may result in significant increases in the adult returns in addition to the hatchery contributions.

Page II-30. The graph, Figure 2, would be clearer if the values were in numbers of salmon and steelhead. The graph is misleading in that the contributions of anadromous fish to recreational users shown on the graph does not reflect the full contribution of both on Forest and off Forest harvest. Anadromous fish contributions to both on and off Forest should be included to demonstrate the Forest's full potential

Page III-1. A statement under PLANNING ISSUE 2. Wildlife and Fish Habitat Management states "Habitat quality will be managed to meet State fish species management goals in most drainages and will comply with State water quality standards." We suggest that the anadromous fish drainages be listed and those drainages that are not

currently meeting State management goals be identified. We are further interpreting the statement on water quality standards as being applied to each individual stream and not a Forest-wide average.

Page III-2. The second sentence under PLANNING ISSUE 6. Watershed Management suggests that limiting sediment delivery to third order and larger streams would meet overall fishery goals. We suggest that the meeting of fishery goals will require close monitoring and control of all sources of sediment that could enter the system.

Page IV-2. The third sentence from the top of the page is a positive statement of the Forest's commitment to maintaining the aquatic resources. We sincerely appreciate this approach and commitment by the Forest.

Page IV-19 and IV-20. The anadromous fish statement under the "GENERAL DIRECTION" column (Page IV-19) and g. under the STANDARDS & GUIDELINES column (page IV-20) are positive targets. We suggest that "90 percent or more of its inherent smolt production capacity" statement be tied to specific sediment levels to facilitate monitoring efforts.

Page IV-50. A series of streams are listed under "Anadromous Fisheries." Does this list comprise a listing of all anadromous fish streams on the Forest or simply the ones "recognized for development"?

Page IV-107. The anadromous fish portion of the GENERAL DIRECTION and STANDARDS & GUIDELINES columns is positive. We recommend that the "90 percent of production potential" be quantified, in part, by specified sediment levels to facilitate monitoring efforts.

Page IV-108. The item 1 under "GENERAL DIRECTION-Water Resource Improvement and Maintenance" is positive. We suggest that ground monitoring be a part of the "GENERAL DIRECTION" until the current sediment model has been tested and verified. Item number 2, under "Hydropower Development", should be modified to read: "Design diversion structures to allow upstream passage of adult and downstream movement of juvenile fish necessary to maintain anadromous fish production objectives "

Page IV-108. The first paragraph of this page discusses the monitoring program. We have a major concern with the language. "based on approved work programs and availability of funds " This statement implies that the proceding GENERAL DIRECTION and STANDARDS & GUIDELINES are not program commitments but are subject to deferal based upon program evaluation/priorities. The commitment to verify water quality standards and fishery habitat status should be a guaranteed program element.

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United States Department of the Interior

OFFICE OF THE SECRETARY
PACIFIC NORTHWEST REGION
500 N E Multnomah Street Suite 1692 Portland Oregon 97232

SALMON N F

January 13, 1986

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Info O Action ☐

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LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RRVW	1	2	3	4	5	6
AO	1	2	3	4	5	6

2 CCs TO Jensen 1/17/86 SH

ER 85/1539

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

Dear Mr. Huff:

The Department of the Interior has reviewed the Draft Environmental Statement and Proposed Land and Resource Management Plan for the Salmon National Forest, Lemhi, Idaho, and Valley Counties, Idaho. The following comments are offered for your use and consideration:

VI-57

Fish and Wildlife Resources

The Fish and Wildlife Service (FWS) will be providing its biological opinion pursuant to Section 7 of the Endangered Species Act under separate cover

The FWS is concerned that perceived short-term degradation in water quality due to nonpoint sources of sediment delivery have and will continue to cause long-term and adverse impacts on fish habitat, which may represent a serious injury to an existing beneficial use. While consideration of water quality is relevant in terms of law, it is the quality of fish habitat that is of concern. The Forest Service needs to be aware of how short-term sediment delivery relates to the quality of fish habitat and this should be discussed in the final EIS.

The FWS uses its Mitigation Policy (FR 46:15, 1981) to make recommendations for mitigation based on resource categories. The FWS has designated the spawning, incubation, and rearing habitats of chinook salmon and steelhead trout as resource category 1. Certain riparian (wetland) habitat are also designated resource category 1. The FWS recommends that all losses of existing habitat be prevented to meet the FWS goal of no loss of existing habitat value.

Since riparian habitats are wetlands, the FWS has initiated a Regional Policy (HR 11, October 18, 1985) as follows "...to view wetland degradation or losses as unacceptable changes to an important national resource As such, it is the goal of this Region to insure that no net loss. .of wetland habitats occur. Development proposals adversely impacting wetlands generally will be discouraged unconditionally at the Field Office level."

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Charles S Polityka
Regional Environmental Officer
U.S. Department of the Interior
Pacific Northwest Region
500 N.E. Multonomah Street, Suite 1692
Portland, Oregon 97232

Dear Mr Polityka·

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

Best management practices are listed in the plan under Standards and Guidelines in Chapter IV This direction, combined with additional site specific mitigation practices identified during field reviews will be the basis for appropriate project design and onsite watershed protection. The relative effectiveness of the mitigation measures is then evaluated through the use of extensive cumulative sediment modeling The cumulative sedimentation modeling has been used throughout the Forest Planning process for larger watershed areas. During project level reviews, this modeling process is used to examine the cumulative effects within the smaller watersheds affected by the specific sale and road proposal.

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

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

FS 6200 28(7 82)

The preferred alternative is inconsistent with these policies for salmon, steelhead, and riparian habitats. Forest activities of primary concern are road construction and reconstruction, logging, and grazing.

Mineral Resources

Appendix B. All references to the District Engineer of the U.S. Geological Survey need to be replaced to reference the District Manager of the Bureau of Land Management (BLM). Reference should be made to the District Manager of BLM. Reference to the District Engineer is no longer appropriate.

Stipulations 9, 10, and 11 are expanded repeats of Stipulations 2, 3, and 5. The Forest Service needs to expand only on Stipulations 2, 3, and 5, and not attempt to duplicate with additional stipulations

Page IV-56, b.8. - BLM's regulations do not give us the authority to dispose of mineral materials from any unpatented mining claim, whether or not the claimant gives his consent If the U.S. Forest Service regulations differ from BLM's, that difference should be explained.

Although the tone of the Proposed Land and Resource Management Plan for the Salmon National Forest is excellent, overall the document is deficient with regard to minerals As with the rest of the Region 4 forests, only the effect of wilderness withdrawals on minerals is acknowledged. It is imperative that effects on minerals of surface management restrictions also be addressed.

On page III-4 it states the "Forest Service manages renewable surface resources, not mineral and energy resources." However, it is probable that management of other resources will have an effect on minerals That effect may be either beneficial or adverse, but must still be addressed.

In so far as mineral access of development is concerned, Alternative 12 is most suitable. It would most certainly be a more qualified decision if more data was available. Most of the forests in Region 1 have addressed mineral potential of land under a format correlating acres and high-medium-low potential. This adds precision and defines management of land much more specifically. As shown in the enclosure, the Beaverhead and Helena National Forests have not only specifically addressed the mineral potential of the Forest but have shown how acres of different potential will be managed (and affected) under each alternative

The Bureau of Mines suggests the Salmon National Forest staff review DEISs from Region 1. The Beaverhead, Helena, and Deerlodge DEISs are especially good examples to consider.

Indian Affairs

The treaties between the United States and the Nez Perce Tribe of Indians in 1855, and with the Eastern Band of Shoshoni and the Bannock Tribes of Indians in 1868, established a trust relationship between the parties Property rights retained by the tribes are identified in their respective treaties. Their rights are exercisable on lands of the Salmon National Forest. The U S Forest Service has the responsibility to recognize the federal-tribal trust relationship and make accommodations for the exercise and

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

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

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

The proposed plan presents detailed information in chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions. Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species. The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals The sediment oriented objectives are also linked with attainment of fishery objectives. Water quality and species goals and objectives were applied on a stream by stream basis and the analysis of effects was also evaluated on the same basis

Riparian habitats on the Salmon National Forest are given protection consistent with direction given in the National Forest Management Act. Resource management activities will be managed in a manner consistent with protection of fishery, wildlife and water quality values Forest-wide management direction and associated standards and guidelines regulate the types and intensities of management activities

All references to the former roles of the Geological Survey in the administration of leasable minerals has been changed as you describe. In our experience, stipulations 3, 4, and 5 are useful for those facilities which can be described without a detailed legal description. Examples are buffer zones along specific features or facilities. On the other hand, stipulations 9, 10, and 11 are used where there is a need to use a legal description, as in the case of critical wildlife or watershed area Because of these different applications, we believe that keeping the stipulations separate will facilitate their use.

The Forest Service has the authority under 36 CFR 228, Subpart C, to dispose of mineral materials on unpatented mining claims These claims are those which have been located after July 23, 1955, and/or on which the United States has established the right to manage the vegetative and other surface

protection of tribal property rights. Copies of both treaties are provided. The Bureau of Indian Affairs recommends revision of the existing documents to provide adequate information on the federal trust relationship and how this relationship will be honored to protect tribal property rights on the Salmon National Forest.

Thank you for the opportunity to review this Draft Environmental Statement and Plan

Sincerely,

Charles S. Polityka
Regional Environmental Officer

Attachments

resources in accordance with the Multiple Use Mining Act of July 23, 1955. The Forest Service will ensure that claimants are given prior notice, and must determine that removal will neither endanger, nor materially interfere with prospecting, mining or processing operations, or user reasonably incident thereto on the claims.

The National Forests cited in your letter as examples of how minerals could be incorporated into the anlysis of alternatives, may represent areas which have been historic producers of leasable minerals and/or have high potential for such production. This is not the case on the Salmon National Forest. To date there has been no production of leasable minerals on the Salmon National Forest, and annual rental fees total $3,778 58 as of April 21, 1986. In regard to locatable minerals there are no direct returns to the government and no way to adequately predict future levels of this kind of mineral activity

Early in the planning process the Salmon National Forest attempted to define areas which had low, moderate or high potential for the various leasable minerals. We found that for leasable minerals in general, there was insufficient data to make professionally sound evaluations. For this reason the potential of most of the Forest is classed as unknown. Since the present values are low, and the potentials unknown, a tradeoff analysis using these factors does not seem meaningful. For locatable minerals, based on USFS mineral evaluation, USGS Rare II mineral potential classification, and confidential industry data, all of the Forest with known mineral occurrences is considered to have a high potential for the purpose of broad scale Forest Planning Although the Forest Service does not receive royalties on the production of locatable minerals, the impact of surface resource decisions on this mineral resource is an important issue which was tracked in the analysis process

Even there are no separate categories of mineral potential, the Forest does recognize the issue of preserving the opportunity for private industry to further define mineral potential. The DEIS displays the restrictions on mineral exploration and development under each alternative in Table IV-1. The preferred alternative does not further restrict access or development opportunity, although such activities may be more difficult and expensive in the roadless areas which remain in semi-primitive classifications.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

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Category A — Withdrawn or proposed for withdrawal from mineral entry.
1. Wilderness areas.
2. Wild and scenic rivers
3. Sites for facilities
4. Historic and cultural sites
5. Developed recreation sites.

Category B — Statues or executive orders require specific protection or mitigation measures.

1. Proposed wilderness areas.
2. Congressionally mandated wilderness study areas.
3. RARE II Further Planning areas.
4. T&E Species.
5. Roadless (Type I) dispersed recreation areas.
6. Culturally significant areas.

Category C — Special conditions exist on lands which require special lease stipulations or plan of operation conditions.

1. Big game winter range.
2. Elk calving area.
3. Riparian area.

Category D — Standard lease stipulations and plan of operation conditions apply.

1. Timber production areas.
2. Existing mineral processing areas.

VI-60

Beaverhead N. F.

0419

Table II-11

Mineral Evaluation Report

Alternative A

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	101,081	230,311	0	0	A	0	193,812	66,868	70,612
B	12,765	172,068	16,648	2,395	B	0	42,167	6,927	154,782
C	972	104,542	1,858	722	C	0	50,639	10,238	47,217
D	58,218	875,119	357,782	213,140	D	0	856,082	340,999	307,178

Alternative B

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	101,081	76,532	0	0	A	0	177,613	0	0
B	2,471	116,094	19,317	3,369	B	0	35,877	10,914	94,460
C	29,666	467,929	220,241	115,770	C	0	474,729	191,967	166,910
D	39,818	721,428	136,762	97,043	D	0	455,906	221,941	317,204

Alternative C

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	128,066	481,154	329,998	165,242	A	0	704,850	267,623	131,987
B	3,835	105,873	223	110,690	B	0	27,091	7,832	75,767
C	10,889	169,777	8,569	11,263	C	0	95,162	29,873	75,463
D	30,246	625,104	37,500	38,993	D	0	315,507	119,704	296,572

Alternative D

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	127,970	402,124	201,920	125,976	A	0	564,337	193,234	100,399
B	4,072	207,232	44,843	14,872	B	0	83,286	49,076	138,657
C	22,309	302,479	50,680	24,115	C	0	190,031	68,515	141,037
D	18,685	470,073	78,877	51,294	D	0	305,026	114,207	199,696

Beaverhead N. F.

0419

Table II - 11 cont.

Alternative F

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	112,520	326,993	40,857	125,976	A	0	433,889	98,997	73,460
B	5,277	112,218	29,458	12,822	B	0	46,025	23,517	90,233
C	38,575	560,449	151,230	36,396	C	0	370,867	180,352	235,431
D	16,664	405,538	123,090	49,458	D	0	291,919	122,166	180,665

Alternative G

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	101,081	85,511	40,857	0	A	0	225,309	2,140	0
B	3,004	139,404	0	0	B	0	18,517	12,730	111,161
C	33,572	459,851	188,380	97,431	C	0	446,052	178,442	154,740
D	35,379	697,507	147,083	118,461	D	0	454,037	231,720	312,673

Alternative H

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	101,081	152,261	12,907	0	A	0	126,769	68,868	70,612
B	95	185,669	13,068	0	B	0	42,368	63,272	93,192
C	27,092	466,101	226,368	132,792	C	0	503,529	197,358	151,466
D	44,768	566,754	135,220	83,345	D	0	397,530	154,971	277,506

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Alternative I

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	128,405	809,421	330,757	168,615	A	0	848,419	329,759	259,020
B	1,750	66,933	636	943	B	0	6,136	1,462	62,664
C	9,885	116,556	3,679	9,090	C	0	80,952	11,709	46,549
D	32,996	388,998	41,248	37,609	D	0	207,193	82,102	211,556

Alternative W

Access Category	Energy Low	Mod	High	Very High	Access Category	Non-Energy Low	Mod	High	Very High
A	118,629	355,544	32,039	0	A	0	304,971	106,567	94,674
B	1,561	91,450	1,966	3,225	B	0	21,094	8,748	68,360
C	38,655	506,842	170,956	119,536	C	0	437,432	176,320	222,237
D	14,191	428,072	171,359	93,496	D	0	379,203	133,397	194,518

The amount of the high and very high potential oil and gas lands available for development, with only standard Forest wide surface protection requirements varies from a low of 28% in the Wilderness Alternative J to a high of 75% in the RPA Alternative B. The Preferred Alternative E has 64% of the high and very high potential oil and gas lands completely available for development with only standard restrictions.

The amount of high potential lands that are completely unavailable for oil and gas development because of existing and proposed mineral withdrawal varies from a low of 10% in the Commodity Alternative C to a high of 67% in the Wilderness Alternative J. The Preferred Alternative E would result in 13% of the high potential oil and gas lands being unavailable for development. This includes portions of the existing Scapegoat Wilderness and the proposed Big Log addition to the Gates of the Mountains Wilderness that would be withdrawn from mineral entry.

TABLE II-13

Non-Energy Minerals
(Percent of high and very high potential lands going to various management categories

Alternative	Management Category A-totally restricted	B-highly restricted	C-moderately restricted	D-standard restrictions
A-current direction	0%	9%	9%	83%
B-RPA	0%	6%	14%	80%
C-high commodity	0%	6%	20%	74%
D-economic efficiency	0%	9%	18%	73%
E preferred	0%	4%	34%	62%
E-departure	0%	4%	34%	62%
F-wilderness/ commodity	10%	8%	14%	67%
G-high amenity	1%	1%	11%	61%
H-wildlife	0%	9%	40%	51%
J-wilderness	32%	7%	10%	51%

Helena N. F.

said confederated tribes and bands of Indians, have hereunto set their hands and seals, at the place and on the day and year hereinbefore written

ISAAC I. STEVENS,
Governor and Superintendent [L. S.]

Kamaiakun, his x mark	[L. S.]	Wish och kmpits, his x mark	[L. S.]
Skloom, his x mark	[L. S.]	Koo lat toose, his x mark	[L. S.]
Owhi, his x mark	[L. S.]	Shee ah cotte, his x mark	[L. S.]
Te cole kun, his x mark	[L. S.]	Tuck quille, his x mark	[L. S.]
La hoom, his x mark	[L. S.]	Ka loo-as, his x mark	[L. S.]
Me ni nock, his x mark	[L. S.]	Scha noo a, his x mark	[L. S.]
Elit Palmer, his x mark	[L. S.]	Sla kish, his x mark	[L. S.]

Signed and sealed in the presence of—

James Doty, secretary of treaties,
Mie. Cles. Pandosy, O. M. T.,
Wm. C. McKay,
W. H. Tappan, sub Indian agent, W. T.,
C. Chirouse, O. M. T.,
Patrick McKenzie, interpreter,
A. D. Pamburn, interpreter,
Joel Palmer, superintendent Indian affairs, O. T.,
W. D. Biglow,
A. D. Pamburn, interpreter.

TREATY WITH THE NEZ PERCÉS, 1855.

June 11, 1855.
12 Stat., 957.
Ratified Mar. 8, 1859.
Proclaimed Apr. 29, 1859.

Articles of agreement and convention made and concluded at the treaty ground, Camp Stevens, in the Walla-Walla Valley, this eleventh day of June, in the year one thousand eight hundred and fifty-five, by and between Isaac I. Stevens, governor and superintendent of Indian affairs for the Territory of Washington, and Joel Palmer, superintendent of Indian affairs for Oregon Territory, on the part of the United States, and the undersigned chiefs, head-men, and delegates of the Nez Percé tribe of Indians occupying lands lying partly in Oregon and partly in Washington Territories, between the Cascade and Bitter Root Mountains, on behalf of, and acting for said tribe, and being duly authorized thereto by them, it being understood that Superintendent Isaac I. Stevens assumes to treat only with those of the above-named tribe of Indians residing within the Territory of Washington, and Superintendent Palmer with those residing exclusively in Oregon Territory.

Cession of lands to the United States.

ARTICLE 1. The said Nez Percé tribe of Indians hereby cede, relinquish and convey to the United States all their right, title, and interest in and to the country occupied or claimed by them, bounded and described as follows, to wit: Commencing at the source of the Wo-na-ne-she or southern tributary of the Palouse River; thence down that river to the main Palouse; thence in a southerly direction to the Snake River, at the mouth of the Tucanon River; thence up the Tucanon to its source in the Blue Mountains; thence southerly along the ridge of the Blue Mountains; thence to a point on Grand Ronde River, midway between Grand Ronde and the mouth of the Woll-low-how River; thence along the divide between the waters of the Woll-low-how and Powder River; thence to the crossing of Snake River, at the mouth of Powder River; thence to the Salmon River, fifty miles above the place known [as] the "crossing of the Salmon River;" thence due north to the summit of the Bitter Root Mountains; thence along the crest of the Bitter Root Mountains to the place of beginning.

Boundaries.

Reservation.

ARTICLE 2. There is, however, reserved from the lands above ceded for the use and occupation of the said tribe, and as a general reserva-

tion for other friendly tribes and bands of Indians in Washington Territory, not to exceed the present numbers of the Spokane, Walla-Walla, Cayuse, and Umatilla tribes and bands of Indians, the tract of land included within the following boundaries, to wit: Commencing where the Moh-ha-na-she or southern tributary of the Palouse River flows from the spurs of the Bitter Root Mountains; thence down said tributary to the mouth of the Ti-nat-pan-up Creek; thence southerly to the crossing of the Snake River ten miles below the mouth of the Al-po-wa-wi River; thence to the source of the Al-po-wa-wi River in the Blue Mountains; thence along the crest of the Blue Mountains; thence to the crossing of the Grand Ronde River, midway between the Grand Ronde and the mouth of the Woll-low-how River; thence along the divide between the waters of the Woll-low-how and Powder Rivers; thence to the crossing of the Snake River fifteen miles below the mouth of the Powder River; thence to the Salmon River above the crossing; thence by the spurs of the Bitter Root Mountains to the place of beginning.

Boundaries.

Reservation to be set apart and [illegible]

Whites not to reside thereon without, etc.

All which tract shall be set apart, and, so far as necessary, surveyed and marked out for the exclusive use and benefit of said tribe as an Indian reservation; nor shall any white man, excepting those in the employment of the Indian Department, be permitted to reside upon the said reservation without permission of the tribe and the superintendent and agent; and the said tribe agrees to remove to and settle upon the same within one year after the ratification of this treaty. In the mean time it shall be lawful for them to reside upon any ground not in the actual claim and occupation of citizens of the United States; and upon any ground claimed or occupied, if with the permission of the owner or claimant, guarantying however, the right to all citizens of the United States to enter upon and occupy as settlers any lands not actually occupied and cultivated by said Indians at this time, and not included in the reservation above named. And provided that any substantial improvement heretofore made by any Indian, such as fields enclosed and cultivated, and houses erected upon the lands hereby ceded, and which he may be compelled to abandon in consequence of this treaty, shall be valued under the direction of the President of the United States, and payment made therefor in money, or improvements of an equal value be made for said Indian upon the reservation, and no Indian will be required to abandon the improvements aforesaid now occupied by him, until their value in money or improvements of equal value shall be furnished him as aforesaid.

Improvements to be paid for by the United States.

Roads may be made.

ARTICLE 3. And provided that, if necessary for the public convenience, roads may be run through the said reservation; and, on the other hand, the right of way, with free access from the same to the nearest public highway, is secured to them; as also the right, in common with citizens of the United States, to travel upon all public highways. The use of the Clear Water and other streams flowing through the reservation is also secured to citizens of the United States for rafting purposes, and as public highways.

Privileges secured to Indians.

The exclusive right of taking fish in all the streams where running through or bordering said reservation is further secured to said Indians; as also the right of taking fish at all usual and accustomed places in common with citizens of the Territory; and of erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land.

Payments by the United States.

ARTICLE 4. In consideration of the above cession, the United States agree to pay to the said tribe in addition to the goods and provisions distributed to them at the time of signing this treaty, the sum of two hundred thousand dollars, in the following manner, that is to say, sixty thousand dollars, to be expended under the direction of the President of the United States, the first year after the ratification of this treaty,

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in providing for their removal to the reserve, breaking up and fencing farms building houses, supplying them with provisions and suitable outfit, and for such other objects as he may deem necessary and the remainder in annuities, as follows for the first five years after the ratification of this treaty, ten thousand dollars each year, commencing September 1, 1856, for the next five years eight thousand dollars each year, for the next five years six thousand each year, and for the next five years, four thousand dollars each year

Payments how to be applied

All which said sums of money shall be applied to the use and benefit of the said Indians, under the direction of the President of the United States, who may from time to time determine, at his discretion, upon what beneficial objects to expend the same for them And the superintendent of Indian affairs, or other proper officer, shall each year inform the President of the wishes of the Indians in relation thereto

The United States to establish schools &c

ARTICLE 5 The United States further agree to establish at suitable points within said reservation, within one year after the ratification hereof, two schools, erecting the necessary buildings, keeping the same in repair, and providing them with furniture, books, and stationery, one of which shall be an agricultural and industrial school to be located at the agency, and to be free to the children of said tribe

To build mechanics shops &c

and to employ one superintendent of teaching and two teachers, to build two blacksmiths' shops, to one of which shall be attached a tinshop and to the other a gunsmith's shop, one carpenter's shop one wagon and plough maker's shop, and to keep the same in repair and furnished with the necessary tools, to employ one superintendent of farming and two farmers, two blacksmiths, one tinner, one gunsmith one carpenter, one wagon and plough maker, for the instruction of the Indians in trades, and to assist them in the same, to erect one saw mill and one flouring-mill, keeping the same in repair, and furnished with the necessary tools and fixtures, and to employ two millers, to erect a

Sawmill

Hospital

hospital, keeping the same in repair, and provided with the necessary medicines and furniture, and to employ a physician, and to erect keep in repair, and provide with the necessary furniture the buildings required for the accommodation of the said employees The said buildings and establishments to be maintained and kept in repair as aforesaid, and the employees to be kept in service for the period of twenty years

Salary to head chief house etc

And in view of the fact that the head chief of the tribe is expected, and will be called upon, to perform many services of a public character, occupying much of his time, the United States further agrees to pay to the Nez Percé tribe five hundred dollars per year for the term of twenty years after the ratification hereof, as a salary for such person as the tribe may select to be its head chief To build for him, at a suitable point on the reservation, a comfortable house, and properly furnish the same, and to plough and fence for his use ten acres of land The said salary to be paid to, and the said house to be occupied by, such head chief so long as he may be elected to that position by his tribe, and no longer

And all the expenditures and expenses contemplated in this fifth article of this treaty shall be defrayed by the United States, and shall not be deducted from the annuities agreed to be paid to said tribe nor shall the cost of transporting the goods for the annuity payments be a charge upon the annuities, but shall be defrayed by the United States

Reservation may be surveyed into lots and assigned to individuals or families

ARTICLE 6 The President may from time to time, at his discretion cause the whole, or such portions of such reservation as he may think proper, to be surveyed into lots and assign the same to such individuals or families of the said tribe as are willing to avail themselves of the privilege, and will locate on the same as a permanent home, on

the same terms and subject to the same regulations as are provided in the sixth article of the treaty with the Omahas in the year 1854, so far as the same may be applicable

Annuities not to pay debts of individuals

ARTICLE 7 The annuities of the aforesaid tribe shall not be taken to pay the debts of individuals

Tribes to preserve friendly relations

ARTICLE 8 The aforesaid tribe acknowledge their dependence upon the Government of the United States, and promise to be friendly with all citizens thereof, and pledge themselves to commit no depredations on the property of such citizens, and should any one or more of them violate this pledge, and the fact be satisfactorily proved before the

To pay for depredations

agent, the property taken shall be returned, or in default thereof, or if injured or destroyed, compensation may be made by the Government out of the annuities Nor will they make war on any other tribe except in self-defence, but will submit all matters of difference

Not to make war except in self defense

between them and the other Indians to the Government of the United States, or its agent, for decision, and abide thereby, and if any of the said Indians commit any depredations on any other Indians within the Territory of Washington, the same rule shall prevail as that prescribed in this article in cases of depredations against citizens And the said

Offenders to be delivered up

tribe agrees not to shelter or conceal offenders against the laws of the United States, but to deliver them up to the authorities for trial

Annuities may be withheld from those who drink ardent spirits

ARTICLE 9 The Nez Percés desire to exclude from their reservation the use of ardent spirits, and to prevent their people from drinking the same, and therefore it is provided that any Indian belonging to said tribe who is guilty of bringing liquor into said reservation or who drinks liquor, may have his or her proportion of the annuities withheld from him or her for such time as the President may determine

Land of William Craig

ARTICLE 10 The Nez Perce Indians having expressed in council a desire that William Craig should continue to live with them, he having uniformly shown himself their friend it is further agreed that the tract of land now occupied by him, and described in his notice to the register and receiver of the land office of the Territory of Washington, on the fourth day of June last, shall not be considered a part of the reservation provided for in this treaty, except that it shall be subject in common with the lands of the reservation to the operations of the intercourse act

When treaty to take effect

ARTICLE 11 This treaty shall be obligatory upon the contracting parties as soon as the same shall be ratified by the President and Senate of the United States

In testimony whereof the said Isaac I Stevens, governor and superintendent of Indian affairs for the Territory of Washington and Joel Palmer, superintendent of Indian affairs for Oregon Territory, and the chiefs, headmen, and delegates of the aforesaid Nez Percé tribe of Indians, have hereunto set their hands and seals, at the place, and on the day and year hereinbefore written

Isaac I Stevens, [L S]
Governor and Superintendent Washington Territory
Joel Palmer, [L S]
Superintendent Indian Affairs

Alexa, or Lawyer, Head chief of the Nez Percés,	[L. S.]	Tippelanechupcoob, his x mark	[L. S.]
Appushwa hite, or Looking glass, his x mark	[L. S.]	Hah hah stilpulp his x mark	[L. S.]
Joseph his x mark	[L. S.]	Cool cool shus nin his x mark	[L. S.]
James, his x mark	[L. S.]	Silish, his x mark	[L. S.]
Red Wolf, his x mark	[L. S.]	Toh toh molewit, his x mark	[L. S.]
Timothy, his x mark	[L. S.]	Tuky in lik it, his x mark	[L. S.]
U ute sin male-cun, his x mark	[L. S.]	Te-hole hole-soot, his x mark	[L. S.]
Spotted Eagle his x mark	[L. S.]	Ish-coh tim his x mark	[L. S.]
Stoop-toop-nin or Cut hair, his x mark	[L. S.]	Wee-as-cus, his x mark	[L. S.]
Tah mob moh kin, his x mark	[L. S.]	Hah hah stoore tee, his x mark	[L. S.]
		Eee-maht sin pooh his x mark	[L. S.]
		Tow wish au il pilp, his x mark	[L. S.]
		Kay-kay mass, his x mark	[L. S.]

Speaking Eagle, his x mark	[L S]	Kole-kole til ky, his x mark	[L S]
Wat ti wa li wah hi his x mark	[L S]	In mat-tute-kah ky, his x mark	[L S]
Howh no tah kun his x mark	[L S]	Mah see-hee, his x mark	[L S]
Tow wish wun his x mark	[L S]	George, his x mark	[L S]
Wahpt tih shoosha his x mark	[L S]	Nicke-el it may ho, his x mark	[L S]
Red Necklace his x mark	[L S]	Say i-ee-ouse, his x mark	[L S]
Koos-koos tas kut, his x mark	[L S]	Wis-tasse cat, his x mark	[L S]
Levi his x mark	[L S]	Ky ky soo te lum his x mark	[L S]
Pee oo pe wha lu, his x mark	[L S]	Ko-ko-wha ty nee, his x mark	[L S]
Pee oo pee te tem, his x mark	[L S]	Kwin to kow, his x mark	[L S]
Pee poome kah, his x mark	[L S]	Pee wee au ap tah his x mark	[L S]
Hah hah shil at me, his x mark	[L S]	Wee-at-ta at il pip, his x mark	[L S]
Wee yoke sin ate, his x mark	[L S]	Pee oo pee a il pip, his x mark	[L S]
Wee tuk ki, his x mark	[L S]	Wah tass tum mannee, his x mark	[L S]
Necalahtem his x mark	[L S]	Tu wee si ee, his x mark	[L S]
Suck on te his x mark	[L S]	I u ee sin kah koose-sin, his x mark	[L S]
Ip-tuf tam moose, his x mark	[L S]	Hah tal-ee kun, his x mark	[L S]
Jason his x mark	[L S]		

Signed and sealed in presence of us—

James Duty secretary of treaties W T
Wm C McKay, secretary of treaties C T
W H Tappan, sub-Indian agent,
William Craig interpreter,
A D Pamburn, interpreter
Wm McBean,
Geo C Bomford
C Chirouse, C M T
Mic Cles Pandosy,
Lawrence Kip,
W H Pearson

TREATY WITH THE CHOCTAW AND CHICKASAW, 1855

June 22, 1855
11 Stats 611
Ratified Feb 23 1856
Proclaimed Mar 4 1856

Articles of agreement and convention between the United States and the Choctaw and Chickasaw tribes of Indians, made and concluded at the city of Washington, the twenty second day of June, A D one thousand eight hundred and fifty five, by George W Manypenny, commissioner on the part of the United States, Peter P Pitchlynn, Israel Folsom, Samuel Garland, and Dixon W Lewis, commissioners on the part of the Choctaws, and Edmund Pickens and Sampson Folsom, commissioners on the part of the Chickasaws

Preamble

Whereas, the political connection heretofore existing between the Choctaw and the Chickasaw tribes of Indians, has given rise to unhappy and injurious dissensions and controversies among them, which render necessary a re adjustment of their relations to each other and to the United States and

Whereas the United States desire that the Choctaw Indians shall relinquish all claim to any territory west of the one hundredth degree of west longitude, and also to make provision for the permanent settlement within the Choctaw country, of the Wichita and certain other tribes or bands of Indians, for which purpose the Choctaws and Chickasaws are willing to lease, on reasonable terms, to the United States, that portion of their common territory which is west of the ninety eighth degree of west longitude and

Ante p 910

Whereas, the Choctaws contend, that, by a just and fair construction of the treaty of September 27, 1830, they are, of right, entitled to the net proceeds of the lands ceded by them to the United States, under said treaty, and have proposed that the question of their right to the same, together with the whole subject matter of their unsettled claims, whether national or individual, against the United States, arising under the various provisions of said treaty, shall be referred to the Senate of the United States for final adjudication and adjustment, and whereas, it is necessary for the simplification and better understanding

Attest

Geo W G Getty, colonel Thirty seventh Infantry, brevet major-general U S Army
B S Roberts brevet brigadier general U S Army, lieutenant-colonel Third Cavalry
S Cooper McKee, brevet lieutenant-colonel, surgeon U S Army
Theo H Dodd, United States Indian agent for Navajos.
Chas. McClure, brevet major and commissary of subsistence, U S Army
James F Weeds, brevet major and assistant surgeon, U S Army
J C Sutherland interpreter
William Vaux, chaplain U S Army

TREATY WITH THE EASTERN BAND SHOSHONI AND BANNOCK, 1868

July 3, 1868
15 Stat 673
Ratified Feb 16, 1869
Proclaimed Feb 21 1869

Articles of a treaty made and concluded at Fort Bridger, Utah Territory, on the third day of July, in the year of our Lord one thousand eight hundred and sixty eight, by and between the undersigned commissioners on the part of the United States, and the undersigned chiefs and head men of and representing the Shoshonee (eastern band) and Bannack tribes of Indians, they being duly authorized to act in the premises

Peace and friendship

ARTICLE 1 From this day forward peace between the parties to this treaty shall forever continue The Government of the United States desires peace, and its honor is hereby pledged to keep it The Indians desire peace, and they hereby pledge their honor to maintain it

Offenders among the whites to be arrested and punished

If bad men among the whites, or among other people subject to the authority of the United States, shall commit any wrong upon the person or property of the Indians, the United States will, upon proof made to the agent and forwarded to the Commissioner of Indian Affairs at Washington City, proceed at once to cause the offender to be arrested and punished according to the laws of the United States and also re imburse the injured person for the loss sustained

Among the Indians to be given up to the United States etc

If bad men among the Indians shall commit a wrong or depredation upon the person or property of any one, white, black or Indian subject to the authority of the United States, and at peace therewith, the Indians herein named solemnly agree that they will, on proof made to their agent and notice by him, deliver up the wrong-doer to the United States, to be tried and punished according to the laws, and in case they wilfully refuse so to do, the person injured shall be re imbursed for his loss from the annuities or other moneys due or to become due to them under this or other treaties made with the United States And

Rules for ascertaining damages

the President, on advising with the Commissioner of Indian Affairs, shall prescribe such rules and regulations for ascertaining damages under the provisions of this article as in his judgment may be proper But no such damages shall be adjusted and paid until thoroughly examined and passed upon by the Commissioner of Indian Affairs, and no one sustaining loss while violating or because of his violating the provisions of this treaty or the laws of the United States, shall be reimbursed therefor

Reservation

ARTICLE 2 It is agreed that whenever the Bannacks desire a reservation to be set apart for their use, or whenever the President of the United States shall deem it advisable for them to be put upon a reservation, he shall cause a suitable one to be selected for them in their present country, which shall embrace reasonable portions of the "Port Neuf" and "Kansas Prairie" countries, and that, when this reservation is declared, the United States will secure to the Bannacks the same rights and privileges therein, and make the same and like expenditures therein for their benefit, except the agency-house and residence of agent, in proportion to their numbers, as herein provided for the Shoshonee reservation The United States further agrees that the follow

ing district of country, to wit Commencing at the mouth of Owl Creek and running due south to the crest of the divide between the Sweetwater and Papo Agie Rivers, thence along the crest of said divide and the summit of Wind River Mountains to the longitude of North Fork of Wind River, thence due north to mouth of said North Fork and up its channel to a point twenty miles above its mouth, thence in a straight line to head-waters of Owl Creek and along middle of channel of Owl Creek to place of beginning, shall be and the same is set apart for the absolute and undisturbed use and occupation of the Shoshonee Indians herein named, and for such other friendly tribes or individual Indians as from time to time they may be willing, with the consent of the United States, to admit amongst them, and the United States now solemnly agrees that no persons except those herein designated and authorized so to do, and except such officers, agents, and employés of the Government as may be authorized to enter upon Indian reservations in discharge of duties enjoined by law, shall ever be permitted to pass over, settle upon, or reside in the territory described in this article for the use of said Indians, and henceforth they will and do hereby relinquish all title, claims, or rights in and to any portion of the territory of the United States, except such as is embraced within the limits aforesaid

Boundaries.

Who not to reside thereon

ARTICLE 3 The United States agrees, at its own proper expense, to construct at a suitable point of the Shoshonee reservation a warehouse or store-room for the use of the agent in storing goods belonging to the Indians, to cost not exceeding two thousand dollars, an agency building for the residence of the agent, to cost not exceeding three thousand, a residence for the physician, to cost not more than two thousand dollars and five other buildings, for a carpenter, farmer, blacksmith, miller, and engineer, each to cost not exceeding two thousand dollars, also a school-house or mission building so soon as a sufficient number of children can be induced by the agent to attend school, which shall not cost exceeding twenty-five hundred dollars

Buildings to be erected by the United States.

The United States agrees further to cause to be erected on said Shoshonee reservation, near the other buildings herein authorized, a good steam circular-saw mill, with a grist mill and shingle machine attached, the same to cost not more than eight thousand dollars

Mills.

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 lands 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

Reservation to be permanent home of Indians.

ARTICLE 5 The United States agrees that the agent for said Indians shall in the future make his home at the agency building on the Shoshonee reservation, but shall direct and supervise affairs on the Bannack reservation, and shall keep an office open at all times for the purpose of prompt and diligent inquiry into such matters of complaint by and against the Indians as may be presented for investigation under the provisions of their treaty stipulations, as also for the faithful discharge of other duties enjoined by law In all cases of depredation on person or property he shall cause the evidence to be taken in writing and forwarded, together with his finding, to the Commissioner of Indian Affairs, whose decision shall be binding on the parties to this treaty

Agent to make his home and reside where

ARTICLE 6 If any individual belonging to said tribes of Indians, or legally incorported with them, being the head of a family, shall desire to commence farming, he shall have the privilege to select, in the presence and with the assistance of the agent then in charge, a tract of land within the reservation of his tribe, not exceeding three hundred

Heads of families desiring to commence farming may select lands etc

and twenty acres in extent, which tract so selected, certified and recorded in the "land-book," as herein directed, shall cease to be held in common, but the same may be occupied and held in the exclusive possession of the person selecting it, and of his family, so long as he or they may continue to cultivate it.

Effect of such selection

Any person over eighteen years of age, not being the head of a family, may in like manner select and cause to be certified to him or her for purposes of cultivation, a quantity of land not exceeding eighty acres in extent, and thereupon be entitled to the exclusive possession of the same as above described For each tract of land so selected a certificate, containing a description thereof, and the name of the person selecting it, with a certificate indorsed thereon that the same has been recorded, shall be delivered to the party entitled to it by the agent, after the same shall have been recorded by him in a book to be kept in his office subject to inspection, which said book shall be known as the "Shoshone (eastern band) and Bannock land book"

Persons not heads of families

Certificates of selection to be delivered etc to be recorded

The President may at any time order a survey of these reservations, and when so surveyed Congress shall provide for protecting the rights of the Indian settlers in these improvements, and may fix the character of the title held by each The United States may pass such laws on the subject of alienation and descent of property as between Indians, and on all subjects connected with the government of the Indians on said reservations, and the internal police thereof, as may be thought proper

Survey

Alienation and descent of property

ARTICLE 7 In order to insure the civilization of the tribes entering into this treaty, the necessity of education is admitted, especially of such of them as are or may be settled on said agricultural reservations, and they therefore pledge themselves to compel their children male and female, between the ages of six and sixteen years, to attend school, and it is hereby made the duty of the agent for said Indians to see that this stipulation is strictly complied with, and the United States agrees that for every thirty children between said ages who can be induced or compelled to attend school, a house shall be provided and a teacher competent to teach the elementary branches of an English education shall be furnished, who will reside among said Indians and faithfully discharge his or her duties as a teacher The provisions of this article to continue for twenty years

Children between 6 and 16 to attend school

Duty of agent

Schoolhouses and teachers

ARTICLE 8 When the head of a family or lodge shall have selected lands and received his certificate as above directed, and the agent shall be satisfied that he intends in good faith to commence cultivating the soil for a living, he shall be entitled to receive seeds and agricultural implements for the first year, in value one hundred dollars, and for each succeeding year he shall continue to farm, for a period of three years more, he shall be entitled to receive seeds and implements as aforesaid in value twenty-five dollars per annum

Seeds and agricultural implements

And it is further stipulated that such persons as commence farming shall receive instructions from the farmers herein provided for, and whenever more than one hundred persons on either reservation shall enter upon the cultivation of the soil, a second blacksmith shall be provided, with such iron, steel, and other material as may be required

Instructions in farming

Second blacksmith

ARTICLE 9 In lieu of all sums of money or other annuities provided to be paid to the Indians herein named, under any and all treaties heretofore made with them, the United States agrees to deliver at the agency house on the reservation herein provided for, on the first day of September of each year, for thirty years, the following articles, to wit

Delivery of articles in lieu of money and annuities

Clothing etc.

For each male person over fourteen years of age, a suit of good substantial woollen clothing, consisting of coat, hat, pantaloons, flannel shirt, and a pair of woollen socks, for each female over twelve years of age, a flannel skirt, or the goods necessary to make it, a pair

VI-65

of woollen hose, twelve yards of calico, and twelve yards of cotton domestics

For the boys and girls under the ages named, such flannel and cotton goods as may be needed to make each a suit as aforesaid, together with a pair of woollen hose for each

Census.

And in order that the Commissioner of Indian Affairs may be able to estimate properly for the articles herein named, it shall be the duty of the agent each year to forward to him a full and exact census of the Indians, on which the estimate from year to year can be based, and in addition to the clothing herein named, the sum of ten dollars shall be annually appropriated for each Indian roaming and twenty dollars for each Indian engaged in agriculture, for a period of ten years, to be used by the Secretary of the Interior in the purchase of such articles as from time to time the condition and necessities of the Indians may indicate to be proper And if at any time within the ten years it shall appear that the amount of money needed for clothing under this article can be appropriated to better uses for the tribes herein named, Congress may by law change the appropriation to other purposes, but in no event shall the amount of this appropriation be withdrawn or discontinued for the period named And the President shall annually detail an officer of the Army to be present and attest the delivery of all the goods herein named to the Indians, and he shall inspect and report on the quantity and quality of the goods and the manner of their delivery

May be changed

Army officer to attest delivery of goods, etc

Physician teachers carpenter etc

ARTICLE 10 The United States hereby agrees to furnish annually to the Indians the physician, teachers, carpenter, miller, engineer, farmer, and blacksmith, as herein contemplated, and that such appropriations shall be made from time to time, on the estimates of the Secretary of the Interior, as will be sufficient to employ such persons

Cession of reservation not to be valid unless, etc

ARTICLE 11 No treaty for the cession of any portion of the reservations herein described which may be held in common shall be of any force or validity as against the said Indians, unless executed and signed by at least a majority of all the adult male Indians occupying or interested in the same, and no cession by the tribe shall be understood or construed in such manner as to deprive without his consent, any individual member of the tribe of his right to any tract of land selected by him as provided in Article 6 of this treaty

Premium for most valuable crops.

ARTICLE 12 It is agreed that the sum of five hundred dollars annually, for three years from the date when they commence to cultivate a farm, shall be expended in presents to the ten persons of said tribe who, in the judgment of the agent, may grow the most valuable crops for the respective year

ARTICLE 13 It is further agreed that until such time as the agency-buildings are established on the Shoshonee reservation, their agent shall reside at Fort Bridger, U T, and their annuities shall be delivered to them at the same place in June of each year

N G Taylor, [SEAL]
W T Sherman, [SEAL]
Lieutenant-General
Wm S Harney, [SEAL.]
John B Sanborn, [SEAL]
S F Tappan [SEAL]
C C Augur, [SEAL]
Brevet Major General, U S Army, Commissioners
Alfred H Terry, [SEAL.]
Brigadier-General and Brevet Major General, U S. Army

Attest

A S H White, Secretary.

Shoshones

Wash a-kie,	his x mark
Wau ny-pitz,	his x mark
Toop se po wot,	his x mark
Nar-kok,	his x mark
Tuboonshe ya,	his x mark
Bazeel,	his x mark
Pan to she ga,	his x mark
Ninny-Bitse,	his x mark

Bannacks

Taggee,	his x mark
Tay to ba,	his x mark
We rat ze won-a gen,	his x mark
Coo she gan,	his x mark
Pan sook a motse,	his x mark
A wite etse,	his x mark

Witnesses

Henry A Morrow,
Lieutenant-Colonel Thirty sixth Infantry and
Brevet Colonel U S Army Commanding Fort Bridger
Luther Manpa, United States Indian agent.
W A Carter
J Van Allen Carter, interpreter

TREATY WITH THE NEZ PERCÉS, 1868

Aug 13 1868
15 Stats 693
Ratified Feb 16 1869
Proclaimed Feb 24 1869

Whereas certain amendments are desired by the Nez Percé tribe of Indians to their treaty concluded at the council ground in the valley of the Lapwai, in the Territory of Washington on the ninth day of June in the year of our Lord one thousand eight hundred and sixty three, and whereas the United States are willing to assent to said amendments it is therefore agreed by and between Nathaniel G Taylor, commissioner, on the part of the United States, thereunto duly authorized and Lawyer, Timothy, and Jason, chiefs of said tribe, also being thereunto duly authorized, in manner and form following, that is to say

Reservation

ARTICLE 1 That all lands embraced within the limits of the tract set apart for the exclusive use and benefit of said Indians by the 2d article of said treaty of June 9th, 1863, which are susceptible of cultivation and suitable for Indian farms, which are not now occupied by the United States for military purposes, or which are not required for agency or other buildings and purposes provided for by existing treaty stipulations, shall be surveyed as provided in the 3d article of said treaty of June 9th, 1863, and as soon as the allotments shall be plowed and fenced, and as soon as schools shall be established as provided by existing treaty stipulations, such Indians now residing outside the reservation as may be decided upon by the agent of the tribe and the Indians themselves, shall be removed to and located upon allotments within the reservation *Provided, however*, That in case there should not be a sufficient quantity of suitable land within the boundaries of the reservation to provide allotments for those now there and those residing outside the boundaries of the same, then those residing outside or as many thereof as allotments cannot be provided for, may remain upon the lands now occupied and improved by them, provided, that the land so occupied does not exceed twenty acres for each and every male person who shall have attained the age of twenty-one years or is the head of a family, and the tenure of those remaining upon lands outside the reservation shall be the same as is provided in said 3d article of said treaty of June 9th, 1863, for those receiving

Allotments.

00 34

United States Department of Agriculture | Soil Conservation Service | Room 345, 304 North 8th Street, Boise, Idaho 83702

December 18, 1985

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

Dear Sirs·

Thank you for the opportunity to review and comment on the following documents:

1. The Proposed Forest Plan.
2. The Draft Environmental Impact Statement (DEIS).
3. The Appendices to the DEIS, and
4. A map packed containing maps pertinent to both the DEIS and the Proposed Forest Plan.

There are no comments forthcoming from this office at this time.

Sincerely,

Stanley N. Hobson
State Conservationist

SALMON N F
COPY
FC

DEC 23 '85

INFO ACTION
SUP
LMP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
LLM 1 2 3 4 5 6
CNRW 1 2 3 4 5 6
FO 1 2 3 4 5 6

Ltr. Jensen 12/23/85 SH

VI-67

The Soil Conservation Service is an agency of the Department of Agriculture

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Stanley N Hobson, State Conservationist
USDA-Soil Conservation Service
304 North 8th Street, Room 345
Boise, Idaho 83702

Dear Mr Hobson

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

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

Thanks again for reviewing our Plan.

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS 6200 28(7 82)

0022

Advisory Council On Historic Preservation

FS R-4 RECEIVED NOV 18 1986 PLANNING AND BUDGET

SALMON NF

The Old Post Office Building
1100 Pennsylvania Avenue NW #809
Washington DC 20004

Reply to 730 Simms Street, Room 450
Golden, Colorado 80401

DEC 2 '85

INFO ACTION

SUP
AMP 1 2 3 4 5 6
AF 1 2 3 4 5 6
FIRE 1 2 3 4 5 6
SHARW 1 2 3 4 5 6
RO 1 2 3 4 5 6

November 13, 1985

Mr. J. Stan Tixier
Intermountain Region
U. S. Forest Service
324 25th Street
Ogden, UT 84401

REF: Draft Environmental Impact Statement for the Salmon National Forest Land and Resource Management Plan (EIS)

Dear Mr. Tixier:

We have received and reviewed the referenced document and are pleased to find that the protection of cultural resources has been given broad consideration in planning.

One point of uncertainty exists, however. Page IV-51 refers to "a major powerline right-of-way over Lemhi Pass (a National Historic Landmark) as a designated utility corridor." It is our understanding that only designation of the right-of-way has occurred, to date, and that no powerline or other service facility has yet been put in place. Wording at the end of the passage on page IV-51 concerning "...the pass where the powerline crosses..." causes confusion in the matter. We request clarification on this point, and suggest that the final EIS clearly document the status of decision-making concerning the introduction of utility lines or other service facilities in or adjacent to the Lemhi Pass National Historic Landmark.

We look forward to working with you furtner as the final EIS is developed. If you have any question, or if we can be of any further assistance at this time, please contact Dean Shinn at FTS 776-2682.

Sincerely,

Robert Fink
Chief, Western Division
of Project Review

VI-68

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Robert Fink, Chief
Advisory Council on Historic Preservation
Western Division of Project Review
730 Simms Street, Room 450
Golden, Colorado 80401

Dear Mr. Fink

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

There are two existing powerlines running roughly east-west through the Lemhi Pass National Historic Landmark. One was constructed in the 1940's and is located within a 40-foot wide Easement for Transmission Line on National Forest Land The second was completed in 1982 and is authorized under a Special Use Permit for Electric Transmission Line This authorization is for a strip 100 feet wide The enclosed map shows the boundary of the Landmark and the approximate locations of the existing powerlines.

The discussion on page IV-51 of the DEIS was intended to highlight the fact that, although powerlines exist in this area, it would be undesirable from a cultural resources standpoint to further apply an official designation as a "utility corridor" which could lead to further concentration of service facilities through the National Historic Landmark

We hope this clarifies the existing situation at Lemhi Pass

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 28(7 82)

0025

U S DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION TEN
Room 312 Mohawk Building
708 S W. Third Avenue
Portland, Oregon 97204

December 6, 1985
IN REPLY REFER TO
HPP-010.3

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

Dear Mr Hauff

Federal Highway Administration, Region 10, has reviewed the draft environmental impact statement for the Payette National Forest Land and Resource Management Plan and offers the following comments for your consideration

U S highway Route 93 and 28, which are on the Federal-aid highway system, are within Salmon National Forest Quite often such highways in National Forest areas do not have defined right-of-way. To make highway improvements with FHWA funds on the above route, or any Forest Highway System routes which may use any lands designated as recreation, requires a determination by FHWA that there is no other feasible and prudent alternative than the selected proposal Without an adequately defined right-of-way, this has, in similar situations, caused considerable delay in project implementation and increased taxpayer expense.

We suggest the final EIS acknowledge that when right-of-way for Federal-aid highway routes or forest highway routes are not defined, a management effort will be made to work out such details with the government officials having operating responsibilities for that route

Ideally, in any area designated recreation by you, the designated right-of-way should be of sufficient width to allow bridge replacements, roadway widening, or elimination of safety hazards such as bad

VI-69

DEC 10 '85

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to 1920

Date

M. Eldon Green, Regional Administrator
Federal Highway Administration, Region Ten
708 S W Third Avenue, Room 312 Mohawk Bldg.
Portland, Oregon 97204

Dear Mr. Green

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

Your concern about Federal highways through National Forests with no defined right-of-way is very pertinent to the Salmon National Forest Our investigation shows that only 3.4 miles of these highways have defined right-of-way, while approximately 23 miles do not

At present we have a Memorandum of Understanding with the Idaho Department of Transportation This document covers the granting of right-of-way, and the coordination needed to avoid unnecessary delay It should not be necessary to address this problem in the Final EIS We plan to contact the appropriate officials in the Idaho Department of Transportation about the right-of-way for the remaining 23 miles of highway.

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 28(7 82)

curves. Roadway improvements within a defined corridor designated for highway use do not require a 4(f) determination. NEPA action will apply to all highway improvements

Sincerely,

M. Eldon Green
Regional Administrator

BY: E. J. Valach, Director
Office of Planning
& Program Development

0013

US Department
of Transportation
Federal Aviation Administration

Northwest Mountain Region
Colorado Idaho Montana
Oregon Utah Washington
Wyoming

17900 Pacific Highway South
C 68966
Seattle Washington 98168

NOV 14 1985

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

Dear Mr Hauff

We have reviewed your draft environmental impact statement for the Salmon National Forest Land and Resource Management Plan and do not foresee any impact on aviation or its activities

Thank you for the opportunity to review your proposal

Sincerely,

for Kenneth Thomasson
Joseph W Harrell
Policy and Planning Officer

VI-71

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Joseph W. Harrell
Policy and Planning Officer
Federal Aviation Administration
17900 Pacific Highway South
C-68966
Seattle, Washington 98168

Dear Mr Harrell

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

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

Again, thanks for taking the time to provide us with your thought.

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0531

JOHN V EVANS
GOVERNOR

OFFICE OF THE GOVERNOR
STATE CAPITOL
BOISE 83720

SALMON N F

JAN 27 '86

Info ☐ Action ☐

LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RRW	1	2	3	4	5	6
AO	1	2	3	4	5	6

CCs TO: [illegible] 1/28/86

January 24, 1986

Richard Hauff, Supervisor
Salmon National Forest
Post Office Box 729
Salmon, Idaho 83467

Dear Dick

I appreciate the opportunity to comment on the proposed Land and Resource Management Plan for the Salmon National Forest I have enclosed comments from those state agencies which have intensively reviewed the plan, and I urge your serious consideration of their recommendations

There are several aspects of your preferred alternative which I can support The proposed campground sites, boat launches and trailheads are recreational developments needed for future Forest visitors, as are the proposed semi-primitive areas I also support maintaining a viable range program and providing an adequate timber supply within the current constraints of federal law My concerns with your proposed approach are as follows

1) The present net value (PNV) calculated for the proposed alternative is marginally positive and at the lower end of the economic scale relative to other alternatives Additional non-commodity values should be incorporated to provide a more balanced, public-oriented program Alternatives 7-11 should be closely examined for their economic strengths in this area
2) I support continued timber management on the Salmon National Forest to adequately supply the local mill recently reopened by worker initiative Still, to better justify proposed activities, improved resource information should be presented in the final plan Suitable timber lands, key wildlife habitats and sensitive riparian areas should be identified and mapped to illustrate how potential resource conflicts are being resolved through appropriate management prescriptions I support your proposal to close new logging roads following completion of timber harvest to protect wildlife Entering into a cooperative road closure program with the Idaho Department of Fish and Game would further address concerns regarding wildlife/timber compatibility
3) A semi-primitive non-motorized prescription should be instituted on the Forest and applied to appropriate sections of the West Big Hole and Lemhis Range roadless areas
4) The Department of Parks and Recreation is concerned with loss of trails to road construction and the lack of emphasis on National Trails and trail maintenance on the Forest I support providing quality trails and interpretive services to Forest visitors as they seek an array of dispersed recreation experiences
5) A cumulative impacts analysis on key watersheds should be performed on the Forest as suggested by the Division of the Environment I encourage the addition of stream data necessary to establish a satisfactory water monitoring program and stream classification system

VI-72

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Honorable Cecil D. Andrus
Governor of Idaho
Office of the Governor
State Capitol
Boise, Idaho 83720

Dear Governor Andrus

This letter is in response to the letter received from Governor Evans regarding the Salmon National Forest's Draft Environmental Impact Statement.

In the present net value economic analysis, willingness-to-pay values are used to compute the benefits associated with wildlife, fish and recreation outputs These willingness-to-pay values are estimates of what certain amenities are worth in the absence of established market values. On the other hand, timber benefits are based on actual cash flow in and out of the Treasury No other resources are valued solely on this basis If they were, most if not all programs would appear to be poor economic investments. Important benefits associated with timber harvest on the Salmon National Forest are not considered in the economic analysis. Employment, income, and community stability benefits are not recognized as benefits in the present net value analysis, but they are recognized as nonpriced outputs. The preferred alternative was selected after considering both priced and nonpriced costs and benefits. We believe it provides the greatest net public benefit Such noncommodity benefits as developed recreation were not proposed at higher levels because the proposal more than satisfied expected demand. Should demand turn out to be higher than predicted, we do have the ability to provide additional opportunities in many areas.

In regard to Governor Evans' question on additional resource information, a description of the legal, physical, and biological criteria used to identify tentatively suitable lands was included in the AMS The Salmon National Forest used their procedures and guidelines completing the suitability classification. The preparation of detailed suitable/unsuitable land stratification maps was considered to be prohibitively costly. Similarly, many other resources were analyzed and mapped to display resource values on a forestwide basis Some of these maps include visual resources, soil-water, old growth wildlife habitat, key summer and winter range for big game, and transportation planning. These maps are available for review of the Salmon National Forest Supervisor's Office, but

FS 6200 26(7 82)

The National Forest Managment Act clearly requires our National Forests to abide by multiple use and sustained yield concepts--and to be cost-effective in doing so Given the resource and budget limitations which currently constrain commodity outputs on the Salmon, it is important to recognize and support a balanced public use of Forest resources in the final plan

My best to you and your staff as you proceed in these important planning efforts

Sincerely,

JOHN V EVANS
GOVERNOR

JVE JJP

cc Jerry Conley, Director
Idaho Department of Fish and Game
Robert Meinen, Director
Idaho Department of Parks and Recreation
Lee Stokes, Administrator
Division of Environment, Department of Health and Welfare

VI-73

would have been too costly to include in each copy of the EIS and Forest Plan.

We appreciate Governor Evans' support of our road closure program All newly constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial public interest to keep a road open is identified through the process outlined in the National Environmental Policy Act (NEPA). Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan. This travel plan is updated periodically using both public input and information gathered by monitoring the current travel plan Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range. We work closely with the Idaho Department of Fish and Game in developing our Travel Management Plan We anticipate the recent legislation passed by the Idaho Legislature, which provided the authority for the Department of Fish and Game to work with us in our road closure enforcement program, will be particularly helpful

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

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

2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,

3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,

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

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

6. Medium investment timber output emphasis from Hill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,

7 Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area.

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

0531

COMMENTS
FROM
GOVERNOR JOHN V EVANS
STATE OF IDAHO

1 Economic Efficiency

The draft plan clearly presents a useful economic portrait of the Salmon National Forest through its analysis of costs and benefits of various management activities This analysis, resulting in a present net value (PNV) for each alternative, illustrates the high value of non-commodity activities on the Forest as well as the investment needed to maintain traditional timber and range employment in the region While such a federal investment is beneficial to certain industries, its contribution to overall community stability should be carefully evaluated in light of a growing tourism and outdoor recreation industry Because higher present net values are realized in those alternatives emphasizing non-commodity values, the Salmon National Forest should incorporate additional amenity values into the proposed plan to provide for a more balanced public-oriented program and a higher PNV Alternatives 7-11 should be reviewed for their economic strengths in this area, particularly in roadless acreage and dispersed recreation opportunities

2 Resource Information and Conflict Resolution

The key to resolving many management conflicts is to clearly identify and map resource information of particular concern I suggest the final plan contain maps which point out key summer and winter wildlife range, sensitive riparian areas, suitable timberlands and mining areas in a manner similar to the range allotment map provided with the draft plan These resource maps would be useful in comparing how well various alternatives and prescriptions protect and/or utilize existing Forest resources Alternative 7 proposed a number of combination timber/wildlife prescriptions and protective prescriptions that were not incorporated in the proposed alternative The following prescriptions should be re-examined for their suitability in resolving conflicts in the final plan

3A-5D, 3A-5E, 3A-5F Anadromous fish/timber/wildlife prescription at three levels of timber output
3A-4C Emphasis on anadromous fish and interstate game migration routes
4B-3 Timber prescription with provision for unimpaired movement of big game to and from key winter range
4C Emphasis on maintaining big game migration corridors
5E,-5F Timber/wildlife habitat prescription at medium and low timber outputs

I support the Forest's proposal to close new logging roads following completion of timber harvest to protect wildlife Such a practice avoids increasing road densities where elk security is of prime concern I urge the Forest to enter into a cooperative road closure with the Idaho Department of Fish and Game to further protect Idaho's wildlife resources

3) Roadless Areas

Although the planners chose not to propose new wilderness, outstanding wilderness qualities have been well-documented on several currently roadless areas on the Salmon National Forest The Roadless Area Review in the DEIS Appendix should provide clear rationale for the decisions made on each roadless unit For the Lemhis Range and the West Big Holes, I support a semi-primitive non-motorized prescription with manageable unit boundaries Existing motorized use should not be significantly reduced, but definitely limited to trails where sensitive resources exist Because the Beaverhead National Forest has proposed wilderness for the Montana side of the Continental Divide, it makes good sense to similarly support wilderness or a semi-primitive non-motorized prescription for the Idaho side This would provide a primitive trail experience for hikers on the Continental Divide Trail and best protect the magnificent, high mountain ridges on the Forest

VI-74

Cecil D. Andrus 3.

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

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

2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,

3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,

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

5 Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek

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

We agree that roads are no substitute for trails, however, some areas have such a high density of roads that a satisfying trail experience no longer exists In other cases, ORV "enthusiasts" have "improved" the trail to the point where it is now a jeep track or 4-wheel-drive road In still other instances, a road has been constructed in the actual trail corridor or adjacent and parallel to the trail. In all of these cases, available trail dollars can be much better spent where a satisfying recreation experience can be provided. We believe that the reductions in trail mileage maintained will be minor and that the system will be well able to accommodate anticipated use Should use increase significantly above expectations, we have the ability to expand the system by either reopening abandoned trails or constructing new trails

Direction for interpretation of nationally designated trails is contained in the individual management plans for each trail, so we saw no need to repeat it in the Forest Plan. We agree that nationally significant trails are a high priority for available funds and have structured the Plan to give emphasis to wilderness trails and National Scenic and Recreation trails outside wilderness The only major new trail construction proposed is for segments of the Continental Divide National Scenic Trail

Cumulative sedimentation analyses were performed in all alternatives during the development of the preferred action. Major anadromous basins were analyzed individually for cumulative sedimentation and water yield changes. Environmental factors, such as soil type, climate, slope, vegetative cover and other significant onsite parameters were used to

I support the Forest's other proposals for semi-primitive areas, but point out that the Idaho Department of Fish and Game has requested boundary adjustments in key elk areas I agree that roadless protection should be granted to the north-facing slopes along Sheep Creek, the Salzar Bar area of Hughes Creek, Upper Anderson Creek and Pierce Creek, and Gant Ridge and Upper Deer Creek

Finally, I support the Forest proposals for ten Research Natural Areas and management of the Salmon River and Middle Fork Wild and Scenic Corridors

4) Trails and Interpretive Services
The Idaho Department of Parks and Recreation has shown significant concern with the plan's lack of emphasis on hiking and motorized trail systems As visitor use increases on the Forest, trail construction and maintenance will be of greater importance The final plan should include a detailed trail map as well as a travel plan to show trails targeted for improvements and those planned for future construction

I support provision of interpretive services for Forest visitors, including printed literature, wayside signing and special programs The Forest Service is an important resource in visitor information/education efforts, and I urge your full cooperation in this role Tourism is an important and growing sector of Idaho's economy which is most dependent on public land managers for providing recreation opportunity and information support

5) Watershed Protection and Water Quality
Maintenance of water quality on all National Forests is of utmost concern to the State of Idaho High quality waters provide blue-ribbon fishing, outstanding river recreation, as well as drinking water for many communities These beneficial uses are fully protected under state law, and I urge the Salmon National Forest to plan for full compliance The Division of Environment suggests that a cumulative impacts analysis be conducted on key watersheds to better determine how various management activities will affect total water quality I encourage the Forest to add to the plan the stream data necessary for establishing a stream classification system and a comprehensive water monitoring program Water is the lifeline for Idaho, requiring that all federal and state agencies work together to ensure that water quality is protected for current and future generations

6) Timely Completion of the Final Plan
Since local communities depend heavily on the outcome of this planning process, I urge the planners to work diligently in compiling the information needed to complete this plan Those preparing for long-term investments need to know what outputs are projected for the Forest and where the final management emphasis will be I encourage you and your staff to commit yourselves toward resolving user conflicts, thereby enabling the Salmon National Forest Plan to be completed on schedule

VI-75

determine the effects of road construction, and timber harvest. The relationships developed in these key watersheds were used throughout the rest of the Forest for general guidance Relative density of road construction and other activities in these key watersheds was projected onto other areas of the Forest, so that watershed goals and associated downstream beneficial uses would be protected.

The preferred action provides general direction and scheduling of land activities. Project level environmental assessments will continue to use cumulative assessment techniques as well to evaluate sedimentation effect within specific watersheds.

We believe the selected alternative does provide for a balanced program of activities and outputs More specifically, the selected management plan will insure that sufficient habitat potential is available to meet the Idaho Department of Fish and Game's objectives for big game, anadromous fish and resident fish. It encourages the legitimate exploration and extraction of leasable and locatable minerals, improves the quality of recreation experiences, and provides for pleasing visual landscapes and a quality wilderness experience in the Frank Church--River of No Return Wilderness. Selected portions of the Forest will be managed for semi-primitive motorized and semi-primitive nonmotorized user experiences Equally important, the management plan provides for a level of livestock grazing consistent with the agriculture base and rural lifestyle of Lemhi County and the surrounding area. Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility.

Responses like Governor Evans' were helpful in preparing the final Plan. Again, thanks to Governor Evans for taking the time to provide us with his thoughts.

Sincerely,

RICHARD T HAUFF
Forest Supervisor

0384

DANE H WATKINS
DISTRICT 33
BONNEVILLE JEFFERSON MADISON
FREMONT CLARK BUTTE CUSTER
LEMHI AND TETON COUNTIES

2242 SOUTH BOULEVARD
IDAHO FALLS IDAHO 83402
RESIDENCE (208) 522 4855
OFFICE (208) 523 0800

COMMITTEES

CHAIRMAN
LOCAL GOVERNMENT AND TAXATION

FINANCE

Idaho State Senate

CAPITOL BUILDING
BOISE

SALMON N F

JAN 15 '86

Info ☐ Action ☐

SUP						
(LMP)	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RR/W	1	2	3	4	5	6
AO	1	2	3	4	5	6

Z CC's TO

January 9, 1986

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

Dear Mr. Hauff

In reviewing the propasals for forest plans that have been brought out for review, the most workable one is the alternative twelve as proposed There needs to be a great emphasis put on protecting existing state water rights and individual rights to such water. There should be continous concern for the people that are affected by any decision affecting the resources of the Salmon Forest

In considering on going costs against timber, mineral and water, the wage, tax base and the well being of the citizens need to be addressed. An over-all effect upon not only the people who are presently living in the community, but also those people later whose livelyhood will be affected. The taxes directly or indirectly paid by these people need to be considered when determining the actual benefits to the forest.

The game animals need to be considered, but should be done so with the domestic animals that use the forest and what the real revenue generated within the community does as far as keeping the community in the black How much actual tax base and disposable income is generated for actual use by the community and state government and not by one agency. No more wilderness should be allocated within the Salmon National Forest. Each area needs to be evaluated for what is available and the multiple use concept should be used. Wilderness does not make any more game animals, wise use and management will determine the herd populations

Roads in any of the forest should be kept to a minimum. Consideration should be given to whether to close or leave them open with consideration given for the values and effects of them over all

VI-76

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Honorable Dane H. Watkins
Idaho Senate
Capitol Building
Boise, Idaho 83720

Dear Mr Watkins·

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

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

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

Even though we know of no legal requirement to maintain community stability, there is little doubt the National Forest Management Act of 1976, National Environmental Policy Act of 1969, and subsequent implementing regulations require that this issue be considered in formulating a Forest Plan. Although community stability or economic development cannot be ensured by the agency.

FS 6200 28(7 82)

The cost of running a Forest Wilderness is too prohibitive to consider, and the people it displaces must be a prime consideration

Sincerely,

Dane Watkins
Senator

DW/pc

the Forest Service often has the ability to prevent actions which could destabilize communities or provide opportunities which could help communities reach their economic goals. We believe our plan provides opportunity for a diverse local economy.

We do not propose any additional wilderness. While there is considerable support for additional wilderness, there is also considerable opposition. This opposition to wilderness designation is based on numerous factors One is the potential for mineral values which occur in many of the Salmon's RARE II roadless areas. Another is the high level of interest from motorized users who would be excluded from their preferred activities. Concerns about the availability of adequate timber supplies and the potential future loss of water rights or reductions in livestock grazing have also been expressed.

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

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

Our plan is for all newly constructed roads to be closed when they are not actually being used for harvest or other resource management activities, unless a substantial need to keep the road open is expressed through the public participation process outlined in the National Environmental Policy Act. Existing roads and trails on the transportation system are outlined on the Travel Plan The Plan is updated periodically using information gathered from the public through monitoring Through this process, the Plan is updated to provide for changes in open roads, trails and areas caused by resource or public safety needs

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0266

VEARL C CRYSTAL
DISTRICT 30
CLARK CUSTER BUTTE
EFFERSON AND LEMHI COUNTIES

HOME ADDRESS
P O BOX 78
LEWISVILLE IDAHO 83431
PHONE (208) 754-4705

COMMITTEES
AGRICULTURAL AFFAIRS
FINANCE
STATE AFFAIRS

ASSISTANT MAJORITY LEADER

Idaho State Senate

CAPITOL BUILDING
BOISE

January 9, 1986

Mr Richard Hauff
Supervisor
Salmon National Forest
Box 729
Salmon, ID 83467

Dear Mr. Hauff

I think the best proposal for Forest Plans that have been brought out for review is Alternative 12.

Very truly yours,

Vearl C Crystal

Vearl C Crystal
Assistant Majority Leader

VCC tb

VI-78

SALMON N F

JAN 13 '86

Info ☐ Action ☐

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

CCsTO Jensen 1/13/86

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date

Honorable Vearl Crystal
Idaho Senate
Capitol Building
Boise, Idaho 83720

Dear Mr. Crystal:

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

We hope that you will continue to be involved in the future management of the Salmon National Forest.

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 2A17 831

0002

10-18-55

State Senator
Legislative District No 31
ANN RYDALCH

Dear Mr Hauff,

I would like to formally register that I object to any additional wilderness area being set aside in your Forest Service Plan.

I really believe many Idaho residents do not understand that wilderness means "locked up". In fact Mr. Hauff, do your forest plans just keep automatically increasing wilderness set aside each year?

Thank you for your consideration of this formal complaint.

Sincerely, Senator Ann Rydalch

VI-79

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date:

Honorable Ann Rydalch
Idaho Senate
Capitol Building
Boise, Idaho 83702

Dear Mrs Rydalch:

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

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

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

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

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

FS-6200 28(7 82)

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date October 23, 1985

Honorable Ann Rydalch
Idaho State Senate
3824 E. 17th Street
Idaho Falls, Idaho 83401

Dear Ms. Rydalch.

Thank you for your letter of October 18, 1985, in which you voiced your objection to any additional wilderness designations.

The National Forests are required by regulation to reevaluate their roadless areas for wilderness potential. This is a result of the decision at the 9th Circuit Court of Appeals in the California vs. Block lawsuit which found the RARE II Environmental Impact Statement inadequate. This reevaluation included a period of public involvement.

As a result of this reevaluation, many Forests have proposed the designation of additional wilderness The Salmon National Forest has not proposed any new wilderness in our Forest Plan since public input to date has not generally supported further wilderness designation. We will be carefully evaluating public input on our proposed plan, and we would consider proposing additional wilderness in the final plan should people's attitudes change. During the next plan revision, in 10 to 15 years, undeveloped areas will again be evaluated for wilderness as required by regulation.

Our Proposed Forest Plan and Draft Environmental Impact Statement are now available for public review and comment. If you would like a copy, we would be happy to send you one. Just send us a note or call Gene Jensen at 756-2215.

Sincerely,

R. T. Hauff

RICHARD T. HAUFF
Forest Supervisor

VI-80

FS 6200 28(7 82)

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

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 28(7 82)

0264

RAY E. INFANGER
DISTRICT 20
LEMHI CUSTER CLARK
AND JEFFERSON COUNTIES

HOME ADDRESS
ROUTE 1 BOX 174
SALMON IDAHO 83467
PHONE (208) 756-3649

COMMITTEES
APPROPRIATIONS
AGRICULTURAL AFFAIRS

SALMON N F

Jan 9, 1985

JAN 13 '86

House of Representatives
State of Idaho

Info ☐ Action ☐

~~LMP~~	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RR/W	1	2	3	4	5	6
AO	1	2	3	4	5	6

2 CCs TO Salmon 1/13/86 JH

Dick Hauff Supv.
Salmon Nat'l Forest
Salmon, Idaho

For; alternative #12

Dear Dick

I'm for alternative #12 because:

1. I think it would be easier for you to manage
2. It is more considerate of the Whole Community
3. Best for all on a long term basis.
4. Much more cost effective
5. We are a "Wilderness Set aside" Rich State already.
6. All civilized countries such as Germany etc long ago came to the conclusion that multiple use was the only way to go.
7. Lemhi County already has given more Wilderness than its "Fair - share"
8. Better protection opportunity for State Water
9. We should be careful to have roads to control forest fires & otherwise manage the forest.

VI-81

Yours for better stewardships.

Sincerely
Ray Infanger

United States Department of Agriculture — Forest Service — Salmon National Forest — P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Honorable Ray E Infanger
Idaho House of Representatives
Route 1, Box 174
Salmon, Idaho 83467

Dear Mr Infanger

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

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

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

FS 6200 26(7 82)

Honorable Roy F Infanger

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

Sincerely,

RICHARD T HAUET
Forest Supervisor

0391

OFFICE OF COUNTY COMMISSIONERS

LEMHI COUNTY

SALMON IDAHO

LOUIE DEMICK, Chairman
DON M O'NEAL
QUINTON SNOOK

January 13, 1986

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

Re: Salmon National Forest Plan

Dear Mr Hauff

The Lemhi County Commissioners have reviewed the proposals for the Salmon National Forest and feel that Alternative 12 should be used

No more Wilderness should be set aside and each area should be evaluated and multiple use should be utilized Multiple use does not harm the wild life as long as wise use and management are employed.

Very truly yours,

Louie Demick, Chairman

Quinton Snook

Don M O'Neal

SALMON N F

JAN 16 '86

Info ☐ Action ☐

SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
BR AW	1	2	3	4	5	6
FO	1	2	3	4	5	6

2 CCs TO Jensen 1/16/86

VI-83

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date:

Louie Demick, Chairman
Office of County Commisssioners
Lemhi County
Salmon, Idaho 83467

Dear Mr Demick

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

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

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 28(7 82)

0131

CITY OF SALMON

200 MAIN STREET / SALMON IDAHO 83467 / (208) 756-3214

January 7, 1986

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

RE. Salmon National Forest Land and Resources Management Plan

Dear Mr. Hauff:

The City of Salmon has reviewed that alternatives presented in the Management Plan. By official action at a regular Council meeting on January 6, 1986, the City Council believes Alternative 12: Mofified Current Management Direction to be the most feasible approach. This Alternative 12 : will allow the City of Salmon to Continue an economic base that it has had in the past. Alternative 12 will allow for the residents of the area to adapt to new economic developments and future changes.

Respectfully,

Jack C. Nelson, Mayor

SALMON N. F

JAN 9 '86

Info ☐ Action ☐
SUP
LMP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
ELM 1 2 3 4 5 6
RRVW 1 2 3 4 5 6
AO 1 2 3 4 5 6
CC & TO

VI-84

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Honorable Jack C. Nelson
Mayor of Salmon
200 Main Street
Salmon, Idaho 83467

Dear Mayor Nelson

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

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

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

FS 6200 28(7 82)

0070

SALMON SCHOOLS

OFFICE OF THE SUPERINTENDENT
DISTRICT NO 291
P O BOX 790
SALMON IDAHO 83467
208 756 4271
SPECIAL SERVICES
208 756 4553

JAMES A SMITH Superintendent

January 2, 1986

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

Dear Mr Hauff:

After reviewing the Salmon National Forest's Draft and Environmental Impact Statement and Land and Resource Management Plan, I would like to comment concerning the listed alternatives

Salmon is very dependent upon all forms of revenue that can be generated in the Salmon area and no one single source will carry the livelihood of this community. With that thought in mind and with the knowledge of the average yield of available saw timber in the Salmon National Forest, I applaud your efforts for the preferred alternative which is Alternative 12 Too much recreation or too much productivity yield of saw timber will not sustain the Salmon community

I would like to encourage you to maintain a solid multiple use concept based on past experience and based on available data as far as animal numbers, carrying capacities, available timber and growth, etc

I thank you for your crews efforts in producing this plan and for this opportunity to respond.

Sincerely,

Jim Smith

James A. Smith
Superintendent

JAS/kc

SALMON NF
COPY
FS

JAN 8 '86

INFO ☐ ACTION ☐
SUP 1 2 3 4 5 6
MP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
LLM 1 2 3 4 5 6
RWW 1 2 3 4 5 6
FO 1 2 3 4 5 6

cc Jensen 1/9/86 JH

ON THE RIVER OF NO RETURN

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

James A Smith
Superintendent
School District No. 291
P O. Box 790
Salmon, Idaho 83467

Dear Mr Smith

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

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS 6200 28(7 82)

0023

COOPERATIVE EXTENSION SERVICE

University of Idaho

Courthouse
206 Courthouse Drive
Salmon Idaho 83467
Phone (208) 756 2824

DEC 4 '85

December 2, 1985

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

Dear Dick,

The draft EIS and proposed forest plan seem to be well written documents. The preferred alternative is a very well-balanced plan which provides protection for the environment while recognizing that the economy of the area is based on natural resource use Forest outputs in the plan will support resource dependent industries (livestock agriculture, lumber, mining) at current or slightly above current levels.

The EIS is good evidence that current and past management have been effective at maintaining the resource base while providing multiple use of the national forest It is a sad commentary on the times that national forest managers in general have been depicted as despoilers of the environment while the hard fact is that 70% of the Salmon Forest is still unroaded or wilderness after 80 years of management

I support the preferred alternative since it will help stabilize the economy of dependent communities while protecting the basic resource. It is a prudent and conservative management plan with small irretrievable commitment of resources and irreversable impact.

Sincerely,

Robert R Loucks

Robert R. Loucks
Lemhi County Agent

Where Tradition Meets the Future

University of Idaho

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Robert R Loucks
Lemhi County Agent
University of Idaho Cooperative Extension Service
206 Courthouse Drive
Salmon, Idaho 83467

Dear Mr. Loucks:

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

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS 6200 28(7 82)

0049

IDAHO DEPARTMENT OF FISH AND GAME
600 South Walnut • Box 25
Boise • Idaho • 83707

SALMON N.F
COPY
FC

JAN 3 '86

INFO ☐ ACTION ☐
SUP
LMP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
ELM 1 2 3 4 5 6
FRWW 1 2 3 4 5 6
/ O 1 2 3 4 5 6

1/3/86 cc

December 27, 1985

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

Re Draft Forest Plan and DEIS

Dear Dick,

We appreciate the opportunity to review these important documents and provide our input on behalf of the fish and wildlife resources

SNF is to be commended for producing a generally readable, understandable document. You did an excellent job of identifying issues. Your emphasis on the important fish and wildlife resources on SNF is commendable.

We do have some concerns regarding data used, interpretations and implementation. IDFG's specific comments are enclosed. Please seriously consider our suggestions. I believe our suggestions will improve your documents and benefit fish and wildlife without any adverse effects on other forest users

Thank you for this opportunity for input into the management decisions on SNF.

Sincerely,

Jerry M. Conley
Director

JMC:CNH tlv

Enclosure

VI-87

• EQUAL OPPORTUNITY EMPLOYER •

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Jerry M Conley, Director
Idaho Department of Fish and Game
P O Box 25
Boise, Idaho 83707

Dear Mr Conley

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

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

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

We expect that the the habitat potential resulting from implementation of Alternative 1Z, though lower than the present level, will be adequate to accommodate the population objectives listed in the State's current Species Management Plan, and will provide for a significant increase in elk numbers

Best management practices are listed in the plan under Standards and Guidelines in Chapter IV This direction, combined with additional site specific mitigation practices identified during field reviews will be the basis for appropriate project design and onsite watershed protection The relative effectiveness of the mitigation measures is then evaluated through the use of extensive cumulative sediment modelling The cumulative sedimentation modelling has been used throughout the Forest Planning process for larger watershed areas. During project level reviews, this modelling process is used to examine the cumulative effects within the smaller watersheds affected by the specific sale and road proposal

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COMMENTS OF IDAHO DEPARTMENT OF FISH AND GAME (IDFG)
ON
SALMON NATIONAL FOREST (SNF)
DRAFT EIS AND RMP

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

In Table S-1, on page S-7, the sediment levels presented are not yearly averages, as stated below the table, but instead are an average of 5 decades of peak values from each of the 11 planning study areas (called geographic areas in the planning process). The actual average yearly sedimentation rates are significantly lower than those presented in the table

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

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

The ability of the Salmon National Forest to provide habitat necessary to meet *Idaho Department of Fish and Game Species Management Plan* population objectives is not tied to habitat improvement projects Meeting these objectives is an inherent part of the resource management prescriptions included in the preferred alternative, and thus should not be affected by yearly budget variations

Budgets will continue to be a concern in the coming years as funding becomes more restrictive. Habitat improvement projects could well be influenced by budget cutbacks, as will other resource areas (i e , timber, range, recreation, etc) Prioritization of improvement projects will include cost/accomplishment assessments as well as project focus

INTRODUCTION

Our comments on the Proposed Land and Resource Management Plan (RMP) and the Draft Environmental Impact Statement (DEIS) are divided into four sections. Under General Comments and Major Concerns, Idaho Department of Fish and Game (IDFG or we) elaborates on areas which we believe must be more adequately addressed by the Salmon National Forest (SNF or you) in the final documents. In the next section we provide specific comments, by page number, for the Summary, DEIS, Appendices, and RMP, respectively. Third, we list some errors we found. Finally, we conclude with some recommendations that we believe can be implemented with substantial benefits to fish and wildlife and the associated recreation.

In general, we think SNF did an excellent job of identifying the major issues and putting together a RMP and DEIS that addressed those issues. Please take our comments as being constructive in nature and be assured that we appreciate this opportunity, and previous ones as well, to provide input into your planning process. We believe the close working relationship between IDFG and SNF personnel in the past has been beneficial and we look forward to continuing to work with you to improve the final RMP.

Your presentation is generally clear, understandable and adequately documented. In particular, we appreciated the fact that you included a substantial section on standards and guidelines, a schedule of activities and clearly defined monitoring requirements. Inclusion of graphs, summary tables, and an index was a significant aid to our reviewers. The "summary" was very useful to ancillary reviewers and for quick reference to salient points.

IDFG reviewed the Summary, DEIS, Appendices and RMP in that order. Our "Specific Comments" are presented in this same order below. Generally, we tried to avoid duplication in our comments by mentioning a point the first time we encountered, or noticed, it and not repeating that point when subsequently encountered. The exception to this is the Summary which we read first primarily for information. This means that many of our Specific Comments on the DEIS also apply to the appropriate section of the Appendices and/or RMP where there is repetition between documents. We did not cross-reference these comments.

IDFG recognizes the complexity of the task involved in developing these documents and understands that they must be relatively general in nature. We hope SNF recognizes that IDFG is, therefore, unable to respond in detail regarding habitat conditions and proposed treatments or uses which influence these habitats. Thus, IDFG must reserve most of our comments on specific impacts on fish and wildlife until specific proposals, in the form of project EAs, are developed by SNF.

considerations. The 10-year habitat management program identified in Appendix D (page VII-D-2 to VII-D-7) is intended to be a dynamic program responsive to budget levels and habitat needs. Wildlife and fish population levels identified in the plan were not dependent upon the habitat improvement program. Coordination of wildlife/fish objectives with other resource activities was the key component in meeting population production objectives. Improvement projects can and will enhance habitat effectiveness, but other habitat management elements (i.e., inventory, monitoring and coordination) will be responsible for attainment of the population objectives.

The Draft Salmon National Forest Management Plan identified areas area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This is an overall increase of land being managed as semi-primitive on the Salmon National Forest. Most of the areas to which you referred are included in these additions.

We share your concern that roads decrease the security of big game habitats, and will continue to work with you through our travel management process to provide necessary security areas for hunted species.

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

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

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

We also request a meeting with SNF staff prior to your developing the final EIS and Plan. Such a meeting would allow our two agencies to explore and answer, in detail, the concerns we have expressed below as well as SNF's response to these concerns. We may have misunderstood some things you propose. Or, we may have missed catching some important point. The size and complexity of the DEIS and RMP make it impossible for our reviewers to have "captured" everything.

GENERAL COMMENTS AND MAJOR CONCERNS

The goals and direction outlined in the RMP, as they apply to wildlife and fisheries, are a step in the right direction. However, we believe that your goals for wildlife must be higher and that other alternatives are preferable to #12. We are disappointed that the chosen alternative does not provide the management emphasis necessary to allow for increases in the several wildlife species so important to a majority of the users of SNF.

Your recognition of the impacts that roading, sediment and riparian management can have on wildlife and fisheries is encouraging and we commend SNF for incorporating those concerns in a meaningful manner. In particular, the goals of meeting state water quality standards, and increasing habitat capacity (habitat improvement) are excellent.

If SNF can meet IDFG goals and objectives, a significant benefit to fisheries and wildlife will occur. We are concerned, however, that SNF may not attain these goals primarily because of budget prospects.

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Budgets vs. Goals

Some of the anticipated benefits to fisheries and wildlife are attributed to habitat improvement projects which will require an increase in funding (see IV-90, RMP). In addition, maintaining fish and wildlife habitats is partially dependent on mitigative measures and road closures which cost money.

Because you receive line-item budgets, you could have funds to implement the timber or road construction or range program but not the fish and wildlife programs. IDFG believes SNF will have substantial difficulty obtaining the budget necessary to carry out the proposed fish and wildlife programs.

You clearly recognize that budgets could significantly alter your implementation schedule (V-1, RMP). The budgeting process could essentially kill your most well-intentioned efforts to coordinate resource management and to reduce the impacts of other programs on fish and wildlife. Therefore, we believe you should add a "variation" criteria for budgets on page V-20 (RMP). IDFG recommends ±5 percent in any 1, or at most 2, year by major program line-item (e.g., range, timber, wildlife).

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

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

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

Riparian habitats on the Salmon National Forest are given protection consistent with direction given in the National Forest Management Act Resource management activities will be managed in a manner consistent with protection of fishery, wildlife and water quality values Forest-wide management direction and associated standards and guidelines regulate the types and intensities of management activities.

As explained in our recent meeting, Timber Management Prescriptions A-C do not refer to outputs but rather to levels of investment The wildlife mitigation and coordination measures inherent in these prescriptions were primarily based upon the Central Idaho Elk-Logging Guidelines. We are also familiar with the Western States sage grouse habitat management guidelines and the antelope habitat guidelines and use these documents on a project design and analysis basis

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

Semi-Primitive Prescription

IDFG is very pleased that SNF has applied this prescription to several areas (II-97, DEIS and IV-103, RMP). It provides many of the benefits of wilderness (security areas, reservoir populations, roadless hunting and fishing opportunity) without some of the detriments (restricting habitat improvements). We are, however, disappointed that you chose to include only 2A and not 2B in Alt. 12, especially since you are recommending no additional wilderness.

We find Management Prescription 2A to be generally compatible with wildlife needs and are pleased to see it applied to several areas of high importance to big game animals. (We think some of these areas should have been assigned to Rx 2B rather than 2A but are willing to work with SNF to resolve problems on a case-by-case basis through the Travel Plan.) We feel, however, that Rx 2A or 2B should be extended to several other areas of prime importance to big game, particularly elk. We note that the lines delineating 2A carefully omitted the following areas that have been scheduled for timber harvest and are controversial due to their importance as KESRs, security areas or migration routes:

1. Upper Anderson Creek and Pierce Creek.

2. North facing slopes of Sheep Creek from Stein Gulch upstream.

3. Salzar Bar area of Hughes Creek.

4. Gant Ridge and Upper Deer Creek.

We recommend that SNF place all of Roadless Areas 13942 (Anderson Mountains) and 13943 (West Big Hole) in Rx 2B, or at a minimum in 2A.

Roads and Road Management

As you recognize, roads and the management of them are an important factor on SNF. Roads are a concern to IDFG because of the increase in number of miles and standards projected, because of entries into areas (over 200,000 acres) that are currently roadless, and because much of the road building will occur in the first 2 decades.

Our four main concerns regarding roads and road management on SNF are (1) sediment production as it relates to fish habitat, (2) loss of security for T and E species, (3) decreased elk, and to a lesser extent deer, habitat effectiveness, and (4) loss of security areas (i.e., increased vulnerability) for big game which could cause population declines and will reduce WFUDs that can be provided. We commend you for addressing, adequately we think, the first 3 of these concerns. Under Specific Comments we suggest how you should address the 4th concern more adequately.

IDFG is concerned about the impacts of roads on future big game hunting opportunity in SNF. Less secure habitats provide less hunting opportunity per animal. Roads are a major factor of habitat security. IDFG has repeatedly found it necessary to restrict hunting opportunity as vulnerability is increased by added road access.

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

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

In reference to your comments on planted Douglas-fir sites, we have had poor success with our planting of Douglas-fir on the harsher sites. On these sites, ponderosa pine or lodgepole pine will usually be planted in place of Douglas-fir if the site is suitable This action often simulates what nature would do in the presence of a natural disturbance, such as fire, since the pines are typically seral species on these sites. Due to its more tolerant status, the species balance of Douglas-fir relative to the pines is continually increasing in the absence of disturbances such as logging or wildfire Although we don't know of any Douglas-fir plantation large enough to provide hiding cover on the forest, this species has been only a minor component of our overall planting program in past years. The Forest has some 5 to 10 year old Douglas-fir plantations on our more favorable northerly to easterly aspects that are well stocked and healthy. At this time we cannot say with certainty, however, that these plantings have been a success since Douglas-fir seedlings appear to have a long resting phase (when either planted or naturally established) of about 5 to 7 years before they begin putting on significant growth and breaking away from competing vegetation

The Forest is concerned that adequate hiding cover is available to provide for the needs of elk and other large game species To insure that these needs are met the Plan requires that created openings are separated by timber stands (ref Chap. IV-43). These openings must be stocked before the stands separating them may be removed. The preferred alternative in the Draft Forest Plan provides adequate habitat to meet Idaho Department of Fish and Game population objectives for all big game species

The Northwest Rivers study provided for a very general appraisal of population and habitat conditions, based primarily on subjective estimators

SNF partially justifies the proposed timber harvest on the grounds of improving wildlife habitat. You cite a need for more acres of the younger age classes of trees and increased stand diversity to improve wildlife habitat. (Incidentally, you should mention which animal species will be the primary benefactors and which will be detrimentally impacted.) IDFG's concern here is that the projected benefits of vegetation management may be more than offset by the negative impacts of improved access, especially into elk and deer habitats. Security is a critical factor in determining habitat effectiveness and the kinds and amounts of consumptive recreation that the herds can provide.

Although SNF recognizes the value of road closures, IDFG has noted a lack of uniform implementation of the road closure program. The North Fork and Cobalt Ranger Districts have developed good road management programs which have provided important benefits to big game. In contrast, the Salmon Ranger District has only recently begun a road management program and a program needs to be developed on the Leadore District.

Because of our concern, we request that SNF implement a more aggressive road management program to ensure that timber harvest scheduled to benefit wildlife has the greatest possible chance of doing so and that other timber harvest has minimal impacts on wildlife. Also, we recommend that SNF and IDFG enter into a cooperative access management program on SNF. Such a cooperative program should be based upon:

1. Designing roads for single-purpose use unless a need for other uses is clearly shown. Such roads would never be open for general use. This prescription would be especially applicable to areas being entered for the first time.

2. Area closures if #1 is not possible. Such closures should be year-round and "permanent".

3. Seasonal closures if #2 is not possible. Such closures should be designed to reduce sediment and provide security during critical times (calving, hunting season, etc.).

4. A strong education program to explain that closures make it possible to achieve multiple outputs.

5. A clear willingness to enforce violations of closures.

IDFG believes the goal of access management should be "No increase in the density of open roads on SNF".

Another possibility for reducing the impacts of proposed roads is to spread construction more evenly; i.e., less emphasis on new roads in Decades 1 and 2. We would like to explore this concept with SNF. What would be the benefits and detriments?

of condition. The objective was to provide information needed for very broad range power generation planning and as such the results will have limited application at a habitat management level.

The riparian issue identified during the planning process included many facets associated with coordination of resource management activities that affect riparian dependent values. The specifics on how these activities would be managed are outlined in chapter IV of the Plan. Standards and guidelines specific to grazing and timber activities are intended to provide riparian zone protection.

Many of the tables presented in the planning documents provide information that is in combined form. In many instances, wildlife and fish values are presented jointly, in other cases the values represent a combination of yearly or decadal values. This was done to provide a summarization of information and to reduce, through consolidation, the volume of information. *Outputs displayed were consistent with units (lbs. and user days) to be used* by other Forests in an effort to standardize and simplify comparisons. Specific management levels were also given in the analysis procedures Use of the minimum viable population levels ir but one example.

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

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

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

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

The actual amount of old growth retained under all alternatives exceeds the 10 percent minimum allocation. The amount retained in excess of the 10 percent minimum varies by alternative depending on several factors, including timber harvest levels and roading/logging economic feasibility

Economic Values

It is essential that all economic values used by SNF be equitable because of the emphasis on PNV. If equitability is not achieved, decisions on resource tradeoffs will be biased. IDFG believes that the values you have applied to fish and wildlife resources are low, while those applied to timber and range are high, for several reasons.

First, we do not fully understand the ramifications of handling some economic values within FORPLAN and others outside it (B-33). However, we suspect, because the model was driven to achieve maximum PNV, that this procedure could bias outputs in favor of those handled in the model.

Second, the base value of $4 22/RVD you use (II-91) is about half of the $8/RVD cited by Loomis and Sorg

Third, you use $2.81/cord of fuelwood (the cost of a permit?) but $8 94/AUM when you get less than $1.40/AUM

Fourth, IDFG urges that SNF use the economic values established by the recently completed Idaho study. These values are $50/WFUD for deer hunting, $60/WFUD for elk hunting, $85/WFUD for small game and $64/WFUD for fishing. Details are available from Lou Nelson in our Boise office at 334-2920.

Fifth, you used 1971-80 to establish stumpage values (B-31) and this may be inappropriate in light of the substantial decrease in prices recently. This decrease is probably due in part to the changes made in the mortgage loan industry in 1981--changes that are "permanent".

Sixth, you assume that demand exists for all products (IV-61, DEIS) but your discussion elsewhere clearly shows that this is not so for timber but is true for fish and wildlife. Thus, this assumption produces a bias which favors timber. Commodity outputs tend to demonstrate price elasticity to a greater extent than do amenity products.

IDFG believes that FORPLAN outputs would be different and emphasize fish and wildlife more if these problems with the economic analysis you used were corrected. Also, the economic importance of recreation, fish and wildlife to PNV would be even more dramatic than your tables show.

FORPLAN

We have already expressed some concern about the economic values used in FORPLAN. IDFG has other concerns about the appropriateness of the model.

You placed a large number of constraints on FORPLAN. Even your benchmarks were constrained. This could have made it impossible to arrive at an optimum solution or realistic benchmark. Thus, it is possible that the constraints applied to an alternative could be what determined the final "solution". For example, constraints for minumum MMBF appear to have been the primary detriment of timber harvest levels in all alternatives.

Many of these stands do not meet the stand size or distribution requirements established as mapping criteria, yet they do contribute to satisfying the needs of many old growth associated species
It would be untrue to say that there are no areas of forest land on the Salmon National Forest not capable of producing crops of industrial wood There are, in fact, many acres which probably fall into that category Those acres are included in classification 6, inadequate information, in Table II-12, page II-175 of the DEIS A final determination on these acres will be made through the next Forest inventory effort on the Salmon National Forest beginning this year While the actual current net growth is about 26 cubic feet per acre per year, the average potential productivity is about 45 cubic feet per acre per year If all of the potential could be realized, the timber productivity could be increased about 73 percent This large potential increase in productivity with management supports the desirability of continuing development of a portion of the currently undeveloped lands

We have changed this description in the FEIS to reflect the cyclical nature of mineral activity and its effect on local communities

The proposed Plan presents detailed information in chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals The sediment oriented objectives are also linked with attainment of fishery objectives Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis

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

The change in RVD's among Alternatives 5, 6, and 12 is related to hunting and fishing These are not the hunting and fishing RVD's, but RVD's incidental to the hunting activity, such as camping. The changes are a result of differing wildlife and fish populations in the different alternatives

When considering timber production level associated with the various alternatives, it is important to understand that differences in effects to other resources are based primarily on areas affected and the scheduling of activity through time Volume or amount of harvest is not intended to be a direct measure of effect on the fishery resources.

In the area of the Long Tom Complex of fires your assumption is correct, the statement you refer to (page IV-56, paragraph 4, of the DEIS) is no longer valid

On balance, IDFG would not be surprised to find that the FORPLAN outputs bear little resemblance to reality. This concern is the primary reason we did not dwell on projected outputs as much as on standards, prescriptions, goals, schedules, etc. of the RMP and DEIS.

Averaging

FORPLAN averages over large analysis areas. Effects are often estimated based upon averages for a decade or for 50 years. Such averaging can "hide" potential impacts because biological systems respond to extremes as well as averages. One way of avoiding this problem is to establish "bounded" rather than average goals. For example, a goal of "open road density will not exceed 1 mile/square mile in any KESR (preferrably even a smaller area)" could provide more protection to elk than one of "open road density will not exceed 0.2 miles/square mile on SNF." Under the latter goal all open roads could be on KESRs.

SNF has used some "bounded" goals, S&Gs, etc. We urge you to closely look at expanding this concept in the Final EIS and RMP.

Wilderness Recommendations

On May 18, 1984, the Idaho Fish and Game Commission passed a motion detailing their support for wilderness areas in Idaho. A letter from the IDFG Director to the SNF Supervisor, dated November 21, 1984, reaffirms this position concerning these critical fish and/or wildlife habitats.

The criterion used by the Commission in choosing areas to recommend for wilderness classification was conservative. They recommended only those areas where wilderness classification was deemed the only way to meet IDFG management objectives for the animals occupying these critical areas.

The Commission's recommendation included roadless areas 13942 (Anderson Mountains) and 13943 (West Big Hole). It is not essential that these areas receive official Wilderness classification, only that they remain in a roadless condition. Therefore, we have evaluated the alternatives on the basis of whether you propose development in these areas. On this basis, although Alt. 3, 8, 9, 10, and 11 do the best job of protecting these specific areas, IDFG can support Alt. 12 with the modifications suggested under Semi-Primitive Prescription above.

We believe that SNF should clearly spell out why they chose to recommend no wilderness and why (in Appendix C) each area was rejected.

Standards and Guidelines

IDFG was very pleased that SNF included a detailed section on standards and guidelines (S&G). These S&Gs, along with the monitoring program outlined, are generally excellent. However, we have suggested adding some S&Gs and strengthening others (see our "Specific Comments"). We believe riparian S&Gs should be strengthened considerably.

Although all the natural factors in pest control are not listed in the Plan, we do recognize their importance. Natural control is emphasized in the standards and guidelines for insects and disease. Refer to "Planning Issue 14" which states that pest control programs will use an integrated pest management approach which includes biological factors

Recently the mountain pine beetle has not been a problem on the Forest but it may in the future. Epidemics have been a natural occurrance in the past even before the advent of fire suppression. As stands of trees grow to larger diameter they become susceptible.

We agree that national economic events have a strong influence on the local economy; however, timber harvest also is very important to dependent communities. We estimate that a 21.1 MMBF/year harvest would provide about 200 full time timber-related jobs in the Salmon area without adversely affecting employment associated with recreation.

Your comment relating to predetermined timber harvest goals in Alternatives 3, 8, and 9 is well taken. There were, in fact, predetermined harvest floors for some alternatives. This error will be corrected in the final EIS.

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

As discussed in our recent meeting, Range Prescription 8A has been changed to state that "forage use by livestock will not be increased."

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

1. Providing properly spaced suitable leave trees for seed and shade;

2. Providing site preparation by destroying suppressed and diseased trees that prevent a suitable stand from being established and where possible scarifying or otherwise exposing a seedbed; and

We note that the Central Idaho Elk-Logging Guidelines are referenced only in those prescriptions with high wildlife emphasis. It is more important to apply the Elk-Logging guidelines in the areas managed with high to medium timber output prescriptions.

IDFG also asks that you reference Lyon et al. (1985. Coordinating elk and timber management). We hope you will follow all recommendations they make and include a statement to that effect in the final EIS and RMP. Recent work by Lyon shows that roads have a greater impact on habitat efectiveness than earlier work, including the Elk-Logging guidelines, indicates. SNF should so note and adjust their proposals, estimates, etc. accordingly.

IDFG strongly urges SNF to acknowledge, reference, and adopt the guidelines suggested by the Western States Sage Grouse Workshop. IDFG also requests that SNF reference and adopt the available antelope guidelines in their S&G section.

Ninth Circuit Decision

The Ninth Circuit Court of Appeals, in Northwest Indian Cemetery Protective Association vs. Peterson (CA No. 83-2225), found that "Adherence to the BMPs does not automatically assure compliance (with water quality standards)." We believe that SNF should examine this decision in detail to ensure that any intended use of BMPs is in keeping with this decision.

We also urge you to make sure your RMP and DEIS address mitigative measures adequately to comply with said decision. They ruled that the EIS ". . .must analyze the mitigative measures in detail. . ." and must explain ". . .how effective the measures would be." We do not think you have done this.

Likewise, have you adequately addressed cumulative impacts? They ruled that the Blue Creek EIS didn't adequately address cumulative effects because ". . .the effects were judged as 'average' increases in sediment over a period of years." If we interpret your DEIS correctly, SNF also places considerable emphasis on averaging (e.g., IV-16, IV-40 and B-9).

Finally, does your sediment model, or other impact estimates, consider the impacts of catastrophic failures or events? The court found that ". . .risks must be revealed if they appear substantial. . .(and) failure to disclose such risks in the EISs renders them inadequate."

Sales Below Cost

IDFG is indirectly concerned about this general subject because such sales are often on poorer timber sites which you will be entering (III-57, DEIS) (slower recovery, less benefit to wildlife from overstory removal, etc.), in steeper areas (more chance for erosion and mass failure), in current roadless areas (improved access, loss of security areas), etc.

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

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

We agree with your request to include a goal for bighorn sheep reintroduction in the Plan We have added the following statement to Section IV: "Explore opportunities to cooperate with the Idaho Department of Fish and Game in reintroductions of bighorn sheep in areas of suitable, vacant historic habitat."

Many specific standards and guidelines are found within the Forest management direction for specific resources, such as minerals management, timber management (where, on page IV-60, the document "R-4 Technical Guide to Erosion Control on Timber Sales is referenced), soils management, and transportation system management (IV-65).

The management prescriptions applied to key big game winter ranges (KBGWR) were discussed at length in our recent meeting; however, a point that was addressed in your letter and perhaps not clarified in the discussions was the KBGWR boundary depicted on the various alternative maps in the Plan These maps show the KBGWR that will be managed under a 4A (KBCWR) Prescription in order to meet the objectives inherent to each alternative. Maps showing what we consider to be the actual KBGWR areas are available for review at the Forest Supervisor's Office.

The intent of monitoring and evaluation is to provide an assessment of the progress achieved toward meeting the goals, objectives and standards expressed in the plan. At present, detailed monitoring programs have not been identified. Allocation of available funds can and will have an influence on the scope and intensity of monitoring and evaluation efforts. Specifics for each habitat parameter and/or species will be determined during development of the annual monitoring programs. Terrestrial parameters that could be monitored would include browse utilization, shrub density trends and pellet transects (i.e., animal use).

We appreciate your complete and objective review of our DEIS and Proposed Plan As a result of your review comments and subsequent meetings to clarify points of concern, we have made a number of changes which should provide for an even higher level of wildlife and fisheries habitat management and coordination with other resources.

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

However, IDFG believes that SNF should carefully examine this issue in light of the recent decision by Deputy Assistant Secretary MacCleery which orders a rewrite of management plans for the San Juan, Grand Mesa-Uncompahgre and Gunnison National Forests because ". . .the plans provide inadequate economic justification for selling timber at deficit prices." Does the SNF DEIS and RMP comply with this decision?

Regenerating Forests

IDFG has some serious questions regarding the prospects of SNF being able to get adequate regeneration on clearcut areas in the drier sites. IDFG personnel are familiar with several examples of past failures In fact, we are not aware on any Douglas-fir sites on SNF that have been regenerated with Douglas-fir to the point where elk hiding cover is now provided. Despite this record, we continue to see timber sales offered in ecotone areas, dry south slopes and other areas which will be extremely difficult to reforest, particularly on the Leadore District. We request that SNF proceed very cautiously with clearcutting on dry sites and Douglas-fir types.

Special Areas

IDFG supports SNF's decision on Planning Issue #20 (II-173 and III-18, DEIS).

Range Resource

The range management portions of the DEIS and RMP contain no information on how AUMs are divided between livestock and wildlife (Only by subtracting livestock from total AUMs can one reduce what AUMs might be allocated to wildlife.)

The S&G section provides no quantifiable information on how critical big game winter ranges will be managed. Without this missing information it is difficult to understand how SNF allocates the range resource. The direction is to increase AUMs but it is unclear if any of the additional forage will be allocated to wildlife.

IDFG is disturbed that SNF appears to view fair range condition as satisfactory--only poor is included in the "less than satisfactory" acreage (II-32 and 33, RMP) We believe that the goal should be to improve all ranges to at least good--i.e., that fair is below satisfactory

Riparian Habitats

In the Affected Environmental chapter, riparian habitat is only mentioned once under Range (III-36) and this refers to management objectives. Considering the documented importance of riparian habitat and the various management activities (grazing, road construction, timbering and mining) that severely impact these areas, a more detailed discussion of riparian habitat is warranted. This discussion should include total acres of riparian habitat; percentage of acres in

excellent, good, fair and poor condition; and criteria for the classification. Also, there should be a set of goals and objectives to insure proper management and improvement of degraded riparian habitat.

Key Wildlife Habitats

IDFG appreciates your recognition of key habitats for wildlife. However, we are concerned that Alt. 12 (the RMP) provides too little protection to key elk habitats on SNF. We are concerned that, over the life of the RMP much (probably over 50 percent) of the existing key elk summer ranges (KESRs) will be lost to development (roading and timber harvest). SNF apparently recognizes the importance of these key habitats as Table II-5 (RMP) illustrates that a disproportionately high number of elk occur on these "optimum habitats". Although some of these areas are protected by Rx 2A or 4B, many are not. Most of the remaining KESRs occur at high elevations, and are thus poor timber growing sites. A major flaw in the RMP is inadequate protection for these important elk ranges. We believe SNF needs to explain how these key elk ranges can be developed without a corresponding loss of elk habitat potential. It was a recommendation of the final report of the Montana Cooperative Elk-Logging Study (financed in part by the USFS) that these important moist summer range sites be identified and the integrity of the habitats protected.

SNF clearly recognizes that past timber activity has been too high for the good of other outputs (II-6, DEIS), that future harvest will occur on poorer timber sites (III-57, DEIS) where hazards to other resources are usually higher (III-56, DEIS), and that coordinating management of the various outputs will become more important (e.g., II-71 thru 73, RMP). We believe SNF is moving in the right direction but has not gone far enough. (See our Comments on Roads). One specific example will suffice here (we provide others elsewhere). You state that " . .many of these (timber harvest) areas would be left open for fuelwood gathering." (IV-34, DEIS). This means that elk must not only face the impacts of timber harvest but also increased use of the area after harvest ceases. For this reason, IDFG believes that most existing roadless areas should be entered for single-purpose use only, if at all. (See Roads for more discussion).

Stream Classification

As you recognize for elk, some habitats are more important to a species than are others Thse "critical" habitats must be identified and protected. A system of classifying habitats into more than two categories (critical and other) has substantial benefits in managing resources. SNF should adopt or devise such a system for streams.

Joint state-federal efforts are currently underway, via the Northwest Rivers Study contracted with BPA, to classify all streams in Idaho based upon their value for 5 resource categories (fish, wildlife, recreation, natural features, and cultural). This effort will be completed in 1986. We urge SNF to adopt, or at least endorse, this system. Ideally, goals, objectives, S&Gs, monitoring, and mitigation should all be specified for each "stream value class". We realize it

may be too late to do this for your current plan but you should certainly use this concept in subsequent plans.

Commodities vs. Amenities

Your narratives do not adequately discuss the relative economic contributions of amenity values such as wildlife, fish and recreation, and commodity outputs such as timber and range. Several tables (e.g. II-24(2) and IV-2) display information that indicates the extremely high values of amenity products. This information is lost in ponderous lists of tables. The preferred alternative shows a positive PNV only because amenity values are high. In all alternatives, the costs of producing the timer outweighs the return to SNF and the public. These relative values are part of the reason why IDFG thinks your Final RMP must place more emphasis on the amenities.

SPECIFIC COMMENTS

Draft Environmental Impact Statement (DEIS)

S-7 Sediment yield over natural is 37 percent for resident and 18 percent for anadromous (50 year average). This average does not realistically present sediment delivery, 50 years is too long Individual years could be devastating to the spawning potential for a stream and could eliminate three-year classes of steelhead and two-year classes of chinook salmon. A range of values would be a better statistic to present.

S-7 Riparian habitat is a valuable resource and should be included in Table S-1.

I-2 Under #3, technically ". . .National Forests are (emphasis added) ecosystems. ." is not correct. National Forests are administrative units which contain ecosystems and/or portions thereof but they are not of themselves ecosystems.

I-7 There was no mention of sedimentation as a separate planning issue nor is it integrated under any of the major planning issues Since SNF has "very steep topography. . .(and) the inherent erosion hazard is high to very high for disturbed areas. . ." (III-56), some reference to sediment control, reduction or prevention should be included under planning issues.

I-8· We urge you to add an "Issue area" to #2 that addresses the impacts of roads and road management on fish and wildlife habitats and recreation associated with these resources.

I-9· Does "Road administration" include road management (closures, use restrictions, etc.)? See our comments above on Roads and Road Management.

I-12 Under Planning Issue 18 the following primary issue areas should be emphasized:

a. How to reduce grazing impacts on riparian zones.

b How to improve degraded riparian areas to increase bank stability, increase overhanging vegetation and decrease sedimentation.

II-7 Is SNF's current policy to maintain 10 percent old growth or is this a change from current direction?

II-9: You state that ". . .sediment delivery will be limited in third order and larger streams to meet Fisheries objectives." Please specify how sediment delivery will be limited.

II-9 What constitutes "inapproprate encroachment" on an RNA?

II-42· Previous discussions have specified levels of fry survival. Failure to do so here makes comparisons difficult.

II-42: It is not clear how SNF can significantly raise AUMs for livestock and still increase elk numbers. There will probably be conflicts in these resource uses. Also, you foresee a ". . .slight decrease in forage and habitat availability for big game. . ." (II-43).

II-43 Under Soil and Water, should the first line read ". . high management intensity. . ." rather than ". . .high management density. . ."?

II-48· In the last sentence of the seventh paragraph, the terms "wildlife" and "big game" are used as if they are synonymous. We noted this in other places in the RMP and DEIS. Although habitat needs for many wildlife species are provided for if the needs of big game animals are met, this is not always the case; thus references should be specific to big game wherever appropriate.

II-54: Should the last word in paragraph 6 be "explored" rather than "exploited"?

II-72· The discussion under Wildlife and Fish implies that key elk summer ranges (KESR) are not affected although many KESRs are left open to timber harvest, thus they will be less able to support elk in the future.

II-72 You state that it will be necessary to ". . .allow sediment levels to decline on several streams in order to attain anadromous species objectives." but there is no mention of a timetable for the "decline" of sediment delivery or how it will be achieved.

II-73· There is no quantification of Range goals. How much range is in poor condition and how many acres will be improved? Under riparian ecosystems, there is also no quantification of goals or the amount of the riparian zones that is "degraded".

II-73 The discussion on Facilities, which is included for Alt. 1-11, is missing here. This omission complicates the process of comparing alternatives.

II-89. Resident fish habitat capability, as well as anadromous, should be addressed in this table.

II-90 You state that ". . .AUM's will not change" for Alt. 12 but II-73 shows an increase of 1,000 over current and 300 over Alt. 1.

II-93 Benchmark #8 is missing from this figure.

II-95: Benchmarks #2, 3, 5, and 9 are missing from this figure.

II-96 Benchmarks #5, 6, 7, and 8 are missing from this figure. (Incidentally, it would have been somewhat less confusing if you would have used letters to designate Benchmarks or Alternatives rather than using numbers for both.)

II-98 thru 140· It would have been much easier for us to evaluate various alternatives if types of habitat improvement under "Wildlife" had been separated (e.g., upland vs. riparian vs. aquatic). We would also like to see sediment reduction included under "Soils".

II-117 The miles of road construction and reconstruction by road category given here do not match the values given on page II-11. For instance, total miles of work for arterials and collectors is given as 10 here but as 18 on II-11 (recons. 10 miles of arterials in Decade 1 [1 mile/year] + const. 7 miles/year of collectors + reconst. 10 miles/year of collectors). Same applies to other alternatives.

II-162 It is not clear how SNF is going to increase habitat for big game in Alt 12 since many of the proposed timber sales in the first decade will occur on key elk ranges. Also, current levels of habitat for old growth species will not be maintained as timber sales over the next decade will occur in old growth habitats There is also no statement (as in the other alternatives) about the effects of the alternatives on state goals for wildlife. Will they be met?

II-162 and 163 You state that "anadromous capability" will remain static under Alt. 12. But II-72 says that both resident and anadromous capability will improve. Which is the case?

II-174: IDFG is trying to get authority to help SNF enforce road closures which benefit fish and wildlife. We would appreciate your support and request that you make a stronger commitment to enforcement than is implied by "minimum level"

II-175· Are there really no areas of "[f]orest land not capable of producing crops of industrial wood"?

III-2 and 3. IDFG believes that SNF should clarify the special status of anadromous fish in the discussion under "C 1." What happens to these fish on SNF can have a greater influence outside the "local area" than within it Also, it would be appropriate to add a #d to address "International influence" because of anadromous fish.

VI-98

III-5: If we were a rancher, we would be offended by the statement (paragraph 6) that ". . .amenity values of the Forest are not significant to the average rancher." In the context of this section, we think what you mean is ". . .are less significant. . .".

III-6: Likewise, we believe your reference to "younger move-ins" could promote controversy by setting up a "them vs. us" perception of resource allocation. We suggest it would be better to simply note that the business community is diverse.

III-7 We believe "Indian tribes" should be a "Social Unit" on SNF especially because of their high level of interest in anadromous fish.

III-10: Historic perspective indicates it would be more appropriate to state that "substantial fluctuations" rather than "substantial increases" are likely because of mining activity

III-10 thru 13· The Income and Jobs discussion could be improved by standardizing on either percent of the workforce or numbers employed rather than varying among sectors. Fortunately, SNF included Tables III-2 thru 4 which makes direct comparison possible.

III-19: The current nomenclature for "Dolly Varden" trout is bull trout. We suggest you reference this species as "bull (Dolly Varden) trout". Chinook salmon should also be mentioned because hatchery outputs in "years to come" will be used to seed former habitat and chinook will increase to pre-1960 levels.

III-21: Anadromous fish MIS should read "(Chinook salmon and steelhead trout)" rather than "(Salmon and".

III-22: Why are only 3 T&E species listed when page III-21 states that 4 are found on SNF?

III-24. What are the ". . .anticipated . .changes in species numbers. . ." for each management level This information is essential to adequately evaluate each alternative for least adverse effects on fish numbers.

III-25 You state that "[t]he most productive resident trout streams. . .are. . .most likely to be adversely impacted by land management activities." These highly productive resident trout streams should receive adequate protection to prevent impacts.

III-26: IDFG recently revised its list of Species of Special Concern. For your information, the current list is appended to these comments.

III-27 We note that SNF includes as map of big game winter range but not key elk summer ranges Your statement that a disproportionately high amount of annual use occurs on these optimum lands (i.e , KESRs) is a key to our ability to reach state management goals for big game. SNF should include a map of KESRs and which ones will be developed by alternative.

III-30 Under Big Game, it should be noted that demand, as measured by hunter trips through the Carmen Creek Station, dropped significantly after elk harvest was restricted to bulls only and has only recently increased after eight years of restrictive seasons. Also, antlerless deer harvest dropped considerably in the late 1970's.

III-30: We applaud your recognition of the current and increasing importance of non-consumptive WFUDs and the fact that you placed an economic value (II-91) on such use. As explained earlier, we suspect the value you have used is low but it is far superior to not attaching any value to this important product from SNF.

III-32. We appreciate the reference to IDFG's plans. In your final, *please reference the 1986-90 versions of these plans and use the* estimates contained therein.

III-33: Paragraph 3 should mention anadromous fish. Most readers will probably know this is what you are addressing but some may not.

III-33: Under Habitat Improvement, it would be more meaningful to express "Road closures" as the numbers of mile of open road that have been closed rather than number of structures. (Incidentally, IDFG believes that road closures should be considered as mitigative measures rather than as "habitat improvement" measures. The primary reason we support this belief is because of funding. That is, money for road closures to mitigate for the impacts of development upon wildlife should not come from the wildlife "habitat improvement" budget but rather should be a cost of development.

III-33. Under Range, If lands are in less than satisfactory condition, does this mean "poor" ecological condition? It would be very helpful to know the condition by vegetative type (in Table III-15). We urge SNF to provide such data in the final EIS. These data would show where the poor, fair, good, and excellent ranges occur.

III-34: The first paragraph mentions "vegetative treatment", "cultural treatment", and "vegetative manipulation" but none of these 3 terms is defined in the Glossary (Chapter VI, RMP). Please either be more specific here or provide definitions in the Glossary.

III-36 In paragraph 6, it should be noted that the strutting grounds in and of themselves are not "key habitat areas"; the key habitats are the associated nesting and wintering areas.

IV-6· *The discussion in paragraph 2 of #b. should clearly state that* no SPNM acres are recommended by Alt. 12.

IV-7· Table IV-REC3, and others in this section, would be more meaningful if SNF emphasized the existing levels of motorized and nonmotorized semi-primitive areas for comparison.

IV-8: We disagree that major increases in ORV use on SNF are unlikely. Recent technological changes, such as the new "three and four wheel mini-bikes" for off-road use are likely to increase the

amount of ORV use on SNF. Opening the entire 286,370 acres of semi-private classified land to motorized use seems likely to lead to resource conflicts. We request that you expand the discussion of effects of ORVs to make it clear that conflicts with wildlife security, elk habitat effectiveness, and level of WFUDs are expected AND that some restrictions will be necessary to reduce such effects to acceptable levels. (See also our comments under "Semi-Primitive Prescription" above.)

IV-12: Why do RVDs vary among Alts. 5, 6, and 12 when all 3 have the same acreage of Wilderness.

IV-17 The discussion for "Anadromous Fish" provides little assurance that goals can be met. You "anticipate[d]" that goals will be met rather than estimating, documenting or projecting that they will be met. Likewise, IDFG ". . .goals were basically (emphasis added) met. . ." leaves substantial question as to how well they were met. Also, the statement that "[t]here were. . .instances where projected sediment levels could interfere with meeting State agency goals in specific drainages during some decades." is not at all reassuring when working with anadromous fish. Failure to address the grazing-fisheries habitat issue in these documents (IV-18) increases our suspicion that SNF will not meet anadromous fish goals. The last statement says that "[t]*imber resource development activities associated with these higher* timber production alternatives (2, 4, 5, and 10) would increase sediment levels and alter fish habitat quality." Since Alt 12 has higher timber production than 10, it can be expected that Alt. 12 will also increase sediment levels Why was Alt 12 ignored as a high timber production alternative?

IV-19· We support USFS efforts to designate both the chinook salmon and steelhead trout as "sensitive species."

IV-20 Old growth forests may be "decadent" to a forester but they provide excellent habitat for some wildlife species. Labeling them as "decadent" sets up an image bias which we believe is unfair. They should more appropriately be called old growth or mature stands. Why was an 80-acre stand size selected?

IV-24. We urge SNF to include a column showing your goals (Alt. 12) also.

IV-25: The statement that "[n]o known. . .population of. . .(T&E species) occur on this forest. . ." contradicts the one only two sentences later that ". . .bald eagles do winter along the Salmon River and its major tributaries. . .". There is clearly a wintering population of bald eagles on SNF.

IV-26. We appreciate SNF's recognizing ". . .the need to enhance and/or maintain riparian ecosystems." However, quantifiable goals for improvement and details on how the goals will be reached are needed. Also, the statement that Alt. 12 ". . .places the greatest emphasis on. . ." coordinating grazing and other riparian dependent resources is misleading if based on what was presented in each alternative. Alt. 2,

3, 7, 8, 9, 11, and 12 stated that enhancement of riparian ecosystems in a degraded condition will be emphasized. There was nothing stated in Alt. 12 indicating that riparian habitat improvement would receive greater emphasis than under any of the above-mentioned alternatives. If Alt. 12 does place greater emphasis on coordinating grazing, then the rationale should be explained, especially considering that AUMs, MMBF and road construction would be greater than under most of the other alternatives mentioned.

IV-27 We do not understand the rationale involved in reducing grazing because of the "coordination emphasis" on upland wildlife habitats This needs to be explained. (Does "coordination emphasis" mean "conflict reduction"?)

IV-31 We note that 68 percent of the timber harvest will come from ponderosa pine (18 percent) and Douglas-fir (50 percent) stands. These timber types provide the most important elk habitats and have historically been the hardest to regenerate on SNF. Our concerns over regenerating Douglas-fir are expressed in the General Comments section. The emphasis on harvest in these types will lead to conflicts with wildlife goals. We suspect this is why SNF cannot meet state wildlife goals under the preferred alternative.

IV-32 The paragraph on reforestation does not adequately address the poor performance of regeneration on naturally occurring (selection cuts) and planted Douglas-fir sites SNF should explain that many Douglas-fir sites must be replanted to lodgepole pine to get adequate regeneration and that lodgepole is a less desirable species from the wildlife and timber market perspectives.

IV-37 The discussion of the adverse impacts of road construction is weakened by the use of qualifiers and omissions. In paragraph one, there is no mention of disturbing wildlife or the possibility of long term additions of sediments. In paragraph two, visual quality will (not may) be degraded over the short term. In paragraph four, most wildlife habitats will (not may) be degraded in the short term. Some losses will be long term if the roads receive constant use. The impacts may (not can) be minimized by timing, intensity, etc and can be reduced by an aggressive road management program as we recommend above.

IV-40 Short term was defined as 10-15 years, If sediment levels are expected to be higher than "normal" for that length of time, then there is a high probability that fish production could be reduced or eliminated from that area We applaud your presentation of peak rather than decadal-average sediment rates.

IV-41 In the first paragraph, Alt. 2, 4, 5, and 10 are listed for highest sediment levels over natural. Inspection of Table IV-WS2 reveals that Alt. 12 is higher than Alt. 10 and, therefore, should be included in the above list. This same apparent bias to portray Alt. 12 in a more favorable light was noted elsewhere in the DEIS (see above under IV-17). Such "discrepancies" produce, or at least encourage,

skeptical reviews of the DEIS and RMP and we urge you to correct these "discrepancies" in the final. Subsequent cases of this bias will not be mentioned.

IV-42: We support your recognition of the unique and sensitive nature of riparian areas You should either be more specific here as to how you will protect these areas while harvesting timber or reference the section where you supply specifics. Any timber harvest that would significantly impact riparian zones should be prohibited.

IV-43. Implementation and application of management requirements should be a high priority and not be exclusively dependent on "adequate time" or "sufficient" funds as you state under Grazing Essentially, you have told us you have great plans for riparian-grazing coordination but don't get your hopes up when it comes to implementation. We expect the final EIS to demonstrate a much stronger commitment to implementing management requirements.

IV-45. We note that Alt. 12 has the least acres withdrawn from mineral entry. Are there no areas on the SNF (outside FC-RNRW) that should be protected from mining to protect other resource values? We believe there are

IV-52: We suggest you change sentence 2 of paragraph 3 to read "Roads alter wildlife habitats, reduce habitat effectiveness, adversely impact wildlife, and reduce the consumptive opportunity (WFUDs) that the wildlife populations can supply."

IV-56. The first statement in paragraph 4 may not be true after the 1985 fire season.

IV-57 There is no discussion of the importance of natural factors, i e , bird populations, in the control of forest "pest". The use of natural controls strengthens the argument for maintaining diversity and healthy ecosystems.

IV-58 This build-up of insects in lodgepole types may be symptomatic of an ecosystem that has been tampered with by man (i e , fire suppression).

IV-61 We recommend that SNF also mention maintaining genetic diversity as a resource that cannot be valued?

IV-62 thru 68. The general discussion of how various "user groups" would be impacted by amenity vs. commodity leaning alternatives is noteworthy. We observe that in the narrative, of the 11 identified groups, only three would most benefit from Alt. 12 (loggers, miners, ranchers), and 7 groups would benefit more from Alt. 3, 8, 9, 10, and 11.

IV-70 and 71 The discussion of Alt 3, 8, 9, and 11 is biased toward possible negative impacts There is no discussion, for example, of how a recreation-oriented community might provide a more stable economy than one dependent on mining or timber. Also, Alt. 11 " would

likely result in fewer ranchers. . ." whereas Alt 4 ". .would result in. . .more agricultural (ranching) workers." even though AUMs for these two alternatives are nearly identical (S-8).

IV-72· We question whether SNF will be able to provide a stable economy under Alt. 12. The national economy and timber prices (demand) have much more effect on the economy, as has been demonstrated over the past few years. The recreation-based economy has been an important stabilizing force for local businesses in recent years.

IV-74 This table is interesting but, without substantial discussion, the last column does little more than justify selection of Alt. 12.

IV-92· It is true that Wilderness designation is an irretrievable commitment of commodity resources. But it is not an irreversible commitment, especially for nonrenewable resources The removal of 224,245 acres from roadless designation during the first decade of management under Alt. 12 will have serious negative impacts on our options for elk management on SNF. Development of unroaded areas constitutes an irretrievable loss of unroaded hunting opportunity.

IV-94. We recommend you add ". .and could be irreversible if a unique gene pool is lost." to the end of the second paragraph

IV-94 The allocation of forage to one use (e.g., livestock) is an irretrievable loss to another user (e.g., wildlife) just the same as land allocated to Wilderness is lost from the timber base.

IV-94 A decision to not harvest trees is only a loss of the wood fiber and associated jobs since trees on site provide benefits to wildlife, water quality, recreation, etc.

IV-95: Paragraph 4 should clearly state that establishing long-distance migratory populations via transplants is difficult for fish and essentially impossible for mammals.

IV-97 Developed sites preempt forage use by all herbivores not just livestock.

IV-98 Why is there no discussion on negative impacts of timber access roads associated with timber harvest on elk vulnerability?

IV-102· Please change the last paragraph from " . .may also be thought of as. . ." to " . .is a. . ."

Appendices to DEIS

B-93: You state that there was no predetermined timber harvest goal for Alt. 3 but B-103 lists an 8 MMBV harvest floor constraint. Same comment applies to Alt. 8 (B-118) and 9 (B-122).

C-83 Rx 2B acreage for Alt 12 is given as 9,179 but II-97 shows that 2B is not used in Alt. 12. Is the 9,179 figure on the wrong line in this table or is the error elsewhere?

C-93 The statement that ". . .no resource activities are predicted which would preclude (future) consideration. . .for wilderness . ." appears to be contradicted by assignment of acreages to Rx 5D, etc. (C-94).

E-20 If we remember correctly, you exclude land from the timber base that cannot reasonably be regenerated within 5 years. How does this relate to the second sentence under #A.1. which has ". . .an average regeneration period of one decade." (emphasis added)? See also pages E-26, E-28, E-33, E-36, E-39, and E-41.

E-25: We are pleased to see this list highlighted. We recommend improving these S&Gs by making the following changes

#1. Replace "support" with "supply habitat potential for".

#2. Replace "support" with "supply habitat potential for".

#5. Omit "If silviculturally and economically feasible".

#7. This statement is too general We recommend that the Central Idaho Elk Logging Guidelines be referenced here.

E-48. "When possible," should be removed from S&G #3.a. Also applies on pages E-51 and E-54.

E-68 We recommend that General Direction #(CO1)2. be changed by substituting ". . .be set so that the needs of big game have priority " for ". . .not be encouraged."

Land and Resource Management Plan (RMP)

II-22 We recommend you add a table for resident fish similar to Table II-5 so that habitat condition is provided. You should also include criteria for classification.

II-28: This table is excellent. Please add "Eliminate livestock competition" to the Potential column for bighorn sheep (in recognition of the fact that livestock management is the key to expanding bighorn sheep into unoccupied historic ranges.) Also, please add "Improve riparian management" under Resident Trout.

II-29· How many Acre Equivalents are necessary to meet SNF and IDFG goals?

II-32 We note that nearly half the suitable acres are in fair or poor condition and most (88 percent) acres have either no apparent trend or downward trend. Your proposal to increase grazing under Alt. 12 is in conflict with these range data. Until SNF is able to upgrade forage conditions and ecological trends, there will continue to be conflicts between domestic livestock use and other resource values. Has SNF been able to identify wildlife-livestock conflict areas? If so, these areas should be mentioned. It would be very helpful if you would show trend by condition class rather than Forest-wide.

II-33 The heading for Table II-10 should read "M Acres. . .". Also, using "poor" in Table II-9 and "less than satisfactory" here is an inconsistency that should be omitted. A "0" should be added in the blank in column 2. We also suggest that you include a line for riparian habitat.

II-34. Table II-10A would be more meaningful if AUMs allocated for wildlife were included for comparison with livestock AUMs.

II-35 and 35a It would be better if SNF specified AUMs allocated to wildlife rather than leaving the impression that wildlife gets what livestock doesn't take. Adding these figures would clearly show that SNF had made a commitment to supply "X" AUMs for wildlife

II-36 The second Feasibility statement gives no indication of how likely it is that the obvious need for improvement (see II-32 above) will occur. In contrast, the first Feasibility statement indicates the likelihood of success. Also applies to Feasibility statements 1 and 4 on II-37 and 1 on II-38.

II-42: IDFG is familiar with many sites on SNF where regeneration of Douglas-fir has failed completely. You should include a discussion here of the problems involved with regenerating Douglas-fir. It matters little if you have an approved prescription written by a certified silviculturist if you end up having to plant lodgepole pine on Douglas-fir sites. (See our General Comments, also).

II-46 thru 50· Because it is so important to fishery resources, sediment production should be specifically addressed in this section.

II-49· How many miles of road does 314 acres represent?

II-54. The mention of a ". . .76,749 acre Lemhi Range proposed Wilderness. .is confusing since Alt. 12 proposes no additional wilderness.

II-72· Road management also includes, in IDFG's view, enforcement. We request that you add "enforcement" to this list.

II-85. The road management discussion should also mention the benefits of closures to fisheries (reduced sedimentation) and to recreation (maintenance of high numbers of WFUDs).

IV-1· The first statement under Wildlife and Fisheries implies that SNF's goals will not meet projected increases in deer and elk populations called for in IDFG's 1986-90 Species Management Plans. We request that SNF's goal be sufficient to meet these projected increases.

IV-2 We recommend that SNF include a goal statement supporting reintroduction of bighorn sheep into suitable vacant historic habitats. Please also add goals for reducing sediment yield (because of the documented potential negative impacts of excessive sediment) and improving degraded and/or protecting satisfactory riparian habitat.

IV-4· Under Facilities, change "Develop and maintain. . ." to "Develop, maintain, and manage. . ." to reflect the fact that, for certain resources (e.g., elk), management of roads is critical

IV-19. S&G #a should be strengthened by adding ", whichever is higher" at the end.

IV-22 We believe General Direction #(CO1)3. could seriously impair our bighorn sheep reintroduction program. Please modify this statement so that bighorn reintroductions will not be prevented because of perceived or potential conflicts with livestock

IV-25 Under #10 and 11, maximum forage utilization levels should be quantified to make this guideline meaningful We suggest that SNF consult the SNRA portion of the Sawtooth Forest Plan for guidance on streams with anadromous fisheries.

IV-32 Utilization levels for #2 and 3 should be quantified.

IV-33· We urge SNF to omit ", and if necessary to achieve riparian area goals" from General Direction #13 IDFG believes that riparian acres are too important to be used as driveways.

IV-44· General Directions #19 and 20 should be strengthened by eliminating the portions following the commas

IV-47 General Direction #7 is good but not specific enough You should have a set of S&Gs for rehabilitation of disturbed areas. SNF should also expand #7, and associated S&Gs, to emphasize preventing or minimizing sedimentation due to ongoing activities.

IV-66: We recommend that SNF include S&Gs for open road densities in key elk summer ranges. There should also be a S&G to define ". . significant accelerated sedimentation " (#6) Likewise, a S&G is needed to define ". . .a significant amount. . " in #3

IV-67 A S&G defining ". . .serious and adverse. " should be added under #4.

IV-68 Refer to comments IV-66 and 67 above.

IV-84 As mentioned elsewhere, IDFG urges SNF to set higher objectives for deer and elk habitat capabilities

IV-84· Either here or under Soil and Water (IV-85), SNF should give an objective of reducing sediment yields in all important fish habitats.

IV-92 You state, and we concur, that unroaded KESRs will support the majority of the population of hunted species We cannot find an account of how many acres are considered KESRs and how many of these acres will be roaded and logged per decade It is not possible for IDFG to evaluate the impact of any alternative without this information. This information should be provided.

IV-93 SNF should include a timetable for correction of migration barriers and reduction of sediment to attain anadromous objectives.

IV-94 It is quite difficult to get a good idea of what road building activity will occur on SNF. Part of this difficulty arises from your presentation of several different values (e.g., IV-94) (RMP) gives miles associated with timbering whereas IV-97 (RMP) gives miles of arterials and collectors, both the above are for Decade 1 whereas IV-52 (DEIS) gives a 20-year average and S-9 gives a 50-year average). A more important cause of this difficulty is inconsistencies in seemingly comparable parameters (e g , Decade 1 average miles/year is given as 55 on II-161 (DEIS) but as 66 (46 + 20) on IV-87 (RMP)). IDFG is deeply *concerned about the effects of increased access upon wildlife,* especially big game populations and hunting WFUDs. Evaluating your proposal in light of this concern is unnecessarily complicated by the inconsistencies noted.

IV-109 We are pleased to see management emphasis on key big game winter ranges applied under this prescription. However, the S&G section should be strengthened by quantifying the amount of forage utilization allowed to domestic livestock on critical winter ranges We also noted that the critical big game winter range in Pattee Creek (including High Creek and Wade Creek) on the Leadore Ranger District has livestock management emphasis. We found no winter range prescriptions on the Salmon Ranger District along the main Salmon River although there are many areas of important winter range for big game. We would like to work closely with SNF to ensure that these key ranges are accurately portrayed on the final map.

IV-112: We believe that Rx 4B, as applied to KESRs, will offer significant protection to these important habitats. The S&Gs are good. However, several KESRs were given management prescription favoring timber production or livestock emphasis. The KESRs outlined and displayed on the Alt. 3 map all deserve protection under this prescription. We find the narrative and maps to be deficient in not explaining clearly the impact of each alternative on KESRs. Because these areas are critical to our ability to reach management goals for elk, it is important for SNF to provide this information. We estimate that the preferred alternative will impact over 50 percent of the existing KESRs during the life of the plan. Maintaining elk numbers, if this happens, will be difficult at best and will necessitate restrictive regulations by IDFG (substantial reductions in WFUDs available to hunters).

V-2 We urge SNF to make austere use of categorical exclusions because of the difficulty of predicting on-the-ground effects of specific projects from the general analysis, etc. provided in the DEIS and RMP.

V-6 IDFG does <u>not</u> conduct annual surveys for SNF's big game indicator species. We doubt whether our periodic surveys, which often are herd composition counts (not population trend flights), will provide adequate monitoring data for your purposes.

V-6 A deviation of ± 25 percent is too large SNF could, for example, provide habitat for 14,000 mule deer rather than the 18,600 goal and not trigger "further evaluation."

V-6. What deviation criterion applies to habitat improvement?

V-6 Only two reviews for S&G conformance will provide a very small sample. How will these two projects be selected?

V-6 thru 20 MIH numbers are missing for several entries

V-7· A deviation of ± 20 percent in habitat is too great.

V-9· A 10-year reporting frequency for size of openings is too long because it allows no time for corrective action prior to plan revisions. We recommend 3 years.

V-11 Reporting period for channel stability should be 3-5 rather than 5-10 years

VI-50 and 52 Neither WFUD nor Wildlife and Fish User Day is listed.

ERRORS

We did not make any attempt to peruse the documents for errors. However, several were noted and are offered below to aid SNF in revising these documents. They are listed by document, page number and location on that page.

Page	Location	Error
S-3	7 lines up	crusts to crests
II-4	B.1.	first sentence is incomplete
II-39	Headings	remove hyphens preceding 2 headings
II-44	Headings	remove hyphens preceding 1 heading
II-45	Headings	remove hyphens preceding 2 headings
II-50	Headings	remove hyphens preceding 2 headings
II-51	Headings	remove hyphens preceding 1 heading
II-56	Headings	remove hyphens preceding 3 headings
II-62	Headings	remove hyphens preceding 2 headings
II-63	Headings	remove hyphens preceding 1 heading
II-68	Headings	remove hyphens preceding 2 headings

II-69	Headings	remove hyphens preceding 1 heading
II-89	#3	last sentence repeated
II-91	Col. 2	Uplan to Upland
II-92	Last line	bring to bringing
III-20	#3, line 14	enroute headwater to enroute to headwater
III-20	#3, line 26	Forest In in to Forest is in
III-22	5 lines up	Grey Wolf to Gray Wolf
III-30	2-6 lines up	verb tense problem
III-39	9 lines up	use Is to use In
III-49	15 lines up	ineffect to in_effect
IV-8	line 18	developmnent to development
IV-14	line #11, Col. 2	blank should be -0-
IV-14	line #11, Col. 3	830469 to 830,469
IV-55	4 lines up	wildlife to wildfire
IV-55	*last line*	*wildlife to wildfire*
IV-59	2 lines up	yaintained to maintained
IV-73	10 lines up	(2) to (3)
B-10	13 lines up	warrent to warrant
B-93	*#1, Col. 2*	*leld to yield*
RMP		
II-6	7 lines up	grey wolf to gray wolf
II-6	5 lines up	grey wolf to gray wolf
II-38	9 lines up	add "Feasibility:" heading
II-41	line 4	some have parentheses, others don't
II-59	Column #(6)	update lines #1, 3 and 4
II-60	4 lines up	4 Protection to 4 Potential

II-63	9 lines up	571 person to 571
II-66	* footnote	punctuation problem
II-68	line 1	for to from
II-72	line 15	1835 to 1,835
IV-4	19 lines up	natural to renewable?
IV-32	line 10	bark to bank
IV-32	lien 15	rigor to vigor
IV-32	line 22	ate; gradient to ate gradient,
IV-32	line 27	bark to bank
IV-34	line 6	sales to sales,
IV-87	line 18	construction to reconstruction
V-2	15 lines up	Projects of to Projects or
V-6	T&E line, Col. 2	Grey Wolf to Gray Wolf
V-8	Entry 2, Col. 7	AMA to AMP

CONCLUSIONS

IDFG cannot support Alt. 12 (preferred) because it will not meet our goals for increases in big game and other important wildlife populations. We believe the minor changes in management, from current direction, still result in a program that emphasizes commodity outputs at the expense of amenity values such as wildlife, fish and related recreation opportunities. This emphasis on commodity outputs cannot be justified on an economic basis, and apparently is not what most Salmon Forest users prefer. The preferred alternative will have negative impacts on amenity values which are very important to the stability of the local economy. SNF indicates, on page IV-23, DEIS, that the Preferred Alternative is ninth out of 12 in providing for wildlife benefits. From our viewpoint, this is justification for rejecting the Preferred Alternative, obviously there are seven other alternatives which provide significant benefits over the current situation or the Preferred Alternative.

It is also significant that only three of the 12 alternatives would impact more roadless areas than Alt. 12 (IV-13 and 14, DEIS). This hardly seems like a balanced approach to roadless area management and will have significant effects on elk management by IDFG in the future.

Alternatives 9, 8, and 3, in that order, would be far preferable to Alt. 12 because they.

1. Protect key wildlife habitats better.

2. Propose fewer miles of road construction/reconstruction.

3. Propose greater use of range prescriptions #6 and 7 which are better for wildlife than #3 and 4.

4. Would require a smaller, more probably attainable, budget.

5. Have higher PNVs.

6. In our estimation, have higher NPBs.

SNF should provide additional information so reviewers can identify areas of obvious resource conflicts. In particular, a map is needed showing key seasonal wildlife ranges, range condition problem areas and timber sale/wildlife conflict areas Also, tables showing how forage is allocated, range trend by condition class, and riparian condition should be added

We believe the RMP represents a step in the right direction toward allocating resources, but the preferred alternative provides too little change and will not prevent conflicts and confrontations between forest user groups in the future. SNF should combine elements of Alt. 12 with those of Alt 9, 8 or 3 to produce a Final RMP that adequately protects wildlife habitats necessary to meet State goals and still provide sufficient timber and forage to support those segments of the local economy. SNF should emphasize commodity outputs only to those lands where significant direct conflicts with nonmarket opportunities will not occur.

Again, we appreciate this opportunity to provide input on the management of the very important fish and wildlife resources on SNF You have made an excellent beginning and we look forward to working with you in the development of the Final EIS and RMP. Jointly, SNF and IDFG can manage the critical fish and wildlife resources on SNF to provide maximum public benefits.

R9PC183TV

0049

ATTACHMENT A (1985 LIST OF SPECIES OF SPECIAL CONCERN)

Several species have restricted range, specific habitat requirements and/or low numbers which may make them vulnerable to elimination from the State Some species may be included in this category because our knowledge of them is limited and not because they are, in fact, threatened. This classification may be used as a basis for preparing, in conjunction with other state and federal wildlife agencies, a state list of threatened and endangered species.

Species	Specifics given in
Kit fox	Carnivorous mammal section of this plan
Wolverine	Carnivorous mammal section of this plan
Lynx	Furbearer plan
Fisher	*Furbearer plan*
Idaho ground squirrel	Noncarnivorous mammal section of this plan
Ferruginous hawk	Raptor section of this plan
Merlin	Raptor section of this plan
Boreal owl	Raptor section of this plan
Trumpeter swan	Water bird section of this plan
Long-billed curlew	Water bird section of this plan
Sharp-tailed grouse	Prairie grouse section of upland game plan
Mountain quail	Quail section of upland game plan
Bobwhite quail	Quail section of upland game plan
Ringneck snake	Reptile section of this plan
Longnose snake	Reptile section of this plan
Western ground snake	Reptile section of this plan
Night snake	*Reptile section of this plan*
Roughskin newt	Amphibian section of this plan
Wood frog	Amphibian section of this plan
Van Dyke's Salamander	Amphibian section of this plan

STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

0073

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

SALMON N E
COPY
PC

JAN - 8 '86

INFO ☐ ACTION ☐
SUP
LMP 1 2 3 4 5 6
TAF 1 2 3 4 5 6
ELM 1 2 3 4 5 6
PTWW 1 2 3 4 5 6
AO 1 2 3 4 5 6

Jcc Jensen 1/7/86

December 31, 1985

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

Dear Mr Hauff

Our comments on the Draft Salmon National Forest Plan and Draft Environmental Impact Statement are listed below Our review and comments are based on the Idaho Water Quality Standards and Wastewater Treatment Requirements (1985), the Idaho Regulations for Public Drinking Water Systems (1985), and the Rules and Regulations for the Control of Air Pollution in Idaho (1985)

VI-106

In regard to the Water Quality Standards we have reviewed the Draft Plan primarily from the standpoint of control of nonpoint source pollution and protection of beneficial uses of state waters The pertinent sections of the Standards which apply to this review are Section 1-2050 02 (c) and Section 1-2050 06 of the administrative policy The first section requires that "in all cases, existing beneficial uses of the waters of the state will be protected" The latter section recognizes that best management practices are the most effective mechanism for controlling nonpoint source pollution, but where degradation occurs, such degradation shall not seriously injure a designated or protected beneficial use Serious injury is defined as "Sustained damage to a designated or protected beneficial use which is not socially or economically justified"

EQUAL OPPORTUNITY EMPLOYER

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date

Lee W Stokes, Ph.D., Administrator
State of Idaho
Department of Health and Welfare
Division of Environment
Statehouse
Boise, Idaho 83720

Dear Dr. Stokes

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

The legal minimum population levels addressed during Plan development and analysis was mandated in the National Forest Management Act and was identified as Minimum Viable Population (MVP) levels Incorporated in the MVP concept was the consideration of actual population numbers and population distribution Genetic diversity was an integral consideration in the analysis process. Reference to population parameters (i.e., pounds of fish) contain the concern for distribution of fish in all available habitats

Many of the tables presented in the planning documents provide information that is in combined form. In many instances, fish values are presented jointly, in other cases, the values represent a combination of yearly or decadal values. This was done to provide a summarization of information and to reduce, through consolidation, the volume of information The analysis, however, was done using species-specific and habitat-specific information. Outputs displayed were consistent with units (lbs. and user days) to be used by other Forests in an effort to standardize and simplify comparisons Specific management levels were also given in the analysis procedures. Use of the Minimum Viable Population levels is but one example

The Proposed Plan presents detailed information in chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species and in all drainages. The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals in all drainages. The sediment-oriented objectives are

FS 6200 28(7 82)

SEDIMENT- FISHERIES

Fisheries is the beneficial use which has the greatest potential to be impacted by Forest management activities Sediment from road construction and timber harvest is the critical paramcter which has the potential to impact this use We have examined the Draft Plan closely to see how this issue is addressed

The rationale behind establishing a legal minimum for fisheries should be explained in the EIS The Plan correctly notes that the legal minimum under State Water Quality Standards has not yet been determined.

The legal minimum for fisheries is described in the Analysis of the Management Situation (Page II-21, Plan) and Draft EIS (Page IV-15) *Table IV WL1 lists legal minimums for resident and anadromous* fish based on interpretation of what constitutes a 'minimum viable' population The source of the term 'minimum viable' and interpretation of its meaning as a basis for establishing a legal minimum should be fully documented

At the present time the State has made no further interpretation of what the Water Quality Standards mean in terms of percent habitat capability as used in Table IV WL1 The Draft Plan correctly points out that the legal minimum may change when this issue is resolved The Board of Health and Welfare reserves the authority to promulgate Water Quality Standards and make interpretation of existing regulations Any future refinement of the State Standards by the Board of Health and Welfare will become the legal requirement for the National Forests

Average habitat capability is not meaningful in relation to State Water Quality Standards The State Standards apply to beneficial uses in individual streams

Average values for legal minimums and existing habitat capability are presented for resident and anadromous fish categories This may be useful for presenting the impacts of alternatives, but cannot be used for interpretation of state law The State Water Quality Standards require protection of beneficial uses where they occur Averaging to meet a standard implies that some drainages may be allowed to be damaged as

VI-107

also linked with attainment of fishery objectives through the influence of fire sediment. The *sediment/fish response relationships* used in planning analysis indicated that steelhead are influenced to a greater degree by sediment than are chinook salmon. Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis.

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

Municipal watersheds, or watersheds providing a water supply for several individuals are located in Jesse Creek (City of Salmon), Spring Creek (Cobalt townsite), and Anderson Creek (Gibbonsville). The Salmon municipal watershed is administered by the Municipal Watershed Plan, approved in 1975 by the Salmon District Ranger, and a 1939 cooperative agreement. Most land management activities, such as logging and grazing, are restricted in this drainage.

The Cobalt townsite watershed (Spring Creek) is managed for a variety of uses as the water supply source is entirely springs, and not stream flow. Timber harvest and other activities are constrained such that watershed stability is maintained. Density of activity will continue to be constrained such that water yield characteristics of the basin are not significantly altered from current conditions. Since no surface flows are involved in providing water to the Cobalt townsite, major management concerns are the maintenance of infiltration rates and subsurface flows.

Water is temporarily stored in *a small pond near the mouth of* Anderson Creek, where it is then distributed by an open ditch system to several residences. No water quality treatment (bacterial or turbidity) is applied to the water A recent private land and Forest Service trespass incident caused damage to stream channel conditions in the lower reaches of the watershed Timber harvesting practices provided no protection to the watershed resource Any timber harvesting activity on National Forest lands within Anderson Creek will include extensive mitigation measures to protect surface water quality. Through the use of field reviews, and cumulative sedimentation and water yield modeling, watershed stability and water quality will be maintained at a high level; however, with no water quality treatment, and the use of open ditch transmission systems, seasonal water quality degradation will continue to occur, until the community installs a water treatment facility and a closed distribution system.

In regards to your comments regarding a water resource monitoring program, much of the impacts on downstream beneficial uses will be evaluated through the monitoring of the fisheries resource, as described on page V-7 of the Plan. Monitoring techniques such as core sampling, embeddedness measurement, *redd surveys and fish counts will be used to evaluate* impacts of land

long as an average condition is maintained on the Forest This is not consistent with the policy of the Standards and should be clarified in the Final Plan

The Analysis of the Management Situation is incomplete with respect to fisheries habitat information The Final Plan should display the existing habitat capability Displaying the baseline condition is essential to understand what the environmental consequences of the various alternatives are

There is little information presented in the Draft Plan for the reader to understand what the existing condition of streams are on the Forest and what the quality of the data is that supports this information A display of the existing stream condition is critical to understanding what the effect of the proposed Plan is as well as establishing a baseline from which progress of the Plan can be measured The Final Plan should include

1 A list of the unit watersheds and their size, e g., third order drainages

2 The indicator species of fish used in the analysis of the Plan as well as a list of other species which occur in the drainage

3 The existing habitat capability with respect to sediment where known, the source of the data, and the quality of the data base It should be noted also for what streams data are not available

4 The effect of the proposed plan of action on the existing habitat quality

5 Documentation of the analysis procedure used to predict impacts on fisheries as a beneficial use of water

The relation between fisheries standards and allowable sediment yields need to be clarified in the Final Plan

The relation between sediment standards (Page II-21, Plan), the fishery standards and guidelines (Page IV-20, Plan) and the appropriate sediment levels (Page IV-16, EIS) shown for alternatives is confusing It is

management activities on the water quality and aquatic habitat These data, in turn, will be used to further calibrate the prediction models being used to assess cumulative sedimentation and water yield effects of land management activities

The 10-year habitat management program identified in Appendix D (page VII-D-2 to VII-D-7) is intended to be a dynamic program responsive to budget levels and habitat needs Wildlife and fish population levels identified in the plan were not dependent upon the habitat improvement program Coordination of wildlife/fish objectives with other resource activities was the key component in meeting population production objectives Improvement projects can and will enhance habitat effectiveness, but other habitat management elements (i e , inventory, monitoring and coordination) will be responsible for attainment of the population objectives

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

difficult to understand what the impact of the proposed plan will be based on these various percentages The controlling standard for anadromous fisheries appears to be the standard on Page IV-20, i e , to manage anadromous fish habitat to supply and maintain 90 percent or more of its inherent smolt production However, this standard is not consistently applied throughout the rest of the document

Sediment yield over natural of 85 percent for resident fish shown for the preferred alternative in the EIS (Page, IV-16) is inconsistent with the percentages (25 or 54 percent) shown on page II-21 in the Draft Plan These differences need to be reconciled There is no rationale presented in the plan to support these increases in sediment yield with respect to resident fisheries

The cumulative effects of timber management, grazing, mining, and dewatering on fisheries should be analyzed in drainages where these impacts may occur together

In the Draft Plan the analysis regarding fisheries is limited to the effects of timber harvest Impacts from grazing and mining in a watershed in addition to the impact from timber harvest needs to be considered in the analysis These cumulative effects should be addressed on a watershed basis The only feasible way to do this is develop watershed specific Environmental Impact Statements Individual EA s are generally restricted geographically or are too narrow in focus to integrate the potential cumulative impacts from various sources The analysis in the Forest Plan EIS cannot be specific enough to address these concerns adequately

To summarize our comments on the fisheries analysis, we believe that the information presented in the Draft Plan is inadequate in the following respects The baseline condition is not presented, the analysis procedure is not explained, the assumptions used in the model are not stated, the sediment criteria used for anadromous and resident fisheries is not consistent throughout the document, and cumulative effects from several potential sources are not addressed in the analysis These deficiencies create confusion regarding what the actual impacts or improvements in stream conditions will be when the Plan is implemented The Proposed Plan may set direction for major improvement over existing conditions, but, this does not come across clearly in the Draft Plan We believe that the missing information is available and can be presented in the Final Plan

VI-109

0073

DOMESTIC WATER SUPPLY

We support the statements made in the Draft Plan regarding protection of public water supply watersheds (Page IV-46 and 47) Protection of these watersheds is a high priority with the Division of Environment We would like to see more specific standards and guidelines developed for these watersheds in the Final Plan The standards and guidelines should address careful control of Forest activities which may result in an increase in turbidity, sediment, bacteria, or organics in these watersheds The guidelines should also address the maintenance or enhancement of an adequate supply of water As an alternative to standards and guidelines the Final Plan could indicate the development or updating of Municipal Watershed Management Plans for specific communities as a future task Division of Environment would like to work cooperatively with the community and the Forest on the development of these plans

MONITORING

The section on monitoring in the Draft Forest Plan is inadequate with respect to water quality A detailed monitoring plan should be developed as part of the Final Plan

A carefully designed and adequately-funded monitoring program is an essential part of water quality management on the Forest Without this information it will be impossible to determine if Forest objectives and standards as well as State Water Quality Standards are being met Monitoring programs on National Forests have been inadequate in establishing the baseline condition and trends in parameters which effect beneficial uses Where data is not available to support planning assumptions in specific project Environmental Assessments, our only recourse in reviewing the document is to be conservative on the side of environmental protection This may unnecessarily impede environmentally sound Forest activities Potential conflict can be resolved by establishing an adequate monitoring program on the Forest

The monitoring plan should include baseline/trend monitoring, project monitoring, and calibration of predictive models The monitoring plan should address the impacts from major activities which occur on the Forest-timber harvest, grazing, mining- with respect to beneficial uses

A lack of supporting baseline data is evident in the Draft Plan with respect to the impacts of sediment on fisheries There is no data presented to support the assumptions made in the Forest Plan A complete inventory of the existing status of fishery streams with respect to deposited sediment should be initiated Appropriate parameters are percent fines or cobble embeddedness in spawning and rearing habitats

We appreciate the opportunity to review the Draft Forest Plan and Draft EIS Our intention is to provide constructive comments which will assist you in formulating the Final Forest Plan If you would like to discuss these comments or need further clarification, please contact Steve Bauer at 334-4250

Sincerely,

Lee W Stokes, PhD
Administrator

LWS:par
cc JS Tixier, Regional Forester
L McKee, EPA
R Burd, EPA
A Murrey, IDHW
Jan Jensen, Governor's Office

0532

IDAHO DEPARTMENT of PARKS & RECREATION

John V Evans, Governor

Robert L Meinen, Director

December 20, 1985

JAN 27 '86

Info 0 Action 1

SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
PRVW	1	2	3	4	5	6
AO	1	2	3	4	5	6

ZCC STO

Mr Richard T Hauff
Forest Supervisor
Salmon NationalForest
P. O. Box 729
Salmon, ID 83467

Dear Mr. Hauff.

Thank you for providing us with the opportunity to comment on the Proposed Land and Resource Management Plan for the Salmon National Forest

We found portions of the Plan difficult to read and the text difficult to relate to the maps. We are outdoor recreation professionals, but found some sections unintelligible without an explanation which never came. What, for instance, do the class numbers mean on the "Site Development Scale"? And, what are the "Frissell condition classes"? We also found reference to standards for which we were unable to find an explanation.

VI-111

Your selection of Alternative 12 as the preferred alternative surprises us, as measured by Present Net Value (PNV), it shows lackluster economic efficiency. Your selection of Alternative 12 surprises us for another reason, it calls for an annual cut of 21.147 MMBF of timber when the Plan states elsewhere that only 10.6 MMBF will sell. Alternative 12 also sets relatively high road-building targets. Are the roads quantified in Alternative 12 required for a 21.147 MMBF or a 10.6 MMBF harvest?

Road construction and timber harvest directly affect recreational use of the Forest, therefore, we question them. In addition, it appears to us that timber harvest on the Salmon National Forest will be a losing proposition for the Forest Service, costs typically exceed benefits.

We are surprised that the Plan recommends no Wilderness. You identified 830,469 roadless acres. Does none of it qualify as Wilderness?

Many ORV enthusiasts will be disenfranchised by the Plan. The areas placed in the Semi-Primitive Motorized ROS Class are fragmented and, individually, usually too small to provide an acceptable trail riding experience. A skilled trail biker will often ride between 60 and 100 miles in a day. Some of the areas proposed for SPM management do not have adequate trail systems. Areas proposed for intensive timber harvesting sometimes have extensive trail systems. The ORV enthusiast loses again.

Statehouse Mail, Boise, Idaho 83720 • (208) 334-2154 • (Street Address) 2177 Warm Springs Avenue

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Idaho Department of Parks and Recreation
ATTN Todd Graeff, Resource Staff Specialist
Statehouse Mail
Boise, Idaho 83720

Dear Mr Graeff

Thank you for your review and comments on the Proposed Land Management Plan and Draft Environmental Impact Statement for the Salmon National Forest

Enclosed you will find two documents which describe development scale and Frissell condition classes

In reference to the annual cut, the allowable sale quantity of 21 1 million board feet per year will be offered only if it is expected to sell If it becomes apparent that certain types of sales are not marketable, then the volume offered will be reduced accordingly All road mileages quantified by alternative are based on the allowable sale quantity Any reductions in volume sold would result in fewer miles of road being constructed

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

While you propose to build 46 miles of new road each year for the first decade of the Plan, you propose to build only two miles of trail per year. You state that road construction has eliminated the need for much of the Salmon National Forest's trail system. We disagree. Roads are no substitute for trails, they provide a very different recreation experience. We believe that trails should be reestablished following road construction and timber harvesting. Nowhere does the Plan call for such protection of the existing trail system.

Quite the opposite, the Plan calls for the elimination of much of the trail system. It states that, "The existing trail system or even a reduced system provides capacity far in excess of demand for the foreseeable future." We agree that you can physically line up the users of the Salmon's trail system and make them fit, with room to spare, on the trails currently on the inventory. You need to address the quality of the recreation experience however. As users are concentrated into individual areas, the quality of their recreation experience there generally declines. Backcountry recreationists, motorized and non-motorized, usually desire solitude and value the opportunity to explore different areas and environments. Through this Plan you will reduce the array of alternatives historically available to those backcountry recreationists. The Plan should recognize this impact. The Plan should also identify the trails to be eliminated.

We found no listing of the Forest's nationally designated trails in the Plan (we had to look in the DEIS). The Salmon National Forest contains parts of the Lewis & Clark National Historic Trail, the Nez Perce National Historic Trail, and the Continental Divide National Scenic Trail. You have terrific opportunities to interpret American history, but make no mention of plans to do so. Why?

The Plan identifies eleven lookouts which are no longer used for fire detection Some of these lookouts could be repaired and rented to the public for overnight stays. Rental fees could be used to support their operation. Forests in northern Idaho rent lookouts, and the public appears to support the program.

The Plan states that existing recreation sites are overused along the Salmon Wild & Scenic River corridor. It calls for recreation site improvements, but does not specify what, where, or when. It is impossible for us to comment on the adequacy of such vague intentions.

"Trails within the Frank Church-River of No Return Wilderness, the river corridors and the Big Horn Crags," the Plan reads, "will be managed to standard, with the remainder of the wilderness managed at less than standard." Why? What is standard? Why isn't it defined?

The Plan also states that the minimum streamflows required to support resident and anadromous fisheries will be quantified. We propose that the minimum streamflow necessary to support recreational activities also be quantified where appropriate. Defensible methodologies exist for this purpose.

priced and nonpriced, were considered before selection of the preferred alternative.

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

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

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

The areas to be managed to provide semi-primitive motorized opportunities include the largest areas available on the Forest When combined with contiguous areas on adjacent Forests, we believe that such areas as the North Lemhi Range and Allen Mountain are very attractive for ORV enthusiasts

The only significant new trail construction proposed on the Salmon National Forest will be the connecting segments for the Continental Divide National Scenic Trail. Other areas of the Forest contain sufficient access for both motorized and nonmotorized users. You are correct that roads are no substitute for trails, however, some areas have such a high density of roads that a satisfying trail experience no longer exists. In other cases, ORV "enthusiasts" have "improved" the trail to the point where it is now a jeep track or 4-wheel-drive road. In still other instances, a road has been constructed in the actual trail corridor or adjacent and parallel to the trail. In all of these cases, our limited trail dollars can be much better spent where a satisfying recreation experience can be provided. The Plan does not identify the trails to be eliminated because they will be identified on a project-by-project basis.

Technology provides the recreationist with new toys, and new forms of outdoor recreation create new user conflicts and management problems. The Plan needs to address ATV's (three and four wheelers) and mountain bikes. We believe that ATV's should be restricted to roads. We believe that the potential for conflict between mountain bikes and other forms of trail recreation should also be considered.

Although we agree with and can support parts of the Plan, we believe that it overemphasizes commodity production and underemphasizes recreation. It is essentially a plan for resource extraction. Despite the platitudes it offers to the contrary, the Plan should be cause for concern for those who recreate on the Salmon National Forest.

I hope that you find our comments helpful. Thank you for your consideration.

Sincerely,

Todd Graeff
Resource Staff Specialist

jm-1158J

VI-113

Direction for interpretation of nationally designated trails is contained in the individual management plans for each trail, so we saw no need to repeat it in the Forest Plan.

Lookouts are being evaluated for their historic significance Segebrush Lookout, for instance, has been determined to be eligible for the National Register of Historic Places Lookouts judged to be historically significant likely will be maintained and available for public use

Our plans for recreation site improvements are displayed on pages IV-83, IV-91, and VII-D-1 of the Proposed Plan.

"Standard" and "less than standard" is terminology which has replaced "full service level" and "reduced service level." Definitions are in the glossary on pages VI-21 and VI-43 of the Proposed Plan The reason for managing any area or facility at less than standard is insufficient funding relative to total funds available or to anticipated use levels and related impacts. We expect that much of the Frank Church--River of No Return Wilderness will remain very lightly used through the Plan period

Methodologies to quantify instream flows for recreation do exist, but no specific methodology has been selected in the Intermountain Region The Forest Service expects to select a methodology in concert with the Snake River adjudication. Instream flows necessary to secure favorable conditions of water flow and provide fish habitat will generally provide adequate water for recreational purposes. In those rare situations where they will not, methodologies suitable for the site specific conditions will be used to quantify flow for recreation

ORV management is addressed annually in the update of the Forest Travel Plan. To date, differentiation based on motorized/nonmotorized and on vehicle width, greater than or less than 40 inches, has worked well on the Salmon National Forest There have been no reported instances of particular problem related to ATV's or mountain bikes Additional restrictions on any mode of transportation will not be imposed until specific problems are anticipated in specific areas.

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

1. Meeting Idaho Department of Fish and Game goals for big game.

2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.

3. Protecting soil productivity in accordance with the National Forest Management Act.

4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.

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

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

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

Enclosures

0169

SALMON N F

JAN 10 '86

Info O Action C]

SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
NRWW	1	2	3	4	5	6
AO	1	2	3	4	5	6

CC's TO Jensen 1/15/86 JK

January 6, 1986

Richard Hauff, Supervisor
SALMON NATIONAL FOREST
P.O. Box 729
Salmon, ID 83467

Sirs:

As the 1990's rapidly approach us one would hope that those who are in control of our limited and ever dwindling natural resources would display a more realistic understanding of environmental concerns. The Salmon National Forest Plan does not reflect these concerns. The loss economically and environmentally that would result from this plan make it entirely unacceptable.

I am in agreement with the Idaho Wildlands Defense Coalition who want more emphasis shifted to the higher value resources, i.e. fish, wildlife and recreational uses derived therefrom. I am in support of Alternative 3. I am also in support of a wilderness designation for the Lemhi Mountains and the West Big Hole area.

Other roadless areas that should be protected as wilderness, or at least as semi-primitive nonmotorized, are the Anderson, Allen and Goat Mountain and Italian Peak roadless areas in the Bitterroot Range. Important areas contiguous to the Frank Church/ River of No Return Wilderness include the Camas Creek, Duck Peak, West Panther Creek, Long Tom, Little Horse, and Oreana roadless areas

More attention needs to be given to the conflict between cattle and the elk/deer population for forage and space.

Idaho is blessed with some of the most beautiful and awe-inspiring wilderness left in the continental United States. To destroy it as a result of an economically unsound logging plan is foolish. The proposed plan, as it stands, is a monster of misplaced values and shows no regard whatever to the work being done by the Idaho department of fish and game.

Please don't misunderstand me, I'm not a fanatical environmentalist. On the contrary, as a contract timber faller from the coast of Washington, I've seen first hand how logging can damage the ground cover and stream qualities.

To do so to the areas in and around the Salmon National Forest, I've mentioned above, would be a damn shame and a great loss to future generations.

VI-115

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O Box 729 Salmon, ID 83467

Reply to 1920

Date

Jhan Hughes
Panther Creek Timber Falling
P O. Box 336
Snohomish, WA 98290

Dear Mr Hughes'

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

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

In the present net value economic analysis, willingness-to-pay values are used to compute the benefits associated with wildlife, fish and recreation outputs. These willingness-to-pay values are estimates of what certain amenities are worth in the absence of established market values. On the other hand, timber benefits are based on actual cash flow in and out of the Treasury. No other resources are valued solely on this basis. If they were, most if not all programs would appear to be poor economic investments. Important benefits associated with timber harvest on the Salmon National Forest are not considered in the economic analysis. Employment, income, and community stability benefits are not recognized as benefits in the present net value analysis, but they are recognized as nonpriced outputs.

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0169

Work more closely with the Idaho Department of Fish and Game and the Idaho Wildlands Defense Coalition and I'm sure there can be a plan worked out that is more in line with everybody's objectives.

Thank you.

Sincerely,

Jhan Hughes

Jhan Hughes
Representing Panther Creek Timber Falling

P.O. Box 336
Snohomish, WA 98290

cc: Governor John Evans
Statehouse, Boise, Idaho 83702

Representative Richard Stallings
U.S. House of Representatives
Washington D.C. 20515

VI-116

The preferred alternative was selected after consideration of both priced and nonpriced costs and benefits. In our opinion it provides for the greatest net public benefit considering both current and expected future uses of the Forest

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

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

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

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0170

aggipah RIVER TRIPS

Bill and Peggy Bernt
Box 125
Salmon Idaho 83467
(208) 756-4167

9 Jan 1986

Mr. Hauff,

I support Alternative #3 of your Salmon Forest Plan rather than your preferred Alternative #12.

The timber industry is an historic and appropriate part of the community, but needs to be kept in perspective. It should not dominate other uses of the Forest.

Wildlife considerations are of primary importance to the recreational user of the Forest. Logging in the Beaverhead Range in Game Unit 21-A and in Unit 29 between Hayden and Timber Creek would be of particular concern.

From an economic standpoint, recreation is becoming a more and more important part of the local economy. On the other hand, deficit timber sales are hard to understand.

VI-117

Sincerely
Bill Bernt

SALMON N F

JAN 10 '86

Info ☐ Action ☐

SUP						
(LMP)	1	2	3	4	5	6
TAF	1	2	3	4	5	6
TLM	1	2	3	4	5	6
RRVW	1	2	3	4	5	6
AO	1	2	3	4	5	6

CC's TO: Sensor 1/10/86 SH

licensed & bonded outfitter
member Idaho Outfitters & Guides Association

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Bill Bernt
Aggipah River Trips
P O Box 425
Salmon, Idaho 83467

Dear Mr Bernt:

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

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

1 Meeting Idaho Department of Fish and Game goals for big game.

2 Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water

3 Protecting soil productivity in accordance with the National Forest Management Act.

4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors

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

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

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

FS 6200 28(7 82)

especially in areas where natural forage openings and timber/non timber ecotones are only present in very limited quantities

Early in the planning process, KESR's were mapped on the entire SNF At the same time, all other acres on this Forest were classified into optimun, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan The predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90 Varying amounts of KESP's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i e , commodity, amenity, etc.) of the particular alternative These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat, however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management goals for elk and other management indicator species are maintained in all areas In other words, management activities in all geographic areas, including designated and undesignated KESR's will be subject to wildlife coordination measures designed to at least maintain adequate habitat to support elk population levels that meet the current species management goals established by the Idaho Department of Fish and Game

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

represent any cash flow to the Treasury The important thing to remember is that the economic analysis does not display the whole economic picture All costs and benefits, both priced and nonpriced, were considered before selection of the preferred alternative

In our opinion, the selected alternative provides an appropriate balance of market and nonmarket activities and outputs. Again, thanks for taking the time to provide us with your thoughts

Sincerely,

RICHARD T RAUFF
Forest Supervisor

0246

SALMON N F

JAN 13 '86

Info O Action ☐

SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RR/W	1	2	3	4	5	6
AO	1	2	3	4	5	6

CC's TO:

SILVER CLOUD EXPEDITIONS
Jerry and Terry Myers
Box 1006
Salmon, Idaho 83467
Ph. (208) 756-6215

RICHARD HAUFF
SALMON NATIONAL FOREST
BOX 729
SALMON, IDAHO 83467

JAN 9, 1986

Dear Mr HAUFF,

In regard to the Salmon Forest Draft Plan, I would like to go on record as supporting Alternative 3. Specific reasons for this alternative are as follows:

A) Healthy wildlife and fish populations are becoming more important as an industry in Idaho. Timber in the Salmon Forest continues to be harvested at a net loss. It may be
B) economically more prudent to manage these areas for maximum wildlife and scenic potentials.
B) Sheep Creek should be protected for its importance as an elk migration route.
C) No more logging should be allowed in the North Lemhis From Gilmore summit

VI-119

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to: 1920

Date

Silver Cloud Expeditions
ATTN: Jerry Myers
Box 1006
Salmon, Idaho 83467

Dear Mr Myers:

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

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

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

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SILVER CLOUD EXPEDITIONS
Jerry and Terry Myers
Box 1006
Salmon, Idaho 83467
Ph. (208) 756-6215

0246

to Hayden Creek to protect water quality and wildlife The West Big holes hold little harvestable timber and should be managed as wilderness.

D) As a big game hunter I have noticed many areas in the Salmon Forest where over grazing and development of spring water for cattle has adversely affected big game populations. A good example of this situation are the haystack - elk depradation problems now occurring on the Lemhi River.

I do not wish for anyone in the Forest related job arena to loss work but I believe that the Salmon Forest's economic future lies in strong wildlife and wilderness management Good luck Finalizing this plan.

Sincerely,
Jerry Myers

c.c. - Gov John Evans
Rep Richard Stallings

VI-120

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

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

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

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

National Forest portion of the Lemhi Range Roadless Area will not be recommended wilderness Eight management prescriptions will be applied.

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

2. Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake.

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

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

5 Key big game summer range in the Tobias Creek area;

6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages.

7. Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area.

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

The Draft Salmon National Forest Management Plan identified areas within this roadless area as semi-primitive motorized. As a result of public comments, the final Management Plan will recommend portions as semi-primitive motorized; portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. We will also increase the land being managed as semi-primitive in the Lemhi Range Roadless Area by 32,400 acres.

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

National Forest Five management prescriptions will be applied to the Salmon National Forest portion

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

2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,

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

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

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

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

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

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

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

Reducing conflicts between big game and livestock on key big game winter ranges is also necessary if habitat quality is to be maintained. By reducing competition for forage on National Forest lands, depredation problems on private lands should be reduced (such as those you describe with elk and haystacks along the Lemhi River).

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0261

SALMON INTERMOUNTAIN, INC.

TELEPHONE (208) 756-6293

P O BOX 928
SALMON, IDAHO 83467

SALMON N F

STREET ADDRESS
200 NORTH CHALLIS

JAN 13 '86

JANUARY 9, 1986

Info ☐ Action ☐

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ELM 1 2 3 4 5 6
RRWW 1 2 3 4 5 6
AO 1 2 3 4 5 6
CC's TO: Jensen 1/13/86

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

RE Salmon National Forest Plan

Dear Mr. Hauff,

In revciwing the proposed iorest plan as presented by the Forest Service we more closely agree with proposal 12, the periierred alternative, than any of the others but we would like to see the following modiiications incorporated into the plan.

As we look at our relatively new position in the Forest as an employer and in reveiwing the past mill practices, we are of the opinion that the timber base in the Salmon National Forest needs to be increased so that the iuture of timbering in this area will continue to be a ieasable operation. We ieel that ii the timber base was raised by at least 25%, to about 28 million board ieet, there would be no detrimental effect upon the plan. This could be accomplished by using more of the timber base in the Fisheries management persciption 3A and reclassifying lands in table 1, Appendix A Items 7 and 5.

Using these areas wisly and deversiiying the water sheds so they are not used simotaneously, controling harvest road size and quality, keeping traffic to a minium, closing when necessary, we ieel that the higher timber goal should be a reality.

In areas classified "Inadequate iniormation and Not re-stockable in 5 years", should be potentially available for some kind of harvest. We do not feel the unstockable in 5 years is correct in many cases.

We feel that to classiiy all such lands in one category does not leave enough flexability to address problems that might arise.

The Salmon National Forest should modiiy their water standards to meet the the State of Idaho standards. This would help meet the higher timber goals.

VI-123

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Dollas Olson, President
Salmon Intermountain, Inc.
P.O. Box 928
Salmon, Idaho 83467

Dear Mr. Olson.

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

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

Increasing the suitable timber base or harvesting more in prescription 3A would result in lower outputs for other resources

Current and proposed policies are that mortality which can be salvaged economically is to be offered for sale, if it does not seriously conflict with other resource objectives.

While there is considerable support for additional wilderness designation on the Salmon National Forest, there is also considerable opposition to any additional wilderness. Despite strong disagreement on wilderness classification, public input has indicated a high degree of support for a management strategy that would limit development on some portion of the undeveloped areas A strategy that accomplishes this is the implementation of semi-primitive recreation emphasis prescriptions.

SALMON INTERMOUNTAIN, INC.

TELEPHONE (208) 756-2293

P O BOX 928
SALMON, IDAHO 83467

STREET ADDRESS
200 NORTH CHALLIS

Infeild testing needs to be done to quality the plan proposed in the Forest plan and timber harvests should not be subjected to anything but proven data.

On page II 39 the 24 million of forest timber mortality should be better addressed As fuel costs and energy becomes higher and rarer, there should be avenues left open in which these may become more profitable to harvest.

In reveiwing the plan we are in total agreement that no more Wilderness be added to the already vast amount we have here in the Salmon Forest. In classifuing roadless areas the plan should leave open all avenues to the resources contained therein.

In using Wilderness criteria, the cost of creating and maintaining Wilderness should be addressed in dollars that are spent or proposed to be spent in order to have such a Wilderness The actual reduction of dollars generated by the Forest should show how much tax base, including taxable wages, county and State taxes, the lower revenue to schools, and generally the overall loss to the community. The difference between having a raw material of an area utilized within the community vs the importing of salable items (gas, fast foods, beverages etc.) which have a 80% export of dollars, leaving only 15 to 20 cents of a dollar within the community vs the 80 to 85 cents of that dollar the community will retain if a local raw material source is used. It should also contain the cost of managing, including all management and monitoring costs for Wilderness

In addressing recreation, the costs of dispersing people throughout the forest should have a place in figuring the costs of timber. The costs of building, upgrading and monitoring roads to remote areas for recreation should be a cost that is not borne by the timber industry and should be addressed when computing the timber base figures.

In addressing the animal populations on the Forest, both domestic, game and non-game, the fact should be used that the wild game populations are very dependent upon a number of things, including but not limited to, weather, available forage, disease, how well dispersed and the management of the same.

The domestic animals should be addressed a taxable base plus the economic well being of the community. Each should be addressed as a year round asset and not just for a month out of a year.

Semi-primitive management area prescriptions have been developed which will provide a high degree of protection for those undeveloped areas to which they have been applied. These areas will be managed primarily for the benefit of recreation and wildlife There will be a mix of site oriented and nonmotorized recreation opportunities available

Virtually all of the new road construction proposed in the plan is single purpose road for timber harvest. These roads will be closed upon completion of harvest activities.

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

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

Winter feeding of big game herds is an expensive project that is sometimes conducted by the Idaho Department of Fish and Game during extremely severe winters to help reduce winter losses and/or reduce depredation problems Money for this task is generated through the sale of elk, mule deer and antelope tags, whereby $1 50 from each tag is specifically set aside for emergency feeding. This is an effective method of placing the financial burden directly upon the recreationists who consumptively utilize the big game resource Since this is entirely a State function, you may want to contact the Idaho Department of Fish and Game directly.

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

Forest Service policy has been to maintain current stream conditions, and recognize State Water Rights Long-term Forest Service policy as stated in the Final Plan will be to continue to recognize all existing water rights

0261

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STREET ADDRESS
200 NORTH CHALLIS

To allow a wild game herd to multiply only to have it limited by starvation every decade or so is not good management. We should not expand numbers to amounts that cannot survive our normal severe winter cycles just to have extensive death by starvation.

Existing water rights should be protected and State and private water rights should be recignized in the plan. In stream flows that would jepordize these rights should not be considered. The Salmon National Forest should recignize that the private farms and ranches do and have always depended upon the water from the Forest. In Lemhi County almost all crops depend upon irrigation and this should be addressed as an issue. To allow in-stream flows to jepordize the Farming community would be disasterous.

In conculssion we would again repeat that multiple use of all of our Forests is a must if we are to survive and prosper in Lemhi County. We cannot afford shut downs of industry that we have had in the past. With renewed effort and basic concern for the people that use the forests, both for a lively hood and recreation we can have a better community through the wise and efficient use of our forest.

VI-125

Sincerely

Salmon Intermountain Inc.

Dallas Olson President

issued by the State of Idaho. We are also obligated to seek those Federal Water Rights (both consumptive and instream) which are needed for management of the Salmon National Forest.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0556

STOLTZE-CONNER LUMBER CO.

Box 415 DARBY MONTANA 59829

January 28, 1986

SALMON N F

JAN 31 '86

Info O Action ☐

SUP
LMP 1 2 3 4 5 6
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ELM 1 2 3 4 5 6
RRV/W 1 2 3 4 5 6
AO 1 2 3 4 5 6

2 CCs TO

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

Re Salmon National Forest Plan Proposal - For the Record

Dear Mr Hauff

Stoltze-Conner Lumber Co is an employer/manufacturer of logs and lumber in Ravalli County, Montana We currently consume 25MM bd ft of logs per year, with 20% of our log supply originating on the Salmon National Forest Stoltze is a federal timber dependent sawmill that has produced consistently through the economic recession in spite of a major mill fire We employ 85 persons in the mill, 15 company loggers and contract the equivalent of 60 full time loggers and roadbuilders The Salmon National Forest is a necessary part of this mill's future raw material supply

We recommend Alternative 12(preferred) as the most proper alternative for the Salmon Forest Plan If there are those who wish to choose an extreme wilderness alternative such as Alternative 3, 8, 9 or 11, our extreme choice is Alternative 5

VI-126

We feel Alternative 12 is a very professional and practical choice by the Forest Service because

1) It requests no more wilderness, recognizing we don't need more than 24% of the entire forest in wilderness to satisfy that demand
2) The Roadless area question is resolved in favor of retaining management options for the future that can be responsive to changing public needs
3) The Alternative identifies certain semi-primitive motorized recreation areas that are intended for primary recreation purposes
4) The Alternative meshes commodity needs and ammenity desires in a practical manner so as not to badly disrupt on-going activities while meeting water, soil, wildlife and esthetic criteria.

The Salmon National Forest is to be congratulated for formulating the most responsive and responsible Forest Plan we've seen to date

Following are comments that pertain to specific areas of the Plan

Wildlife and Fish - The Salmon National Forest is doing a credible job currently balancing habitat, populations and a myriad of public preferences Refinements and improvements seem to be built in the plan within the scope of the preferred alternative State Fish and Game folks often overstate their demands The public is too easily led emotionally down this narrow path The Plan seems to identify idealism and reality in it's recommendations

Timber Management - Timber is the major biologic impact on the forest Because it can be professionally managed in perpetuity, it will continue to be the major

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Rem Kohrt, Manager
Stoltze-Conner Lumber Co.
Box 415
Darby, Montana 59829

Dear Mr. Kohrt·

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

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

We will be re-examining the "Forest Land - Inadequate Information" with our next timber inventory which should be completed by 1988. It is expected that most of this land will remain as unsuitable for timber harvest because regeneration cannot be assured on these poor sites

The Forest Plan was not intended to answer many of the other questions you raise. Most are national in nature and cannot be addressed at the Forest level (i e , national timber needs, products desired, and balance of payments) The 1979 RPA Assessment and the Assessment Supplement are the most recent analysis of the nation's renewable resource situation. The assessment and program analysis were considered in our alternatives and plan selection.

FS 6200 28(7 82)

economic contributor in the Salmon area With a sustained timber base, the industry will supply jobs, a tax base and a stable community The United States is historically a net importer of wood(6 9 billion bd ft in 1984) This Plan and other forest plans have not answered certain questions How much timber do we need as a nation? What products, what balance of payments, what community stability do we desire? This isn't established in the DEIS or Plan Also, what effect will reduced timber sell on the Salmon have on adjacent forests, their planning process and dependent industry There seems to be no coordination between forests addressed in the DEIS.

Forest road access should be expanded within normal resource constraints such that resource benefits can be maximized over time On Page II-175 of the DEIS, Table II-12, Item #6, "Forest Land - Inadequate Information - 235,000 acres" needs resolution as soon as possible

Wilderness - We don't need any additional wilderness Wilderness is not a public need, it is a public desire 24% of the forest classified as wilderness is adequate With over 8 million acres of wilderness plus parks within 200 miles of the Bitterroot National Forest, we're overloaded. The wilderness we have should be used for study, research and recreational purposes To that extent it too needs management Additional designated wilderness is like money placed in a bank that permits no withdrawal and pays no interest, we can do better

Roadless Areas - They should be terminated as of the plan conclusion and returned to management Semi-primitive motorized recreation areas properly managed offer alternative recreational opportunities These can be contracted or expanded as needed The important thing is to retain management options

Recreation - Developed, semi-primitive and wilderness recreation are all necessary As the population grows and more commodity uses are demanded of the forest, concurrent recreational development and management will be required It must be remembered that the most adaptive factor relative to forest management is the least worked with - that is the public themselves A resource educated public that understands the difference between public needs, public desires and the resources ability to provide, can master the mental challenge of reaping ammenity values within the managed forest To date this area has been ignored

Water - This resource is being better managed on the Salmon National Forest than on private lands USFS current management is good and improving Water concerns are generally overstated by fish, wildlife and some recreational groups because they work with only preferred facets of the larger resource management picture

Grazing - This use is compatible with other forest uses under current management techniques.

Visual Resource - This resource is more a matter of the aware mind than any other discipline Basic resource education will help this area coupled with good management techniques

Forest Planning - Forest planning has degenerated over time from a process that relates forest output potential to satisfy public needs to a political/legal/media tug of war that is not in anyone's best interest It is a costly circumstance where procedures have become more important than results Because the agency has limited management authority, the judicial system becomes the decision arena, bad at best

Rem Kohrt

The question on community stability was addressed in terms of jobs and income in the DEIS. The preferred alternative provides for the highest level of timber industry employment and income consistent with other resource objectives The effect of reducing timber harvest is estimated to be nine jobs lost for each million-board-foot reduction in the allowable sale quantity. We share your concern on the combined effect of reduced timber offer on the Salmon, Bitterroot, and Beaverhead National Forests on local dependent communities Coordination meetings for the Draft Statement and Forest Plan were held with the adjacent National Forests The Salmon will continue to explore means of offering economically viable sales, consistent with other resource objectives, in an attempt to sell as much of the timber offered as possible

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

General - We all must recognize that full stomach America is a poor medium in which to seek public opinions on resource management The public needs food, fiber, shelter, jobs, tax base, education opportunity, health care and stable communities This can be provided by a responsively managed National Forest System Full stomach America relates more easily to ammenity desires on the short term An ammenity example is an elk(wildlife), wilderness acre or a visual vista, none of which we need, but which we all desire It is in this area that resource education, professional resource management, hard economic facts, long term vision, retention of options and guts are needed to fill the voids

We thank you for the opportunity to comment on the Salmon Forest Plan You are at a decision point of great importance Let's keep the needs of the common man in relation to the forests ability to provide A managed forest can do the job

Sincerely,

Rem Kohrt

Rem Kohrt, Manager

RK/be
cc Senator MClure
Senator Symms
Representative Stallings

Idaho Falls Trail Machine Association, Inc
Conservation, Courtesy, Safety
P.O. Box 2345 Idaho Falls, Idaho 83401

NOV - 6 '85

November 3, 1985

To: Forest Supervisor, Salmon National Forest
Forest Service Building
Salmon, Id 83467

Gentlemen,

In behalf of the membership of the Idaho Trail Machine Association and the Idaho Snowmobile Association, we express our support for the Salmon National Forest proposed plan this planning cycle.

Since 46 % of our national forest system is presently classified as wilderness, it indicates strong evidence that we have so far been very generous with stewardship over our public lands in America.

Now is the time to proceed carefully in managing the remainder of nonwilderness areas so the average citizen will benefit, which is denied in wilderness legislation, at least from our standpoint of backcountry recreation.

Nationwide studies indicate that about 02 % of our national wilderness system is being used by about 08 % of the recreationists. The remaining 92 % of us enjoy the nonwilderness areas that offer something for all Americans to enjoy.

Of the 08 % who use wilderness, about 90 % of them use the areas originally locked up in the 1964 Wilderness Act.

Idaho wilderness use studies indicate that 06 % of the recreationists in this state use wilderness. Along with this we have seen a 30 % decrease in use of the Sawtooth NRA wilderness since 1979.

(over, please)

VI-129

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Carl Atamanczyk
Public Relations and Land Use Committeeman
Idaho Falls Trail Machine Association, Inc.
P. O. Box 2345
Idaho Falls, Idaho 83401

Dear Mr. Atamanczyk:

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

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS-6200 28(7-82)

In contrast, snowmobile and trail bike recreation in Idaho have increased over 08 % annually since 1979. This doesn't account for the increased use of 3 and 4 wheelers, which have exceeded the 08 % figure. Since ORV recreation is enjoyed by over 10 % of Idaho's population, and more that 11 million citizens nationwide, we would encourage the Salmon National Forest to plan ahead into the future for environmentally acceptable increases of motorized recreation.

The demand for ORV use on our public lands is increasing even faster than we would sometimes like to see it, but it is inevitable and our group would like to assist the Salmon forest planners in any ways we can be of assistance, to help promote responsible ORV use.

Through our statewide volunteer service projects, we maintain over 500 miles of forest trails annually to remove deadfall and repair erosion damage from hikers, horses and ORV travel. We would like to recommend the wilderness users to match our volunteer efforts, in light of land management budget cutbacks.

Thankyou very much for this opportunity to comment.

Sincerely yours,

Carl Atamanczyk

Carl Atamanczyk

Public Relations
and Land use
Committeeman

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SALMON N F

JAN 14 '86

Info ☐ Action ☐

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PRWW 1 2 3 4 5 6
AO 1 2 3 4 5 6

CC's TO

439 Styner Avenue
Moscow, Idaho 83843
January 9, 1986

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

Dear Mr. Hauff.

I appreciate the opportunity to review and comment on the Proposed Forest Plan for the Salmon National Forest. My comments are concerned with research natural areas.

The Salmon National Forest has done an excellent job in treatment of research natural areas in the Draft EIS and Forest Plan. All of the proposed research natural areas which have resulted from the cooperative effort of the Salmon National Forest, the Idaho Natural Areas Coordinating Committee, and the Intermountain Region RNA Committee are included in the Plan except two, Sheep Mountain and Mountain Peak, both on the Leadore District. Mountain Peak was omitted because of mining claims. Sheep Mountain straddles the common boundary of three Forests, Salmon, Challis, and Targhee. The Challis Forest has taken the lead on this area and has listed it in the Challis Forest Plan. I suggest that it should also be included in the Salmon Forest Plan. I recognize that mining claims may be a problem but the alpine features of Sheep Mountain with its varied rock substrate are so valuable for research purposes that I believe that it should be established as a RNA despite possible mining claims.

Some minor comments follow.

Forest Plan Page II-58

I believe that the information for the Frog Meadows proposed RNA is largely based on my letter to you of January 5, 1982. We made a thorough examination of the Frog Meadows area in 1984 and suggested some boundary changes to include a greater diversity of features and and increase in acreage more in keeping with Forest Service minimum size recommendations. My letter to you of September 13, 1984 gives details of these suggestions for changes. The suggested area was 336 acres and the types included ABLA/VASC-VASC, ABLA/VASC-CARU, ABLA/CARU, ABLA/CAGE, AND ABLA/CACA-LEGL. The major cover type is PICO.

Forest Plan Page II-59

The recommended Dome Lake RNA also was in part examined in 1984. My letter to you of September 13, 1984 listed the following habitat types that we found in the area examined: PSME/CARU, PSME/PHMA, PSME/VAGL, PIEN/CATR (?), ABLA/VASC, ABLA/MEFE, ABLA/XETE, ABLA/CACA-LEGL, PIAL-ABLA. These could be included on Page II-59.

Sincerely
C. A. Wellner
Charles A. Wellner
Idaho Natural Areas Coordinating Committee

VI-131

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to 1920

Date.

Mr. Charles A. Wellner
Idaho Natural Areas
Coordinating Committee
439 Styner Avenue
Moscow, Idaho 83843

Dear Chuck·

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

As suggested, we have noted in the final plan that parts of the Sheep Mountain RNA (Research Natural Area) occur on three Forests, and that the Challis National Forest has taken the lead for this proposed RNA We have also made the minor corrections you noted on page II-58 and II-59 for the Frog Meadows and Dome Lake RNA's.

The Salmon Forest greatly appreciates all the help you and the Idaho Natural Areas Committee has provided to our RNA program, and look forward to your continued assistance.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS 6200 28(7 82)

0008

NOV - 6 '85

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE 83702

November 1, 1985

Supervisor
Salmon National Forest
U S Forest Service
Salmon, Idaho 83467

Dear Sir

Thank you for sending us a copy of the proposed Land and Resource Management Plan for the Salmon National Forest Our comments concern the management of archaeological and historic properties

1 You should mention on page III-16 that Lemhi Pass is a National Landmark, as well as a National Register Site

2 The Salmon National Forest should cooperate with the Salmon BLM District in developing a management plan for the Lewis and Clark Trail There is no reason to have two separate federal management plans for the trail in this region

3 We believe the Forest should nominate the archaeological and historic properties along the main Salmon River to the National Register of Historic Places This clearly fits your priorities in the management activities listed on page IV-6 Our office will be happy to help this endeavor

4 It is unrealistic to believe you can complete an inventory of archaeological and historic properties on the Forest by 1990 (see page II-15)

5 We doubt the cultural resource program outlined in the plan can be adequately conducted with part-time seasonal employees and paraprofessionals The Salmon National Forest should hire a full-time CRM specialist

Thank you for allowing us to comment

Sincerely,

THOMAS J GREEN
State Archaeologist
State Historic Preservation Office

TJG rm

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Thomas J. Green
State Archaeologist
Idaho State Historical Society
610 North Julia Drive
Boise, Idaho 83702

Dear Mr. Green:

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

Your suggestion to further identify Lemhi Pass as a National Landmark on page III-16 of the DEIS will be adopted.

There is already an existing approved management plan for the Lewis and Clark National Historic Trail The plan was prepared by the National Park Service and approved in January 1982.

Sites identified as eligible for the National Register of Historic Places will be nominated as workload permits

The proposed completion of an inventory of archeological and historic properties under the current program is projected for the year 2020 (see page IV-7).

We expect to continue with shared service professionals, seasonals, and para-professionals to accomplish the cultural resource job, but we will also continue searching for improved methods of operation. It may be possible, for example, to share the services of professional staff with the Salmon District, Bureau of Land Management.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

FS 6200 28(7 82)

0011

NOV 13 '85

Alice I Frell
Lands Director

Rocky Mountain Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER COLORADO 80202
303/534 8261

November 15, 1985

Mr Gene Jensen
Forest Planner
Salmon National Forest
P O Box 729
Salmon, ID 83467

Dear Mr Jensen

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I am writing to comment on the Draft Land and Resource Management Plan (LRMP) and Draft Environmental Impact Statement (DEIS) for the Salmon National Forest RMOGA is a trade association representing hundreds of members who account for more than 90% of the oil and gas exploration, production, and transportation activities in the Rocky Mountain West Because of this, our members have a vital interest in how the Forest Service manages its lands, particularly with respect to mineral resource activities.

We are concerned with the treatment energy resources have received in the draft planning documents For instance, the discussion in the DEIS regarding resource outputs, activities, costs and benefits for each of the benchmarks and alternatives is misleading and inaccurate. We are concerned that minerals have been assigned a value of zero There are many factors which should be taken into consideration when determining the relative value of mineral activities and their associated benefits such as lease rentals and returns to the Treasury in terms of bonuses and royalties We understand the Forest Service's concerns with the possibility that, when calculated, the value of mineral activities would outweigh all other resources Regardless, there is no justification for ignoring mineral resources during the analysis process.

Other Forests have made varied attempts at dealing with mineral resources in the planning process with different degrees of success. We recommend that the Salmon Planning Team review the draft planning documents of the Custer National Forest, the Wasatch-Cache National Forest, and the Shoshone National Forest. Each of these plans approaches minerals from a relatively different view, but they all incorporate energy and mineral resources into the planning analysis process

VI-133

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to· 1920

Date

Alice I Frell, Public Lands Director
Rocky Mountain Oil and Gas Association, Inc.
345 Petroleum Building
Denver, Colorado 80202

Dear Ms. Frell·

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

To date there has been no production of leasable minerals on the Salmon National Forest, and annual rental fees total $3,778.58 as of 4/21/86. In regard to locatable minerals, there are no direct returns to the government and no way to adequately predict future levels of this kind of mineral activity. *For these reasons we did not include specific values for these* resources in our evaluations We did recognize, however, that although the current value of such resources is low or unknown, the potential for future exploration and development is an important issue in the analysis of alternatives Table IV-1 displays how mineral exploration and development would be restricted under each alternative, based primarily on how much roadless area acreage was assigned to wilderness. We do believe it is important to maintain the opportunity to explore for mineral resources on the Forest. This issue was recognized in the selection of the preferred alternative which allows further exploration and development in areas not already in wilderness, or withdrawn from mineral entry.

The three National Forests cited in your letter as examples of how minerals could be incorporated into the analysis of alternatives, represent areas which have been historic producers of leasable minerals and/or have high potential for such production. This is not the case on the Salmon National Forest The current value of leasable minerals expressed as direct returns to the treasury has already been discussed. Early in the planning process the Salmon National Forest attempted to define areas which had low, moderate or high potential for the various leasable minerals. We found that for leasable minerals in general, there was insufficient data to make professionally sound evaluations. For this reason the potential of most of the Forest is classed as unknown.

Since the present values are low, and the potentials unknown, a tradeoff analysis using these factors does not seem meaningful. The Forest does recognize the issue of preserving the opportunity for private industry to further define mineral potential. The DEIS displays the restrictions on

FS 6200 28(7 82)

November 15, 1985

Mr. Gene Jensen
Forest Planner
Salmon National Forest

page two

The National Forest Management Act (NFMA) regulations, Section 219, require the inclusion of a tradeoff analysis between surface and subsurface resource uses during the preparation of Land and Resource Management Plans. We believe that the Forplan model utilized by the Forest to determine the most efficient mix of resource uses does not allow for site-specific considerations to be made in terms of which areas have low, moderate or high potential for oil and gas or whether the use of these resources should receive priority treatment over other uses. There is no evidence in the draft planning documents that any sort of tradeoff analysis has been prepared. If such an analysis does exist, it should be included in the draft planning documents so that the public can review it to determine why and how the Forest has made certain proposals. The energy industry needs to know, for instance, which areas are going to be withdrawn, leased with surface occupancy restrictions or seasonal restrictions, and the rationale for these decisions. The energy industry operates on a site-specific basis One of the major components in reviewing a draft LRMP is our ability to determine how areas of particular geologic interest are going to be affected by surface management decisions.

Another item of concern is the Environmental Consequences Section of the DEIS It does not provide an indepth discussion as to how mineral activities could be affected by surface resource decisions This section is flawed because it deals only with the possible effects mineral activities would have on other resource values While it is true that the loss of a resource is an irreversible degradation of productivity, it should be noted that oil and gas activities don't normally result in an irreversible loss of a resource. This is due to the fact that numerous mitigation measures are taken to minimize or avoid impacts. It is interesting to note the contradiction in the statement on Page IV-96 of the DEIS that "the Forest Service administrative sites and roads may cause irreversible resource loss to the immediate area they supply, although they may be removed and the land restored over time" Impacts from mineral exploration and development activities may also be removed and the land restored to a natural condition. Yet the section on minerals does not really make the same qualifying statements, even though it is said that the Forest Guidelines are designed to minimize the resource damage which may occur during exploration and development activities.

On a positive note, we support the Forest's decision not to designate additional wilderness The portion of the River of No Return Wilderness located on the Salmon National Forest amounts to almost 25% of the Forest's land base We understand there has been little support for additional wilderness on the Forest, and we concur. The 2.2 million acres of the River of No Return Wilderness is centrally located and should satisfy the needs for wilderness recreation in the area.

mineral exploration and development under each alternative in Table IV-1. The preferred alternative does not further restrict access or development opportunity, although such activities may be more difficult and expensive in the roadless areas which remain in semi-primitive classifications. For locatable minerals, based on USFS mineral evaluation, USGS Rare II mineral potential classification, and confidential industry data, all of the Forest with known mineral potential is considered to have a high mineral potential for the purpose of broad scale Forest planning.

Although the Forest Service does not receive royalties on the production of locatable minerals, the impact of surface resource decisions on this mineral resource is an important issue which was tracked in the analysis process The DEIS displays the restrictions on mineral exploration and development under each alternative in Table IV-1 The preferred alternative does not further restrict access or development opportunity although such activities may be more difficult and expensive in the roadless areas which will remain in semi-primitive classifications.

The DEIS does document the impacts that would occur as a result of surface resource decisions For example see Pages IV-45, 46, and IV-99, and Tables IV-1 and II-1. We do agree that the discussion of "Irreversible and Irretrievable Commitments of Resources," omits the effects that surface resource decisions have on the mineral and energy resources availability and use. This has been corrected in the FEIS We do not see the contradiction referred to between the treatment of "Facilities" on Page IV-96 and Minerals and Energy on Page IV-95. Both sections note that through use of appropriate guidelines, most potentially irreversible impacts are not expected to occur

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

November 15, 1985

Mr Gene Jensen
Forest Planner
Salmon National Forest

We agree with the Forest's use of a semi-primitive recreation designation in those roadless areas which require added protection but not a wilderness classification, because these areas will be available for oil and gas exploration and subsequent development activities We support the Forest's decision to lease these areas with surface occupancy, but with reclamation requirements regarding constructed roads. Congress has mandated through numerous acts that opportunities allowing domestic exploration for and production of energy resources *should receive priority consideration in the management of federal lands.*

In conclusion, we believe the final planning documents should be revised to include an illustration of the tradeoff analysis between surface and subsurface resource values We further encourage that the benchmark analysis be revised to properly address energy and mineral resources and their associated costs and benefits to the Forest As we previously stated, there are several other Forests which have incorporated oil and gas resources into the planning process and we recommend that the Salmon Planning Team confer with these other Forest Planners to discuss their respective methods

We appreciate this opportunity to comment on the Draft LRMP and EIS If you would like to discuss our comments in more detail, please do not hesitate to *contact me*

Sincerely,

Alice I. Frell

Alice I. Frell
Public Lands Director

AIF.cw

IDAHO PETROLEUM COUNCIL

Rocky Mountain Oil and Gas Association

0019

ANDREW G. ANDERSON
EXECUTIVE DIRECTOR

Suites 614 616 618 Empire Building
205 N 10th St
Boise Idaho 83702
Telephone 208/343 0456

MAIL ADDRESS
P O Box 547
Boise 83701

SALMON NF
COPY
FC

NOV 25 '85

INFO ACTION
SUP
MP 1 2 3 4 5 6
TAT 1 2 3 4 5 6
LAM 1 2 3 4 5 6
RWH 1 2 3 4 5 6
JO 1 2 3 4 5 6

Jcc Jensen 11/25/85 JH

November 21, 1985

Mr. Gene Jensen
Forest Planner
Salmon National Forest
P.O Box 729
Salmon, ID 83467

Dear Mr. Jensen

On behalf of the Idaho Petroleum Council, I would like to take the opportunity to comment on the proposed Salmon Forest L R.M.P. We feel that there are several points that we would like you to consider.

We support the Forest's decision not to designate additional wilderness The portion of the River of No Return Wilderness located on the Salmon National Forest amounts to almost 25% of the Forest's land base We understand there has been little support for additional wilderness on the Forest and we concur. The 2.2 million acres of the River of No Return Wilderness is centrally located and should satisfy the needs for wilderness recreation in the area.

VI-136

We support the Forest's use of a semi-primitive recreation designation in those roadless areas which require added protection but not a wilderness classification because these areas will be available for oil and gas exploration and subsequent development activities. We support the Forest's decision to lease these areas with surface occupancy, but with reclamation requirements regarding constructed roads Congress has mandated through numerous acts that opportunities allowing domestic exploration for and production of energy supplies should receive priority consideration in the management of federal lands.

The discussion in the Draft Environmental Impact Statement regarding resource outputs, activities, costs and benefits for each of the benchmarks and alternatives is misleading and inaccurate. We are concerned that minerals have been assigned a value of zero. There are many factors which should be taken into consideration when determining the relative value of mineral activities and their associated benefits such as lease rentals and returns to the treasury in terms of bonuses and royalties We understand the Forest Service's concerns with the possibilities that, when calculated, the value of mineral activities would outweigh all other resources Regardless, there is no justification for ignoring mineral resources during the analysis process.

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Andrew G Anderson
Executive Director
Idaho Petroleum Council
205 N 10th St , Suites 614-616-618
Boise, Idaho 83702

Dear Mr. Anderson

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

To date there has been no production of leasable minerals on the Salmon National Forest, and annual rental fees total $3,778.58 as of 4/21/86 In regard to locatable minerals, there are no direct returns to the government and no way to adequately predict future levels of this kind of mineral activity For these reasons we did not include specific values for these resources in our evaluations We did recognize, however, that although the current value of such resources is low or unknown, the potential for future exploration and development is an important issue in the analysis of alternatives Table IV-1 displays how mineral exploration and development would be restricted under each alternative, based primarily on how much roadless area acreage was assigned to wilderness We do believe it is important to maintain the opportunity to explore for mineral resources on the Forest This issue was recognized in the selection of the preferred alternative which allows further exploration and development in areas not already in wilderness, or withdrawn from mineral entry

The three National Forests cited in your letter as examples of how minerals could be incorporated into the analysis of alternatives represent areas which have been historic producers of leasable minerals and/or have high potential for such production. This is not the case on the Salmon National Forest The current value of leasable minerals expressed as direct returns to the treasury has already been discussed. Early in the planning process the Salmon National Forest attempted to define areas which had low, moderate or high potential for the various leasable minerals We found that for leasable minerals in general, there was insufficient data to make professionally sound evaluations For this reason the potential of most of the Forest is classed as unknown.

Since the present values are low, and the potentials unknown, a tradeoff analysis using these factors does not seem meaningful The Forest does recognize the issue of preserving the opportunity for private industry to further define mineral potential The DEIS displays the restrictions on

Other Forests have made varied attempts at dealing with mineral resources in the planning process with different degrees of success. We recommend that the Salmon Planning Team review the draft planning documents of the Custer National Forest, the Wasatch -Cache National Forest, and the Shoshone National Forest. Each of these plans approaches minerals from a relatively different view, but they all incorporate energy and mineral resources into the planning analysis process.

The National Forest Management Act regulations, Section 219, require the inclusion of a tradeoff analysis between surface and subsurface resource uses during the preparation of Land and Resource Management Plans We are concerned that the Forplan model utilized by the Forest to determine the most efficient mix of resource uses does not allow for site-specific considerations to be made in terms of which areas have low, moderate, or high potential for oil and gas and whether the use of these resources should receive priority treatment over other uses. There is no evidence in the draft planning documents that any sort of tradeoff analysis has been prepared. If such an analysis does exist, it should be included in the draft planning documents so that the public can review it to determine why and how the Forest has made certain proposals. The energy industry needs to know, for instance, which areas are going to be withdrawn, leased with surface occupancy restrictions, seasonal restrictions, and the rationale for these decisions. The energy industry operates on a site-specific basis One of the major components in reviewing a draft L.R.M P. is our ability to determine how areas of particular geologic interest are going to be affected by surface management decisions.

The Environmental Consequences Section of the Draft Environmental Impact Statement does not provide an indepth discussion as to how mineral activities could be affected by surface resource decisions. This section deals only with the possible effects minerals activities would have on other resource values. While it is true that the loss of a resource is an irreversible degradation of productivity, it should also be stated that numerous mitigation measures are taken to minimize or avoid serious impacts or loss of resources. It is interesting to note the statement on Page IV-96 of the DEIS that "the Forest Service administrative sites and roads may cause irreversible resource loss to the immediate area they supply, although they may be removed and the land restored over time." The same is true of mineral exploration and development activities. Yet the section on minerals does not really make the same qualifying statements, even though it is said that the Forest Guidelines are designed to minimize the resource damage which may occur during exploration and development activities.

Sincerely,

Andrew G Anderson

ANDREW G ANDERSON
Executive Director

AGA:jbt

mineral exploration and development under each alternative in Table IV-1 The preferred alternative does not further restrict access or development opportunity, although such activities may be more difficult and expensive in the roadless areas which remain in semi-primitive prescriptions

For locatable minerals, based on USFS mineral evaluation, USGS Rare II mineral potential classification, and confidential industry data, all of the Forest with known mineral potential is considered to have a high mineral potential for the purpose of broad scale Forest Planning Although the Forest Service does not receive royalties on the production of locatable minerals, the impact of surface resource decisions on this mineral resource is an important issue which was tracked in the analysis process The DFIS displays the restrictions on mineral exploration and development under each alternative in Table IV-1 The preferred alternative does not further restrict access or development opportunity although such activities may be more difficult and expensive in the roadless areas which will remain in semi-primitive prescriptions

The DEIS does document the impacts that would occur as a result of surface resource decisions For example see Pages IV-45, 46, and IV-99, and Tables IV-1 and II-1 We do agree that the discussion of "Irreversible and Irretrievable Commitments of Resources," omits the effects that surface resource decisions have on the mineral and energy resources availability and use This has been corrected in the FEIS We do not see the contradiction referred to between the treatment of "Facilities" on Page IV-96 and Minerals and Energy on Page IV-95 Both sections note that through use of appropriate guidelines, most potentially irreversible impacts are not expected to occur

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

AFS AMERICAN FISHERIES SOCIETY
ORGANIZED 1870
IDAHO CHAPTER

DEC 17 '85

December 11, 1985

INFO ☐ ACTION ☐

	1	2	3,4	5	6	
TAF	1	2	3	4	5	6
FLM	1	2	3	4	5	6
GRWW	1	2	3	4	5	6
AO	1	2	3	4	5	6

2 cc 12/17/85 cl

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

Gentleman.

We offer this letter as technical advice to the National Forests on adequate ways to develop changes in Forest Plans and Environmental Impact Statements before final documents are issued. We have recently had the opportunity to review many different groups' concerns regarding the draft Forest Plans, and draft Environmental Impact Statements issued for National Forests in Idaho There seems to be several common deficiencies in these documents, which could be resolved by proper application of technical fisheries information and analysis.

Areas of analysis needing more attention from a fisheries standpoint fall into seven main categories. These are 1.) lack of site specific inventory, 2.) lack of site specific impact analysis, 3.) lack of hierarchical treatment of drainage systems in order to analyze cumulative impacts, 4.) lack of adequate calibration of models, including sediment and fisheries models, 5.) lack of specific direction for the enhancement or protection of fisheries, 6.) lack of adequate social and economic analysis, and 7.) lack of scientifically adequate monitoring programs for fisheries resources.

VI-138

1) Lack of Site Specific Inventory

In order to meet legal requirements for the analysis of impacts to fisheries resources, some stratified, random or systematic inventory of the condition and trend of fish habitat and populations is necessary. We have found that Forests are remiss in presenting only subjective, wide ranging descriptions of fish habitat. Mapping and information are presented at such coarse scale that the public has very little information about the factual conditions or extent of fish habitat resources on the Forest. This may be satisfactory for programmatic planning, but we do not believe that it provides the necessary detail to authorize project development. If programmatic documents are issued showing or anticipating the possibility of significant site specific impacts, then the Plan should require subsequent Environmental Impact Statements for specific projects. Site specific fish habitat inventory and analysis should be required for project analysis.

Forest Plans should present all known inventory references, so that their adequacy can be judged in light of Section 6 of the National Forest Management Act. After reviewing the Draft Forest Plans and Draft Environmental Impact Statements to date, it is apparent that far too little emphasis has been placed on fisheries inventory relative to the inventories

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Mr. Ned Horner, President
Idaho Chapter, American Fisheries Society
South 2450 Greenferry Rd.
Coeur d'Alene, Idaho 83814

Dear Mr. Horner:

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

Your concern related to the presentation of information in the planning documents and what appeared to be superficial treatment of the fishery resource is closely tied to the level of planning that was undertaken The programmatic nature of Forest Plans makes it impractical to present the information in a site specific manner, even though such information was available and used in plan development and analysis

Many of the tables presented in the planning documents provide information that is in combined form In most instances, fish species values are presented jointly, in other cases the values represent a combination of yearly or decadal values. This was done to provide a summarization of information and to reduce, through consolidation, the volume of information Outputs displayed were consistent with units (lbs and user days) to be used by other Forests in an effort to standardize and simplify comparisons

The Proposed Plan presents detailed information in Chapter IV regarding fish habitat management goals, Forest-wide management direction, associated standards and guidelines and specific management area prescriptions Under the preferred alternative, aquatic habitats will be managed to provide high water quality and meet State species management goals and objectives for all fish species and habitats The specific management requirements identified in the standards and guidelines are intended to assist in achieving these goals The sediment oriented objectives are also linked with attainment of fishery objectives. Water quality and species goals and objectives were applied on a stream-by-stream basis and the analysis of effects was also evaluated on the same basis.

It is important to note that Forest Planning and the associated Environmental Impact Statement are not intended to replace project level environmental assessments. Information specificity at the Forest planning level will be supplemented with site specific assessments prior to project authorization

such as timber. Dynamic resources, such as fish habitat, require far more expenditure in order to acquire equivalent reliability information compared to more static resources, such as timber The old adage that, "you get what you pay for," is all too evident in most Forest documents to date Forests have not budgeted for precise fisheries information, and have not presented this information in draft documents. Future programs should include sufficient budget to analyze impacts to fish habitat due to other resource development projects.

2.) Lack of Site Specific Impact Analyses

Prediction of impacts to fisheries is not displayed for specific spawning, rearing, or other habitats In order to be meaningful, impacts should be displayed for specific random sites on a systematic basis reflecting all of the major habitats on the Forest Only in this manner can later monitoring determine whether predictions of impact were correct Estimates or guesses about impacts to large drainages at amorphous sites or on a Forest-wide basis do not provide sufficient detail.

3.) Lack of Hierarchical Treatment of Drainage Systems

Mapping and analysis of watershed and fisheries resources should be developed by starting with relatively small watersheds (<10,000 acres) containing fish habitat nested within larger drainages up to several hundred thousand acres in size. Only in this manner can site specific impacts be described for small drainages and their cumulative or synergistic effects in larger basins be developed.

4) Lack of Adequate Calibration of Models

Data to substantiate relationships between physical processes, such as sediment yield and fish habitat, must be presented. Only in this manner can claims about the "significance" or "thresholds of impact" be assessed. Statistically imprecise or subjective evaluation of such relationships will always result in greater risk to fish habitat from development, than if natural processes are allowed to proceed. This is because decisions to develop or disturb land are absolute decisions, while the determination of significance is probabilistic. When absolute decisions are made, they always carry an element of uncertainty or risk. When this risk has the potential to negatively influence fish habitat, a great deal of precision is needed to assess the significance of impact in order to avoid "worst case" types of analyses.

5.) Lack of Specific Direction

Direction for the protection and/or enhancement of fisheries should use the adverb "will" and "must" rather than "should." If "should" is used to describe prescriptions for fish habitat in the Plan, then the "worst case" analysis should be presented in the EIS assuming that the action described is not carried out to benefit the fishery. Fisheries targets based on protection, mitigation, and/or enhancement of fish habitat should be guaranteed rather than recommended if those targets are being used to support multiple use objectives.

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

Use of modelling and simulation of natural conditions has been and will continue to be a valuable tool in the decision making process modelling techniques utilized on the Salmon National Forest have helped to enhance professional judgment Output from models is being used to help assess long-term effects of numerous activities within an area Before modelling techniques were initiated to compare alternatives and help evaluate cumulative effects, no consistent methodologies were available which could maintain a running assessment of total watershed disturbance and sediment creating activities within a watershed

Modelling techniques on the Salmon National Forest have involved the use of local soil, geologic, climatic, topographic, hydrologic and fishery habitat data which has modified regional models to more closely represent localized conditions. This was done to reduce uncertainty, risk, and the possibility of making management decisions that create irreversible conditions Forest monitoring programs will continuously evaluate all model outputs, utilizing locally collected information, such as fishery habitat conditions Because of variability of all natural systems, all modelling data will be used as indicators of magnitude of effects, and not absolute decision making tools Onsite reviews and professional judgment will continue to be an integral part of evaluating impacts of land management activities on resources within the National Forest

The economic valuation and social consideration of the fisheries resource included consideration of both on- and off-Forest use of the fishery production Components included sport use, commercial fishing and Indian treaty use The relative distribution of fish use was based on State and Federal agency information and personal communication with individuals familiar with harvest patterns

The intent of monitoring and evaluation is to provide an assessment of the progress achieved toward meeting the goals, objectives and standards expressed in the plan At present, a detailed monitoring program has not been identified Allocation of available funds can and will have an influence on the scope and intensity of monitoring and evaluation efforts.

6) Lack of Adequate Social and Economic Analyses

Much of the social and economic values of fishery resources associated with the National Forests is due to use by people from large urban areas, such as Boise/Spokane/Salt Lake City, or in marine or lower Columbia River fisheries, in the case of anadromous species Economic and social analyses should be extended to those areas. The scope of social and economic analyses should not be limited to rural communities dependent on Forest timber or range products. Such analyses are severely biased against fisheries resources Social and economic values should be displayed for the sectors directly consuming most of the fish resource of a Forest

7.) Lack of Adequate Monitoring

Monitoring should be described in terms of specific fish habitat locations and measurements It should be designed around multivariate and empirically valid statistical models, so that error and uncertainty can be quantified. Monitoring should be designed to validate site specific impact projections It should also be tied to rigid direction statements which define how management actions will be modified when monitored effects do not meet projected values, or when adequate monitoring is not funded

Adequately funded monitoring of fishery/sediment models should also be a key component of the Forest Plans It is to everyones benefit to determine how well existing models predict the impact of timber harvest and other developmental activities are having on watersheds and fish habitat, so all resources can be managed appropriately

This advice is presented in order to help guide your technical staff in developing final Forest Plans and Environmental Impact Statements. We hope that substantive changes in Forest planning result in technically acceptable documents The Idaho Chapter of the American Fishery Society will be glad to provide further assistance to clarify how their advice can be used to the advantage of your National Forest in finalizing the Forest Plan and any future Forest planning documents

Sincerely,

Ned Horner

Ned Horner, President
Idaho Chapter American Fisheries Society
So 2450 Greenferry Rd
Coeur d'Alene, ID 83814

cc Carl Sullivan, Washington D C
Johanna Rienhart, Ottawa, Ontario
Tony Novotny, Seattle, WA

Specifics on the monitoring program will be determined during development of annual monitoring programs Habitat features that could be monitored include both rearing and spawning components

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

Sincerely,

RICHARD T HAUFF
Forest Supervisor

0033

The Nature Conservancy

c/o Forestry Sciences Laboratory
1221 South Main
Moscow Idaho 83843
(208) 882 3557

SALMON NF
DEC 23 '85

December 19, 19

REC'D
ACTION

SUP						
MP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
TLM	1	2	3	4	5	6
RMW	1	2	3	4	5	6
FO	1	2	3	4	5	6

cc: Jensen 12/23/85 SAF

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

Dear Mr Hauff

Thank you for the opportunity to review the Proposed Salmon National Forest Plan The Nature Conservancy's overall goal is the preservation of rare elements of biotic diversity and it is toward this that the following comments are directed More specifically, I am commenting on how the plan addresses two major areas

Sensitive Plant Taxa - For this information I rely on the Idaho Natural Heritage Program The Heritage Program is a comprehensive biological inventory undertaken in a cooperative effort between The Nature Conservancy and the Idaho Department of Fish and Game The resulting data base serves as a clearinghouse for information on rare species and ecosystems in Idaho and is continuously being updated and refined, making it ideally suited for natural resource planning efforts on National Forests

Research Natural Area (RNA) Establishment - In April, 1985, The Nature Conservancy entered into a cooperative agreement with the USFS, Intermountain Research Station, wherein the Conservancy would assist the Forest Service in its RNA establishment efforts in Idaho, Nevada, and Utah As the Idaho representative, I am working with National Forests in Idaho In addition, I am working closely with members of the Idaho Natural Areas Coordinating Committee

Overall, the Forest has done a good job in planning for sensitive species and RNA's The Nature Conservancy suggests, however, that the Forest Plan could be improved by consideration of the following comments

1 The Salmon National Forest has done a good job in establishing and recommending RNA's The ten RNA's proposed in the Plan will be significant additions to the RNA system in Idaho It is also encouraging that the Forest acknowledges their role in future RNA establishment efforts as our knowledge of the range of diversity embraced by the Forest increases

National Office, 1800 North Kent Street, Arlington, Virginia 22209

VI-141

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

Bob Moseley, Natural Areas Ecologist
The Nature Conservancy
c/o Forestry Science Laboratory
1221 South Main
Moscow, Idaho 83843

Dear Mr. Moseley.

Thanks for your comments regarding sensitive plant species. As you are probably aware, our Regional Office is working on a revision of our regional sensitive plant species list. The list is scheduled for completion prior to the date our final Forest Plan will be completed. Changes in the sensitive plant species list, as mentioned in your letter, will be reflected in the final copy

Also, as suggested, we will note in our final Plan that a portion of the proposed Sheep Mountain RNA (Research Natural Area) is on the Salmon National Forest. As you noted, the Sheep Mountain RNA spans portions of three Forests, and the Challis National Forest has taken the lead for this proposed RNA.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

There is one omission, however, from the list of proposed areas Cheer Mountain is a candidate RNA that is included in the Challis National Forest Plan The northeast portion of the proposed RNA occurs on the Salmon National Forest.

2 Several problems exist with the sensitive plant species list presented in the DEIS Specifically 1) It includes taxa no longer considered rare and, therefore, the Forest need not consider them in planning (i e., Agastache cusickii and Physaria didymocarpa var purpurea), 2) East-central Idaho has excellent floristic information, especially on rare plants, due to the research of Dr D M Henderson of the University of Idaho Your list includes species that are not known to occur near the Forest boundry and, again, the Forest probably need not consider them (i e , Astragalus amnis-amissi and others), and, most importantly 3) The list does not consider species occurring on the Salmon National Forest that have only recently been found to be rare (i e , Astragalus scaphoides)

I realize that, until recently, the Forests in Idaho have had no easily accessible source of up-to-date information on rare plants The Idaho Natural Heritage Program is now available to provide this data

Thanks again for the opportunity to comment on the Proposed Plan and DEIS and I look forward to working with the Salmon National Forest in the future If you have any questions concerning these comments feel free to contact me

Sincerely,

Bob Moseley

Bob Moseley
Natural Areas Ecologist

cc Lloyd - Chairman, R-4 RNA Committee
Wellner - Idaho Natural Areas Coordinating Committee
ID Natural Heritage Program
Atwood - R-4 Zone Botanist

VI-142

IDAHO TRAIL MACHINE ASSOCIATION, INC.

Conservation — Courtesy — Safety

PTMA
PO Box 4459
Pocatello Id
83205

IFTMA
PO Box 2345
Idaho Falls Id
83401

MVTMA
PO Box 1023
Twin Falls Id
83301

SRTRA
Rt 2 Box 72
Rupert Id
83350

TVTMA
PO Box 1913
Boise Id
83701

VI-143

Dec. 21, 1985

Forest Supervisor
Salmon National Forest
Forest Service Bldg.
Salmon, Idaho 83467

Dear Forest Supervisor:

Although we don't have a chapter of the I.T.M.A. in Salmon, many of our members ride on the forest, and there are many trail riders in the area. Because of the projected increase in demand for motorized recreation areas we would like to insure that consideration is given to those needs in your Resource Management Plan.

We are opposed to any additions to the Wilderness Preservation system on your forest. This formal designation is to ~~p~~ restrictive, and proper consideration is never given to motorized recreation when making wilderness decisions. All trails now open to motorized recreationists should remain open, with seasonal closures used where necessary, to protect wildlife at particularly vulnerable times of the year. Seasonal closures could also be advisable, in certain areas vulnerable to damage from to early of use of wheeled vehicles. These temporary closures would be preferable to closing an area entirely due to these concernes, and only the type vehicle effecting ~~the~~ the area should be prohibited. Sometimes the roads aren't ready for four wheel use but the trails are ready for trail bike use.

As no trails are closed to non-motorized users due to user conflict, we feel that it would be unfair to close trails or areas to motorized use due to a percieved user conflict expressed by non-motorized users. There aren't enough trails and recreation areas to segregate use and it is unfair to descriminate against one user group as a result of a percieved conflict by a user group who is not willing to share the resource, and has access to the entire forest. If in the future user conflicts are going to prompt closures, non-motorized users should be excluded from some of the areas.

In these times of limited funding for recreational improvements and maintenance, it is increasingly important that costs not be increased by overly restrictive Wilderness Classification. Exclusion of motorized recreation also excludes use of State Parks and Recreation O.R.V. ~~gunfd-yhsy-atr-ogyrf-uirf-got~~ funds that are often used for improvements that benefit all trail users.

Please consider the many motorized forest users in finalizing your management plan and send me a copy of your final decision.

Sincerely:
Clark L. Collins
Clark L. Collins Vice President
201 ~~Henry~~ Henry
Pocatello, Idaho 83202

United States Department of Agriculture — Forest Service — Salmon National Forest — P O Box 729, Salmon, ID 83467

Reply to 1920

Date

Clark L Collins, Vice President
Idaho Trail Machine Association, Inc
201 Henry
Pocatello, Idaho 83202

Dear Mr Collins:

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

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

All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA) Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan This travel plan is updated periodically uring both public input and information gathered by monitoring the current travel plan Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range. The guidelines for transportation system management are located in the Draft Forest Plan on pages IV 65-68

FS 6200 28(7 82)

You are correct in stating that exclusion of motorized recreation also excludes use of State ORV funds; however, it is our intent to provide a wide range of recreation opportunities, including both motorized and nonmotorized uses. We hope you will agree that the selected plan provides significant opportunities for motorized recreation users.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

00 58

Idaho Environmental Council

P O Box 1708

Idaho Falls, Idaho 83401

DEC 26 '85

Dec. 21, 1985

Proposed Salmon N.F. Plan

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

Dear Dick,

Here are our comments on the proposed Salmon National Forest Plan and draft EIS

On the Salmon National Forest are some of the most outstanding wildlands, wild rivers, and wildlife in America, including parts of the Frank Church-River of No Return Wilderness, Middle Fork Salmon Wild & Scenic River, and main Salmon Wild & Scenic River. In addition, the Salmon N.F. has lesser known but outstanding de facto wilderness areas, noteably the Lemhi Range and the Bitterroot Range

However, these high values have been de-emphasized, and often damaged, by primary emphasis on timber harvest. Since the mid-1950's, the Forest has been badly overcut. Hundreds of miles of roads have been constructed to access the timber. Most of these roads remain open, continuing to cause wildlife impacts. Damage to fisheries and big game habitat has also been caused by cattle in the wrong places, and by mining. These problems have been identified by public input. Although the DEIS lists them as Issues and Concerns, still the proposed Forest Plan fails to address them in any substantial way, instead attempting to justify primary emphasis on commodity outputs.

VI-145

Alternatives 3, 8, 9, and 11 all have a positive thrust regarding protection of habitat, watersheds, wildlife, fish, and roadless areas. Unfortunately, you have selected none of those. Instead, for no good reason and without even listing Decision Criteria, you selected Alternative 12, one of the more environmentally destructive and economically wasteful of the alternatives you evaluated.

Instead, we urge you to adopt Alternative 3, the "Non-Market Opportunities" Alternative, with some modifications and points of emphasis which follow.

A very important criterion for alternative selection should be the amount of roadless area left undeveloped at the end of the planning period. More roadless area left will mean more ecosystems retained and more floral and faunal diversity, and generally will mean more habitat, more watershed and fishery protection, more primitive recreational opportunity, and less money lost on timber subsidies.

United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to 1920

Date

Jerry Jayne, Board Member
Idaho Environmental Council
1568 Lola Street
Idaho Falls, Idaho 83402

Dear Mr. Jayne

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

Each of the twelve alternatives presented in the Forest Plan presents an achievable, yet different, mixture of resource levels Some alternatives place more emphasis on commodity resources such as timber Other alternatives place more emphasis on nonmarket resources with correspondingly less emphasis on commodity resources Alternative 12 was chosen because it provides the best mix of resource outputs at a reasonable cost No one resource is maximized at the expense of others Timber harvest levels have actually been reduced from the 38 million board foot levels of the 1970's to approximately 21 million board feet

WILDLIFE AND FISH

Elk

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

Early in the planning process, KESR's were mapped on the entire SNF At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the Draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road

FS 6200 28(7 82)

The table below ranks all 12 alternatives by the amount of roadless area to be retained for the next 10 years. To the nearest 1000 acres, it shows the total areas recommended for wilderness, SPNM recreation, SPM recreation, and other multiple uses. The "Lost" column shows the roadless acreage the DEIS predicts will actually be roaded and logged in the first 10 years. (The amount of roadless acreage retained = 830 thousand - Lost.) The table also shows, for the first decade, annual average timber harvest levels and annual average miles of road construction and reconstruction. In addition, the table shows the 50 year Present Net Value. Note the general correlation between the PNV and the amount of wildland retained for 10 years, and the inverse correlation between PNV and levels of road-building and timber harvest. These correlations clearly indicate that low commodity/high amenity alternatives are economically superior as well as environmentally superior for the Salmon National Forest. (DEIS II-79,81,154,155, 160,164, and IV-7,92.)

COMPARISON OF ALTERNATIVES, with
Alternatives Ranked by Amount of Wildland Retained, 1st Decade

(All values are for the first decade except PNV.)

Rank	Alt	W Rec	SPNM	SPM	Other	Lost	Timber	Roads	PNV,50 yr
		Areas are in 1000 acres					MMBF/yr	Mi/yr	Million $
1	11	830	0	1	0	0	9.1	31	64.1
2	10	677	6	2	145	46	18.1	58	19.2
3	9	579	60	53	138	72	7.7	30	49.8
4	8	471	96	35	228	104	9.5	29	64.0
5	3	349	85	227	169	109	8.0	29	49.4
6	6	0	0	483	347	165	17.6	38	34.4
7	7	237	90	107	396	209	17.9	49	24.6
8	1	77	21	46	686	221	20.5	63	15.3
9	12	0	0	286	544	224	21.1	66	0.5
10	2	184	2	23	621	320	32.9	97	-28.8
11	4	158	3	30	639	348	32.7	104	-28.2
12	5	0	17	0	813	385	36.8	115	-34.4

construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk This analysis revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90

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

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

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

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

WILDLIFE AND FISH

The Salmon National Forest is a tremendous fish and wildlife resource, with a large diversity of habitat. There are 337 species of vertebrates which derive all or part of their habitat needs from the Forest, including 21 species of fish, 9 of amphibians, 10 of reptiles, 222 of birds, and 75 of mammals. Species include elk, moose, mule deer, white-tailed deer, bighorn sheep, goat, pronghorn, bear, lion, coyote, marten, etc. There is habitat for 4 T&E species: bald eagles winter on the Forest, peregrine falcons have traditionally nested there, there have been past grizzly sightings, and a very few wolves seem to be present. In addition, Species of Special Concern to Idaho Fish & Game Dept. are wolverine, lynx, bobcat, trumpter swan, ferruginous hawk, and prairie falcon. (Plan II-6,20; DEIS III-26,IV-15,25)

The table below shows a partial list of Management Indicator Species (MIS) with estimated existing populations, minimum viable populations, maximum potential populations, and the predicted effects on habitat for several alternatives. Shown are Alternatives 3, 8, and 9, all generally good wildlife alternatives; the proposed Plan, Alternative 12, which is not; and Alternative 5, which is probably the worst wildlife alternative of the 12 evaluated. This table shows only those MIS for which estimated populations very significantly by alternative; primarily elk, deer, and mature/old growth forest species. (DEIS S-9, IV-24)

Effects on Selected MIS by Alternative

(Elk and deer populations are shown in thousands; other species as % of maximum habitat, with pop. nos. in parens.)

Species	Minimum Viable	Maximum Potential	Existing	Alternative 3	8	9	12	5
Elk	1.5	10.3	7.1	9.6	8.7	9.1	7.4*	5.4
Mule Deer	5.0	44.4	21.7	22.3	22.3	22.3	18.6	14.8
Marten	13% (200)	100% (1090)	55% (600)	50%	65%	64%	33%	20%
Pileated Woodpecker	10% (46)	100% (456)	38% (172)	46%	50%	50%	23%	14%
Goshawk	33% (50)	100% (150)	48% (72)	46%	55%	55%	38%	37%
Great Grey Owl	12% (30)	100% (244)	25% (60)	21%	34%	32%	17%	13%
Pygmy Nuthatch	?	100% (3800)	24% (900)	20%	35%	35%	12%	11%
Brown Creeper	5% (1800)	100% (35000)	26% (9000)	20%	35%	35%	9%	9%

(* This elk figure is highly optimistic. See "Elk" below.)

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will only be subject to salvage timber harvest following natural disasters Consequently, these migration routes are provided protection from road encroachment and cover removal.

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

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

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

Fish

The relationship between timber management activities within a drainage and the influence on fish habitat was modeled with sediment being the controlling factor Two key approaches were incorporated into the analysis The first approach was the application of the relationships presented in the "Guide for Predicting Sediment Yields from Forested Watersheds" to estimate changes in sediment delivery to streams The second approach utilized the relationships in the "Guide for Predicting Salmonid Response to Sediment Yields in Idaho Batholith Watersheds" to estimate the influence sediment would have on fish survival Both guides are available from the Forest Service.

Sediment rates were limited in all alternatives so that fisheries goals for that alternative could be met. The nature of fishery goals are different for anadromous and resident species because of the difference in life histories Even though each alternative had different fishery goals with respect to anadromous and resident populations, the difference between alternatives was not very great because of the life history relationships used In order to meet the sediment restrictions associated with fishery goals, the timber production model directed activity into the more stable geologic areas of the forest and limited the rate of access construction and acres of logging activity

The proposed Plan would have adverse impacts upon many species of wildlife, including elk, deer, anadromous fish, trout, and several old growth species.

For big game species, the Plan admits that Fish & Game goals cannot be met. In "Summary of the Need for Change on the Forest as a Whole" it says (Plan II-84,85):

> "Wildlife and fisheries changes identified are centered around the ability to provide habitat sufficient to meet State Fish and Game Department population goals. As projected, the current management direction would not provide the habitat quality needed to meet big game goals after the first decade. This will necessitate changing the objective of meeting State goals or changing the amount and scheduling of timber harvest and road construction."

("current management direction" is Alternative 1, which has about the same level of timber harvest as the proposed Plan.)

A stated Forest Management Goal for wildlife and fisheries is: "Provide wildlife habitat of sufficient quantity and quality to sustain current populations of economically important management indicator species " (Plan IV-1) But the Plan will not even do this, at least not for elk, deer, salmon, steelhead, or trout.

Elk

In 1980, the Idaho Fish & Game Dept. Director asked all N.F. Supervisors in Idaho to manage all key elk ranges in the State at 100% of potential. A Salmon N.F. inventory found a total of 271 thousand acres of key elk habitat outside the FC-RNR Wilderness, and that 60% of the summering elk were found on these lands. Hadley Roberts has determined that the Plan will eliminate over half of the existing key elk summer range. We must therefore challenge the claim that the Plan will maintain the existing 7000-plus elk Most key elk summer range is high (over 7000 ft) with short growing seasons, so these areas must be regarded as poor timber growing sites. It is difficult to understand why the F.S. has created a timber-wildlife conflict by proposing that a low resource timber value degrade a high resource elk range value.

The Plan indicates that many of the key elk summer range areas, all favorite hunting spots, will be roaded and cut within the first decade. Some of the better areas are Musgrove Creek, Salzer Bar, Anderson-Threemile Creeks, Hayden and Tobias Creeks, Pierce Creek, Big Deer Creek, Horse Creek, and Oreana Ridge. And this is only the first decade. The Plan simply ignores the F&G Director's 1980 request for protecting key elk range.

The Plan proposes to road and log in Threemile, Anderson, and Pierce Creeks in the Anderson Mt. Roadless Area, and in Sheep Creek and Dahlonega Creek, just south of the that Roadless Area. A F.S. financed research project in 1976 pointed out the extreme value of this elk migration corridor. It recommended that the area remain roadless to protect this value. The Plan completely ignores this recommendation and might even lead to complete abandonment of the Sheep Creek-Silverleads Creek elk and deer winter range.

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

Old Growth

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

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

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

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

The wildlife species selected as management indicator species (MIS) for the Salmon Forest Plan are considered to represent each of the various wildlife habitats found on the Salmon National Forest and to have the most limiting

Fish

Anadromous fish and trout (all species combined) are also used as MIS. But the predictions of effects (DEIS IV-24) are questionable, since they show no great difference in fish mass by alternative, while the stream sedimentation rates do. We believe that there is more linkage between increased sedimentation rates and decreased fish production than the Plan indicates The following table, from the DEIS IV-41-42, compares the rate of steam sedimentation for the same alterantives compared in the MIS table above.

Sedimentation Rates in Streams, by Alternative
(% over natural level, for the first decade)

	Alternative				
	3	8	9	12	5
Anadromous streams	11%	11%	11%	21%	40%
Resident-only streams	22%	28%	23%	53%	81%

The Plan would greatly increase the rate of sedimentation in important spawning streams, including Hayden Creek, Iron Creek, North Fork of the Salmon River, and Indian Creek, which are all classified as Blue Ribbon streams by the Idaho Fish & Game Dept., as indicated on the 1978 map "Stream Evaluation Map for the State of Idaho". All are important for anadromous fish spawning, but all are threatened by timber sales. In the North Lemhi Roadless Area, Hayden Creek, including the Basin and Bear Lake Creek Drainages, is an important spawning tributary of the Lemhi River. The planned timber sales in Hayden Creek would probably destroy anadromous fish spawning there. Iron Creek drains east from the Taylor Mt. Roadless Area into the Salmon River; the Plan calls for timber harvest in the drainage. Timber harvesting is planned in several of the North Fork drainages, threatening spawning habitat as well as key elk habitat

Old Growth Species

For MIS species other than economically important ones, the Forest Management Goal for wildlife and fisheries says: "Provide wildlife habitat of sufficient quantity and quality to at least maintain minimum viable populations for all other MIS." (Plan IV-1).

The non-game MIS species to be impacted most by the Plan are the old growth species. The discussion of Plan responses to issues and concerns says that "Habitat for old growth-dependent species will decrease in non-wilderness areas, but will not fall below that necessary to support minimum viable populations." (Plan III-1).

"Minimum viable populations" is inadequate. In 1978, Regions 1 and 4 of the F.S. signed a wildlife plan with the Idaho F&G Dept. for habitat management on the National Forests in Idaho. One of the specific goals of that plan says: "Intensify fish and wildlife management to protect, maintain, and enhance existing populations." ("A Program for Fish and Wildlife Habitat on the National Forests and Grassland in Idaho", August, 1978, U.S. GPO 1978-796-058/20.)

habitat requirements of the species using these habitats By satisfying the habitat needs of those wildlife species with the most restrictive requirements, it is felt the needs of all other species will also be met

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

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

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

TIMBER

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

TIMBER

In the mid-1950's, the Forest Service nationwide encouraged the timber industry to move to the National Forests on a large scale. The Salmon is a good example of a National Forest with low timber values, which has subsidized the local mill with roads, cheap logs, and overharvest since then, to the detriment of fish and wildlife.

In February of this year, Champion International closed their Salmon mill because of poor market conditions. Another economic problem for the Salmon mill has been that it is farther from a railroad head than just about any other logging community in the U.S. It should be pointed out that wilderness, designated or proposed, had very little to do with the closure. In fact, after Champion closed the mill, they turned back at least 36 MMBF of timber they had contracted to buy but had not cut; this represented a 2 year supply even at a former 2 shift level of operation. The mill is now being operated by new management at a much lower level of output.

The Plan proposes to offer 21.1 MMBF/yr for sale during the first decade, and an average of 23.9 MMBF/yr over the next 50 years. But it states that "If current lumber market conditions continue, only 10.6 MMBF per year is expected to sell." (Plan II-93,94).

The proposed 23 9 MMBF/yr is certainly lower than the peak overcut of 34 MMBF/yr in the 1970's. But it is still too high. Elk, deer, fish, and many of the non-game MIS species, particularly the old growth species, would suffer significant habitat loss and population reductions, as discussed in the previous section on Wildlife and Fish. As to big game species, the Plan (II-85) says that:

> "Projected levels of harvest exceed that which would allow the attainment of State big game goals. Meeting these goals would necessitate a reduction of timber harvest levels."

The extent of economic loss on past Salmon N.F. timber sales is indicated by a 1984 GAO report ("Congress Needs Better Information on Forest Service's Below-Cost Timber Sales", GAO/RCED-84-96, June 28, 1984). It shows that all timber sales on the Salmon N.F in 1981 and 1982 were below-cost; the 5 sales in 1981 lost $1.5 million and the 8 sales in 1982 lost $0.95 million. A more recent sale example is the Mill Creek Timber Sale in the Lemhis, which sold on October 21 of this year. The 2039 MBF sale cost the F.S. $25/MBF for preparation and administration, and another $25+/MBF for the road, or a direct cost of $102,929. The timber brought $13.43/MBF, or $27,384. With a B/C ratio of 0.27, this represents a loss to the government (i.e., the taxpayers) of over $75,000.

More to the point, the Plan proposes to continue this economically wasteful and environmentally destructive mode of management. The timber subsidies which the F.S. offers only induce more overcutting, mining of old growth, and loss of fish and wildlife habitat. The F.S. plans to continue using appropriated funding to build new arterial timber access roads. For other timber access

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It would be true to say that there are areas of forest land on the Salmon National Forest incapable of producing crops of industrial wood There are, in fact, many acres which probably fall into that category The e acres are included in classification 6, inadequate information, in Table II-12, page II-175 of the DEIS A final determination on these acres will be made through the next Forest inventory effort on the Salmon National Forest beginning this year. While the actual current net growth is about 26 cubic feet per acre per year, the average potential productivity is about 45 cubic feet per acre per year If all of the potential could be realized, the timber productivity could be increased about 73 percent This large potential increase in productivity with management supports the desirability of continuing development of a portion of the currently undeveloped lands

The National Forest Management Act does state that regulations should be developed specifying guidelines which insure that timber will be harvested only where "there is assurance that such lands can be adequately restocked within five years after harvest " These "NFMA Regulations" (36 CFR 219) state that "when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way as to assure that the technology and knowledge exists to adequately restock the lands within 5 years after final harvest " The initial cut in the shelterwood and seed tree methods is normally made to encourage prompt regeneration, however, the final harve t must often be delayed more than 5 years to ensure that there will be adequate regeneration after the final harvest. This delayed final harvest to await regeneration was used in our FORPLAN model for harvest projections and is consistent with the Regulations

Fire

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

ROADS

All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA) Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan. This travel plan is updated periodically using both public input and information gathered by monitoring the current travel plan Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range The guidelines for transportation system management are located in the Draft Forest Plan on pages IV 65-68

roads, the Plan proposes to continue augumentation funding at 22% of the total road costs (DEIS II-73). Both of these road funding schemes represent raids on the Federal treasury While many of us are not opposed to all subsidies, we do tend to oppose those subsidies which contribute to the destruction of natural resources such as wilderness and wildlife habitat.

How much money would the proposed timber plan waste? The DEIS shows that the Present Net Benefit (PNV) for timber for the 50 year period is $14.9 million, while the Present Net Cost (PNC) for timber is $66.7 million. That is, the Present Net Value (PNV) for timber is -$51.8 million! The timber PNV ranges from about -$18 million (Alternatives 3, 8, and 9) to about -$70 million (Alternatives 2, 4, and 5) (DEIS II-81).

Money loser that it is on the Salmon N.F., timber harvest is even worse than it looks in the Plan, which bases its economic analysis on timber prices from 1971-1980 (DEIS Appx B-31). The much lower price of more recent years is probably more realistic.

The Salmon National Forest is not a good timber growing forest, with a current average annual growth of 26 cubic feet of wood per acre, which is far below what is considered economic on private timber lands. And yet the DEIS does not identify lands which are economically unsuitable for timber harvest, in spite of the fact that NFMA requires this. Section 6(K) says that the Forest Service "shall identify lands within the management area which are not suited for timber production, considering physical, economic and other pertinent factors...".

Regeneration of Douglas-fir is also a problem. NFMA requires that regeneration can reasonably be expected in 5 years. The Plan should indicate the historical success rate of regenerating harvested Dougfir stands, to show whether or not this requirement can be meet.

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Fire

There is no significant difference in the fire protection program for alternatives (DEIS IV-54). One would expect that fires in wilderness would usually be allowed to burn, and that this would reduce fire costs in the higher wilderness alternatives.

Fires burned large areas on the Salmon N.F. this summer. But bulldozer damage created by fighting those fires may have caused more damage than the fires. Hundreds of acres were denuded by bulldozers because of lack of guidance for their operation. The Plan should includes standards and guidelines for soil resource management that will cover eventualities when catastrophic fires occur again.

ROADS

The Plan proposes 66 miles of new and reconstructed roads per year for the first decade (DEIS II-154,155). This is far too much roading for the good of wildlife and watersheds. The Plan predicts that the total permanent road system at the end of 50 years would

ROADLESS AREAS

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

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

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

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

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

2 Semi-primitive motorized on designated routes in the head of drainages from the Middle Fork of Little Timber Creek north to Basin Lake,

3 Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,

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

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

6. Medium investment timber output emphasis from Mill Creek to Little Sawmill Creek and in the McNutt Creek/Basin Creek drainages,

be 3080 miles, a net increase of 1245 miles over the current road system. Even alternative 3, with the smallest anticipated road system in 50 years, shows 2300 miles, a net increase of 455 miles. (DEIS II-164).

One proposal which is very good, which we support, is road closures for new roads. The Plan says that there is a need for "a more effective road and area closure policy" (Plan II-85) and that "All newly-constructed roads will be closed when not actually being used for timber harvest, or related timber management activities, except those roads left open for other needs as determined through the NEPA process. (Plan III-2). This means that an Environmental Assessment would have to be done and justify leaving any new road open.

However, there are also existing roads on the Forest that should be closed. Some of the roads are in high value wildlife habitat, and are not needed for management purposes.

ROADLESS AREAS

There are 830,469 acres in 30 roadless areas in the Salmon National Forest, not counting 427 thousand acres of the Frank Church-River of No Return Wilderness. Many of these wild areas have very high fish and wildlife, scenic, and recreational values. The descriptions of these roadless areas in Appendix C of the DEIS make numerous references to species of wildlife and fish which don't even exist in most of the United States.

For all the magnificent wild land on the Salmon National Forest, the Forest Service is not proposing a single acre for wilderness designation! Furthermore, this atrocious plan proposes to develop 224 thousand acres of the 830 thousand acres of existing roadless area within 10 years. Twelve of the roadless areas would be completely eliminated from further wilderness consideration. Large fractions of 8 other roadless areas would also be developed (DEIS Appendix C).

There are 3 regions of the Salmon N.F. that should remain wild - the Lemhi Range, the Bitterroot Range (5 roadless areas), and the 6 roadless areas contiguous to the FC-RNR Wilderness. Several of these areas are in the wilderness recommendation of Alternative 3, which includes part of the Lemhi Range, most of West Big Hole and Allan Mt in the Bitterroot Range, and all of the roadless areas contiguous to FC-RNRW.

We urge that you recommend for wilderness those areas in Alternative 3, with this modification: that all of the Lemhi Range Roadless Area be included, and that Anderson Mt. be included. In addition, Goat Mt , Italian Peaks, and Taylor Mt. Roadless Areas should be managed as roadless.

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7 Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas; and

8. Range management emphasis in the Swan Basin area

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

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

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

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

1. Key big game winter range emphasis on the Panther Creek Face,

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

Lemhi Range

Lemhi Range Roadless Area - provides outstanding habitat, scenery, and primitive recreation. This large, high area, 303 thousand acres, has 153 thousand acres on the Salmon N.F. and 150 thousand on the Challis N F. Wildlife includes bighorn sheep, goat, bear, deer, elk, antelope, and probably wolf. Some of the lower elevation forest has already been roaded and logged on the Salmon side, even though timber values are low. The Plan calls for even more timber sales and roads in the Lemhis. These are planned for Alder Creek (a tributary of Big Timber Creek), Deep Creek, Hayden Creek, and Basin Creek, which is a tributary of Hayden Creek. These timber sales and roads would ruin elk calving range, anadromous and resident fish spawning habitat in Hayden Creek, and beautiful roadless land best left alone. Continuing to log the Lemhis is asking the taxpayers to pay for mining timber and destroying fish and wildlife habitat.

Instead you should recommend wilderness designation for the entire Lemhi Range Roadless Area. Alternative 3 leaves out 50 thousand acres. But the excluded portions tend to be at lower elevation, and these are generally the best habitat for most species.

Bitterroot Range

This mountain range forming the Continental Divide between Idaho and Montana is important habitat for several wilderness species. It is especially valuable elk range. It is essential that the roadless areas in the Bitterroots remain undeveloped.

West Big Hole R.A. - This area, with its spectacular range of sharp peaks, provides important elk and deer migration corridors and anadromous fish streams. Other wildlife includes bear and goat. On the Montana side, the Beaverhead N.F. has recommended part of West Big Hole for wilderness.

Anderson Mt. R.A. - This area is key elk summer range and an important migration area for a large 2 state elk herd. The Fish & Game Department has asked you to leave it undeveloped (as we have), but you have a large timber sale planned in Anderson-Threemile Creeks, and another in Pierce Creek.

Allan Mt. R.A. - This scenic area has some old burned open areas furnishing good habitat and good views. There are bear, lion, goat, wolverine, pileated woodpecker, and many raptors.

Goat Mt. R.A. - This is high, largely open, scenic country Antelope and deer migrate through the area. There may be wolves. Prairie falcons and golden eagles nest there. "Prehistoric and historic cultural resources are known to exist within this unit, but their significance has not been determined." (DEIS Appendix C).

Italian Peak R.A. - Is contiguous to BLM roadless land, which is contiguous to the Targhee N.F. portion of Italian Peak R.A. It's also open on top and scenic, has elk calving and deer fawning areas as well as winter and summer range. Cultural resources exist here too.

3 Emphasis on low investment timber outputs on a portion of the upper Big Deer Creek drainage

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

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

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

Blue Joint Roadless Area Number 13941 (Salmon Portion) will not be recommended for wilderness designation, however, the management emphasis will be semi-primitive motorized Moderate public support for wilderness designation was generated during RARE I, RARE II, and more recent public comment opportunity while considerable opposition against new wilderness was

Areas Contiguous to the FC-RNR Wilderness

Camas Creek R.A. - Wildlife includes elk, deer, bear, sheep, goat, cougar, and trout. There is potential for wolf recovery. The northern end lies mostly on the Salmon N.F., draining into Camas Creek (via Silver, Castle, and Furnace creeks). Since Camas Creek is a major tributary of the Middle Fork of the Salmon, and this is steep, rugged land, wilderness recommendation is a good idea.

Duck Peak R.A. - Drainage is mostly into Camas Creek via Yellowjacket and Silver Creeks. The DEIS says (Appendic C) that the area is "extremely diverse in terms of vegetative and topographic features, containing a wide variety of wildlife habitats over almost a mile of vertical relief." There is key elk range and anadromous fish habitat.

West Panther Creek R.A. - Elevation from 3500 feet to 9000 feet. Deer, elk, and bighorn.

Long Tom R.A. - Steep. Corn Creek and Wheat Creek. Elk, deer, lion, bear

Little Horse R.A. and Oreana R.A. - These 2 small areas are separated only by the road on Oreana Ridge.

Other

Taylor Mt. R.A. - Iron Creek, an important anadromous fish spawning stream which drains directly into the main Salmon River, is threatened by planned roads and timber sales. The area has several alpine lakes in cirque basins, noteably the scenic Hat Creek Lakes Several lakes have trout, and one has grayling. There is key elk summer and winter range for the 200 to 250 animals in the Moyer Creek herd.

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MINERALS

The Plan (II-52) points out that "Past mineral exploration and production activities within the Forest have created serious environmental problems, primarily in the areas of degraded water quality and aquatic habitat, in the vicinity of the Blackbird Mine." Some of the settling ponds left in the Cobalt area from previous mining activities are in need of repair. Otherwise, effluents containing heavy metals, and perhaps other toxic materials, may escape and further degrade water quality and aquatic habitat in Panther Creek and the main Salmon River

Although there has been no historic production of leasable minerals and there are now only 6 oil & gas leases on about 5400 acres, there are 40 to 50 more oil & gas leasea pending on 177,000 acres. And there are also 9 phosphate prospecting permits pending on 18,000 acres, some east of Leadore in Hall Creek and some in the Italian Peak area (Plan II-53).

expressed Mineral potential is low on the Salmon National Forest portion (490 acres), and no resource activities are planned which would preclude consideration of this area for wilderness during the next plan revision Wilderness designation has been recommended for a portion of this area on the Bitterroot National Forest

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

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

2. Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,

3 Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kerney Creek,

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

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

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

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

We ask that no oil & gas leases or prospecting permits be granted in any roadless area which we are asking you to recommend for wilderness designation or to manage as roadless (See previous section on Roadless Areas.), or in any other area with high wildlife values. In 1981, the IEC, and most of the other parties who responded, asked the F.S. to deny the phosphate prospecting permit applications in Hall Creek because of wildlife values. But we were essentially ignored, as the final EA proposed to grant the permits. The Plan offers the opportunity to correct this error and deny the permits.

Already, 69% of the Forest is open to mineral entry and leasing. The Plan would increase this to make 76% available, which is too much to offer needed protection to important roadless areas and habitat. (Alternatives 3, 8, and 9 would make available 57%, 50%, and 44%, resp.) (DEIS II-162)

RANGE

Alternative 12 proposes a slight increase from the existing grazing level of 54,100 AUM's per year to 55,000 A lower level would be better, such as the 48,000 in Alternative 3.

But at least as important as the total AUM's is the need to direct cattle use away from key wildlife areas The Plan points out that "Livestock grazing is currently adversely impacting some riparian zones and conflicts with environment policy and direction. Grazing systems and structural improvements need to be implemented on some riparian zones if this direction and policy is to be met." (Plan II-39) It also says that "Enhancement of riparian areas in a deteriorated condition will be emphasized." (Plan III-3). We support your efforts to protect riparian areas.

The Salmon N.F. earlier inventoried areas of conflict between livestock and wildlife. This report shows that of the 188,000 acres of suitable rangeland on the Salmon N.F., there are 33,500 acres where conflicts exist between cattle and wildlife in general. Of this area, there are conflicts between cattle and elk on 18,400 acres. These include interspecific competition for forage and space on calving areas, wet meadows and wallow complexes, and key forage areas. Yet this report is not part of the DEIS, and the cattle-elk problems it identified are not addressed. We suggest that a summary of this report be included in the EIS, and that the cattle be moved out of areas of conflict as identified by this report. Otherwise, elk will continue to be displaced from these key summer habitats into marginal areas.

RECREATION

The outstanding wilderness, wildlife, and recreational values of the Salmon National Forest are of national significance. "Many people know of, and are attracted to, the Salmon National Forest and nearby areas, because of the National reputation of the river, floating, wilderness areas, and hunting and fishing activities along with the general scenic beauty of the area." (Plan II-3).

against new wilderness was expressed The Conference Committee Report to the Central Idaho Wilderness Act of 1980 states that it is the intent of Congress that this area be managed for nonwilderness multiple uses High mineral potential and past mining activities indicate a high probability of continued mineral development in portions of the area The Divide-Twin Creeks National Recreation Trail is also located within this area This National Recreation Trail is available for all types of trail use including motorized vehicles (trail machines) No other activities are planned that would preclude consideration of this area for wilderness during the next Forest Plan revision

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

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

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

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

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

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

2 Medium investment timber outputs on the Grizzly Hill/Irish Fox area

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

The Italian Peak Roadless Area involves portions of the Salmon, Beaverhead and Targhee National Forests and abuts the Bureau of Land Management's (BLM) Eighteen Mile Wilderness Study Area. Portions on the Beaverhead National

But the Plan, if implemented, will diminish hunting, fishing, hiking, and other primitive forms of recreation. It will destroy fish and wildlife habitat. It will degrade scenic quality of many areas. It will recommend not one acre of designated wilderness. And it will make all Semi-primitive recreational areas motorized instead of non-motorized, which means not even the Lemhis or the West Big Holes will be off limits to the use of dirt bikes.

We agree that the Meadow Lake Campground is overused. But instead of expanding the existing campground, we recommend that you put the larger campground well below the lake along the existing road, and that you make Meadow Lake itself a day use area only.

CULTURAL RESOURCES

Since no systematic survey of the Forest has been done, it is speculated that in addition to the 407 recorded sites, there may be several thousand sites not inventoried. We do not feel that your level of professional staffing for cultural resources, which has been limited to 1 or 2 temporary summer employees, is adequate. We support a higher level of surveying, general research, and interpretation. We agree that the location of most sites should not be publicized unless protection can be afforded

The interpretive signs at the Shoup Rockshelters and at Lemhi Pass are very good. It is important to protect the historic resources as well as the prehistoric ones; for example the indians trails and the Lewis and Clark trail.

RESEARCH NATURAL AREAS

There is now only 1 RNA on the Forest, in the Frank Church RNR Wilderness (Gunbarrel). We recommend that you propose for RNA staus all 10 of the sites which have been recommended by the Intermountain and Idaho Natural Areas coordinating committee.

SUMMARY

Alternative 12 is unacceptable because it overremphasizes timber management and road-building at the expense of fish and wildlife habitat, scenic values, and primitive recreation. It proposes no wilderness, even for the Lemhis or West Big Holes

You need a complete change in management direction for the Salmon National Forest, not just slight modification of Current Direction. We urge that you adopt the thrust of Alternative 3, which says: "Emphasis is on nonmarket outputs and values such as water, fish and wildlife and dispersed recreation."

Forest, the Targhee National Forest, and portions of the Eighteen Mile Study Area have been proposed for wilderness designation Five management prescriptions will be applied to the Salmon National Forest portion:

1 Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,

2 Key big game winter range emphasis in Hawley Creek,

3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,

4. Range management for domestic livestock emphasis on the gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages, and

5. Medium investment timber outputs in Frank Hall and Wildcat Creeks.

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

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

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

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

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

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

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

We ask that instead of Alternative 12 you select a modified Alternative 3 as preferred alternative. Our suggested modifications and points of emphasis are:

- Wilderness recommendation for Roadless Areas as in Alt. 3, but add entire Lemhi Range and Anderson Mt. Roadless Areas.
- Roadless management for Goat Mt., Italian Peak, and Taylor Mt. R.A.'s, with SPNM instead of SPM classification.
- Manage big game and fish habitat to meet Fish & Game Department goals.
- Manage non-game MIS habitat for existing populations, not minimum viable populations.
- Support for your proposal to close new timber access roads after logging is completed.
- Close those existing roads in important wildlife habitat which are not needed for Forest management.
- Identify lands not economically or physically suitable for timber harvest, as required by NFMA 6(K).
- Summarize degree of success with Dougfir regeneration.
- Provide guidelines for fireline construction
- Repair old tailings ponds in Cobalt area.
- Do not grant mineral leases in roadless areas referenced above, or in other important habitat, including Hall Creek.
- Support for riparian habitat protection and improvement.
- Move cattle out of important elk habitats. Include summary of livestock-wildlife conflicts inventory.
- Put the new Meadow Lake Campground down the road.
- Increase level of survey and research for cultural resources.
- Recommend the 10 nominated areas for RNA status.

Thanks for all the work you and your people have been putting into the planning effort. We are hoping you will improve the Plan along the lines we have suggested.

Sincerely,

Jerry Jayne

Jerry Jayne
IEC Board
1568 Lola St.
Idaho Falls, Id. 83402

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

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

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

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

2. Anadromous fish emphasis with medium investment timber outputs along the existing road up Camas and Castle Creeks, on the lower Silver Creek Face, and on the northern tip between the Rabbit Foot and Singhorse Mines, and

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

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

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

1. Anadromous fish emphasis with low investment timber outputs on a large portion of the area in Rams Creek, Duck Creek, Hammer Creek, Little Jacket Creek and Trail Creek;

2 Predicted fish emphasis with medium investment timber outputs in Meadow Creek and Beagle Creek.

3 Anadromous fish emphasis with high investment timber outputs on the Silver Creek Face.

4 Emphasis on medium irvestment timber outputs in Cabin Creek, Corral Creek and Fourth of July Creek.

5. Key big game winter range emphasis on the lower Panther Creek Face.

6 Key elk summer range--optimum habitat emphasis on the ridge and upper slopes between Duck Peak and Red Rock Peak; and

7 Semi-primitive nonmotorized recreation emphasis in Forge and Anvil Creeks

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

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

MINERALS

We don't fully understand your reference to problems with existing settling ponds in the Cobalt area. You are probably referring to the heavy metal effluents which originate on the Blackbird Mine property and which has

severely limited the anadromous fishery in Panther Creek. This pollution is caused by acid mine drainage and by nonpoint sources of pollution such as the waste piles and dumps in the Meadow Creek and Bucktail Drainage Most of this pollution results from past operation of the mine, and originates on private land. The Salmon National Forest is participating in a study funded by the Bonneville Power Administration, which is designed to develop rehabilitation strategies for facilities on both public and private lands

We understand your concerns about the effects of mineral leasing on the surface resources, especially in roadless areas. The DEIS does recommend a certain amount of these lands to be managed as wilderness under some alternatives and mineral leasing would not be recommended to the Bureau of Land Management under those alternatives until Congress acts on the proposals. The Preferred Alternative does not contain any wilderness recommendations.

In regard to the roadless areas that will be managed under a semi-primitive motorized or nonmotorized prescription and other National Forest System Lands, it was originally thought that Forest Plans would provide the final documentation and guidance for leasing recommendations, however, several court rulings have established that the NEPA analysis in Forest Plans generally do not contain enough detail on which to base a leasing decision Because of this, the Salmon National Forest believes that the Forest Planning direction should establish management priorities which will guide, but not dictate future leasing decisions This direction is found in the description of each alternative (DFIS), Forest Goals and Objectives (Forest Plan), Standards and Guidelines, VII-B-1 (Forest Plan), and the Desired Future Condition found in the Forest Plan Application of all Forest Planning Direction will depend upon site specific analysis prior to lease issuance In this way we believe that we can avoid the problems associated with blanket denial or approval of lease activities and concentrate on site specific issues

RANGE

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

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

RECREATION

The Forest Plan will provide a wide range of recreation opportunities including primitive and semi-primitive The final plan will also designate some portion of the areas that were depicted as semi-primitive motorized in the draft as nonmotorized and some as motorized-restricted to designated routes.

The Plan will meet the population objectives established in the species management plans prepared by the Idaho Department of Fish and Game.

Meadow Lake Campground is one of the most popular overnight camping and fishing spots on the Forest The resource damage that is occurring, such as erosion and compaction, is the result of uncontrolled, unrestricted vehicular and pedestrian traffic. The new design for the campground will incorporate features, such as barriers and hardened surfaces, that will restrict or channel vehicles and people onto surfaces that will accommodate their use without further resource damage. The lakeshore will be rehabilitated with topsoil and seeding and a surfaced access trail provided The reconstruction of the campground will not increase use over current levels, but will accommodate the use that the site is already receiving, and in a manner that will protect the fragile environment at this popular location Your suggestion of building a new campground well below the lake is a good one except for the fact that there is no other suitable location between the lake and the Forest boundary

CULTURAL RESOURCES

We appreciate your support for the cultural resource program The purpose of the Plan is to guide our efforts in protecting and fostering public use and enjoyment of these cultural resources We intend to maintain confidentiality of site locations except those managed for public interpretation We expect to continue with shared service professionals, seasonals, and paraprofessionals to accomplish the cultural resource job, but we will also continue searching for improved methods of operation. It may be possible, for example, to share the services of professional staff with the Salmon District, Bureau of Land Management.

RESEARCH NATURAL AREAS

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

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

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0039

Continental Divide Trail Society

P O BOX 30002 BETHESDA, MD 20814

DEC 30 '85

December 26, 1985

INFO ☐					ACTION ☐	
SUP						
LRP	1	2	3	4	5	6
TM	1	2	3	4	5	6
ELM	1	2	3	4	5	6
CRMW	1	2	3	4	5	6
AO	1	2	3	4	5	6

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

Attn: Forest Plan (1920)

Dear Mr. Hauff:

We wish to submit these comments on the proposed land and resource management plan for the Salmon National Forest. Our comments are directed exclusively to those aspects of the plan that are related to the Continental Divide National Scenic Trail.

There are important positive elements of the plan -- notably the inclusion of CDT provisions in management prescription A12 (pages IV-69 to 72). We agree with the prescriptions and their application, on an interim basis, to routes to be identified in the CDNST comprehensive plan. We also welcome the priority contemplated for maintenance and improvement of nationally designated trails (e.g., III-2, IV-1, IV-84, IV-91) and for right-of-way acquisition (IV-58).

VI-160

The principal deficiency may have been an oversight. Nowhere does the proposed plan explicitly declare that the Forest intends to take the necessary steps to formally designate rights-of-way for the CDT. This omission should be corrected. The plan should incorporate both a timetable for such designation and a brief description of the procedures that will be observed, including the manner in which the advice and assistance of the States, local governments, private organizations, and landowners and land users concerned will be obtained. (See 16 USC 1246(a)(2).) We have no reason to believe that the designation of a route would be particularly controversial, and for that reason recommend that it be scheduled for completion over the next three or four years. If need be, the route could temporarily follow some existing roads, such as FR 184, with later relocation "to preserve the purposes for which the trail was established" to new treadway closer to the actual Continental Divide. (See 16 USC 1246(b)(1).)

We are confused about wilderness designation for the West Big Hole. What does it mean that the preferred alternative is a recommendation until a final decision on the Beaverhead plan? If this means that the West Big Hole should be designated as wilderness if contiguous to wilderness in the Beaverhead, then it should say so. Irrespective of the Beaverhead action, though, the information in your EIS supports wilderness designation for the West Big Hole, and the plan should be revised accordingly. Overall, the plan strikes us as being insufficiently sensitive to wilderness concerns, leading us to favor selection of one of the other alternatives (i.e. 8, 9, 10, or 11). Although we place particular emphasis upon the West Big Hole, we think Anderson Mountain and Italian Peak merit further consideration as well.

Sincerely,

James R. Wolf, Director

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O Box 729 Salmon, ID 83467

Reply to: 1920

Date

James R Wolf, Director
Continental Divide Trail Society
P O Box 30002
Bethesda, Maryland 20814

Dear Mr Wolf

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

Management direction has been added to the Final Plan that specifies adoption of the CDNST Final Comprehensive Plan and initiation of the process to formally designate right-of-way A timetable for designation of ROW has not been included, but work to identify specific location of the trail began 3 years ago in cooperation with the Beaverhead National Forest and the Bureau of Land Management.

The advice and assistance of the State, local government, private organizations, and users will be obtained through the normal public involvement process associated with the National Environmental Policy Act of 1969 (NEPA) process. This will occur in the near future once agreement is reached on specific alternative locations.

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

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

2 Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area;

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

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

FS 6200 28(7-82)

5 Emphasis on medium investment timber outputs along the mid-slope between Fourth of July Creek and Little Silverleads and a portion of Kenney Creek.

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

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

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

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

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

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

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

1. Semi-primitive nonmotorized recreation emphasis in the Chamberlain Basin area,

2 Key big game winter range emphasis in Hawley Creek,

3. Key elk summer range in the broad headwater areas of Quakin' Asp Creek, Reservoir Creek, Meadow Creek, and Rocky Canyon,

4. Range management for domestic livestock emphasis on the gentle/moderate slopes in Cruikshank, Little Bear, Big Bear, and Powderhorn drainages, and

5. Medium investment timber outputs in Frank Hall and Wildcat Creeks.

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

Wildlife Management Institute

Suite 725, 1101 14th Street, N W, Washington, D C 20005 • 202/[illegible]

DANIEL A POOLE
President
L R JAHN
Vice-President
L L WILLIAMSON
Secretary
WESLEY M DIXON Jr
Board Chairman

COPY
P C

JAN 3 '86

December 31, 1985

INFO ☐ ACTION ☐

SUP	1	2	3	4	5	6
DMP	1	2	3	4	5	6
TAS	1	2	3	4	5	6
CLM	1	2	3	4	5	6
FRWM	1	2	3	4	5	6
A.O	1	2	3	4	5	6

ZCC 1/3/86 CB
General

Forest Supervisor
Salmon National Forest
Post Office Box 729
Salmon, Idaho 83467

Dear Sir

The Wildlife Management Institute is pleased to comment on PROPOSED FOREST PLAN AND DRAFT ENVIRORNMENTAL IMPACT STATEMENT, SALMON NATIONAL FOREST, Idaho.

We prefer Alternative 9 It is the best for nearly all wildlife populations, has good cost benefits, is the lowest in road construction, retains the most old growth and is high in wilderness. Selection of Alternative 9 can be justified by data in Table IV-2 (Forest Plan), which shows the wildlife has 55.7 percent of the annual value of all resources combined during the first decade, and has 46 percent of the annual value of all resources in the 10th decade. We see no reason why wildlife should be a subordinate resource to timber and domestic livestock.

VI-162

Road construction is excessive in the Preferred Alternative 12 There is disagreement within the plan about how many miles of road will be built a year in the first decade. For example

Plan Page II-72	50 miles per year (our calculation)
Plan Page IV-94	22.8 miles per year
Plan Page IV-97	17 miles per year
EIS Page S-9 (Table S-L)	36.2 miles per year (our calculation)

Unless a consistent plan for road building, the most controversial activity on the forest, can be presented, there is not much confidence in the rest of the Forplan-generated data

It is good that the Idaho Fish and Game Department's objectives are presented in the EIS We are concerned that these are based on existing habitat, not on the potential that could be realized by habitat improvement (Page II-24) Improvement is the key, after all, wildlife is the most valuable resource on the forest and it should receive priority treatment. On page II-24 of the plan it is clearly stated that winter range is the limiting factor. The Preferred Alternative 12 does not meet all state objectives, and is the highest of all alternatives in amount of vegetation altered

United States Department of Agriculture
Forest Service
Salmon National Forest
P.O. Box 729
Salmon, ID 83467

Reply to: 1920

Date:

Daniel A. Poole, President
Wildlife Management Institute
1101 14th Street, N.W., Suite 725
Idaho Falls, Idaho 83401

Dear Mr. Poole:

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

The impact of domestic livestock grazing upon the wildlife resource was a commonly expressed concern. The level of grazing provided for in the preferred alternative of the Proposed Forest Plan is commensurable with maintaining high wildlife (i.e., amenity) outputs on the Salmon National Forest. Adequate quality and quantities of habitat will be maintained under this alternative to meet the 5-year species management objectives (1986-90) that have been set by the Idaho Department of Fish and Game for all species of big game. The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game. This is especially true of key or critical winter range areas For example, a key provision of the range prescription (8-A) states that "forage use by livestock on critical big game winter range sites will not be increased."

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

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

Provision of quality hunting should be a reason for seasonal road closures

The EIS should recognize that the timber industry has moved to the Southeast and may never recover in the Northwest

How many of the 85 grazing permittees are viable economic operations?

Some specific comments follow

EIS

Page S-5 The average sale offering was 32 6 mmbf, of this only 26 2 mmbf was sold, and only 13.8 mmbf was sold in each of last 3 years. On Page II-73 we are told that 21.1 mmbf will be offered in first decade but only 10 6 mmbf are expected to sell The plan should be realistic and get goals, sales and roads into perspective rather than issuing challenges to managers to push sales and roads

Page III-23. These are good definitions of the various wildlife population levels. A similar table should be included in the forest plan.

Page IV-20. 10 percent old growth in the timber base is good What provision is made for replacement as these tracts are burned or die?

Page IV-22. This table should include state wildlife population goals.

Page IV-64. The statement that loggers' problems are economic is good. This section should be expanded to discuss moves, uses and quality of wood products that will permanently influence the western timber industry.

PLAN

Page II-25, Table II-7 on wildlife populations is good. It should be expanded to include state objectives.

Page II-72. The magnitude of the road problem is clear. There are 1,835 miles of road and 2,000 to 2,500 more miles are needed

Page II-73 The only reason for seasonal road closures given is erosion control. Wildlife harassment and provision of quality hunting should be added. Page III-2 is not explicit on reasons for closure.

Page IV-7 Vegetative diversity. The use of "Where feasible" negates these guidelines.

Page IV-22, Range Resources. Numbers 2 and 4 are incompatible.

Page IV-23, #6. Grazing conflicts should not search for solutions or coordinate activities with wildlife. Any livestock grazing problems in riparian areas should be eliminated at once. All riparian problems should be resolved in favor of wildlife.

Page IV-36, #8. Why cut any timber in riparian zones?

VI-163

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

1 Meeting Idaho Department of Fish and Game goals for big game

2 Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.

3. Protecting soil productivity in accordance with the National Forest Management Act

4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.

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

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

The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timberland. Densities vary according to the harvest system used and the location of the timber stands. The harvest system used varies depending on the type of terrain, with helicopter yarding being used where roading costs are excessive or roading would produce unacceptable adverse impacts. The random scattering of mature timber stands on the Forest requires additional road miles for access.

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

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

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

The degree to which the various alternatives meet the wildlife and fish population objectives as expressed in the State's Species Management Plans for the period 1986-90 was a major evaluation criterion used in developing the draft preferred alternative. The information displayed on page IV-88 of

Page IV-65, #3, Seasonal road closures Add provision of quality hunting as a reason for closure

Page IV-110, Dispersed recreation. Better controls on roads and vehicles are needed on winter range.

Page IV-159, Fish and Wildlife #2. It is not enough that "Forage use by livestock on critical winter range should not be encouraged " Rather livestock use of winter range should be eliminated unless that grazing is needed for vegetative manipulation for wildlife habitat improvement

Page V-6 Monitoring should also provide vegetative trend surveys on critical winter ranges.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A Poole
President

DAP dt

the DEIS and in Table II-7 of the Draft Forest Plan, however, reflects the State's 1981-85 figures which were used when the planning process was initiated This information will be corrected in the final Forest Plan to reflect the new objectives for the period 1986-90.

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

We agree that the timber industry is experiencing a shift between the northwestern and the southeastern portions of the country. Many mills have recently closed in the Northwest, however, there are still many wood manufacturing facilities operating in the Northwest, contributing to the employment and economic stability of many dependent communities while providing a significant portion of the nation's timber needs.

The allowable sale quantity proposed in the Draft Forest Plan is 21 1 million board feet per year compared with approximately 38 million board feet per year during the 1970's and early 1980's. The difference is due partly to increased limits placed on timber harvest to produce other resources and partly due to changes in the timber base brought about by either new information or past treatment. The last timber management plan calculated the allowable sale quantity based on certain growth rates, reforestation periods and other resource objectives, all of which have been revised to include more current information. The allowable sale quantity proposed in the Forest Plan reflects the yield that can be maintained under the existing situation, including other resource objectives and the existing timber base. As shown in the benchmark and alternatives analysis, considerably higher levels of timber harvest are possible but were not selected.

When and if stands of old growth are destroyed by fire or die, other stands will be set aside and allowed to age to replace the lost old growth.

Reasons for managing roads by seasonal closures are further noted in the guidelines for Transportation System Management on page VI-65.

Some soils are not capable of supporting much in the way of vegetative diversity An example would be grasslands or extended areas of sagebrush Vegetation is almost absent on some shallow sterile soils.

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

Multiple use activities can and do influence the nature and condition of riparian areas. Not all of these influences are detrimental, but some are, and changes in use will be necessary to comply with legal intent. Resolution of conflicts will be completed on a site and/or project specific basis using options appropriate to the conditions and circumstances involved.

Timber management and associated harvest is but one of the many multiple uses that can occur in forested riparian zones. Timber management activities in riparian areas will, however, be conducted in a very controlled manner consistent with protecting and maintaining other riparian dependent resources such as water, fish and wildlife. Standards and guidelines presented in chapter IV of the Plan are intended to provide direction adequate to protect Forest riparian zones

The quality of hunting is a concern we share with State agencies, and we work closely with the Idaho Department of Fish and Game in structuring our road management program to meet mutual objectives whenever possible.

The direction, standards and guidelines on page IV-110 contain sufficient direction to ensure that motorized vehicle use must be compatible with big game objectives This will be accomplished with wildlife biologists' involvement in ORV use management and travel planning

We received several comments regarding wildlife considerations in the Range Prescriptions listed on pages IV-158, 159 and 160 of the Draft Forest Plan. Consequently, the statement under General Direction, Wildlife #2, has been changed to "Forage use by livestock on critical winter range should not be increased "

Monitoring of the various resources will be an important part of the implementation of the final Forest Plan We currently conduct vegetative trend and utilization transects on big game winter ranges and will continue these efforts during this planning period.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

0053

EW DIRT RIDERS Association

1986 President
Gary Siesfried (509 268-4653)
December 30,1985

P O Box 5681, Kennewick, WA 99336

Forest Supervisor
Salmon National Forest
P O Box 729
Salmon, Idaho 83467
In Re: 1986 Forest Plan
Dear Sir:

The Eastern Washington Dirt Riders Association is pleased to provide comments on the Salmon National Forest Draft Forest Plan in reply to your transmittal of September 19, 1985. Our comments are principally addressed toward land resource use since that is the principal thrust of the planning process. We do have several comments regarding the land use prescriptions.

The comments are arranged in four parts:
General viewpoint of the Association
General comments on scope of alternatives presented
Area allocation comments
Land and Resource Management Plan comments

ASSOCIATION VIEWPOINT

We specifically endorse the recommendation of no additional area for wilderness and are in general concurrence with the areas recommended for Semi-Primitive-Motorized, prescription 2-A designation.

Our basic position in formulation of comments is that the National Forests are public domain and therefore the resources should be open to all user groups compatible with the environment (Please, do not confuse with viewpoints of some user groups as to their opinion of compatibility) The availability of recreational resource in roadless areas which include lakes and streams to provide a primitive trail riding, camping, fishing, and hunting experience for trailbike users is of particular concern to us. Reduction of user pressure on an area by restriction of access of a single user group is not an equitable legislative or administrative means to achieve reduction of user density. The trailbike user group should be accorded the same low density use resource as is accorded other user groups

VI-166

United States Department of Agriculture | Forest Service | Salmon National Forest | P O. Box 729 Salmon, ID 83467

Reply to: 1920

Date:

C. E. Leach, Member of Board of Directors
E.W. Dirt Riders Association
P.O. Box 5681
Kennewick, Washington 99336

Dear Mr. Leach:

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

Reduction of user pressure or user density has never been used as a rationale for motorized travel restrictions on the Salmon National Forest. Travel restrictions are generally for three purposes: protection of wildlife resources, protection of soil and water resources, or to provide a wide range of recreation opportunities which includes both motorized and nonmotorized uses.

The Draft Salmon National Forest Management Plan identified several areas as semi-primitive motorized. As a result of public comments, the Final Management Plan will recommend portions of these as semi-primitive motorized, portions as semi-primitive motorized on designated routes, and portions as semi-primitive nonmotorized. This results in an overall increase of land being managed as semi-primitive in the Salmon Forest.

Everson Lake, Mill Lake and Basin Lakes will all be managed for semi-primitive recreation emphasis with motorized traffic restricted to designated routes. Forested land in the vicinity will not be managed for timber production.

The planned use capacity you recommend for the semi-primitive classes is much more restrictive than the guidelines contained in the Recreation Opportunity Planning handbook which guides Forest Service recreation planning. The numbers you propose are in the range that is appropriate for the Primitive ROS class. On the Salmon National Forest, the only areas which meet the criteria for the Primitive class are located within the Frank Church--River of No Return Wilderness.

The statement to which you refer on page IV-105 under Trail System Maintenance and Operation refers to general maintenance guidelines to be implemented by Management Prescription 2A--Semi-Primitive Motorized Recreation Emphasis. Specific routes that will be open to motorized traffic are designated in the Salmon National Forest Travel Plan. Public meetings to

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EL DIPT RIDERS ASSOCIATION

Forest Supervisor, Salmon NF -2 December 30, 1985

SCOPE OF ALTERNATIVES

1. The plan considers a reasonably broad range of alternatives to cover the feasible management schemes, although the all roadless areas to wilderness alternatives are probably not necessary to the deliberations since they are not viable alternatives.

2. The proposed action embodied in Alternative 12 appears to represent an acceptable compromise between competing desires of user groups and Congressional mandate. This conclusion is reached based on the following observations:

The proposed prescription 2-A is the lesser portion of the inventoried roadless areas when Congressional designated wilderness is included. Semi-primitive motorized areas are open to hikers and horsemen, whereas wilderness areas are not open to recreational motorized use. All areas are open to hiking and horsemen and therefore, these user groups may make their recreational choice. The projected visitor days density for prescription 2-A areas are substantially higher than for wilderness prescription 7-B. Therefore, no further wilderness need be recommended based on use density.

3. We are anxious that the primitive motorized use areas be maintained as such without future erosion to either wilderness, roaded recreation or forest product resource.

4. The planning staff appears to have made reasonable effort to obtain public input through public and interest group meetings. We observe that written comment must be carefully gauged in measuring broad-at-large interest. However since it tends to favor those user groups well organized, funded and educated. Surely, these attributes do not relate to the availability of the public resource to the various user groups.

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C. F. Leach 2

update or change the current Forest Travel Plan are held when there is a major changes or significant public concerns, usually during the winter month.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

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EW DIRT RIDERS ASSOCIATION

AREA SPECIFIC COMMENTS

LEADORE RANGER DISTRICT

Everson, Mill, and Basin Lakes should be maintained in the semi-primitive-motorized prescription rather than be included in a timber output prescription. There are precious few roadless area lakes open to motorized use for primitive camping and fishing. The allocations and corridors allocated to prescription 5-B for these lakes especially Mill Lake suggests a future plan to provide roaded access. Such access would add little to the roaded primitive resource but subtract substantial from the motorized primitive resource. The significant impact on the motorized primitive resource is because of the minimal number of roadless area lakes available to the trailbike user community. The reduced impact on the roaded resource is because of the many roaded lakes available to the roaded prescription users. It is apparent that the motorized primitive trailbike user areas are pressured from both wilderness and roaded users and the trailbike user experiences a decreasing resource, unlike the other users.

A possible compromise position for Basin Lake would be to maintain a wooded, primitive trail corridor to and including Basin Lake. Any logging roads would not occlude the access trail and the logging roads could be closed upon completion of each contract.

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EW DIRT RIDERS ASSOCIATION

PROPOSED FOREST PLAN
LAND AND RESOURCE MANAGEMENT PLAN

Page IV-104
Dispersed Recreation Management
Maximum use and capacity levels are:
- Trail and camp encounters during peak use days are less than six other parties per day

COMMENT
Planned use capacity should not result in greater than one trail and camp party encounter each other hour during peak use days (six encounters in a twelve hour daylight period). One objective of the primitive or semi-primitive recreation experience is solitude, surely not obtained with an encounter each half-hour

Page IV-105
Trail System Maintenance and Operation
COMMENT
Please add to the prescription:
Provide for trailbike access to roadless area lakes and streams for semiprimitive camping, fishing, sightseeing, wildlife observation, and hiking experiences.

We appreciate this opportunity to participate in the forest planning process.

Sincerely,

C F Leach
Member of the Board of Directors

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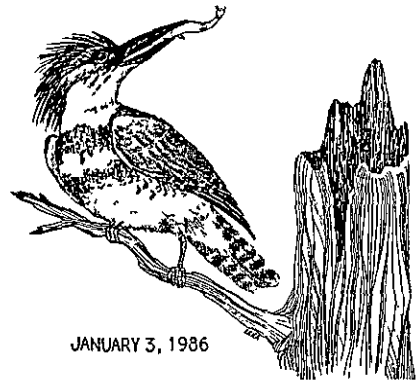
Portneuf Valley Audubon Society



JANUARY 3, 1986

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

Dear Mr Hauff

Our 200 member Audubon Chapter is very much opposed to your preferred alternative Number 12 in your draft forest plan We feel it places far too much emphasis on the harvest of timber, which are all below cost sales, at the expense of wildlife and recreational values Certainly the city of Salmon receives other income than from just the timber industry, and those extensive interests need to be represented in your plan For example, there is no new wilderness proposed in your alternative, and yet there are several excellent candidates in the Lemhis and the West Big Hole areas These resources bring recreational money into the businesses of Salmon, and should not be disregarded as unimportant The elk population is not managed properly in your prefered proposal, and there are very real conflicts with timber harvest roads, and grazing that need to be addressed Grazing in particular needs further control, especially in elk calving areas and in riparian habitats Your preferred alternative doesn t even recognize conflicts here, and yet you propose to increase the AUM s on the forest Cattle and sheep degrade riparian areas, which reduces bird species diversity, and cattle compete directly with the elk for forage and for space We would like to see a reduction in their numbers and control of their movements with fencing

Your group of indicator species is a good idea, but we feel others should be considered as *important too For example, there have been several Boreal Owl sightings on your forest, and it* appears they have a need for old growth timber Your draft plan ignores this species and its needs Are you planning any studies to detect their presence before beginning logging? Many cavity nesters, such as Boreal Owls, depend on woodpeckers for cavities The Pileated Woodpecker is another old growth species, and yet your proposed plan would surely be detrimental to this species The Yellow-bellied Sapsucker has been split into two species, with the name of our birds changed to Red-naped Sapsucker, and the Yellow-bellied species is found in the east Is the cutting of aspen forests or grazing of riparian areas affecting this species? *We would like to see you address these problems before you propose increased logging of old* growth and increased grazing in riparian habitats

In short, we are strongly opposed to your prefered alternative, and want to support Alternative 3 instead

Sincerely,

Charles H. Trost

Charles H Trost
President

VI-169

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O Box 729 Salmon, ID 83467

Reply to 1920

Date

Portneuf Valley Audubon Society
ATTN: Charles H. Trost
P.O. Box 4755
Pocatello, Idaho 83209

Dear Mr Trost:

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

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

1. Meeting Idaho Department of Fish and Game goals for big game

2. Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water.

3. Protecting soil productivity in accordance with the National Forest Management Act.

4. More recreational capacity than anticipated demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors.

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

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

We feel that we have selected an alternative that best meets the needs of all Forest users. Forest users have a wide range of needs and wants. Timber industry would like to see us cut more timber while backpackers would like more wilderness. *The management of one resource may impact another* resource. We have tried to provide a balance of benefits from the forest and at the same time minimize the impacts to other resources. The National Forest System is dedicated to providing a flow of goods and services from the Forest while minimizing environmental impacts.

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

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

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

Early in the planning process, KESR's were mapped on the entire SNF. At the same time, all other acres on this Forest were classified into optimum, acceptable, or marginal summer elk habitat, and the key big game winter ranges were also mapped. These maps then became the basis for predicting the elk habitat potential under each of the 12 proposed management alternatives included in the draft Forest Plan. These predictions were calculated based upon proposed timber harvest levels, associated road construction, silvicultural practices and knowledge of the effects that habitat parameters such as cover, forage and open road densities have on elk. This analysis

revealed that the elk habitat potential under proposed Alternative 12 (the draft preferred alternative) would be more than adequate to support an elk population level that meets the Idaho Department of Fish and Game's Species Management Plan goal for the period 1986-90.

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

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

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

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

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

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

final decisions to resolve riparian zone management issues will consider all aspects of the specific area.

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

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

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

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

The Salmon Forest has been, and continues to be, involved in a cooperative program with the University of Idaho to monitor the distribution and use of the Forest by boreal owls.

Aspen as a plant community type is very limited on the Salmon Forest and regarded as key wildlife habitat. We currently have an ongoing enhancement program to ensure this important community type is perpetuated over time.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

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SALMON RIVER BACK COUNTRY HORSEMEN

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~~P.O. BOX 1002~~

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Jan. 7, 1986

Forest Supervisor
Salmon National Forest
P O Box 729
Salmon, Idaho 83467

Land and Resource Management Plan:

We support the preferred alternative with the recommendation that new road construction be restricted to an absolute minimum and that roads that are necessary be closed and restored back to the original state as much as possible.

We feel that approximately one half of the motorized semiprimitive areas be reclassified to non-motorized semiprimitive areas. Criteria for selecting forest areas for this change should include consideration for elk migrating routes and opportunities for improving solitude in especially scenic areas.

Salmon River Back Country Horsemen

Everett DeCora

President

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to 1920

Date:

Everett DeCora, President
Salmon River Back Country Horsemen
Route 1, Box 7A
Salmon, Idaho 83467

Dear Mr. DeCora:

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

All newly-constructed roads will be closed, when not actually being used for timber harvest or other resource management activities, unless substantial reason to keep a road open is identified through the process as outlined in the National Environmental Policy Act (NEPA). Additional road, trail, and area closures on the existing system will be outlined in the Salmon National Forest Travel Plan. This travel plan is updated periodically using both public input and information gathered by monitoring the current travel plan. Through this process the travel plan will be revised to provide for changes related to fire, recreation, timber sale scheduling, firewood gathering, and range. The guidelines for transportation system management are located in the Draft Forest Plan on pages IV 65-68.

The road mileages needed for the level of timber management identified in the plan are calculated based on the road density (number of miles per square mile) needed to access the suitable timberland. Densities vary according to the harvest system used and the location of the timberstands. The harvest system used varies depending on the type of terrain, with helicopter yarding being used where roading costs are excessive. The random scattering of mature timber stands on the forest requires additional road miles for access.

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

Maintaining the integrity of the various elk and mule deer migration routes across the Montana-Idaho divide is critical to the long-term welfare of the big game populations that primarily summer in Montana and winter in Idaho. This premise was an underlying force in the initial phases of the planning process and prescriptions for managing these corridors were developed. During the development of the geographical area boundaries and the assignment

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

Some portions of RARE II inventoried roadless areas will be managed for semi-primitive nonmotorized recreation emphasis including all of the Long Tom Roadless Area Number 13521 and portions of the Camas Creek Roadless Area Number 13504, West Big Hole Number 13943, Italian Peak Roadless Area Number 13945, Jesse Creek Roadless Area Number 13510, Lemhi Range Roadless Area Number 13903. The importance of maintaining the integrity of elk migration corridors along the Montana-Idaho divide has been recognized and will receive semi-primitive motorized, semi-primitive motorized restricted to designated routes, and semi-primitive nonmotorized management strategies that will protect migration routes from road encroachment and cover removal. All areas receiving semi-primitive nonmotorized recreation emphasis provide good opportunities for solitude and scenic landscapes with the exception of Jesse Creek, which was designated nonmotorized to protect Salmon's municipal watershed.

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

Idaho Conservation League

Box 844 Boise, Idaho 83701 (208) 345-6933

0104

January 8, 1986

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

Dear Mr. Hauff,

On behalf of the Idaho Conservation League, thank you for this opportunity to comment on the future direction of the Salmon National Forest. As one of the state's premier recreation forests, and one containing a large amount of unroaded land, it is essential that all management descisions be given careful consideration.

Attached is the Idaho Conservation League review of the Proposed Land and Natural Resource Management Plan and Draft Environmental Impact Statement for the Salmon National Forest. While we did not attempt to address every point in the plan, those that concern us most are included.

The Idaho Conservation League repesents approximately 1500 individual and family members. This document is meant to represent a summary of concerns of the Idaho Conservation League.

Thank you once again for this opportunity to comment.

Sincerely,

Mary Kelly
Executive Director
Idaho Conservation League

VI-174

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RRWW	1	2	3	4	5	6
AO	1	2	3	4	5	6

CC's TO 2 Boise Idaho

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to. 1920

Date·

Mary Kelly, Executive Director
Idaho Conservation League
Box 844
Boise, Idaho 83701

Dear Ms Kelly·

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

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

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

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

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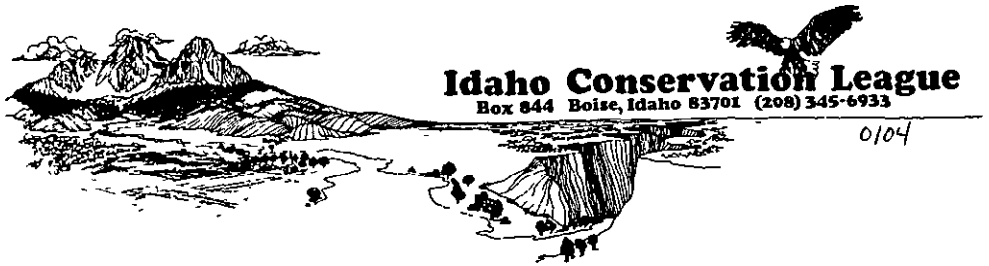

Idaho Conservation League
Box 844 Boise, Idaho 83701 (208) 345-6933

0104

A REVIEW AND RECOMMENDATION
ON THE PROPOSED LAND AND
NATURAL RESOURCE MANAGEMENT
PLAN AND DRAFT ENVIRONMENTAL IMPACT
STATEMENT

SALMON NATIONAL FOREST

As directed by the Assistant Secretary of Agriculture and in compliance with 36 Code of Federal Regulations 219 17 (36 CFR 219 17) published in the Federal Register on April 18, 1983, roadless areas on the Salmon National Forest were re-evaluated during the Forest Planning Process for possible wilderness recommendation. Each roadless area was described as to its environmental, wilderness and resource attributes and evaluated against all Forest Plan Alternatives to identify impacts to wilderness characteristics and environmental consequences of wilderness/nonwilderness designation. Criteria used for evaluating roadless areas were developed based on the 9th Circuit Court ruling of California vs Block

Significant issues, concerns and opportunities were identified during the scoping process and are the basis for the formulation of alternatives. If issues, concerns and opportunities were properly identified, and we feel they were, the full range of alternatives should be the result An alternative emphasizing market values (2) has been included as does an alternative emphasizing nonmarket values (3) An alternative emphasizing wilderness and wildlife (8) has also been included, as has an alternative emphasizing high productivity (5) We feel this represents an adequate range of alternatives

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

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

2. *Semi-primitive motorized on designated routes in the head of* drainages from the Middle Fork of Little Timber Creek north to Panther Lake,

3. Semi-primitive nonmotorized recreation emphasis in the head drainages from Bruce Canyon north to Alder Creek,

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

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

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

7 Low investment timber output emphasis in the Gilmore, Meadow Lake and Nez Perce areas, and

8. Range management emphasis in the Swan Basin area

There was both strong public support and strong public opposition expressed regarding wilderness designation of this area during the public comment periods for RARE I, RARE II, the proposed 1984 Idaho Forest Management Act, and in input submitted to the proposed Salmon National Forest Management Plan. Hardrock mineral potential is high with many mineral claims located

0104

January 8, 1986

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

Dear Mr. Hauff,

The following are the comments on the Proposed Land and Natural Resource Management Plan and the Draft Environmental Impact Statement (DFP) for the Salmon National Forest (SNF) by the Idaho Conservation League (ICL). We thank you for the opportunity to comment on the plan and hope our comments are an aid to the formulation of a final plan for the Salmon National Forest

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We are in agreement that the past management direction of the Salmon National Forest was in need of modification, but we feel that the proposed plan offers entirely too little. There has been a long history of environmental degradation in much of the SNF and we do not see any real change from that past history in the DFP.

Your DFP offers a good response to the requirements set forth in the National Forest Management Act (NFMA) but fails to follow through with them. Alternatives are offered, but the preferred alternative does not present any significant change from pre-NFMA standards and continues the trend of forest management that fails to see the forest through the timber. The the DFP continues to advocate commodity management at the expense of other important forest values.

throughout the area. The potential for development of mineral claims (more than annual assessment work) within the semi-primitive area is considered low, however, the potential is much higher at lower elevations. Oil and gas potential varies from none to moderate. Significant growing stocks of poles and sawtimber makes portions of this area an important contributor toward Salmon National Forest timber product outputs Management emphasis on anadromous fisheries habitat in the Hayden Creek/Bear Valley Creek areas will continue. No activities are planned that would effect the wilderness potential of semi-primitive areas, however, past and predicted activities would preclude portions of the remaining area from wilderness consideration in the next plan revision.

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

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

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

2 Semi-primitive motorized along the mid-slope in the Fourth of July Creek to Sheep Creek area,

3. Semi-primitive motorized on designated routes only in Carmen Creek and from the Freeman Creek drainage to Kenney Creek,

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

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

PROBLEMS WITH THE PREFERRED ALTERNATIVE

Wilderness Recommendations

The DFP inventories 30 different roadless areas in the SNF compromising 830,469 acres, not including any of the existing Frank Church/River of No Return Wilderness. These 30 roadless areas include the Lemhi Mountains and the West Bigholes in the Beaverheads, as well as several important areas contiguous to the FC/RNR Wilderness. After a consideration of the requirements of the NFMA, a judgement of state and national public opinion, and an evaluation of the 1964 Wilderness Act, the ICL is in complete opposition to the DFP which fails to recommend any wilderness in the SNF.

The wilderness recommendations in the DFP are the result of the restudy of the Roadless Area Review and Evaluation (RARE II), the second attempt by the Forest Service to identify roadless lands in the National Forests for inclusion in the National Wilderness Preservation System. This restudy was required by a Ninth Circuit Court of Appeals decision in 1982 (California v. Block, 690 f. 2nd 753) that declared RARE II inadequate and biased toward development. The wilderness recommendations in the proposed plan are the third attempt to complete this process.

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We feel that this third attempt is totally inadequate as well, and hope the SNF will reconsider its recommendation based on public comment received and make the needed changes in the final plan. RARE II was determined to be biased toward development, a ruling that precipitated the roadless area review included in the DFP. We feel that the DFP continues to be heavily biased toward development, which constitutes a reversal of the direction set by California v. Block.

California v. Block also required that an adequate range of alternatives be presented in the DEIS. We feel that the SNF has not achieved this. The wilderness recommendations of the ICL are included in the proposal made by the Idaho Wildlands Defense Coalition. This proposal has received a great deal of attention,

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

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

The Forest is concerned that adequate hiding cover is available to provide for the needs of elk and other large game species To insure that these needs are met the Plan requires that created openings are separated by timber stands (ref Chap IV-43). These openings must be stocked before the stands separating them may be removed. The preferred alternative in the Draft Forest Plan provides adequate habitat to meet Idaho Department of Fish and Game population objectives for all big game species

The General Forest Direction for Transportation Management in the Plan is to close newly constructed roads with a few stated exceptions Refer to page IV-65 Road closures will mitigate some of the effects of timber harvest

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

1 Providing properly spaced suitable leave trees for seed and shade,

2 Providing site preparation by destroying suppressed and diseased trees that prevent a suitable stand from being established and where possible scarifying or otherwise exposing a seedbed, and

and rather than being a proposal of a single interest group, it is supported by a broad-based coalition of conservation and sporting groups.

The IWDC proposal has had political support as well, as evidenced by its introduction in the form of the Moody-Kostmayer Idaho Wilderness Act. This legislation has been introduced in the 98th and 99th sessions of Congress.

Clearly, the support for this proposal is strong and long standing, and therefore worthy of inclusion as an alternative in the DFP.

The DFP proposes to develop 224,000 acres of the remaining roadless acreage in the first planning decade, an action that would lead to 12 of the 30 inventoried roadless areas being excluded from further wilderness consideration in the future. In addition, the wilderness characteristics would be severely compromised in another 8 areas.

There are numerous reasons that there should be more wilderness in the SNF, but foremost is the outstanding quality of some of the areas, particularly the Lemhi Mountains, and the West Big Holes. Other areas, such as the roadless areas contiguous to the FC/RNR Wilderness should also be protected, but semi-primitive non-motorized classification would be adequate for these areas, although we would support their inclusion into the FC/RNR Wilderness.

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Lemhi Mountains- This very special area should certainly be recommended for wilderness in the DFP, and should not be classified as semi-primitive motorized.

The Lemhi Range has had strong support and was included in the Carter Administration wilderness proposal. It has long been supported for wilderness by the Idaho Wildlands Defense Coalition (IWDC), a group that includes the ICL. Wilderness designation of even larger portions of the roadless area has been supported by other groups.

The Lemhis are a spectacular region, rich in wildlife and outstanding scenery and meeting all criteria of the Wilderness Act. While it is close to the FC/RNR Wilderness, it is

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

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

The National Forest Management Act does state that regulations should be developed specifying guidelines which insure that timber will be harvested only where "there is assurance that such lands can be adequately restocked within five years after harvest." These "NFMA Regulations" (36 CFR 219) state that "when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way as to assure that the technology and knowledge exists to adequately restock the lands within 5 years after final harvest " The initial cut in the shelterwood and seed tree methods is normally made to encourage prompt regeneration, however, the final harvest must often be delayed more than 5 years to ensure that there will be adequate regeneration after the final harvest This delayed final harvest to await regeneration was used in our FORPLAN model for harvest projections and is consistent with the Regulations.

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

A decrease in the volume of timber to be offered for sale on the Salmon National Forest is proposed in the selected alternative. Timber volumes offered under the current program were approximately 35 million board feet

substantially different in character. There is a probable population of gray wolves in the area, and other wildlife species of concern are plentiful.

Some 60 remote lakes and numerous streams offer excellent fishing and destination hiking. Hunting opportunities are excellent. Ranchers adjacent to the roadless area have expressed support for wilderness in the Lemhis.

We support a minimum of 189,000 acres of wilderness in the Lemhis. For habitat protection we support the boundaries in Alternative 3.

West Big Holes - This area of rugged peaks, lakes and valleys on the Continental Divide is spectacular and worthy of wilderness recommendation by the SNF on its own merits, but since the Beaverhead National Forest side of this area has been recommended for wilderness it is incomprehensible that the SNF did not do likewise.

The DFP clearly states that "(r)ecreation use in this unit is expected to increase significantly in the future as implementation of the Continental Divide National Scenic Trail proceeds" (DEIS Appendix C, p. C-89). The types of recreation that will increase are specific to the types of recreation found in wilderness areas.

The West Big Holes also offer significant wildlife values including such indicators of prime wilderness habitat as the mountain lion and the black bear. There are very important elk migration corridors in this roadless area, as well as winter range. Anadromous fish habitat is also in the unit. The diverse elevations and habitat types make the West Big Holes and important wildlife resource.

Other National Forests have set the precedent of wilderness protection along the Continental Divide in Colorado, Wyoming, and Montana. Why is it the SNF refuses to recommend this area as wilderness? The Continental Divide is the backbone of the region and makes an absurd boundary for the Beaverhead side of the wilderness. We recommend a minimum of 51,000 acres of wilderness for the West Big Holes.

versus 21 million board feet under the selected alternative This decreased volume does not represent the "increased dependency upon marginal timber sales" to which you referred in your letter. The volume as proposed in the selected alternative is considered to best meet all of the interdependent issues considered in the Forest Plan

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

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

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

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

Varying amounts of KESR's were recognized as geographic areas (with wildlife prescriptions applied) under each proposed alternative, depending upon the theme (i.e., commodity, amenity, etc) of the particular alternative. These designated KESR's will be managed to favor elk under a set of very specific prescriptions designed to enhance elk habitat; however, the prescriptions being proposed for application to other geographic areas also include an array of wildlife coordination measures that will help ensure that adequate habitats to meet species management

Other Areas of Concern - The Anderson, Allan, and Goat Mountain, and Italian Peak Roadless Areas in the Bitteroots should all be managed as semi-primitive non-motorized.

In Alternative 3, which comes closest to any reasonable alternative for conservationists, the roadless areas contiguous to the FC/RNR Wilderness are included as wilderness recommendations While the IWDC has not supported these areas for wilderness in the past, they would make good additions to the existing wilderness. At the very least, these areas should be managed as semi-primitive non-motorized. These areas include the Camas Creek, Duck Peak, West Panther Creek, Long Tom, Little Horse and Oreana Roadless Areas.

Timber Management

The preferred alternative places far too much emphasis on timber production for the SNF. The rationale for this emphasis is questionable. The forest's contribution to the nation's timber supply is meager at best, and the forest's contributions to water, fish, wildlife, and recreation is great and continually increasing.

The timber management plans in the DFP will continue the trend in the SNF of destroying its wildlife populations for a timber harvest of marginal value The elk, deer, fish, and many of the non-game management indicator species will be subjected to increasing habitat and population losses if the DFP is implemented.

And why should it be? The SNF is a poor timber producer, with an average annual growth that barely gives it classification as commercial timber, and is far below what is considered commercial timber on private land. The only reason timber is cut on the forest is that the federal government has been giving it away in the form of subsidy to timber interests This is a trend that is likely to see a serious change in the future as the nation cuts back on deficit-building government practices.

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

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

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

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

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

The preferred alternative provides for a level and intensity of livestock management which will reduce conflicts between livestock and big game

We are also concerned with the regeneration of harvested sites in the SNF. NFMA regulations require "assurance that such lands can be adequately restocked within five years after harvest" [section 6(g)(3)(E)(ii)]. Hadley Roberts, a retired wildlife biologist that worked on the SNF for 14 years, has "not seen one site on the entire Forest where a Douglas-fir stand has been harvested and regenerated to the point where it is elk hiding cover."

Which sales in the SNF are specifically to achieve timber goals and which are specifically to improve wildlife habitat? The DFP appears to promote sales to achieve wildlife habitat goals for the purpose of avoiding the regeneration requirements that will be impossible to achieve in many areas proposed for harvest. Many of the the sales scheduled for the Lemhi Mountains are not likely to be successfully restocked due to many factors including the difficulty in regenerating Douglas-fir stands, the dry climate, unstable terrain, ground squirrel infestations in clearcut areas, and several others. What is the SNF's past record in such areas?

Security of an area is critical to its quality as habitat. In most cases, the harvests planned to enhance habitat will have a negative effect due to the road construction that goes with it. Also, there is little mention of the species that will be harmed by so called habitat improvements.

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The MacCleery decision and below-cost sales -

On July 31, 1985, Deputy Assistant Secretary for Natural Resources and Environment in the U.S. Department of Agriculture Douglas MacCleery signed an order that requires a forest meet certain procedural standards in explaining and rationalizing the preferred alternative when the proposed timber program will have substantial below-cost sales.

While this opinion applied to the San Juan National Forest and the Grand Mesa, Uncompahgre, Gunnison National Forest administration unit, it still sets a standard for all national

Mary Kelly

This is especially true of key or critical winter range areas. For example, a key provision of the range prescription (8-A) state that "forage use by livestock on critical big game winter range sites will not be increased."

Providing a level of livestock grazing consistent with the agricultural base and rural lifestyle of Lemhi County was an important consideration in the selection of our preferred alternative. The projected increase in permitted grazing over the current program level is less than 1 percent, and involves implementing a higher level of management on selected allotments. One of the main reasons for proposing a more intensive level of grazing management was to reduce conflicts with wildlife and fish.

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

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

The use of heavy equipment in nonmotorized areas will be consistent with Forest Service policies relative to these areas.

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

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

Sincerely,

RICHARD T. HAUFF
Forest Supervisor

forests, and sets requirements on the Forest Service that are not clearly outlined in the forest planning regulations. The decision does not forbid below-cost sales, instead it questions when they should allowed and recognizes that below-cost sales may not be justified in some circumstances where past management would have allowed them.

It is important to note that the ICL is not opposed to below-cost sales in their entirety; below-cost sales are opposed when they promise to destroy a resource that would be more valuable to the forest and the public in an uncut state.

In this time of budget restraints, many of which the SNF will have to face directly, we feel it is not appropriate for the SNF to continue its' timber give-away. A 1984 GAO report titled "Congress Needs Better Information on Forest Service's Below-Cost Timber Sales" (GAO/RCED-84-96, June 28, 1984) clearly shows that all timber sales in the SNF were below-cost sales in 1981 and 1982. Recent sales also continue this trend.

Information from the Office of Timber Management of the U.S. Forest Service in Washington D.C., clearly shows the recent trends in the SNF. In the last six years (1979-84) the SNF has received $503,000 in timber receipts. During that same time $2,594,000 was spent on those sales, amounting to net timber receipts for the SNF of -$2,091,000.

The appropriations decisions in Congress in 1985, which cut road building budgets in an effort to curb the funding imbalance between the multiple uses, will likely continue. These cuts have taken place not only because of the poor economic base for much of the timber activity, but also because such activity destroys a resource more valuable in its wild, unroaded state

The DFP proposes a Present Net Benefit for timber of $14.9 million over the 50 year planning cycle balanced somehow against a Present Net Cost of $66.7 million. How can the SNF justify a Present Net Value for timber of -$66 7 million? A loss to taxpayers of $66.7 million!

0104

Community stability has been given as a reason for the below-cost sales in the SNF for a number of years. In light of this past and current situation the SNF should consider the following passage from the MacCleerly decision "(A)n explanation is needed as to why increasing the dependency of local community mill capacity and jobs which could result from an increase in sales of National Forest timber with revenues exceeding costs will contribute to greater national or local welfare -- especially since increased dependency upon marginal timber sales would seem to result in potentially greater community instability due to uncertainties over continuation of a relatively high level of Federal funding to support a timber program with costs greater than revenues. The Record of Decision should address this question," (page 9, MacCleery decision).

There are several areas that the ICL is opposed to any timber harvest The ICL opposes all sales in the Lemhi Range from Gilmore Summit to Hayden Creek, particularly those planned for Deer Creek, Alder Creek, Big Fightmile Creek, and Mill and Hayden Creeks.

We are in opposition to all logging in the Dahlonega Creek and Sheep Creek elk migration corridor. Logging in this area would jeopardize the elk migration between Idaho and Montana with the possibility of disrupting the entire wintering elk population in the Idaho Fish and Game Department Management Unit 21-A.

All sales in these areas can not be justified due to the destruction of habitat, loss of valuable unroaded terrain potentially up for wilderness designation, and because of their below-cost nature.

The DFP calls for the construction of 56 miles of road to be constructed or reconstructed each year of the first planning decade This will continue to displace wildlife, with little or no benefit to the forest and state, and for that reason we oppose the level of road construction for the SNF

We urge that very serious consideration be given to a reduction of roadbuilding activity in the SNF.

Fish and Wildlife Management

The SNF is a fish and wildlife resource of incalculable value. We feel that the DFP does not take into consideration the value of this resource, in fact the DFP would do much to harm this resource.

Of particular concern to the ICL are the effects the DFP will have on the elk and fish populations in the SNF. For the most part, the problems with fish and wildlife management center on the excessive timber program.

Sedimentation will be greatly increased in several important fisheries as shown by the DFP. In streams that contain resident trout populations only, sedimentation will increase at a rate of 53% above natural levels. This is unacceptable. Fisheries with anadromous fish populations will see an increase in the sedimentation rate over natural levels by 21%. Given the high value of restoration of anadromous fisheries, we also find this level unacceptable.

Hayden Creek, Iron Creek, Indian Creek, and the North Fork of the Salmon have all been classified as Blue Ribbon streams by the Idaho Department of Fish and Game, and are important anadromous spawning streams. The proposed timber harvests in these areas will very likely curtail the improving anadromous fish populations in the SNF. The ICL opposes all programs that will damage these resources.

The elk resource of the SNF should not be compromised. The DFP ignores the request of Idaho Fish and Game Director Jerry Conley to manage all key elk ranges in the state at 100% of potential. An inventory of the forest by the SNF shows that 270,500 acres of the SNF is classified as key elk habitat, outside of the existing wilderness. We estimate that the DFP will eliminate as much as 50% of this habitat during the planning cycle, most within the first decade. Some of the areas we are particularly concerned about are Musgrove Creek, Salzer Bar, Anderson and Threemile Creeks, and Hayden, Tobias, Pierce, Big Deer, and Horse Creeks. Oreana Ridge is also an area of concern.

0104

How does the SNF justify this destruction of a valuable resource?

As has already been mentioned, the Sheep Creek and Dahlonega Creek area is an elk migration corridor of very high value. A 1976 Forest Service research project described the high value of this area and recommended that it remain roadless. The proposed *logging activity for this area is unacceptable.*

Fish and wildlife values in the SNF are of tremendous and increasing value. The ICL strongly advocates a management program that will protect the fish and wildlife values to the fullest.

RANGE MANAGEMENT

Grazing has been shown to be a source of conflict with wildlife. SNF studies have shown that there are 33,500 acres on the forest where cattle conflict with wildlife. These conflicts are particularly important with elk where competition for forage and space requirements are occurring. We see little in the DFP that attempts to do anything about this problem, in fact, there is no mention of the study made for this purpose by the SNF. Why?

Section 219.20 of the NFMA states: "Lands suitable for grazing and browsing shall be identified and their condition and trend shall be determined. The present and potential supply of forage for livestock, wild and free-roaming horses and burros, and the capability of these lands to produce suitable food and cover for selected wild species shall be estimated. The use of forage by grazing and browsing animals will be estimated. Lands in less than satisfactory condition shall be identified and appropriate action planned for their restoration."

We feel that this information has not been adequately supplied in the DFP, and that it should be a part of the final plan.

We insist that grazing in the SNF be planned to allow adequate forage and habitat integrity for wildlife species. Where a conflict develops between livestock and wildlife, the SNF

should protect wildlife. Particular action should be given to riparian areas.

FIRE MANAGEMENT

In the event of a large fire, the SNF should be able to rely upon prepared standards for machine use and fireline construction for each area of the forest. Damage from fireline construction and other bulldozer use in 1985 was excessive on the SNF. We recommend that bulldozers not be used in any area that is recommended for wilderness or semi-primitive non-motorized classification by the ICL.

CONCLUSION

Idaho is the seventh fastest growing state in the nation. As the population of the state increases, and as the state becomes more popular as a tourist destination, the resources of our National Forests will become an increasingly more valuable resource. Idaho's economy is in the process of change. It is important that the primary stewards of the land in Idaho be aware of that change.

Timber production in Idaho will never regain the place it once had in the state's economy. Idaho's quality of life - a resource, in part, reflected by many of the values in the SNF - must not be compromised. The DFP proposes to make that very kind of compromise.

The ICL rejects the preferred alternative #12, and recommends alternative #3. The wilderness recommendations in this alternative are excessive, and should be adjusted as recommended earlier.

Thank you for this opportunity to comment on the Salmon National Forest.

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SALMON N F

December 31, 1985

JAN 10 '86

Info ☐ Action ☐

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TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RRWW	1	2	3	4	5	6
AO	1	2	3	4	5	6

CC's TO Zack Jensen

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

Dear Mr Hauff

The Associated Logging Contractors of Idaho, with a current membership of 561, would like to thank you for the opportunity to make recommendations and comments on the Salmon National Forest's Draft Environmental Impact Statement and Proposed Forest Plan We have appreciated your planning staffs willing and friendly assistance during our review process

Our specific recommendations and comments are enclosed in this letter by the following categories Timber, Fisheries/Water Quality, Visuals, Wildlife, Fire/Insect/Diseases, Soils, Wilderness, Recreation, Land, and Economics The immense effort required for these publications is very evident, and your planning team is to be congratulated for completing this work to date As always, we look forward to the continuing opportunity we have to help you, and your forest staff, to manage the Salmon National Forest

In general we are deeply concerned with the increasing emphasis on the development of, and use of techniques that tend to remove professional judgment and common sense from the decision making process This trend has tended to produce mechanical, or mathematical, decision making techniques that reduce the judgment factor to that which can be applied by a non-thinking computer. Modeling is one good example of this! The detailing involved in matrix modeling has been used extensively in this planning process In many cases the fundamental assumptions that are made for the design of the model are not founded in a sound data base but rather theory or quasi-theory (very little statistically sound local data support) Furthermore, large quantities of short term data in a few areas such as fisheries habitat and sedimentation may stand the test of statistical significance in parts or by sample area, but fail miserably to achieve statistical significance when grouped together through matrix modeling or expansion of the sample We want to emphasize that you and your decision makers in this plan need to maintain flexibility to depart

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United States Department of Agriculture | Forest Service | Salmon National Forest

Reply to 1920

Date

Donald B Jensen, President
Associated Logging Contractors, Inc
P O Box 671
Coeur d'Alene, Idaho 83814

Dear Mr Jensen

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

We feel we have selected an alternative that best meets the needs of all Forest users We have tried to provide a balance of benefits from the forest and at the same time minimize the impacts to other resources The preferred alternative was selected after consideration of both priced and non-priced costs and benefits In our opinion, it provides for the greatest net public benefit considering both current and expected future uses of the Forest Timber harvest is maintained at a level consistent with other resource objectives and economic feasibility

The selected alternative also provides for important noncommodity outputs such as

1 Meeting Idaho Department of Fish and Game goals for big game

2 Meeting Idaho Department of Fish and Game goals for anadromous and resident fish as well as protecting downstream beneficial uses of water

3 Protecting soil productivity in accordance with the National Forest Management Act

4 Meeting recreational demand for all classes of recreation, including wilderness, except in the Wild and Scenic River corridors

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

6 Livestock grazing consistent with the agricultural base and rural lifestyle of our area

7 The exploration for and development of mineral and energy resources.

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December 31, 1985

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formulation that will, in essence be forced by mathematical/mechanical measurements. If inadequate research or data exists we insist that this be documented, identified as theoretical, and not be utilized or implemented until its relevance is actually proven and documented We recognize that "experts" in specific areas may, and do easily, exaggerate the data base, provide outside literature reviews from sources which have only the slightest, at any application, and conclude with grandious modeling programs for large areas which have not been field proofed or even supported with a mathematical statistical foundation to the scale it is applied to We are not trying to destroy or even critize these experts in their research endeavors We simply want to insure that research, ideas, and theories are properly identified and categorized vice converted to fact without local complete field proofing In days of past we use to worry about putting the cart before the horse In our opinion much of this modeling and stacking of models (one models output = another models input) is building the cart in front of the horse (a non-common sense approach) Unless sound extensive field proofing is demanded before implementation we believe that the sedimentation/fish habitat/fish population goals will result in the cart before the horse construction while the tremendous timber base in the madromous drainage is left unmanaged or at best poorly managed We recognize that the limited funding for research work in the past has caused much of this absence of extensive field testing and data collection We also can see that a good potential exists that future funding levels may also be well below perceived needs However, we cannot be expected to accept decision making which is founded in the unknown, or unproven, because of this funding problem A review of the DEIS, and proposed plan leaves us wondering to what extent you base your decisions, findings and proposals on formal proven and tested research versus administrative literature review studies, plus interested general observations and "expert" or scare tactics We find no mandates in NFMA, RPA, NEPA, or Multiple-Use Sustain Yield Act, which requires the use of anything except the best reliable information available

Finally, we are deeply concerned about the increasing emphasis on procedure and mitigation of these procedures at the expense of results This is particularly apparent in the timber management program It appears as if the natural long term forest dynamics have been either overlooked or underestimated and replaced in many cases with microscopic short term viewpoints which severely, unfairly, and illegally constrain one of our primary cash income renewable resource crops -- timber

We submit that the Salmon National Forest has not accurately identified its timber supply opportunities or local timber industry needs It is mandatory that a minimum Annual Sale Quantity of 36 7MMBF, plus salvage be implemented for the first two decades in order to allow for local economic stability To not attain a reasonable timber productivity impairs the short term and long term productivity

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Donald B. Jensen -2

8 Several areas to be managed with a semi primitive motorized or nonmotorized emphasis. In these semi-primitive emphasis areas a full range of management options will be available for the next planning period

If it was possible to increase the suitable timber base, one would normally expect a corresponding increase in the Salmon's allowable sale quantity To do so, however, would either lower outputs from other resources, require harvesting low productivity sites or involve offering economically questionable sales. We believe the 407,000 acre suitable timber base in the chosen alternative represents a practical choice given these consideration Specifically

1. The National Forest Management Act prohibits harvest when regeneration cannot be assured in five years (physically unsuitable or forest land--inadequate information) By definition, this category would include dwarf mistletoe stands that must be clearcut, yet cannot be adequately regenerated, either naturally or through planting Item B2 on page IV-40 is, therefore, legal and proper We will be re-examining the forest land--inadequate information category during our next timber inventory scheduled this year. It is expected most of this land will remain unsuitable for timber harvest because regeneration cannot be assured on many of these poor sites

2 Salmon timber sales are characterized by steep slopes, low volume per acre, several miles of road construction per million board feet, and long distances from mills Logging and roading costs tend to be high Despite efforts to reduce these costs during the past 5 years, an average of only 15 million board feet of 28 million board feet offered annually actually sold Industry has demonstrated that not all sales are economical If such areas (forest land not appropriate for timber production) were included in the suitable timber base and a corresponding increase in allowable sale quantity was made, several things could occur Public funds could be spent for timber sale preparation on lands where sales are unlikely to be purchased Alternatively, sales from uneconomical areas could be shifted into the existing 407,000-acre suitable timber base as additional volume We believe the second option is not in keeping with a balanced management program The first is a poor expenditure of public funds For these reasons, we believe classifying forest land as not appropriate for timber production due to economics is reasonable, prudent, and legal Many of these economically unsuitable areas were finally classified as semi-primitive Should conditions change, these areas could be considered for inclusion in the suitable timber base during the next planning revision

3. Other resource values can best be provided by classifying some timber land as suitable for timber production, but not appropriate Two major considerations are the protection of downstream beneficial uses of water, and maintaining viable wildlife/fish populations, including old growth dependent species While a minimum 10 percent old growth retention requirement was built into the FORPLAN model, it is conceivable, for whatever reason, that suitable timber land was not scheduled for harvest For this reason, the words "a minimum of" are appropriate on pages IV-19 and IV-83 Old growth stands do occur in wilderness, and these stands do contribute to old growth dependent wildlife species; however, the need for old growth stands applies to the rest of the Forest also Juxtaposition of old growth

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of the forest and violates the multiple use----sustain yield act as well as the R.P.A.

Our concerns in todays economic climate are heavy. We submit that without major changes in this proposed forest plan and DEIS that our local timber industries future will be sealed in a fate which will cause it to undergo a severe downward reorganization with disasterous economic consequences for the industry itself, the local communities, the state of Idaho and all americans who use and need products. We are not proposing a different choice of the identified alternatives. Rather, we are proposing to revise the preferred alternative primarily through additions to the suitable land base classification for timber production and revisions in the proposed discretionary constraints.

Sincerely,

Donald B. Jensen
President

DBJ/lm

Enclosures

stands is very important, and the words "outside of wilderness" on page IV-82 become essential.

We agree that increasing the suitable timber base and corresponding allowable sale quantity might decrease fire suppression costs and reduce resource waste. A similar case can be made for insect and disease control. As with most management activity, there is a cost associated with such action. We believe the preferred alternative offers the best choice of suitable timber base at a reasonable cost. For example, during the Salmon's last mountain pine beetle epidemic in the 1930's, many stands of lodgepole pine were killed. This was certainly a great loss of a timber resource. Without a small log manufacturing facility in the area, however, the value of this resource did not warrent the cost of management. The same could be said for much of the unsuitable timber land today.

The 4,021 acres from which the 21.1 million board foot allowable sale quantity was based (page III-1) was intended to be an annual figure. We will clarify this matter in the final plan. Thank you for bringing this to our attention.

While the Salmon's timber output is certainly important to the local economy, we do not agree that 21 million board feet out of a 10 billion board foot national timber sale program is of national significance. The presence of cobalt and the Salmon Wild and Scenic River, on the other hand, do make mining and recreation national in influence.

The calculated 30 million board foot "short-fall" for area mills was based upon a 1980 study which included input from industry. The national and regional economic lumber situation has changed significantly since 1980. Locally two fewer mills are in operation than in 1979. The point brought out by the 1980 study was that the existing mills have a larger capacity than the long term sustained yield timber supply from the area Forests. That condition still exists. We believe the emphasis for a local stud mill operation should come from the private sector. We would be willing to provide Forest data, and meet with potential operators on that subject.

Your suggestion that we "integrate uneven-aged managed stands between even-aged stands" would have drawbacks if applied as a blanket prescription. Many of the benefits that you cite can be obtained by selecting priority stands for initial treatment. There are stands where uneven-aged management would be the system of choice; After considering the silvics of a tree species (including its regeneration requirements), fire history, susceptability to insects and diseases, etc., an even-aged system of management is usually preferred because it derives optimum benefits from our forest resource. In our situation, uneven-aged management often carries with it some serious economic and stand management drawbacks. Some of the drawbacks include:

1. Stand condition is often such that the leave stand will not provide an acceptable level of growth. Remaining volume is inadequate to allow for an additional entry. Several situations still exist on our Forest where appropriated dollars are required to restore previously cut uneven-age stands to a productive state since the remaining timber value is inadequate to support a commercial entry.

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ASSOCIATED LOGGING CONTRACTORS, INC. Response to the Salmon National Forest Plan/DEIS

TIMBER

Fundamentally the forest has failed to provide adequate levels of timber resources for both current and future uses. The forests also fails to meet the needs of the local wood products industry for the first decade Page II-45 identified that a 30 MMBF shortfall exists for the study area. We submit that this is a conservative volume estimation and recommend that a 50 MMBF is more realistic to provide efficiency to these facilities. Additionally, we believe that the forest of the Salmon and Challis should combine efforts to attract a small log processing manufacturer to handle the small log problems of both forests.

We agree that the demand curve for timber should be considered perfectly elastic. We have every faith in our democratic free enterprise system. As such, we recognize that opportunities for growth in our wood products industry will be absorbed when equitable profits are available (Page 2-45 applies).

An 18 MMBF per year constraint identified on page B-144 for alternative 7 is not considered to be enough timber to maintain a viable logging and manufacturing industry in dependent communities. We suggest that the current output of 36.7 MMBF is minimum level ! It is absolutely imperative that the logging and manufacturing industry must be supported at a level which will optimize efficiency to enable the local timber industry to remain competitive in the wood products industry. The 18 MMBF simply will not achieve this goal

We submit that the timber objective on page 4-85 must be changed from an ASQ of 21.1 MMBF to 36 7 MMBF for the first decade and for planning purposes it should increase to the forest potential yield over time.

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Only 4,012 acres have been identified as the area that the 21 1 MMBF ASQ will affect during the entire first decade (page 3-1) We recognize that the forest management goal of "vegetative diversity" is not attainable. The forest simply is not treating enough acres on the forest to achieve this diversity of age groups or the various ecological stages of endemic plant communities (Page 4-1) Simultaneously, the forest is showing a 24 MMBF annual mortality which it states is not recoverable (page 2-39), and a 19 cubic feet per acre per year loss in growth potential A more aggressive timber management program would accelerate the conversion of existing mature and overmature stands to younger and thriftier age classes while increasing the timber productivity. Simultaneously, it would significantly reduce the susceptability of the suitable lands to insects and diseases plus fire while reducing mortality losses. This is the intent of the Multiple use Sustain-Yeild Act of 1960 plus RPA/NFMA. To not optimize this potential is to fail to meet the intent and mandates of these laws and other regulations We submit that the forest has reduced the forests productivity in the proposed plan . through discreationary constraints and failed to fully respond to the requirements of RPA/NFMA, and the Multiple Use Sustain Yield Act Also, it has not provided a program which will maintain the potential productivity of the forest lands A strong aggressive timber management program coupled with an increased annual sale quantity would correct this error We submit that other mangement objectives of the forest would also be achieved at levels of legal requirements whilereasonably attaining the required productivity potential. Table 2-15 exemplifies this situation. It identifies that by the year 2030 that over 51% of the suitable forest land will still be in overmature decaying timber stands

Donald B Jensen

2 Prevalent insect and disease problems (i.e., spruce budworm and dwarf mistletoe) are often controlled better with an even-aged system of management

3 Logging costs associated with lighter volume cruises are often higher

The tractor skidding slope limit of 45 percent is intended to limit the erosion potential on our more erosive soils We do not think that the questionable improvement in sale economics associated with increasing the limit to 55 percent is worth the risk of increased erosion

We have no evidence that your suggested water bar spacing would achieve the same level of erosion control as our standard spacing.

Our standards and guidelines do not preclude the use of even-aged management in riparian areas

Watershed management on the Salmon National Forest is directed toward minimizing sedimentation in all land management activity The Forest is not involved in any actions to reduce naturally occurring sedimentation Instead, emphasis has been placed on reducing land management induced sedimentation (1) through the use of mitigation measures such as those described in the standards and guidelines of the proposed action, and (2) through the use of cumulative assessments to evaluate potential impacts to watershed stability and stream channel conditions The general statements on pages II-48 and 49, dealing with land management activities and water quality, we believe to be true Two areas listed on page II-49 give site specific examples of this relationship

A fisheries objective of the proposed Plan is meeting the State species production goals At present, certain habitats are below their predicted level as a result of underseeding Numerous factors have contributed to the underseeding, most involve off-Forest conditions and the influence of past activities on site conditions which have been remedied Efforts to resolve off-site problems have been accelerated and positive results are beginning to show In addition, Idaho Department of Fish and Game effort in hatchery culture has provided a source of fry and smolts to re-establish populations in habitats that are underseeded.

Modelling techniques utilized on the Salmon National Forest have helped to enhance professional judgment rather than remove judgment from the decision-making process Output from models are being used to help assess long term effects of numerous activities within an area Before modelling techniques were initiated to compare alternatives and help evaluate cumulative effects, no consistent methodologies were available which could provide a timely assessment of total watershed disturbance and sediment creating activities within a watershed

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

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We believe the forest has a good handle on its silviculture and even-aged/ uneven-aged mangements However, it is believed that the forest has overlooked a major economic opportunity to address below cost sales and mortality salvage It is recommended that the forest integrate unevenaged managed stands between even-aged stands This will allow the forest to treat the entire area accessed upon the first or next entry where this is economically viable The forest benefits attributable to wildlife, visual quality, recreation, ect can be met while allowing timber harvesting prescriptions to operate on the entire sale area which is economically viable We submit that economies of scale in logging costs will be fully employed while harvestable volume per mile of road will dramatically increase. Additionally, the stands can be sanitized to reduce mortality potential We recommend this unevenaged program while recognizing the Dwarf Mistletoe and the Spruce Bud Worm problems. We suggest that the re-entry constraints associated with wildlife hiding and thermal cover, visual quality objectives, and Fisheries habitat coupled with the 40 acre size limitation will cause a tremendous requirement for retention of old growth forests between even-aged treated stands for about three decades These constraints reduce the forests productivity in both the short run and throughout the planning period while permitting the forests mortality to continue without a significant recovery opportunity. Unevenaged mangement for these areas is logical!

The Silvicultural Prescriptions on Page 4-33 needs to guarantee that the general direction numbers 1 & 3 should insure that the economics of the sale are not reduced by these activity considerations The standards and guidelines for DF, PP, and LPP should stress a combined evenage and unevenage silvicultural treatment within a timber sale when the overall economics of the sale can be enhanced while maintaining a reasonable level of other mulitiple use outputs. This will allow the timber harvest entry to treat the majority of the area while adding economies of scale to the timber harvesting related costs This should greatly assist the below cost problems. We submit that the tractor skidding slope limitation for volcanic, granitic, and sedimentary landtypes be raised to 55%. This should improve overall costs associated with timber harvesting, and can be expected to contribute favorably to overall multiple use benefits. We suggest that the skid trail water bar spacing will not achieve its erosion control intent We suggest doubling these distances at a minumum. We submit that these doubled distances will accomplish the same goal while significantly reducing erosion control costs. We suggest that the use of unevenaged management in riparian areas is a sound silvicultural prescription which will allow greater timber availability per entry. We suggest that whis be included in the standards and guidelines (Pages4, 36&37 apply). It appears as if a climax forest will result from the exclusive use of the prescriptions proposed with a very high mortality as one of the undesireable results.

The general direction 13 on page 4-39 has associated standards and guidelines number 2 which must be scrutinized and reviewed before utilized to insure that any information shortfall is not used to default to this land class. Item 5 indentifies, under subsection "C",that dwarf mistletoe stands may qualify an area for unsuitability for timber production. We suggest that this be removed. This regeneration classification should be used for managed stands not evaluated in a unmanaged stands status We submit that item B2 on page 4-40 is not legal or in confomance with the Presidents goals for long term sustained yield. We insist that this be eliminated from the standards and guidelines.

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

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

Manipulation of forest vegetation (i e , timber management), as you point out, is a very powerful habitat management technique and can be of great benefit to early and mid-successional species such as mule deer and elk, however, forage is only one component of wildlife habitat Therefore, timber harvest entries are designed to provide aspects of good wildlife habitat closing roads to restore necessary security for hunted species, leaving blocks between cutting units, and smaller (under 40 acre) units

The Salmon Forest Plan does not include target numbers for the grizzly bear since the Grizzly Bear Recovery Plan developed by the U S Fish and Wildlife Service does not involve recovery efforts on the Salmon National Forest

The standards and guidelines which apply to the Visual Quality Objectives (VQO's) of Retention and Partial Retention are intended to be restrictive VQO's of Retention and Partial Retention are only applied to visually sensitive areas You will note that the majority of the areas assigned a timber management prescription have assigned VQO's of Modification and Maximum Modification, and the accompanying standards and guidelines permit standard silvicultural practice in terms of regeneration and rotation age The intent of 22-foot regeneration in Retention is to assure that harvested areas are sufficiently healed as to not be obvious before further activity is permitted, thereby assuring that management activities are not visually evident The same is true of rotation age, which is only restrictive in foreground retention, where the intent is to provide mature and overmature specimens in the immediate foreground. The amount of land base that has foreground retention, a timber management prescription and merchantable timber is insignificant In short, the approach that is necessary is not to relax standards for VQO's but rather to lower the VQO in areas where desired management activities and restrictive VQO's are incompatible

The constraints used in the formulation of the alternatives were based on results of the benchmark analysis. Many are not required by law, but are necessary in order to ensure a reasonable, implementable alternative A very broad array of alternatives was considered, and we feel that we have complied with all legal requirements, including the NFMA requirement for cost efficiency.

The vegetative diversity standard and guideline of old growth retention should be set at exactly 10% overall with a minimum of 5% for any identified type. This will allow for a maximization of the TCRNR 263,400 productive forest land acres to contribute at its maximum potential to this old growth requirement while reducing the restriction on the tentatively suitable forested lands. The standard of providing a minimum 20-30 hard snags per 10 acre should befully relaxed for the suitable timber production lands. The large percentage of unsuitable lands should meet these objectives However, this constraint will sevemly reduce the long term productivity of the forest and increase the costs associated with timber management (page 4-17 applies). We suggest that the words " a minimum of" be eliminated form item 2b and throughout the plan (page 4-19 applies). We believe that these goals need to be mandated at their legal minimums only.

Page 4-83 identifies " Forest Management Objectives " The "Negetative Diversity" subsection should be changed by the removal of the words " Outside of Wilderness". We cannot understand why the wilderness lands cannot contribute their share in this requirement. It is within the applicable laws and regulations to have the wilderness designated lands provide for this need We suggest the maximum use of the wilderness areas in this area to minimize the establishment of defacto wilderness acreage (Page 4-84 applies also). We also suggest the use of the Research Natural Areas for simultaneous satisfaction of this need. Finally, we encourage the forest to set vegetative diversity objectives which stress the need for establishing a diversity of age groups throughout the forest. This diversity has proven to maximize overall multiple use benefits.

It is stated on page 2-3 that only recreation and mining have a significant influence in the National Zone of Influence. We submit that the forest potential timber output capability also has a national influence level, and request that this be identified frequently.

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Donald B Jen en

Your suggestion that timber stumpage is not the total measure of timber benefits is well taken The effects of timber harvest on local employment and income are very important and are documented in the EIS Their community stability benefits were weighed heavily in the selection of the preferred alternative which had a less than attractive present net value for timber activities. We are aware of the inconsistencies in the economic analyses and are confident that all benefits and costs, both priced and nonpriced, were considered in our decision

Almost all of your cost saving suggestions have already been implemented We are continuing to work with the local industry to minimize purchase cost consistent with meeting resource objectives Any input you might have regarding cost saving opportunities specific to the Salmon would be appreciated

Just as you suggest, road costs are capitalized over long periods of time in the present net value analysis

We believe that community stability has been adequately addressed in accordance with regulations, directions, and guidelines for the Forest Planning process Under the concept of community stability, the Forest Plan is not intended to guarantee full operation of the locally established wood product operations We have, however, proposed a timber offer level which provides the opportunity for the timber sector to be an important part of the economy throughout our zone of influence This condition is especially recognizeable when nonlocal bidders are successful at competitive bid timber sales. The economic tables for manufacturing costs (Appendices page B-32) were developed through audits of actual industry cost and represent an operator of average efficiency

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

Sincerely,

RICHARD T FAUST
Forest Supervisor

ASSOCIATED LOGGING CONTRACTORS, INC RESPONSE TO THE SALMON NATIONAL FOREST PLAN/DEIS

WATER QUALITY/FISHERIES

Page 2-46 states that "the goal of watershed management on the Salmon National Forest, is to provide the optimum contribution of the water resources from national forest lands to the Nation's present and future needs" It states further that "the reduction of stream sedimentation" is a specific goal These statements lead us to believe that the Salmon National Forest is placing water resources at the head of the list of multiple use outputs. The Multiple Use Sustain Yield Act of 1960 (MUSY) and the Resource Planning Act (RPA) are laws which look for a balance of outputs from the forest rather than one output optimized and another output minimized or eliminated. We suggest that this watershed management goal conform to these laws. The specific emphasis towards reducing stream sedimentation indicates that the forest has set a goal which is opposing the acts of nature We suggest that the specific goal of reducing stream sedimentation be eliminated

The general direction for Anadromous fish habitat requirements identifies that adequate sediment free spawning gravels will be provided We submit that the forest has taken on a "creator" managerial position in this endeavor Natural sedimentation has been overlooked, and the forest is proposing to eliminate all sedimentation We suggest that the words "adequate spawning gravels" be used instead of this impossible general direction We submit that the trout general direction is also infected with this same delusion of grandure

We agree that off forest influences on anadromous fish populations make it impractical to emphasize actual population factors using forest habitats However, we do not agree with the statement on Page 2-22 which states "Potential populations or use levels can be derived from habitat relationships" for anadromous fish We submit that the available data and research work on sediment and habitat relationships have not been extensive enough for the rivers and streams of the forest or the entire Idaho Batholyth System The major shortfall is a sound field proven relationship between anadromous fish habitat and populations The factors which affect this tremendous shortfall in applicable information are budget constraints which have limited the quantity of studies, research, and data base collection on wild and free flowing streams in this system plus others This lack of information on the dynamics of streams and rivers, both seasonally and over long periods of time, has caused the experts in this area to rely upon a very restrictive unrepresentative, environmentally controlled, laboratory experiment by the University of Idaho on sedimentation versus fry emergence, and field data which does not properly account for the downstream affects of dams, native American fishing/capture, and international fisheries To create habitat for a population of anadromous fish which are severely impacted by off forest downstream affects which have yet to be mitigated, or to estimate habitat needs for the use of a full seeding adult population when the need is substantially below this level is premature if not totally inappropriate With the objective (Page 2-30) to rebuild anadromous species population levels to the 1960 levels, it appears as if the forest is intending to become involved in off forest effects in this endeavor It is recommended that the forest objective be changed to a statement which provides satisfactory habitat for returning adult population based upon the previous life cycle population returns until the major downstream impediments are resolved

We do not believe that the research needs identified on Page 2-31 should exclude anadromous fish habitat needs on the forests streams and rivers We request that this area of research be included to either field proof or disprove many of the existing theories and postulates which exist today

The "Wildlife and Fish Resource Management" standard and guideline item "g" states that the forest will manage anadromous fish habitat to supply and maintain 90% or more of its inherent small production capability (Page 4-20 applies) This standard and guideline is completely unreasonable. By ignoring the downstream off forest problems, we are providing habitat for anadromous fish which are not existing This complete over reaction to this problem constrains seriously other mutliple use outputs and increases the costs associated with these other outputs dramatically Furthermore, the forest cannot identify from existing data and research the habitat condition required for a fully seeded spawning area for wild and free flowing streams We suggest that until our data and research results identifies the real needs, and the downstream problems are solved, that this standard and guideline be removed We submit that it should be replaced with one which identifies that meeting the existing state water quality standards will meet the fisheries aquatic habitat needs

The Water Resource Improvement and Maintenance Management Activity on Page 4-45 identifies under "a" that the "salsed" model will be used to determine increased sediment yields that exceed threshold limits We submit that this model may be either "state of the art" or worthless It has not been field proven or field tested on the Salmon National Forest We submit that its use should be limited to an indicator status only, and that actual measurements be the only trigger mechanism used We encourage the use of additional research and field proofing of this "salsed" model during this planning period (Page 4-48 also applies)

The fish response models are not at all reasonable for use on the Salmon National Forest Its soils foundation is very weak, and its fundamentals are founded in granitic soils This makes the establishment of base line natural sediment levels for streams and rivers a very rough approximation Without the ability to properly determine this base line situation (sometimes referred to as the pristine habitat condition) the forest cannot predict relative sediment changes to fisheries needs The reliance upon the University of Idaho laboratory studies for fry emergence and sedimentation lacked the important stream dynamics in this controlled environment No field proofing of this test has yet to be published or known to have been done We find no statistically sound information, research, or data which coordinates free flowing or wild streams or rivers and this laboratory testing We cannot accept the corelation which has been drawn between sedimentation, habitat and anadromous fish populations. It must be considered theoretical for use on any forest However, for the Salmon National Forest to use it or the "Guide" is an extension of everyones imagination and could only be accurate accidentally We submit that the Model and Guide be abandoned, except for research, and that the forest utilize the attainment goals for water quality as an indicator of satisfactory fish habitat response Additionally, we submit that the fry survival objective on Page 4-85 is not monitorable and therefore not a viable objective. We suggest that this be replaced with the following "Maintain water quality to the established state standards to maintain fry survival for both resident trout

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WATER QUALITY/FISHERIES Page 3

and anadromous species

Page 2-48 states that timber harvesting and road construction are sources of water quality degradation We insist that this be changed to a realistic statement if you persist in this proliferation The statement simply is not true on a carte blanc basis We strongly suggest that the forest recognize the natural degradation which water quality would undergo over time if no timber harvesting were to take place. Certainly the major fires the forest had in 1985 dramatize that a do nothing attitude is unsatisfactory as well as illegal We recommend that any statement like this and the one specifically concerning road construction on Page 2-49 be eliminated unless qualified by site specific areas and time This will allow the user of these documents to recognize where past problems exist and where our current state of the art timber harvesting techniques offer better results.

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ASSOCIATED LOGGING CONTRACTORS, INC. Response to the Salmon National Forest Plan/DEIS

VISUALS

We submit that the VQO on page IV-9 which requires that trees reach 22-25 feet in height,before retention or partial retention openings are reclassified, is over-restrictive We suggest that satisfactory stocking should be used vice this standard. We believe that this constraint will seriously reduce the forests productivity overall and dramatically reduce future potential outputs. The rotation ages required for VQO are completely unreasonable and permanently restrict the forest long term productivity and LTSY capabilities We suggest that no rotation age exceed the timber types biological rotation age and strongly recommend that the culmination of mean annual increment be used as the desirable rotation age for the retention/partial retention groups, (page 4-9 through 4-11 applies)

ASSOCIATED LOGGING CONTRACTORS, INC. Response to the Salmon National Forest Plan/DFIS

WILDLIFE.

We note that "Habitat Diversity is a critical element necessary for maintenance of the wildlife and fish population on the forest". (page 2-20) Because of these relationships, we encourage the forest to fully recognize the symbiotic relationships between vegetative manipulation by timber harvesting and wildlife and fish population goals. We believe an increased timber output is achievable without significantly affecting fish goals as outlined in the proposed plan, and aiding the achievement of wildlife goals.

We suggest that the forest expand the representative habitats used as indicative of specific biotic communities for timbered types to include all age groups vice mature and/or old growth only. We submit that the successional stages of each rotation provide specific needs within the biotic community vice just the old growth and/or mature forests.

We seriously question the forests ability to meet its elk and mule deer objectives at the proposed timber harvest levels. We suggest that this indicates a substantial number of acres of the forest scheduled to be burned to achieve the required forage through vegetative manipulation. We submit that the forest should re-evalute its suitable land base for timber harvesting/ production to accomodate this increasing habitat need vice destroying the timber stand by burning.

We take great exception to the statement that says "with the exception of mule deer, management activities permitted in optimum areas will cause a serious decline in animal use" We submit that vegetative manipulation of the forested habitat have been proven to increase forage for elk as well as mule deer, and that population increases can be expected with forage value increases. Timber harvesting, through an aggressive timber management program, will accomplish this needed vegetative manipulation and inhance the habitat. We request that this quoted statement and any others which relate the same connotation be specifically exempted for both elk and mule deer (page 2-23 applies). Obviously, a forest habitat classified as optimum elk habitat today would deteriorate over time as the forest matures and available forage deminishes. The need for ongoing timber management in optimum areas is obvious

We submit that a failure by the forest to implement adequate quantities of road closures has been the cause of the inability to attain reasonable big game goals However, we submit that the goals set by the Department of Fish and Game are over zealous and seriously lack a full multiple use output approach as required by RPA and the Multiple Use Sustain Yield Act (page 2-84 applies) We do not agree with the change in amount and scheduling of timber harvest and road construction which was deemed necessary to obtaining reasonble objectives for big game populations. Your Mr Jensen indicates that hiding cover was the major contributor to this big game habitat problem . Road closures allow for the twin production of big game populations and timber. The "Wildlife Habitat Improvement and Maintenance" standard and guideline requires hiding cover It is submitted that this standard and guideline will be unnecessary along roads which are closed Furthermore, natural openings behind closed roads will not require buffer strips or special mitigations. It is suggested that this road closure situation be put into this standard and guideline (page 4-21 applies). The general direction #3 should stress commercial

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silvicultural practices to accomplish wildlife habitat objectives This would assure that a twin crop of timber and wildlife is the real goal whenever possible

We suggest that the raptor nest site "no cutting zones" (page 4-20) be utilized only if these species become classified as threatened or endangered under the T & E Species Act.

The Forest Services Grizzly Bear objectives of 215,000 acres are not warrented as the recovery plan for this species does not include the Salmon National Forest. We suggest the use of the existing acreage until an identifiable target is established unless this area is already within the Congressionally designated wilderness lands

ASSOCIATED LOGGING CONTRACTORS, INC. RESPONSE TO THE SALMON NATIONAL FOREST PLAN/DEIS

FIRE/INSECT/DISEASE

As the forest identifies a upward trend in fire occurrence and acreage burned during the 50 year planning period due primarily to the accumulation of natural fuels , we submit that this suggests a need for a much more intensive timber harvesting/management program. The forest expects to be expending large amounts of tax payers dollars for fire fighting in the future Certainly 1985 proved this projection! We suggest that a major portion of this catastrophic fire suppression expenditure can be avoided by a much more intensive timber harvesting program than projected Furthermore, the forest has not recognized the past investment in its timber resource which was made through fire suppression We recommend that these investments be recognized, and that a much more intensive timber harvesting program be instigated to recapture these investments. We note with pleasure that recognition to some of the values of timber harvesting in fire management is concluded on Page II-64 and 65 We concur!

We are not at all convinced that the fire program properly addresses the immense natural fuel buildup which will result from the low level of timber harvesting proposed. We submit that the average acres burned (Page VII-D-33) cannot be expected to decrease to the levels projected Certainly the 1985 fires can be expected to indicate this trend We submit that this unrealistic "projected fire program" misleads the public as to the real catastrophic fires which this proposed forest plan will cause as a result of the very low level of timber management proposed. We project that at a minimum we expect an increase of at least 10% per year over the historic average We also expect that the suppression costs are grossly underestimated The costs should reasonably be 15 times those identified. We submit that an aggressive timber harvesting program coupled with a large increase in the suitable land base can be expected to result in a major reduction in the realistic suppression costs We project that one-half of these costs can be expected Also, the total F.F P Budget should be able to be reduced through a re-evaluation of the program which will reduce the work to an absolute minimum We estimate that the proposed F.F P. Budget is basically focused upon rather minute project work and overstates its value on a forest goal basis

Mortality associated with misletoe is estimated at 10MMBF/year in the D.F type and 12MMBF/year in LPP type (pp II-81) We submit that the forest insect and disease control planned will result in increases in mortality throughout the planning period (pp II-82-83) We believe the forest properly recognizes its opportunities to strongly reduce this mortality through the application of sound economically viable silvicultural methods. However, the forest has not utilized this capability We recommend a much more aggressive timber management program to accomplish a major reduction in thiswaste of our timber resources as well as other multiple use outputs. We note that if current management continue no improvements can be expected (pp II-82) We suggest that reduced timber outputs will cause significant increases in this mortality as well as severely reduce overall multiple use outputs and goals Major fires can be expected to radically decrease visual quality objectives, recreation benefits, fisheries and wildlife benefits, timber benefits, water quality and community stability, as well as other multiple uses We insist that this proposed output from the plan be changed

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ASSOCIATED LOGGING CONTRACTORS, INC. RESPONSE TO THE SALMON NATIONAL FOREST PLAN/DE

SOILS.

The soil Survey Action Plan on Page VII-p 34 identified a major shortfall in available information necessary to reasonably provide the information required for the sediment production modeling proposed by the forest We suggest that the SAMSED Model should not be implemented until the next planning cycle when, hopefully, the data base will be adequately refined and the model field tested and field proofed The use of the guide for predicting sediment yields from forested watersheds (guide) is inappropriate for use on the Salmon National Forest because of the extremely small amount of data/research which has been actually done on the Salmon National Forest The utilization of a class four soils classification standard simply is not detailed enough to provide the necessary soils foundation data which this model depends upon so very much. Even the use of the broad based methodology of the "Guide" is seriously questioned as to its applicability on granitics However, it is basically unsubstantiated on volcanics and other soils We submit that there are very few local research based coefficients for the Salmon National Forest for roads or timber harvesting to correlate sediment production to there activites What the forests "experts" have done is to take a limited amount of data (primarily in granitic based soils) and extrapolated this skimpy information to form the foundation for this model We conclude that the model is theoretical and produces only empirical values. We do not support its use except on a research/field testing basis We cannot find in the applicable laws the need to utilize this form of information However, its impacts on timber harvesting related activities is severe It causes, a loss in available ASQ forest productivity in both the short and long term, and increased costs associated with timber harvesting We insist that this creativity of estimation without factual proof be cancelled, and that the model be withdrawn from use for this planning cycle. We are left wondering what is really being said on Page II-50 concerning mass wasting Surely the "special mass movement hazard areas" are not intended to be the entire creeks, basins, or drainage that are identified We suggest that specifics in these areas be disclosed vice condemming the entire creek, basin, or drainage We assume that the definition on Page IV-63 concerns itself with volume growth measured in cubic feet over the rotation age In other words a reduction in timber growth for say 20 years while regeneration is established would not be considered a reduction in timber value growth We stress this line of reasoning because of its impact upon Item 1 in the standards and guidelines on Page IV-62 We believe that the 80% activity limitation will seriously reduce the available silvicultural treatments in an area for an entry, and cause a severe loss in the timber resource availability and productivity potential in the long term Additionally, it will not allow for a reasonable attainment of the Presidents goal of achieving 90% ITSY We also submit that this standard and guideline would be the cause of severe decreases in economic benefits due to increased costs associated with dispersion of timber harvesting areas We simply cannot afford this constraint We recommend its deletion entirely!

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ASSOCIATED LOGGING CONTRACTORS, INC. Response to the Salmon National Forest Plan/DEIS

WILDERNESS:

We support the forest proposal which does not recommend any more lands for wilderness classification or management. Obviously, the needs for wilderness lands exceeds demand throughout the planning period. Any change in this allocation in the final plan would be vehemently opposed.

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ASSOCIATED LOGGING CONTRACTORS, INC Response to the Salmon National Forest Plan/DEIS

RECREATION.

We note that dispersed recreation supply exceeds demand by an extremely large margin of over 20 times (table 2-B page 2-11) We also note that developed recreation also exceeds demand but by a smaller margin of over 3 times (table 2-A on page 2-11) We submit that any future emphasis for recreation should only occur in very site specific small areas, and that this resource output not become constraining upon any other resource outputs The need for roadless area designation for recreation opportunities simply is not warrented. The supply exceeds demand by an extremely large margin for the entire planning period, We recommend that all semi-primitive non-motorized recreation opportunities can be satisfied in the FCRONR wilderness around areas where access exsits. The preclusion of a classification of suitable for timber production in roadless areas is not intended by the applicable laws when other resource outputs can be met at their legally mandated levels. This discretionary constraint must be removed

LAND

It is of strong concern to us the difference between the Forest Land classification of 1,354,200 acres and the suitable forest land classification of only 407,000 acres This is barely 30% of the forested land and only about 23% of the total Salmon National Forest land base When we focus on the land suitability classification for timber production on page VII-A-1, our concern concentrates upon the 235,000 acres of forest land which is unsuitable because of "inadequate information", and the 337,900 acres of forest land which is classified as "not appropriate for timber production This tremendous erosion of our previously classified commercial forest land base of 909,000 acres (provided by your staff) demonstrates that the forest is not adequately concerned about its timber management program and is disregarding the basic intents of RPA and the multiple use sustain yield act (page 7-A-1 applies) We recommend that the portion of the 337,900 acres of land classified as not appropriate for timber production due to economics be reevaluated based upon our economic recommendation We also recommend that the proposed extensive roadless area allocations are not needed to satisfy semi primitive recreation projections We do not support the management of any lands as semi-primitive management areas. We submit that the wilderness areas established provide for this need on lands adjacent to the access wilderness areas (page 4-84 applies). For a semi primitive motorized recreation objective a timber/recreation prescription should be identified vice a single use recreation objective An even more stringent road management program should be instigated to allow the targets for elk and deer to be met instead of a classification of the land which excludes timber harvesting

We believe that witholding a suitable timber land classification for fish objectives based on sediment models of very quiestionable reliability is illegal We recommend a timber land suitability classification for these fish objectives which gives reasonable consideration to fish while meeting current state water quality standards We believe that relatively inexpensive mitigation measures exist which can achieve these water quality objectives and allow almost full availabitity of forested lands to be eligible for timber harvesting land management programs, while achieving the legal requirment of all applicable laws

We want to stress the importance of maintaining the largest possible suitable timber production land base for this planning cycle. We submit that this allows the forest its maximum flexibility for timber production potential to meet current and future needs of local communities, the State of Idaho and all Americans for wood products Excluding timber production capabilities while meeting the legal mandates for all multiple use outputs employes discretionary constraint choices by the forest which were not intended by RPA or the Multiple Use Sustain Yield Act, and not in accordance with the Presidents ITSY goals. As such, we request that the 235,000 acres classified as unsuitable because of inadequate information be given the benefit of the doubt and classified as suitable land for timber production for this planning cycle

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ASSOCIATED LOGGING CONTRACTORS, INC. Response to the Salmon National Forest Plan/DEIS

ECONOMICS

We find that the Salmon National Forest has excessively employed discretionary constraints in all alternatives. This use has caused the overall productivity of the land to be radically reduced It has also seriously reduced timber outputs such that no opportunity exists or is even attempted, to achieve the presidents goal of long term sustain yield. In addition it has failed to provide for economic stability in local communities. We cannot identify any legal requirements for implementing most of these discretionary constraints, but do recognize the infringements they cause on these legal requirements and drastic cost increase associated with timber harvesting. NFMA regulations require the forest service to effect the most cost-efficient combinations of management prescriptions We submit that this has not been accomplished Rather, the forest service has chosen very costly methods which has resulted in a low level of present net value outputs for timber and minerals. When these bloated inaccurate costs are displayed, all comparisons on a PNV basis become unrealisitic and unusable.

We submit that the benefits associated with timber found on Page IV-89 are misrepresented. Timber values must recognize more than stumpage receipts We suggest the use of end product values for wood products be utilized and combined with the employment caused values The forest consistently grossly undervalues its timber program. The average cost/MBF in Table B-5 on Page B-33 for logging costs in the first decade are not considered reasonable. We submit that the tractor skidding costs are $5 to high, and the tractor overhead costs are in the range of $2.00/MBF to high Also the loading costs are 0.80/MBF to high for tractor. We encourage the use of annual road closure when this would allow for timber access road construction cost savings over mitigation measures for multiple use roads. We could not find this general direction in the road management activity for roads (Pages IV-65 through IV-68 apply) In reviewing the road development cost, it became apparent that many of these costs could be drastically reduced It appears as if the forest is continuing to use cost appraisals which can be related to the old high standard roads of past These roads were characterized by 15'-24' road widths, with high speed (15MPH+) alignment, oversized culverts, 100 percent brush disposal, full stabilization, inslopes with ditches, and many other sophisticated and costly measures Our members and many other interested people have expressed very strong concerns about these high standard roads which easily have costs in excess of $30,000 per mile to construct, and require large maintenance requirements annually, in the past. We have found a reasonable response to some of these road problems, but seem to be plagued with a constant reoccurrence of this high cost/over building disease type problem Simply put, we are again expressing our opposition to these high standard roads We cannot afford to continue to subsidize the USFS through deficit timber sales, or live with below cost timber sales We submit that timber access roads do not require these high standard type roads, except for the arterial type roads which are generally already in place We are continuing to recommend very low standard roads for local and collector type roads. These low standard roads are characterized by roads which fit the contour of the land, have very close excavation balance points, allow for brush disposal by windrowing, are narrow in width (12-14 feet), are outsloped, and have occasional turnouts. Additionally, they can have road grades up to 12 percent adverse, and 15 percent favorable These low standard roads can have rolling dips for water dispersion and /or water bars They also may reduce water velocity related problems with pitched grades. These local roads can also have vertical cut banks, or near vertical cut banks, when roads closures

are utilized. The culvert pipes, or log culverts, or other stream channel crossings installed, can either be temporary or permanent. If they are permanent we insist that they be minimally sized (past roads have all to often required oversized culverts) These low standard timber access roads will reduce the cost previously associated with average road development costs by one-half in general. This must be reflected in the costs associated with the current planning process before any final plan or DEIS is acceptable. We also believe that engineering related costs can and should be reduced by at least one-half. We submit that the increased use of flag line locations of roads with a template design standard vice full field designed and staked roads will be the major engineering cost reductions. However, a drastic reduction in overhead assessments must also be achieved, and a back to basics affordability approach re-introduced. We believe that we can work with the forest in road development costs, to drive these costs down to a level of affordability, such that a major increase in the suitable land base classification for timber production will result. We also request that all future road development costs be capitalized over long periods vice fully charged to the first timber sale accessed

Issue number 13 " Community Stability" has not been adequately addressed We submit that until an adequate ASQ is provided for full operation of locally established wood products manufacturing facilities, that the minimum achievement of economic community stability cannot be attained. Only through economies of scale, and the efficiency which result from a double shift operation, can these manufacturers expect to remain competitive with their wood products The community can only rely upon these manufacturers when they are competitive We submit that the manufacturing costs utilized in the Economic Tables are at least 20 percent to high for double shift operations.

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IDAHO NATURAL RESOURCES LEGAL FOUNDATION, INC.

To Restore, Preserve and Protect PO Box 1946 Boise, Idaho 83701 (208) 343 8978

January 10, 1986

Forest Supervisor
Salmon National Forest
Post Office Box 729
Salmon, Idaho 83467

Re. INRLF's Comments on the Salmon National Forest Plan

Dear Forest Supervisor

Here is Idaho Natural Resources Legal Foundation, Inc.'s comments on the Salmon National Forest Plan. We appreciate the opportunity to make these comments and thank you for considering them.

Sincerely yours,

Edwin W. Stockly

EWS/ps
cc All INRLF Board Members

SALMON N F

JAN 13 '86

Info O	Action ☐					
SUP						
LMP	1	2	3	4	5	6
TAF	1	2	3	4	5	6
ELM	1	2	3	4	5	6
RRVW	1	2	3	4	5	6
AO	1	2	3	4	5	6

2 CC's TO Jensen 1/13/86 JH

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United States Department of Agriculture | Forest Service | Salmon National Forest | P O Box 729 Salmon, ID 83467

Reply to: 1920

Date

Edwin W Stockly, Chief Executive Officer
Idaho Natural Resources Legal Foundation, Inc
P.O. Box 1946
Boise, Idaho 83701

Dear Mr Stockly:

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

Areas identified as having significant mass failure and slope instability potential have been identified during the Forest Planning [illegible] areas of mass failure or severe erosion areas have been designated as "forest land physically unsuitable," and are not scheduled for roading, timber harvest or other site disturbing activities These areas are also designated on Forest Land System Inventory maps, which are continuously updated and used during project level analysis Since the Land System Inventory maps are working maps, and continuously updated with new field information, they were not included in the Forest Plan document, but are being used extensively in the planning process

Worst case analyses are required when there is missing information or scientific uncertainty as to the significant adverse environmental impacts of a course of action The Draft EIS presented Forest Planning alternatives that are within the minimum management requirements to protect soil and water resources Under the Forest Plan, any project that [illegible] will be subjected to further environmental analyses to assure that soil and water quality standards and guideline [illegible] achieved. The [illegible] accelerated erosion, sediment transport and mass failure are [illegible] analysis, and project areas are planned accordingly to [illegible] these situations (40 CFR 1502 22, revised)

Modelling techniques utilized on the Salmon National Forest have helped to enhance professional judgment rather than remove judgment from the decision making process. Output from models [illegible] effects of numerous activities within an area [illegible] were initiated to compare alternatives and help evaluate [illegible] effects, no consistent methodology [illegible] were available which could [illegible] running assessment of total watershed disturbance and [illegible] activities within a watershed