

100 Legal and Administrative Framework (violations, lack of disclosure, decisionmaking, laws, regulations, policy)

Concern Statement 100.01

The Forest Service must comply with section 1501.6 regarding cooperating agency involvement throughout the NEPA process.

Response to Concern 100.01

The Forests have worked closely with numerous Federal, State, and local governmental agencies throughout the process. Appendix A of the Final Environmental Impact Statement provides a listing of coordination meetings that have occurred since the beginning of the revision process.

Concern Statement 100.02

The Forest Service should explain what statute gives it authority to manage by ecosystems. The Forests have a mandate to manage as close to the ground as possible. The authorizing language for ecosystem management comes from the Endangered Species Act, in which land use regulations are authorized only to protect members of listed species from harm. Ecosystem management would greatly expand federal land use regulation at the discretion of federal agencies; the primary problem being the loss of private property without compensation, an even worse situation than under the current species-by-species approach.

Response to Concern 100.02

There is not a specific statute the Forest Service uses as an authority to manage by ecosystems. An ecosystems approach was adopted by the agency in 1992 as it provides for a more complete approach to considering the components of the environment (biological, physical, economic and social), how the components interact, and the effects of management actions on those components. Ecosystem management does not expand federal land use regulation nor does it infer any claim to private property. It is simply a way to better provide a context for integrating the biological, physical, economic and social components of the environment with the intention of maintaining or restoring the integrity and sustainability of these components on National Forest System lands over space and time.

Concern Statement 100.03

The LMPs violate 16 U.S.C. 475 because locking up areas from both logging and natural fires converts the forest to artificially high levels of old growth which reduces stream flows below historic levels while, at the same time, not meeting timber needs. (16 U.S.C 475 states: "...No national forest shall be established, except to improve and protect the

forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States....”)

Response to Concern 100.03

Through the Revision process, alternative management approaches to protecting and improving the Forests were analyzed. These approaches included potential management practices ranging from passive management where natural processes are allowed to dominate, to active management including the use of prescribed fire and mechanical treatments. To best address biophysical as well as social/economic issues, a mixture of management practices are included in the Forest Plans. This is consistent with the provisions of 16 U.S.C. 475.

Concern Statement 100.04

The Forest Service violates 43 U.S.C. 1712(C)(2) because no loggers were on the interdisciplinary teams. (43 U.S.C. 1712(C) sets the criteria for development and revision of land use plans and (2) states “...use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences...”)

Response to Concern 100.04

In accordance with FSH 1909.15 – Environmental Policy and Procedures Handbook WO Amendment 1909.15-92-1, 12.1 Interdisciplinary Team selection, “The team will consist of whatever combination of Forest Service and other Federal Government personnel is necessary to provide the necessary analytical skills.” The provision does not allow for loggers on the interdisciplinary team, however, the team selected for the revision effort did include a forester.

Concern Statement 100.05

The Forest Service violates NFMA, NEPA, APA, and MUSY by utilizing information about specific milling facilities in Alternatives 3 and 6. None of the alternatives, except 1B and 5, meet the needs of the mills supplied by these forests. A goal of the LMPs should be to provide sustainable levels of products from the forests to assure economic sustainability of communities.

Response to Concern 100.05

Any information collected and utilized in the economic analysis was taken into account during assessment of all of the alternatives analyzed in detail. Utilization of this information was deemed necessary by the line officers to assist them in making an informed decision. Without use of such information in an economic analysis, decisions can be determined to be arbitrary and capricious. Arbitrary and capricious

decisions are in violation of the laws guiding environmental analyses and resulting decisions. This analysis had an overriding purpose to contribute to the economic stability of communities within the ecogroup. The Forest Service does not have direction to ensure economic stability but instead contribute to economic stability.

Concern Statement 100.06

The Forest Service attempts to identify, analyze, and disclose the proposed action, alternatives, and impacts of revisions of the three Forest Plans in a single DEIS, which results in a document that is a cluttered analysis and impossible for the public to consider the specific context of the proposed revisions on each Plan. Because of this deficiency, the DEIS fails to comply with NEPA and APA and violates NFMA, MUSY, CWA, ESA, and the Organic Act. The range of alternatives and analysis should address each Forest Plan separately (particularly the Sawtooth National Forest), as each alternative has such differing elements. Individual alternatives should be developed for each Forest based on public input. Therefore, the Forest Service should revise the DEIS, or prepare a supplemental EIS, and provide another opportunity for public review and comment.

Other commenters felt that analyzing the three forests together as an Ecogroup was a good approach to planning, because the forests have much in common in terms of use and land characteristics.

A schedule for completing the Plan revision process should be developed and available for public review.

Response to Concern 100.06

Alternatives were developed individually for each Forest to address specific management needs of each Forest. While most of the forest-wide direction is the same for all three forests, management area direction varies significantly not only between the three forests, but also between management areas depending on specific management needs. Likewise, the effects analysis in the FEIS is displayed both at the Ecogroup and individual forest levels.

Concern Statement 100.07

The LMPs must disclose the Environmental Protection Agency's and U.S. Army Corps of Engineers' exceptions and exclusions to the Clean Water Act for mining, logging, agriculture, home construction, and a variety of other provisions.

Response to Concern 100.07

The Forest Plans include direction that applicable Federal, State and local laws and regulations will be followed. Due to the sheer number of applicable laws and regulations, the Forest Plans cannot and do not include exceptions and exclusions to these laws and regulations. Readers must refer to the specific laws and regulations to get that information.

Concern Statement 100.08

The proposed LMPs cannot rely on the incomplete ICBEMP for development of forest-wide goals, objectives, standards, and guidelines and direction for project-specific analysis and implementation.

The Forest Service should explain how the proposed ICBEMP decisions would influence the Ecogroup LMPs.

Any new information from the ICBEMP "Terrestrial Science Assessment" should be incorporated into the final LMPs.

Response to Concern 100.08

Information from the ICBEMP science reports was used to validate basin-wide and regional scale current condition data. ICBEMP management direction was reviewed for applicability. Only that direction applicable to specific Ecogroup issues and needs for change was considered in development of forest-wide goals, objectives, standards and guidelines.

Concern Statement 100.09 (Letters 274, 1753)

To the extent possible, the EIS should discuss all new policies and guidance and locate the discussions in one specific area in the DEIS, explain how they will be implemented, and show their relationship to current policy. Include discussion of the policies that (1) propose standards for evaluating lands between 1,000 and 5,000 acres that are roadless; (2) revise standards and definitions for roads/trails management and proposed instant Forest Plan revisions with a variety of objectives, standards, and guidelines, primarily in certain soil, water, and aquatic areas; and (3) implement the Roadless Area Conservation Rule.

Response to Concern 100.09

A brief discussion of policies and guidance affecting resource management was included in the DEIS and has been updated for the FEIS to include new or changed direction.

Concern Statement 100.10

The minimum stocking standards shown on Table III-8 of the Forest LMPs violate the minimum stocking standards outlined in the Idaho Forest Practices Act. The tables and standards should be revised.

Response to Concern 100.10

The final minimum stocking standards included in the revised Forest Land and Resource Management Plans are consistent with the Idaho State Forest Practices Act.

Concern Statement 100.11

The Forest Service must comply with the mandates of the Organic Act (which vested all jurisdictions, both civil and criminal, to the state) and carefully consider its fiduciary responsibility under both the state and federal constitutions and laws. The Forest Plans must reiterate that state and local governments were intended to be part of the process of protecting custom, culture, heritage, and local economics, and are responsible for regulating and controlling public highways, rights-of-ways, waterways, rivers, and irrigations and utility systems, including related maintenance roads. The Forest Plans should state the need for a government body to provide police power jurisdiction; in Idaho, it is the county.

Response to Concern 100.11

As stated in the Plans, the Forests are required to comply with various Federal, State and local requirements. Appendix H of the Forest Plans includes a list of commonly referenced Federal and State requirements. From a police power standpoint, the federal statute at 16 U.S.C. sec. 551 provides the Forest Service law enforcement authority.

Concern Statement 100.12

There should be a discussion of how existing management plans (except for allotment management plans) that are underway will be handled with the issuance of the revised plans.

Response to Concern 100.12

Where consistent with the types of decisions made in forest plans, existing management plans are discussed in management area direction. Additional direction may also be found in the Records of Decision.

Concern Statement 100.13

There is no framework in the LMPs as how to accomplish the goal to “provide habitat capable of supporting plant and animal biodiversity to meet social needs.” The original Forest Plans for this region contained specific guidelines for how to provide for diversity at the project level.

Response to Concern 100.13

Chapter 3 of the Plan has been improved to better address plant and animal biodiversity needs from a coarse and fine filter approach. Coarse filter approaches can be found in the Vegetation section of the Plan and fine filter in the Botanical and Terrestrial Wildlife sections.

Concern Statement 100.14

The 1988 Forest Plan did not provide adequate protection for forest resources, and the current LMPs provide no better protection. Additionally, the responsible official within each Forest has vast discretion as to what may or may not occur within that Forest; this is due to the vague direction written into the Forest LMPs.

Response to Concern 100.14

Opinion noted.

Concern Statement 100.15

The Ecogroup should clarify in the final LMPs if it will proceed with the 1982 administrative appeal process or use the objection process under the 2000 regulations. Since site-specific actions will eventually have to conform to the 2000 regulations, the Ecogroup should consider and discuss how the LMPs will conform.

Response to Concern 100.15

The final LRMPs will be issued under the authority of the 1982 appeals process, as new planning regulations have not been finalized. The Record of Decision issued for the Forest Plans will include specific information on the appeals process.

Concern Statement 100.16

The Americans with Disabilities Act (ADA) requires equal access for individuals who cannot walk or cross country ski to areas within the state. Elderly and handicapped people enjoy being in the forest, and many still want to access the areas they have visited for

years. Wilderness and roadless areas lock up a huge portion of the mountains, which keeps elderly and handicapped from accessing those areas. The current Wilderness program violates federal laws.

Another view offered by the public was that, while equal access efforts and the ADA are laudable, it should not be carried too far. There should be a balance between ADA reform and preservation of the historic character of national assets.

Response to Concern 100.16

We disagree with the opinion that the National Wilderness Preservation System violates the American With Disabilities Act (ADA). Congress recognized that Wilderness was to be managed differently than other public lands. In Section 507(c) of the ADA, Congress specifically reaffirmed that "no agency is required to provide any form of special treatment or accommodation, or to construct any facilities or modify any conditions of lands within a wilderness area to facilitate such use."

Access in Wilderness is determined by the prohibitions clauses of the Wilderness Act. Specifically, forms of motorized or mechanical transport are prohibited in order to assure the perpetuation of an enduring wilderness resource.

Access within recommended wilderness portions of Inventoried Roadless Areas varied by alternative. Under Alternatives 4 and 6, mechanical transport would be prohibited only within recommended wilderness portions. Access within areas within IRAs but outside of recommended wilderness in these two alternatives would still be governed by current travel regulations. In all five of the other alternatives, access would still be governed by current travel regulations. In that the Ecogroup includes approximately 1,471,000 acres that have been developed and are roaded, opportunities for vehicular access at many highly popular recreation sites are abundant.

The ADA and other accessibility-related laws, regulations and policy represent direction that must be followed. As such, decisions to vary from them are beyond the scope of Forest Plan revision processes.

Concern Statement 100.17

The FEIS should contain language that addresses requirements set forth in the settlement agreement for the Boise National Forest.

Response to Concern 100.17

Management area direction has been modified to include requirements in the settlement agreement. It was felt the direction was more appropriately included there than in the FEIS.

Concern Statement 100.18

Regarding Payette National Forest LMP, page 11-33, first sentence: There should be some lower limit on acres in a management area.

Response to Concern 100.18

Management area boundaries are based on hydrologic units with common issues and management concerns. While the size of the management areas varies, most range in size from 50,000 to 250,000 acres.

Concern Statement 100.19

The Forest Service states on page 11-33 of the Sawtooth LMP that the SNRA Private Land Regulations established standards for the use and development of privately owned property “with an emphasis on preserving the area’s historic value.” The assertion is incorrect. Also, the Forest Service erred in seeking to revise building standards for private property in the SNRA through an amendment separate from the Plan.

Response to Concern 100.19

The private lands regulations at 36 CFR 292 established standards for “the use and development of privately owned property in furtherance of the preservation and protection of the natural, scenic, historic, pastoral and fish and wildlife values and to provide for the enhancement of the recreational values of the Recreation Area.” Because the majority of the private lands within the SNRA are designated as *Agricultural*, the generalization was made that the emphasis was on preserving historic values. This generalization has been removed from the final plan. As for the revision of building standards, that project was beyond the scope of this revision effort.

Concern Statement 100.20

The Forest Service must make a definite commitment to remove domestic sheep from all MA 01 allotments, or the Forest Service risks violating the National Forest Management Act if the LMPS do not provide for animal and plant diversity on national forest lands, and the Hells Canyon National Recreation Area Act, if it does not consider and comply with its legal duties toward the HCNRA.

Response to Concern 100.20

The Oregon, Idaho, and Washington State wildlife agencies, in coordination with other interested parties and organizations have formed the Hells Canyon Bighorn Sheep Restoration Committee to address potential disease transmission in the Hells Canyon area. The Forest Service has agreed to work with this committee to address big horn sheep concerns.

Concern Statement 100.21

The LMPs should follow the best management practice (BMP) directives contained in the Idaho Forest Practices Act.

Response to Concern 100.21

Forest-wide direction for timberland resources incorporates and is consistent with best management practice directives.

Concern Statement 100.22

The LMPs should acknowledge state jurisdiction and the intermix of state and federal authorities with regard to valid mining claims. While the statutory provisions permit states to set requirements for locating mining claims on federal lands, they do not distinguish between matters governed by federal law and those governed by state law. The federal statutes establish basic requirements governing the location of mining claims but permits local laws to supplement the requirements. This means that a valid mining claim is not the result of complying with either federal or state law, but complying with an intermix of state and federal laws.

Response to Concern 100.22

The term “valid mining claim” can have several connotations. It has been used to imply the claim has been correctly filed with the BLM and/or county. It has also been used in cases where the “discovery of valuable minerals” has been verified. In these cases, the authorities are with the BLM and State, not the Forest Service. BLM has the authority over the mineral estate and adjudication of mining claims. The states have authority for recording mining claims at the county level.

The FLRMP acknowledges the Forest Service role in surface management in connection operations authorized by the mining laws. (36 CFR 228.1)

102 - 108 Issues Pertaining to the Alternatives

Concern Statement 102.01

The Forest Service should choose an alternative that maximizes protection of remaining roadless areas through federal designation of wilderness and implementation of the Roadless Area Conservation Rule. Currently, none of the alternatives comply with the Rule.

Response to Concern 102.01

As described in Chapter 1 of the FEIS, a significant issue that drove alternative development was generated from public comment concerning the development/protection of existing Inventoried Roadless Areas (IRAs).

The seven alternatives carried through detailed analysis in the FEIS provide a wide range of “protection” of IRAs. Chapter 3 of the FEIS, subsection on IRAs, fully describes the level of “protection” the different alternatives provide. The range of management strategies (i.e., management prescription categories (MPC)) represented in different alternatives goes from those: (1) heavily weighted toward strategies that are fully consistent with the 2001 Roadless Area Conservation Rule (i.e., Alternative 6), (2) that include a high number of IRA acres as recommended wilderness (i.e., Alternative 4), and (3) ones that include management strategies that would allow full development on many existing IRA acres (i.e., Alternative 5).

Appendix C of the FEIS provides a detailed reevaluation of each IRA for their wilderness suitability. The potential environmental consequences to wilderness suitability that may result from the mix of management strategies (i.e. management prescription categories or MPCs) found in an alternative are discussed.

Appendix H of the FEIS provides a detailed description of the current roadless area characteristics of each IRA. Characteristics assessed include: (1) High quality or undisturbed soil and water; (2) Diversity of Plant and Animal communities; (3) Habitat for Threatened, Endangered, Proposed, Candidate, and Sensitive (TEPCS) species; (4) Recreation; (5) Natural-appearing landscapes with high quality scenic quality; (6) Traditional Cultural Properties and Sacred Sites; and (7) Special or Unique Characteristics.

Concern Statement 102.02

The EIS does not have a reasonable range of alternatives without the inclusion of goals, objectives, and MPC assignments that lead to a recreation emphasis within one or more alternatives. As it stands, none of the alternatives are acceptable because they do not include a comprehensive study encompassing a four-season recreational plan. There should be an enhanced recreation alternative (or alternatives) that features a broad array of recreation opportunities and takes advantage of the desire to have more developed recreation facilities. The alternatives must also address future winter travel management.

Response to Concern 102.02

As described in Chapter 1 of the FEIS, a significant issue was generated from public comment concerning how management strategies found in alternatives would affect the broad array of recreation opportunities, including developed recreation facilities. This issue was used as an important indicator in the effects analysis that the Responsible Official wanted clearly displayed and tracked through the EIS, but was not one that specifically drove alternative development (refer to FEIS, Chapter 2, Alternatives Considered but Eliminated from Detailed Study).

The alternatives carried in to detailed study in the FEIS provide for a range of recreation opportunities where recreation uses can be accommodated given the limitations presented by land and resource capabilities. Management emphasis and priority are manifest in a number of ways in the alternatives. From a large-scale perspective, MPC 4.1, 4.2, and 4.3 assignments reflect recreation emphasis and priority. From this standpoint, Alternative 6 carries a substantial recreation emphasis in that approximately 55 percent of Ecogroup lands are assigned to recreation prescriptions. However, we believe that the bulk of recreation use occurs, and will continue to occur, within concentrated corridors in locations proximal to population centers, and in association with significant recreation attractions such as the Sawtooth mountain range, lakes and developed ski areas, rather than across the larger watersheds and subwatersheds at which level management prescriptions were assigned. Localized recreation priorities for these concentrated use areas are also reflected in specific management area direction that's found in a number of management areas across the Ecogroup stated in the revised forest plans.

The revised Forest Plans do represent a full, four-season recreation program. Management direction specific to winter recreation was included at both the forest-wide and management area levels. Examples of this direction can be found in the forest-wide management direction under the Winter Recreation subheading in the *Recreation* section of the revised Forest Plans. Consideration for winter recreation was also represented in the *Recreation* and *Roadless* effects analysis sections in the EIS. Recreation analyses included in the EIS included winter ROS changes as well as winter travel opportunities.

Recreation managers have observed that demand for developed camping and picnic sites in popular recreation areas and travel corridors is currently at or above capacity during peak summer weekends and summer holidays. At the same time, other facilities are much less than full during the same periods or prior to Memorial Day and after Labor Day. We recognize that development of new recreation facilities may be warranted in the future, however the Forests currently lack the resources to adequately maintain many of the existing facilities. Although a stated agency priority, the recreation program must compete with other national priorities such as ecological restoration and watershed needs for funding. It is unlikely that the Ecogroup would see the level of increased funding that would be needed to address maintenance backlogs at existing sites as well as to greatly expand developed recreation facilities. Exacerbating the current situation of inadequately maintained facilities is not desired.

Travel management and allocation of travel "use" zones are addressed to a very limited extent in this forest plan revision process. Travel management was only addressed on a programmatic basis as reflected in the forest-wide management direction under the Recreation Access subheading in the *Recreation* section of the revised Forest Plans and in that mechanical transport is prohibited within recommended wilderness under Alternatives 4 and 6. None of this management direction would change the current Travel Plans directly but would provide the foundation for determining access in subsequent travel planning processes. Travel management and Forest travel maps will be revised in a separate planning process. The responsible official elected not to address site-specific travel management in this revision process due to the broad array of localized issues with travel management that occurs at scales below a Forest Planning unit. Attempting to address specific travel management issues at the scale of this revision effort would not allow for the localized modifications needed to effectively meet resource, social and economic issues known to exist. Forest Plan direction will be developed to provide a framework to address broader scale issues requiring consistency across the planning unit, State or Regional scales for different types of allocations (MPCs).

Concern Statement 102.03

The structure of all alternatives is dramatically altered due the constraints imposed by the Inventoried Roadless Area Management decision and the Transportation Policy. The Forest Service prepared plans under the old regulations, and it has not considered implications of new rules and policies, thus voiding the alternatives. The Forest Service should extend the completion date for the final LMPs and consider preparing a supplemental EIS. This would allow time to resolve some of the management issues in the draft LMPs with regard to the Roadless Area Conservation Rule, which is now on hold.

Response to Concern 102.03

The implications of new rules and policies, such as the 2001 Roadless Conservation Rule and Road Management Policy were considered in the structure of all seven alternatives carried in detail. Chapter 1 of the FEIS, subsection on National and Regional Issues, provides a discussion for several of the recent key rules and policies that have been considered and used in this forest plan revision process. This includes the 2001 Roadless Conservation Area Rule and Roads Management Policy.

Appendix H of each of the Revised Forest Plans provides a more detailed account of the legal and administrative framework that provided the foundation for these revised plans.

One of the drivers for development of Alternative 6 was the Roadless Area Conservation Rule. It is fully consistent with the terms of the Rule. Similarly, the Transportation Policy requires that forests undergoing revision complete a Roads Analysis Process (RAP) and incorporate any needed changes resulting from that analysis into the revised plan. The RAP has been completed for the three forests and the results considered in the revised plan direction.

Concern Statement 102.04

The Forest Service should analyze alternatives that reflect the desire for more non-motorized recreation opportunities. The alternatives appear to favor motorized recreation uses, which account for just a small percentage of recreational use in the three Forests. Table RE-5 in the DEIS shows there are twice as many hikers and horseback riders as ATV/motorcycle riders on the Boise National Forest, two and one-half times as many on the Payette, and four times as many on the Sawtooth National Forest (DEIS page 3-370).

Response to Concern 102.04

Actually, the fastest growing forms of recreation include both motorized and non-motorized uses. Although none of the alternatives were built using non-motorized recreation forms as a central theme, non-mechanical recreation opportunities were substantially increased under Alternatives 4 and 6. This is due to the fact that mechanical transport was prohibited within recommended wilderness under these

alternatives. Under Alternatives 4 and 6, opportunities for summer semi-primitive non-motorized recreation experiences increase by 59 and 27 percent respectively as represented by acres of Semi-Primitive Non-Motorized ROS classification. During winter, semi-primitive non-motorized recreation experiences increase even further with 166 and 70 percent increases respectively for the two alternatives.

As described in Chapter 1 of the FEIS, a significant issue was generated from public comment concerning how alternative management strategies would affect the broad array of recreation opportunities, including developed recreation facilities. This issue was used as an important indicator in the effects analysis that the Responsible Official wanted clearly displayed and tracked through the EIS, but was not one that specifically drove alternative development (refer to FEIS, Chapter 2, Alternatives Considered but Eliminated from Detailed Study).

The seven alternatives carried through detailed analysis in the FEIS provide a broad array of recreation opportunities. Chapter 2 of the FEIS, Alternatives Considered in Detail, includes summary tables of Management Prescription Category (MPC) acres for each alternative. MPCs 1.1, 1.2, 4.1a, 4.1b, 4.1c, 4.2, and 4.3 are management strategies emphasizing different developed and undeveloped recreation and wilderness opportunities. However, because this revision process does not include changes in travel management (refer to Response to Concern 102.02), existing motorized uses within the MPCs are not affected.

FEIS Chapter 3, Recreation subsection, describes the current array of recreation opportunities and how the different mix of management strategies (i.e., MPCs) found under alternative may alter recreation setting, resources and experiences.

Concern Statement 102.05

Alternatives 2, 3, 4, and 6 do not address the crucial, degrading factor of livestock utilization through appropriate standards, guidelines, or required monitoring procedures. These alternatives, therefore, are unacceptable, as they would continue to significantly degrade the resources and wildlife habitat of the Boise, Payette, and Sawtooth National Forests.

Response to Concern 102.05

The effects of livestock grazing on soil, water, riparian, aquatic and wildlife resources are fully disclosed in Chapter 3 of the FEIS, subsections on Soil, Water, Riparian and Aquatic Resources and Terrestrial Wildlife Habitat and Species, respectively. Standards and guides have been developed to address potential effects of livestock grazing on forest resources. In addition to standards and guides, specific management objectives have been included at the Forest-wide and Management Area level to address resource concerns associated with livestock grazing.

Concern Statement 102.06

The DEIS fails to address a full range of alternatives, as is apparent by the lack of variation among the AUMs for the different alternatives. The level of AUMs for sheep and cattle in the Preferred Alternative is too high. The Ecogroup should evaluate an alternative that considers a reduction in grazing by 10 percent to as much as 50 percent.

Response to Concern 102.06

(Also see response to Rangeland Management Concern 640.09) Adjusting use (i.e., AUMs) authorized under the term grazing permit system is outside the scope of decisions made through this Forest Plan revision. Rangeland capability and suitability determinations are re-evaluated in a Forest Plan scale analysis. Rangeland capability is an assessment of the broadscale physical attributes or characteristics of the landscape that determine whether it is conducive to livestock grazing. Capable rangelands remain the same for all alternatives and establish a foundation for forest plan alternative development and evaluation. This determination is not a Forest plan decision, it is simply an inventory of the lands capable of supporting livestock grazing (Project Record, Rangeland Resources Technical Report #1).

Suitability determinations were made for each alternative. These determinations represent decisions by the responsible official on how to address specific resource, social or economic direction that varies by alternative. Suitability is established either to provide prescriptive management direction for future project-level analysis and subsequent site-specific NEPA decisions or as a decision to not graze specific designated areas (i.e., close allotments). Both situations occur in the forest plan alternatives. Suitable rangeland acres vary in some alternatives in the FEIS and generally reflect those situations to not graze specific designated areas. The Environmental Consequences in the Rangeland Resources section of the FEIS and Rangeland Resources Technical Report #3 discuss forest plan alternative suitability in more detail. Within these discussions, specific acreage deductions are identified based upon the specific resource, social or economic concerns under an alternative.

However, the re-evaluation of rangeland capability and suitability during forest plan revision only effects where and how livestock may be grazed under a specific alternative (i.e., on suited rangelands). It does not make a decision on, or change, livestock grazing use or capacity levels under current term grazing permits. Grazing capacities are determined at the allotment level (Rangeland Resources Technical Report #2). The forest plan defines the desired outcomes and prescriptive measures (i.e., standards and guidelines under each resource section related to grazing) that are then used during the more site-specific AMP analysis process. During the AMP process alternative grazing practices are considered that are needed to meet the desired outcomes and prescriptive measures found in the forest plan, which may or may not result in a reduction in AUMs or Head Months. Each AMP process will tailor a suite of grazing practices for each allotment, as needed, to meet desired outcomes and prescriptive direction found in the revised plans.

Concern Statement 102.07

The alternatives must contain quantitative and accountable standards, guidelines, and monitoring procedures to address watershed, wildlife, fisheries, and other resource values and to ensure implementation and achievement of desired results. The alternatives rely on unquantifiable descriptors such as “properly functioning condition” and “historic range of

variability” to define existing and desired conditions, which act as surrogate management standards. Without such standards, the DEIS cannot assure its intended results and cannot support its effects analyses, particularly with respect to water and fishery resources.

The DEIS, on page 3-270, states,, “The proposed revised Plan was developed with alternatives (except 5) that have Desired Future Conditions (DFC) that strive to be within the bounds of the Historic Range of Variability (HRV). One could make an assumption that Alternative 5 was not seriously considered, and the prescriptions that did not get to the HRV alternative would finish last when it should have finished first.

Response to Concern 102.07

The analysis procedures and methodologies used to assess effects for each resource and the social and economic analysis are provided at the beginning of each section in the FEIS. Appendix B of the FEIS also provides detailed discussion on modeling and analysis processes.

The revised forest plans contain quantitative and accountable forest-wide standards, guidelines, and monitoring procedures that address watershed, wildlife, fisheries, and other resource values and to ensure implementation and trending toward goals and desired conditions. This forest-wide direction is assumed to be the foundation for meeting management requirements at 36 CFR 219.27 and, therefore, is consistent across the action alternatives. This forest-wide direction in conjunction with the Management Prescription Category (MPC) direction found in Chapter 3 of the forest plans provide a foundation for effects analysis. As stated, in the effects analysis it is assumed that the forest-wide direction is a constant across action alternatives. The differences between alternatives results from the varying amount of area within the planning unit allocated to the various MPCs. Thus, the basis for effects in the FEIS is the range of MPCs contained within an alternative, their allocation across the planning units, and their management emphasis and related direction needed to help achieve this emphasis.

The responsible official seriously considered all alternatives during the decision-making process, including Alternative 5. In fact, components of alternative 5 were incorporated into Alternative 7, the selected alternative for the revised plans.

Concern Statement 102.08

A new alternative should be developed that combines elements of alternatives 4 and 6.

Response to Concern 102.08

The Responsible Official has the option to mix and match components of different alternatives, including elements of Alternative 4 and 6, in the alternative selected for implementation. It is not necessary to develop an additional alternative to address this interest.

Concern Statement 102.09

All alternatives reflect a loss of semi-primitive motorized opportunities; land management agencies need to preserve these opportunities.

Response to Concern 102.09

The analysis presented in Table RE-10 in the Draft EIS was updated with new data and reflected in Table RE-21 in Chapter 3 of the FEIS, *Recreation* section. This table displays the estimated changes in semi-primitive motorized opportunities for both summer and winter periods. As displayed, there are alternatives that are projected to increase and decrease semi-primitive motorized opportunities, as well as maintain existing opportunities. Anticipated effects to semi-primitive motorized opportunities was also addressed in the *Indicator 1 - Recreation Settings* analysis in the recreation cumulative effects analysis section.

Concern Statement 102.10

The DEIS should clarify how the alternatives are different from each other. The wording in the alternative descriptions varies and it is difficult to discern the significance of the variance either in the text or the tables.

Response to Concern 102.10

Alternative descriptions in Chapter 2, FEIS, have been updated to clarify differences and to better reflect how each alternative responds to the significant issues identified in Chapter 1.

Concern Statement 102.11

The DEIS should demonstrate that the Preferred Alternative or any other alternative maintains or restores long-term ecosystem health and integrity or provides ecosystem-based direction for viability of wildlife and long-term recovery of listed species. None of the alternatives provide a balanced approach to managing the overall ecosystem.

Response to Concern 102.11

The FEIS, Chapter 3, contains detailed assessments for each resource and its relationship to maintaining or restoring long-term ecosystem health and integrity, as well as for the social and economic environments.

In addition to the assessments in the FEIS, the Biological Assessments (BA) and related Biological Opinions (BO) located in the projected record that were completed for ESA listed fish, terrestrial wildlife and plant species contained specific, detailed assessments as to how ecosystem-based direction found in each of the revised forest plans conserve and provide for the long-term recovery of these species. Biological Evaluations contained in the project record completed in support of the forest plan revision process provide similar assessment for sensitive fish, terrestrial wildlife and plant species.

Concern Statement 102.12

The Forest Service should choose the alternative that directs aggressive timber management, provides the greatest benefit-to-cost ratio, and returns jobs to workers or rural communities will be destroyed. New wealth must be created and actively managing renewable resources is a source of new wealth.

Response to Concern 102.12

Alternative 1B (current situation) and Alternative 5 emphasize timber management as the primary tool to achieve management goals and objectives. As shown in Chapter 3 of the FEIS, Socio-Economic Environment section, these two alternatives have substantially higher levels of timber generated jobs than other alternatives, as well as a strong present net value and benefit – to – cost ratio.

Concern Statement 102.13

It is impossible to compare the alternatives if they have different DFC and HRV goals and if each alternative shows a different method of attaining this single set of goals. The Forest Service should choose the alternative that meets HRV goals in at least a 50 to 75-year time frame.

Response to Concern 102.13

Alternatives have different DFC goals due to their varying resource, social and economic emphases. HRV was used as a means to compare alternatives, not necessarily as a goal to achieve (refer to FEIS, Chapter 3, Vegetative Diversity, Introduction and Reference condition discussions). FEIS, Chapter 3, Vegetative Diversity, contains detailed assessments for the variety of vegetative components and attributes assessed and how well they achieve the alternative DFC modeled as part of the revision analysis process. What the DFC means in terms of HRV is also described for each of the vegetative components and attributes as a basis for comparison.

Concern Statement 102.14

The Forest Service should create a new alternative comprised of Alternative 1B for rangeland management, Alternative 5 for sustained yield and perpetuation of range-linked jobs, and Alternative 3 for use of prescribed fire for habitat treatment.

Response to Concern 102.14

The Responsible Official has the option to mix and match components of different alternatives, including elements of Alternative 1B, 3 and 5, in the alternative selected for implementation. It is not necessary to develop an additional alternative to address this interest.

Concern Statement 102.15

The Forest should develop an alternative for intensive timber management on the roaded areas of the Boise (20%) and Payette (12%) National Forests. It would involve designating some areas as MPC 5.2 plus changing some areas from 3.2 to 5.1. This alternative should not include maximums for wildlife, as 80% of the acres in other Forests are available.

A range of alternatives should be developed that are classified 5.2 for all areas that are not classified as wilderness.

Response to Concern 102.15

Alternative 7 was developed, in part, to focus timber management in roaded areas with high timber site productivity. In many cases, these areas were allocated to MPC 5.2. This alternative also included reassignment of some 3.2 MPCs that occurred outside of Inventory Roadless Areas to MPC 5.1 and 6.1 in areas where habitat recovery for anadromous and inland fish, restoration of 303(d) drainages, or municipal watersheds were not a priority.

Alternative 5 emphasizes MPCs that allow the full range of development in areas not classified as wilderness. Acres in MPCs 5.2 and 6.2 are substantially greater than in any other action.

Concern Statement 102.16

The Forest Service should develop a new alternative that focuses on managing the entire forest in order to maintain a range of habitat conditions for all species, while at the same time maintaining local stability in communities, including range, timber, mining, and other activities.

Response to Concern 102.16

Alternative 7 was developed, in part, to balance commodity production, restoration and protection of inventory roadless areas. Essentially it draws from components of Alternatives 3, 5, and 6 to accomplish this, providing a mix of active, passive and conservation treatment strategies.

Concern Statement 102.17

The Purpose and Need statement for ecosystem restoration projects should not include an objective to supply wood fiber to the local economy, which would still allow consideration of commercial harvest alternatives but would not preclude the Forest Service from considering a noncommercial alternative that would meet the Purpose and Need statement.

Response to Concern 102.17

One of the mandates for managing National Forests is the Multiple Use and Sustained Yield Act of 1960, which requires that forests provide a predictable/sustainable level of forest products, including timber. Including the objective to supply wood fiber through ecosystem restoration projects does not require that all restoration projects should provide for commercial harvest, but rather that commercial harvest could be used as a means to accomplish some restoration projects or activities.

Concern Statement 103.01

Alternatives 1B is the only alternative that doesn't needlessly reduce recreational access. The other alternatives are unacceptable in that they advocate more road closures and the Forest Service can't manage under those conditions. Alternative 1B is also the only alternative that protects the agriculture-based economy of Adams County. With the closure of the sawmill and logging operations, the County has little else to rely on other than timber and grazing

Response to Concern 103.01

This revision process does not include site-specific changes in travel management (refer to Response to Concern 102.02); existing motorized uses within the MPCs are not affected. Under Alternatives 1B, 2, 3, 5, and 7, the current Travel Plans are assumed. Under Alternatives 4 and 6, mechanical transport is prohibited within recommended wilderness areas. Site-specific travel management planning processes are scheduled to be initiated following completion of the Forest Plan revision process. It is difficult to predict specific roads or trails for which access regulations will change during the subsequent travel planning process. This is because changes in access regulations need to be analyzed on a case-by-case, site-specific basis, which was not included in the Forest Plan Revision process. Although MPC assignments may indirectly affect access regulations through their priorities, there is no direct relationship between specific MPCs and types of travel allowed, other than designated Wilderness and designated Wild Rivers. As such, it is difficult to predict the levels of change to access regulations that might occur under the different alternatives, outside of Alternatives 4 and 6.

FEIS Chapter 3, Recreation subsection, describes the current array of recreation opportunities and how the different mix of management strategies (i.e., MPCs) found under alternatives may alter recreation setting, resources and experiences.

The projected effects of each of the alternatives on Adams County and its agriculture-based economy is discussed in the FEIS, Chapter 3, Socio-Economic Environment. The discussion focuses on major communities within the County, Council and New Meadows.

Concern Statement 104.01

For Alternative 2, the Forest Service should add MPC 6.1 since it also emphasizes maintenance and restoration of vegetation.

Response to Concern 104.01

MPC 6.1 is strongly represented in Alternative 2; 500,000 acres across the ecogroup.

Concern Statement 105.01

Alternative 3 is too restrictive and does not provide a balance between ecosystem needs and socio-economic needs and puts undue hardship on Idaho counties. It does not fully address the needs of people, communities, and recreationists. Alternative 3 also fails to meet the second goal in the Purpose and Need Statement that provides for sustainable and predictable levels of products from National Forest systems lands on the Boise, Payette, and Sawtooth National Forests.

A similar view was that Alternative 3 would not achieve the first objective in the Purpose and Need section, which is to maintain or restore long-term ecosystem health and integrity.

Response to Concern 105.01

The effect of Alternative 3 on the social and economic environments and specific counties in Idaho is discussed in detail, along with the other 6 alternatives carried into detailed analysis, in the FEIS. Refer to FEIS, Chapter 3, Socio-Economic Environment section. The revenue-benefit ratio, PNV, and projected jobs resulting from Alternative 3 is not the highest, nor is it the lowest, of the alternatives considered in detail.

The effect of Alternative 3 on resources assessed to address long-term ecosystem health and integrity, along with the other 6 alternatives carried into detailed analysis, is discussed in the FEIS. Refer to FEIS, Chapter 3, all physical and biological resource sections. Alternative 3 tends to provide greater gains in ecosystem restoration than many of the alternatives due to its aggressive restoration design.

Concern Statement 105.02

Alternative 3 does not protect the wilderness attributes of the Boulder-White Cloud area, nor does it assign any additional acreage to recommended wilderness status.

Response to Concern 105.02

The Boulder-White Cloud Area is one of the inventory roadless areas recommended for wilderness designation under Alternative 3. As required by the Wilderness Act, the wilderness attributes must be protected until Congress acts on the recommendation and either designates it as wilderness or releases it from wilderness consideration.

Alternative 3 recommends the same areas for recommended wilderness as Alternative 1B. Minor adjustments to boundaries were made in Alternative 3 to reflect more manageable watershed boundaries and to reflect current use.

Concern Statement 105.03

The Preferred Alternative should be changed from 3 to 6, primarily to protect remaining roadless areas from further development and degradation. The change would conform to the roadless initiative now in place.

Response to Concern 105.03

The effects to the alternatives assessed in the FEIS on inventory roadless areas (IRA) will be considered by the Responsible Official in the decision-making process. The current condition and effects to IRAs are discussed in detail in the FEIS, Chapter 3, Inventory Roadless Area section, Appendix C and Appendix H. Alternative 7 does consider the current condition and character of the IRAs and maintains the majority of them in an undeveloped or unroaded character. However, development is allowed in portions of some IRAs to address forest health concerns.

Concern Statement 105.04

Alternative 3 is based on rules and findings that have not yet been finalized (Interior Columbia Basin Ecosystem Management Plan, Roadless Area Conservation Rule, and the Roads Management Policy.

Response to Concern 105.04

The Interior Columbia Basin Ecosystem Management Implementation Strategy, Roadless Area Conservation Rule and the Roads Management Policy have all been finalized prior to completion of the Records Of Decisions (RODs) for forest plan revision.

Concern Statement 105.05

Alternative 3, as the Preferred Alternative, ignores the concerns raised by the majority of public comments, because most of the comments on the initial proposal were put into Alternative 5.

Response to Concern 105.05

The responsible official considers all comments on all alternatives in the decisionmaking process.

Concern Statement 105.06

Alternative 3 is acceptable except that Management Area 16 should be zoned as shown on Alternative 4. The area is over-grazed, non-native plants are out of control, and there are too many roads. Cattle should be kept out of the Snowbank Roadless area and the Third Fork Squaw Creek.

Response to Concern 105.06

The Responsible Official has the option to mix and match components of different alternatives, including allocating Management Area 16 as shown in Alternative 4, in the alternative selected for implementation. It is not necessary to develop an additional alternative to reflect this very specific change.

Rangeland capability and suitability to livestock grazing were re-evaluated as part of the revised forest planning analysis process. No resource protection need was identified for the capable acres within the Snowbank Inventory Roadless Area and the Third Fork Squaw Creek that would require their removal from the suitable rangeland base. With application of forest-wide and management area direction related to livestock grazing within each MPC allocation under the selected alternative, livestock grazing was determined to be compatible with the purpose and principles of multiple use (36 CFR 219.1) and management requirements (36 CFR 219.27).

Concern Statement 105.07

The final EIS summary should explain why the Preferred Alternative was chosen over the other alternatives.

Response to Concern 105.07

The Record of Decision will provide the Responsible Official's rationale for selection of the alternative for the revised forest plans.

Concern Statement 105.08

Alternative 3 is the best choice, as it is well-founded in science and provides for the recreational needs of the public and an appropriate balance of resource uses.

Response to Concern 105.08

FEIS Chapter 3, Recreation subsection, describes the current array of recreation opportunities and how the different mix of management strategies (i.e., MPCs) found under alternatives, including Alternative 3, may alter recreation setting, resources and experiences.

The science foundation and balance of resource uses provided by an alternative will be part of the information considered by the Responsible Official when determining which alternative should be selected and implemented as the revised forest plans.

Concern Statement 105.09

Alternative 3 must consider current fuel loads and allow for mechanical treatment and fire for managing forest vegetation, as well as livestock grazing for grasslands and shrublands.

Response to Concern 105.09

The seven alternatives assessed in detail in the FEIS, including Alternative 3:

- result in a range of effects to fuel loads (FEIS, Chapter 3, Fire Management),
- provide a mix of MPCs that allow varying degrees of mechanical and fire treatments (FEIS, Chapter 2, Description of Alternatives, and Management Prescription Category descriptions),
- disclose the effects of livestock grazing on grasslands and shrublands (FEIS, Chapter 3, Vegetative Diversity, Non-Forested Vegetation discussions).

Concern Statement 105.10

The Forest Service should indicate the analysis, documentation, or rationale in which it determined that the primary emphasis for the dominate management prescriptions for the Preferred Alternative would be restoration and maintenance of forested vegetation (MPC 5.1), followed by restoration and maintenance of aquatic, terrestrial, and hydrogeologic conditions.

Response to Concern 105.10

The development process for Alternative 3, the preferred Alternative in the DEIS, is summarized in the description of Alternative 3 located in FEIS, Chapter 2. MPCs 5.1 and 3.2 dominate this alternative because the primary focus of the alternative was to aggressively, through active management, restore resource conditions to a desired condition that falls within the estimated historic range of variation (HRV) for resources.

The Record of Decision (ROD) will provide the Responsible Official's rationale for selection of an alternative for the revised forest plans, which may or may not be the preferred alternative identified in the DEIS. This discussion in the ROD will include appropriate references to the analysis and documentation, as needed, to support the rationale.

Concern Statement 106.01

The intent of Alternative 4 is to reduce risks to species viability and ecological integrity by minimizing management activities, yet states that grasslands and shrubs will be managed using a combination of fire and livestock grazing. Those management activities should be excluded from Alternative 4. Also, within Alternative 4, include provisions for voluntary retirement of livestock permits. The Forest Service should draft a new resource-appropriate land management alternative or substantially modify Alternative 4.

Response to Concern 106.01

The Responsible Official has the option to mix and match components of different alternatives or remove specific elements, in the alternative selected for implementation. It is not necessary to develop an additional alternative to address this interest.

Concern Statement 106.02

Alternatives 4 and 6 are too restrictive because they do not consider financial efficiency (refer to the "Summary of Annual Estimated Outcomes and Activities by Alternative for the Ecogroup").

Response to Concern 106.02

The financial and economic efficiency for all alternatives, including Alternatives 4 and 6, are discussed in detailed in FEIS, Chapter 3, Socio-Economic Environment, Financial and Economic Efficiency.

Concern Statement 107.01

The Forest Service should adopt Alternative 5, as its management strategy best achieves the combination of the goals presented in the Purpose and Need section of the proposed action. It is the best alternative for maintaining the health of the forest and economic health of Idaho counties. It does not restrict motorized or mechanical use and livestock grazing or lock up any more of Idaho forests in wilderness, roadless areas, or wild and scenic rivers.

Response to Concern 107.01

The effects of implementing any alternative, including Alternative 5, will be considered by the responsible official before making a decision on the alternative to adopt. This includes an alternative's:

- Ability to maintain the health of the forest,
- Ability to influence the economic health of Idaho counties,
- Restrictions on motorized use,

- Emphasis on use of mechanical treatments to achieve desired outcomes,
- Effects to livestock grazing, and
- Use of wilderness, roadless areas and wild and scenic rivers, or recommendations for additional wilderness.

Concern Statement 107.02

Alternative 5 does not represent the Forest's mandate for multiple-use and proposes unacceptable utilization levels and excessive human manipulation for single-resource consumptive uses, including that of livestock grazing. It fails to address the needs of native plant communities and dependent or obligate wildlife species.

Response to Concern 107.02

The effects of implementing Alternative 5 to resources and the social and economic environments is described in detail under each resource section in the FEIS, Chapter 3. The effects of implementing Alternative 5 to native plant communities is specifically discussed in FEIS, Chapter 3, Vegetative Diversity. The effects of implementing Alternative 5 to terrestrial wildlife species is specifically discussed in FEIS, Chapter 3, Terrestrial Wildlife Habitat and Species.

Concern Statement 107.03

Alternative 5, followed by alternative 1B, does the most to increase the risk of uncharacteristic wildfires.

Response to Concern 107.03

The risk of uncharacteristic wildfires that would be anticipated to occur as a result of implementing Alternative 1B or 5 is discussed in Chapter 3, Vegetative Hazard, Wildfire Risk.

Concern Statement 108.01

Alternative 6 provides for the greatest long-term protection of the forests. It should be chosen as the Preferred Alternative because it is inline with the Roadless Area Conservation Rule and protects resources in the remaining roadless areas from further development and degradation.

Alternative 6 should be amended to ban all ORV use on lands recommended for wilderness. If wilderness status is not approved, then ORV use could be considered just as it would be anywhere else.

Response to Concern 108.01

The anticipated effects of implementing Alternative 6 are addressed specifically under each resource area in Chapter 3 of the FEIS.

Travel management and allocation of travel “use” zones, including for ORVs, is not addressed through this forest plan revision process. Travel management and Forest travel maps will be revised in a separate planning process. The responsible official elected not to address travel management in this revision process due to the broad array of localized issues with travel management that occurs at scales below a Forest Planning unit. Attempting to address specific travel management issues at the scale of this revision effort would not allow for the localized modifications needed to effectively meet resource, social and economic issues known to exist. Forest Plan direction will be developed to provide a framework to address broader scale issues requiring consistency across the planning unit, State or Regional scales for different types of allocations (MPCs).

Concern Statement 108.02

Alternative 6 is too restrictive. It is not acceptable because it prohibits logging, which will increase the likelihood of more uncontrollable fires and greater destruction of the diversity and ecology of the forests.

Response to Concern 108.02

The anticipated effects of implementing Alternative 6 are addressed specifically under each resource area in Chapter 3 of the FEIS. The likelihood that Alternative 6 will increase the risk of having more uncontrollable fires is discussed in Chapter 3, Vegetative Hazard, Wildfire Risk. The effects projected to result from the implementation of Alternative 6 on the diversity and ecology of forests is discussed in Chapter 3, Vegetative Diversity, Forest Vegetation discussions.

Concern Statement 108.03

Alternative 6 should include increasing developed recreation sites to keep pace with the demand for recreation

Response to Concern 108.03

Alternative 6 was designed specifically to address issues concerning protection of inventoried roadless areas, consistent with the 2001 Roadless Conservation Area Rule.

Recreation managers have observed that demand for developed camping and picnic sites in popular recreation areas and travel corridors is currently at or above capacity during peak summer weekends and summer holidays. At the same time, other facilities are much less than full during the same periods or prior to Memorial Day and after Labor Day. We recognize that development of new recreation facilities may be warranted in the future, however the Forests currently lack the resources to adequately maintain

many of the existing facilities. Although a stated agency priority, the recreation program must compete with other national priorities such as ecological restoration and watershed needs for funding. It is unlikely that the Ecogroup would see the level of increased funding that would be needed to address maintenance backlogs at existing sites as well as to greatly expand developed recreation facilities. Exacerbating the current situation of inadequately maintained facilities is not desired.

110 Standards, Guidelines, Goals, and Objectives

Concern Statement 110.01

Beginning on page III-105, Goals and Objectives, reference should be made to agreements and maps developed by the Winter Coalition Collaborative Team in the year 2000.

Response to Concern 110.01

The comment was noted and guideline 0478 was specifically added to the recreation management direction for Management Area 04 in the revised Sawtooth Forest Plan.

Concern Statement 110.02

The Forest Service should stiffen the standards and provide precise and strong language. Instead of using "should" or "may," use "must" or "shall."

Response to Concern 110.02

The language used for standards in the Forest Plans is consistent with the definitions provided to the Forests. Changes to these definitions are beyond the scope of this analysis.

Concern Statement 110.03

The Forest Service should establish, or retain from prior plans, specific measurable and accountable standards for old growth, fish habitat, wildlife, recreation, soils, timber, and grazing. Objectives relating to wildlife habitat; conflicts between wildlife, livestock, and humans; protection of water quality and riparian areas; and mitigation of noxious weeds should be moved into the Standards and Guidelines section to ensure these issues will be addressed. Guidelines from the Sierra Framework should be incorporated into the LMPs. The Forest Service should create provisions for enforcement and hold itself accountable to accomplish or implement the Standards and Guidelines. The LMPs should contain a

discussion of how enforcement will be accomplished. Also, the Forest Service should provide time lines in the LMPs that indicate when and where restoration and other specific activities will take place and be given adequate budgets to fully restore vegetation, watersheds, and habitat.

Response to Concern 110.03

With the revised Forest Plans comes a new set of direction to be adhered to during project implementation. Monitoring requirements are now tied to the new set of direction and are consistent with the new monitoring requirements set forth at the National level. Through monitoring, the Forests will determine compliance with the standards and guidelines and adjust as necessary. The revised plans are built on need for change items as well as new scientific research and comments from interested parties. As such, old growth is analyzed in a more encompassing manner within the large tree component of various Potential Vegetation Groups (PVGs). This was done in response to newer research depicting needs for terrestrial species including wildlife and botanical. We believe improvements were made in direction for all resources mentioned above. The Forests did not automatically include direction from any other National Forest effort. What is included in these plans is in direct response to the issues, concerns and opportunities identified and responded to that directly relates to the Ecogroup area complexities. The when and where of restoration are determined via project level planning and further NEPA analysis. The budget levels supplied to the National Forest system is solely dependant on Congressional appropriations. This budgetary process is outside the scope of this analysis.

Concern Statement 110.04

Management Area 02 in the Sawtooth Plan - There are no goals, objectives, and standards for Recreation Resource Management. The Forest Service should add a Standard that states, "Manage recreation activities to preserve water quality, scenic values, pastoral values, and natural state of the Sawtooth Valley"

Response to Concern 110.04

The comment was noted. Recreation management direction for Management Area 02 has been substantially increased in the final version of the revised Sawtooth Forest Plan. Recreation management direction now consists of objectives, standards, and guidelines 0275 through 02121. It was also noted that direction related to the special status of the Sawtooth National Recreation Area was deficient in the draft Plans. Standards 0201 and 0202, related to the SNRA, have also been added to the management area direction. Standard 0201 is consistent with the suggested standard in the comment.

Concern Statement 110.05

The sentence on Page 111-107, last paragraph, should not exclude the SNRA; replace SNRA with Management Area 04, Big Wood River.

Response to Concern 110.05

Management Area 4 is comprised of lands both within the SNRA proclaimed boundaries and lands outside the proclaimed boundaries. Lands within the SNRA have special legislation requiring a higher standard for scenic and recreational values than that for other National Forest System lands. Therefore, it is determined that the guideline is correct in addressing only lands outside the SNRA.

Concern Statement 110.06

Skilled timber personnel (not just planners) should review all standards and guidelines to ensure that forest management activities can be implemented. Current Standards and Guidelines for resources such as fish, wildlife, soil, and water will not allow the Forest Service to implement some of its timber management prescriptions.

Response to Concern 110.06

Skilled timber personnel were provided numerous opportunities to review all of the direction contained in the Forest Plans. These opportunities included non-interdisciplinary settings as well as interdisciplinary settings. Skilled timber personnel from District Offices, Supervisor's Offices, and the Regional Office levels all provided input to the process. Resource specialists from all resource areas also provided input to assist the planners in assuring implementability of the standards and guidelines. The Forest Plans contain no pure "timber management" prescriptions. Instead, timber management is a tool to utilize in moving management prescription categories toward the desired condition described for each alternative. The desired condition for each alternative, except for Alternative 5, (and MPC 5.2 in all alternatives) lies at various locations within the Historical Range of Variability and takes into account socio-economical issues and ecosystem management concepts. Timber management prescription 5.2 will also be implemented within the ecosystem concept defined in the plans.

Concern Statement 110.07

The following statement is entered verbatim from a form letter submitted to the Forest Service.

Specific and strong standards should be established or retained from the old plans for old growth, fish habitat, timber, wildlife habitat, recreation, soils, grazing and for specific areas such as South Fork Salmon and French Creek.

Response to Concern 110.07

Standards for the revised plans were developed in response to comments, issues, concerns and opportunities received during the entire analysis process from all interested parties. Management Prescription Category (MPC) assignments were also made to respond to these items. Management areas containing the South Fork Salmon River and French Creek may include additional direction for those watersheds.

130 Adequacy of Analysis and Data (content, use of information/data, conclusion not supported by data, need for additional analysis)

Concern Statement 130.01

The FEIS should disclose any irreversible and irretrievable commitments of resources and any other information that relate to the effects of the proposed action.

Response to Concern 130.01

FEIS, Chapter 3, contains a detailed disclosure of effects that each of the seven alternatives carried through detailed analysis on the resource, social and economic environments. As stated at the end of Chapter 3:

“The decisions made in forest plan revision do not represent actual irreversible and irretrievable commitments of resources. This is because forest planning identifies what kinds and levels of activities are appropriate in different parts of the Forest; it does not make project decisions. (For more information, see Chapter I of the Forest Plans, Decisions Made in a Forest Plan). The decision to irreversibly or irretrievably commit resources occurs at: (1) the time the Forest Service makes a project decision, such as approving a new trail or timber sale; (2) the time Congress acts on a recommendation to establish a new Wilderness or to include a stream segment in the Wild and Scenic River System; or (3) the time the Regional Forester designates a Research Natural Area.”

Concern Statement 130.02

An analysis should be performed that discloses the relationship of short-term uses to the maintenance and enhancement of long-term productivity. Without an analysis that considers known, documented, and likely impacts and risks, the Preferred Alternative cannot maintain or restore long-term ecosystem health and integrity, provide for species viability or long-term recovery of listed species, or maintain or enhance long-term productivity. The differences are not clear among all alternatives in how each will be implemented and what the impacts could be for each alternative. Further, the Forest Service should define “short-term” and “long-term” in number of years, which should comply with other agencies’ definitions.

Response to Concern 130.02

As stated in FEIS, Chapter 3, Resource Commitment section:

“Short-term uses are those expected to occur for the planning period (10-15 years), including recreation use, timber harvest, and prescribed burning. Although these uses are not directly implemented by the Forest Plans, the potential for these uses are described in Forest Plan goals and objectives, both at the Forest-wide and Management Area levels (see Chapter III in the Forest Plans).

Long-term productivity refers to the capability of the land to provide resource outputs for a period of time beyond the planning period. Minimum management requirements, established by regulation (36 CFR 219.27), provide for maintenance of long-term productivity of the land. Minimum management requirements are contained in Forest-wide and Management Area standards and guidelines, and would be met under any alternative. They ensure that the long-term productivity of the land is not impaired by short-term uses.

Monitoring and evaluation, as described in the revised Forest Plans (Chapter IV), applies to all alternatives. A primary purpose of monitoring is to ensure that long-term productivity of the land is maintained or improved. If monitoring and evaluation show that Forest Plan standards and guidelines are inadequate to protect long-term productivity of the land, then the Plans will be adjusted (through amendment or revision) to provide for more protection or fewer impacts.

Although all alternatives are designed to maintain long-term productivity, there are differences among the alternatives in the long-term availability or condition of resources. There may also be differences among alternatives in long-term expenditures necessary to maintain or achieve desired conditions. The differences are discussed throughout the various sections of Chapter 3.”

Timeframes have been defined in 3 scales: Temporary (0-3 years), Short term (greater than 3 years to 15 years) and Long term (greater than 15 years). Refer to FEIS, Chapter 3, Ecosystem Management, Concepts, timeframe discussion. Forest Plans, Chapter III, Forest-wide Management Direction, Timeframes.

Concern Statement 130.03

The Forest Service must provide an accurate inventory of resources. The DEIS should disclose what effect the alternatives would have on the overall forest inventory, or how that inventory is affected if it is “locked up”. An analysis of how the inventory will change and the effects that this would have on listed terrestrial and aquatic species and habitats. Will we be able to react in case of catastrophic fire under the different alternative management strategies? Will these strategies result in shortages of commodities?

Response to Concern 130.03

FEIS, Chapter 3, includes summaries of current resource inventories and assessments of the social and economic environments in the front of each section. The detailed methodology and assessments from which these summaries were generated are found in individual specialist reports contained within the project record.

The FEIS, Chapter 3, discloses the environmental consequences associated with each of the 7 alternatives assessed in detail. These seven alternatives contain a broad range of active, passive and conservation management scenarios, and the environmental consequences and related risks to resource inventories and social and economic environments of adopting one or a combination of these strategies is described. Wildfire risk is assessed in the FEIS, Chapter 3, Vegetative Hazard discussion. Alternative management strategy effects on availability of commodities, is discussed in the FEIS, Chapter 3, Socio-Economic Environment.

In addition to summaries of effects in the FEIS for listed and sensitive aquatic and wildlife species, the Biological Assessment and Biological Evaluations found in the project record provide detailed disclosures of effects of the selected alternative on ESA listed and proposed species and Intermountain Regional sensitive species, respectively.

Concern Statement 130.04

The Forest Service should make the following corrections to the maps:

- 1. Management Area maps should reflect the recently completed Payette #5 Exchange.*
- 2. The maps of Management Areas, in general, are inadequate and too vague, and there are not enough details, or details are too small to read.*
- 3. Maps should include details and acreages of listed roadless areas and proposed Wilderness Areas..*
- 4. Color-blind people cannot discern detail on the colored maps.*
- 5. Regarding DEIS, page 3-95, V-1 – Key to Features, number 6 - Blue Mountains: Recheck the location of the Blue Mountains, which are not in Idaho. The correct feature depicted should be Blue Mountain ERU.*

Response to Concern 130.04

Management Areas maps were corrected to reflect completed land exchanges.

Substantial changes have been made to management area maps and alternative maps to improve clarity and provide detail.

Each forest plan contains a detailed, large format, map of inventoried roadless area locations. The maps include an individual listing of each inventoried roadless areas that corresponds to discussions in the FEIS, Chapter 3, Inventoried Roadless Area section; FEIS Appendix C (Roadless Area Re-Evaluation) and Appendix H (Roadless Area Characteristics).

The large format Management Prescription Category Maps included with each Forest Plan for the selected alternative displays the Recommended Wilderness areas (i.e., MPC 1.2). FEIS, Chapter 3, Inventoried Roadless Area section discusses the wilderness recommendations considered under each alternative.

During development of our final map products we worked with people with different types and levels of color blindness in an effort to choose colors that were more discernible.

The map feature for the Blue Mountain ERU has been corrected.

Concern Statement 130.05

It is difficult for the reader to determine whether the slight wording changes from alternative to alternative have any significance. The Forest Service should consider ways to make the differences among the alternatives clearer by providing more specific examples instead of using broad terms. The EIS is consistent in the use of terms that describe how the resources that are resilient and resistant to disturbance will be managed; however, the general narratives describe this for some of the alternatives but not all.

Response to Concern 130.05

The methodology and approach to effects disclosures within the FEIS, Chapter 3, have been retooled and restructured to clarify both quantitative and qualitative differences between alternatives, where they exist.

Concern Statement 130.06

1. *Regarding SPECTRUM models, the Forest Service should indicate:*
 - *weaknesses associated with the application of SPECTRUM as a series of models;*
 - *whether information/data input into SPECTRUM includes a comparative/predictive sediment model to arrive at a long-term/short-term scenario in determining effects to water quality and aquatics;*
 - *any assumptions used in applying the SPECTRUM/RELM models to achieve the objectives of a particular alternative; and*
 - *whether the models utilize data on road densities per square mile/watershed and per square mile/RHCA.*
2. *It seems that too much information is input into the models, which could skew results and objectivity. Regarding page B-33 of Appendix B, first paragraph, the methodology results in a total that is greater than the sum of its parts and the accuracy of this is questionable.*
3. *The methods of determining desired future conditions and the model used for goal programming are very complicated and difficult to follow.*

4. *The fire-dominated prescriptions are not realistic. In most Douglas fir, grand fir, and some sub-alpine fir habitat types, the Forest Service should remove some fuel by mechanical means if its objective is to leave large-diameter trees after prescribed burns.*
5. *Uncharacteristic wildfire events should have been utilized in the SPECTRUM model, as these events have done more to change the forest than slow incremental changes. The SPECTRUM model and analysis in all alternatives ignores the occurrence of uncharacteristic wildfire events, which results in long-term effects that are not analyzed and fail to achieve Desired Future Conditions. Therefore, the Ecogroup should re-assess the issue of long-term risk and develop a suitable means of accurately modeling the monetary costs and the impacts of uncharacteristic wildfire on ecosystem health.*
6. *Regarding DEIS page 3-281: Reevaluate the forested vegetation structure outcomes that were used in the wildlife viability modeling process.*

Response to Concern 130.06

Appendix B of the FEIS, Analysis Processes, summarizes weaknesses associated with the application of SPECTRUM and assumptions used in applying the SPECTRUM/RELM models to achieve the objectives of a particular alternative.

The SPECTRUM model does not include a comparative/predictive sediment model to arrive at a long-term/short-term scenario in determining effects to water quality and aquatics. How short- and long-term effects to water quality and aquatics is addressed in the FEIS, Chapter 3, Soil, Water, Riparian and Aquatic section, is described in the corresponding methodology subsection. The SPECTRUM model was used in conjunction with the RELM Equivalent Replacement Treatment (ERT) Model to provide indications as to level of disturbance and predictions of thresholds of concern associated with resources. Refer to the FEIS, Chapter 3, Soil, Water, Riparian and Aquatic section, methodology subsection, for a discussion of how ERT was used and its relationship to effects disclosed.

The SPECTRUM model does not use road densities per square mile/watershed and per square mile/RHCA directly. This information was assessed to determine current conditions. How it was used is discussed in the FEIS, Chapter 3, Soil, Water, Riparian and Aquatic section, methodology subsection. A more detailed discussion is provided in the Soil, Water, Riparian and Aquatic specialists resource reports and Biological Assessment (Aquatic Conservation Strategy (ACS) components 5, 6, and 7) located in the project record.

Figure B-4 in Appendix B attempts to summarize the data input and the interrelated portions of the SPECTRUM model. As discussed in the introduction for Appendix B, the SPECTRUM model is a valuable tool for exploring allocation of resources, like budget and scheduling of management actions, including no action, to achieve resource management objectives. There are references provided that describe in greater detail the value and limitations of the SPECTRUM modeling tool in forest planning.

Alternatives evaluated include a broad range of Management Prescription Categories (MPC) mixtures. The effects of alternatives that are heavily weighted toward MPCs with more fire-dominated prescriptions (e.g., Alternative 4) to large tree retention in the Douglas fir, grand fir and alpine fir PVGs can be compared against alternatives that are weighted more toward a mix of MPCs emphasizing mechanical treatments. FEIS, Chapter 3, Fire Management and Vegetative Hazard sections provide the reader with this comparison. However, readers should note that effects described are programmatic in nature and not site-specific. Forest Plans do not authorize actions to occur on the ground, they provide the framework for where and how actions, if implemented, should occur to achieve strategic planning goals and objectives outlined in the plan.

Uncharacteristic wildfire events have been utilized in the SPECTRUM model through sensitivity analyses (refer to Appendix B, Sensitivity Analysis Conducted for the FEIS). In addition, the Vegetation Dynamics Development Tool (VDDT) was used to project the combined landscape level effects of multiple factors, such as wildfire, management treatments, pathogens, growth, and competition over long periods of time. How this was used for both the forested and non-forested vegetation effects modeling is described in Appendix B of the FEIS. The results are reported in FEIS, Chapter 3, Vegetative Diversity and Vegetative Hazard sections.

Concern Statement 130.07

The base data used to classify the forests is out of date and, in some cases, does not include the changes caused by large uncharacteristic wildfires in recent years.

Response to Concern 130.07

Databases have been updated between DEIS and FEIS to address these concerns.

Concern Statement 130.08

Regarding tables in the DEIS:

1. *Page 2-41, Table 2-24: This table should list the cover types by Forest.*
2. *Pages 2-42 and 2-43, Tables 2-25 and 2-26: The information should be shown by Forest.*
3. *Page 2-47, Table 2-31: The information should be listed by Forest.*
4. *Page 2-49, Table 2-33: The number of acres and types of weed species should be listed by Forest.*
5. *Pages 2-72 through 2-78, all tables: All amounts should be listed by Forest.*

Response to Concern 130.08

The DEIS and FEIS address topics at the Ecogroup (i.e., three forests) and/or individual forest scales depending on what analysis scale was needed to adequately address the particular topic. Scales were reviewed and adjustments made to address concerns expressed. For example, cover types have now been broken down in both the Ecogroup and individual forest scales in the FEIS, Chapter 3, Vegetative Diversity section.

Concern Statement 130.09

Commenters would like the final EIS and LMPs to provide definitions of various terms and acronyms used in the documents and make other requested editorial changes.

Response to Concern 130.09

The Forest Service has reviewed all comments, and editorial corrections have been made to the final EIS, as appropriate.

Concern Statement 130.10

There is no information or detail to back up the Forest Service statement that its application of mitigation measures and BMPs would reduce or eliminate environmental effects and issues. There must be information on the adequacy of mitigation measures and on the success or failure of measures that were implemented in other forests.

Response to Concern 130.10

The adequacy of standards and guidelines contained in forest plans and BMPs to reduce or eliminate environmental effects is demonstrated through the referenced research, science and historical monitoring evidence. Refer to Chapter 3, FEIS, all resource sections for the references pertaining to specific measures or BMPs of interest.

Concern Statement 130.11

The Boise National Forest LMP should include a reference to the adopted Public Lands Foothills Open Space Management Plan, which identifies over 200 separate recommendations, goals, and objectives for open-space management along the Boise Front.

Response to Concern 130.11

The Public Lands Foothills Open Space Management Plan does not directly affect the strategic planning for National Forest System lands within the Boise National Forest, nor will the decisions made for the revised Boise National Forest Plan affect the outcome of open-space management along the Boise Front.

Concern Statement 130.12

The DEIS should contain a complete analysis of direct, indirect, and cumulative impacts for recreation, economics, and inventoried roadless areas; and a comparison of impacts by alternative.

Response to Concern 130.12

The FEIS contains a complete analysis of direct, indirect, and cumulative impacts and a comparison of impacts by alternative for:

Recreation (FEIS, Chapter 3, Recreation section),

Economics (FEIS, Chapter 3, Socio-Economic Environment section), and

Inventoried roadless areas (FEIS, Chapter 3, Inventoried Roadless Areas section, as well as Appendix C and H of the FEIS).

Concern Statement 130.13

The Ecogroup should provide textual links between the EIS and the LMPs when the EIS contains information that provides important direction.

Response to Concern 130.13

This option was considered for electronic versions of the EIS and Forest Plans, however, due to time and budgetary constraints was not completed. This is still being considered for incorporation into forest plan implementation documentation that will be generated after the Record of Decision.

Concern Statement 130.14

The DEIS did not:

- *Adequately assess existing forest conditions and resources,*
- *analyze the relationship between existing conditions and past management practices,*
- *adequately analyze the likely level of use that will result from the proposed management direction, or*
- *analyze the likely effect of these activities on the existing situation.*

The DEIS relied on charts with broad categories but contained very few maps to provide a more accurate depiction of forest resources. The DEIS also relied on subjective ratings and arbitrary scales to articulate existing conditions. No definitions were provided to indicate what the following terms mean: improving, not improving, pristine, heavily degraded, meeting objectives, not meeting objectives, properly functioning, and functioning at [variable] risk.

Response to Concern 130.14

The methodology and approach to effects disclosures within the FEIS, Chapter 3, have been retooled and restructured to provide greater quantitative and qualitative clarity for topics such as:

- assessments of existing forest conditions and resources,
- relationships between existing conditions and past management practices in Alternative 1B disclosures,
- level of use likely to result from proposed management allocations found in an alternative, and
- likely effects activities allowed under an alternative will have the existing situation, as well as further achievement of desired conditions for each resource.

The glossary has also been updated to include definitions for: degraded, properly functioning, and functioning at risk.

Concern Statement 130.15

The data used in the DEIS has not been updated to reflect the effects of catastrophic fires occurring in the 1990s through 2000. Therefore, the LMPs must be supplemented, and current data must be used in preparation of that plan. Future fire management plans and any cumulative impacts must also be disclosed.

The DEIS contains a serious analytical error in its application of DFCs, which are not reliable because of the inability to accurately or reasonably predict the occurrence of large fire events. Therefore, a reasoned and accurate analysis and selection of alternatives, as required by NEPA, are not possible.

Response to Concern 130.15

Resource inventories used in the effects analysis for the FEIS have been updated to include the wildfires of the 1990s and 2000.

It is not necessary to accurately and reasonably predict the occurrence of large fire events in order to described desired conditions. Desired conditions (i.e., DFCs) for potential vegetation groups (PVGs) and non-forest vegetation types are developed based on research and historical records that consider and evaluate the fire relationships inherent in the development of the vegetation across the landscape. The SPECTRUM model as then used to assess vegetative change that could result from application of different alternative management strategies and how well they were able to attain desired conditions. FEIS, Chapter 3, Vegetative Diversity describes the results of this modeling effort for each alternative assessed in detail.

This modeling effort and other effects disclosures found in the FEIS, Chapter 3, for all resources and the Socio-Economic environment provides the necessary foundation for a reasoned decision by the Responsible Official, as required by NEPA.

Concern Statement 130.16

The Forest should verify the information in the Payette LMP, "Forest Service Administration," at page I-17, and verify the historic boundary information for creation of the Payette and Boise National Forests. The LMP states that the current Payette National Forest was created from the original Payette and Weiser Forests. It was thought that the Payette was actually formed from the old Idaho National Forest and parts of the old Payette and Weiser National Forests. The Idaho National Forest was created on July, 1908, and the Forest Service should assume administration of this area.

Response to Concern 130.16

The FEIS and Forest Plans descriptions were reviewed and updated as needed to accurately depict this relationship.

Concern Statement 130.17

Regarding DEIS, appendix C: Poison Lake is listed as a "special water feature" (page C-64) and "picturesque small water body" (page C-65); however, because of past activities, the lake is currently only a small wetland.

Response to Concern 130.17

This comment was considered during final preparation of Appendix C: Roadless Area Re-Evaluation. However, for the purposes of this analysis of the Poison Creek Inventoried Roadless Area, Poison Lake is believed to represent a "special water feature", as well as a "picturesque small water body".

Concern Statement 130.18

A summary document of the FEIS should be prepared, as well as a summary of the LMPs. The summary that was prepared for the DEIS was very helpful.

Response to Concern 130.18

A summary document for the FEIS and Forest Plans (i.e., LMPs) have been prepared.

160 Cumulative Effects Analysis

Concern Statement 160.01

The DEIS fails to disclose the current and likely cumulative effects to SWRA resources that could result from the synergistic disturbance caused by the application of MPCs, in general, and specifically, from logging, grazing, mining, management practices, road construction, noxious weeds, and natural disturbance events such as wildfire. The DEIS acknowledges only the presence of “Cumulative Effects” but provides unsubstantiated speculations about past, present, and future conditions.

The EIS should explain what actions would and would not occur under the new management directions to strengthen the Ecogroup conclusion that “new management direction and scientific knowledge on how to maintain and improve SWRA resources will lead to an improvement in these resources.”

Response to Concern 160.01

The FEIS, Chapter 3, Soil, Water, Riparian and Aquatic Resource section includes a summary of the current conditions and likely direct, indirect and cumulative effects that could result from the synergistic disturbance caused by the application of MPCs in general, and from direction related to logging, grazing, mining, management practices, road construction, noxious weeds, and natural disturbance events such as wildfire, as appropriate and needed to support conclusions. The methodology section describes the analysis process, including assumptions.

Individual, detailed, subbasin assessments were completed for Threatened, Endangered and Proposed fish species and is disclosed in the Biological Assessments supporting forest plan revision and in the Biological Evaluations for Intermountain Regional sensitive fish species (BA and BE for the Revision of the Boise, Payette and Sawtooth NF Plans, Project Record).

Concern Statement 160.02

There is no evaluation of cumulative effects to air quality from emissions produced by catastrophic wildfires.

Response to Concern 160.02

The “Air Quality and Smoke Management” section of the FEIS, Chapter 3, has been substantially updated. The impacts of wildfires on emissions are assessed where and as appropriate.

Concern Statement 160.03

The DEIS should provide an analysis of the cumulative effects that are influenced by trends in population growth and human use of resources, which are discussed in other parts of the document but not in the cumulative effects sections.

Response to Concern 160.03

FEIS, Chapter 3, effects discussions for each resource area and the Socio-Economic Environment have been updated. The influence of population growth and human use of resources was updated or added in direct, indirect and cumulative effects discussions, as appropriate.

Concern Statement 160.04

There should be another table or another column in Table C-5 that shows the cumulative effects on Wilderness Characteristics that could result from implementation of any of the alternatives.

Response to Concern 160.04

The inventoried roadless area development potential under each alternative is discussed in the FEIS, Chapter 3, Inventoried Roadless Area, effects relative to Issue 1: IRA Development Potential. For greater detail, refer to the recreation resource specialist report, inventoried roadless area discussion, contained in the project record.

Concern Statement 160.05

The NEPA analysis must thoroughly consider the cumulative effects of other ownerships and their impacts on fragmentation.

Response to Concern 160.05

The effects of other ownership and their impacts on fragmentation of aquatic and terrestrial habitat are discussed in the FEIS, Chapter 3, Soil, Water, Riparian and Aquatic Resources and Terrestrial Wildlife Habitat and Species sections, respectively. Detailed assessments on Threatened, Endangered and Proposed species was disclosed in the Biological Assessments supporting forest plan revision and in the Biological Evaluations for Intermountain Regional sensitive species (BA and BE for the Revision of the Boise, Payette and Sawtooth NF Plans, Project Record).

Concern Statement 160.06

Regarding “Cumulative Effects on Fisheries – Hydropower Dams,” DEIS page 3-86: Major tributary dams should also be included as contributing to the elimination of migration corridors for both anadromous and resident fish; not just the Snake and Columbia River dams. One such tributary dam that should be included on the list is Arrowrock on the Boise River.

Response to Concern 160.06

FEIS, Chapter 3, Soil, Water, Riparian and Aquatic Resource section includes an overview of the current condition, including effects of major tributary dams. Individual, detailed, subbasin assessments of current/baseline conditions affecting Threatened, Endangered and Proposed fish species, including major tributary dams, was disclosed in the Biological Assessments supporting forest plan revision and in the Biological Evaluations for Intermountain Regional sensitive fish species (BA and BE for the Revision of the Boise, Payette, and Sawtooth NF Plans, Project Record).

Concern Statement 160.07

Failure to disclose cumulative impacts of limiting treatment options violates NEPA, NFMA, ESA, and CWA; therefore, the Forest Service should place more focus on understanding the effects of limiting treatment options within all the watersheds currently zoned with MPC 3.1 and 3.2 to non-mechanical treatments only. This limitation greatly increases the long-term risk to these areas and may negatively impact both terrestrial and aquatic species of concern.

Response to Concern 160.07

The FEIS, Chapter 3, all resource and Socio-Economic Environment sections disclose the cumulative impacts likely to result from the allocation of different MPCs within and among the alternatives considered in detail. This includes limitations on mechanical treatments and what those limitations may mean to the long-term risks to areas. The potential for negative impacts to terrestrial and aquatic species of concern are discussed in the FEIS, Chapter 3, Soil, Water, Riparian and Aquatic Resources and Terrestrial Wildlife Habitat and Species sections, respectively. Detailed assessments on Threatened, Endangered and Proposed species was disclosed in the Biological Assessments supporting forest plan revision and in the Biological Evaluations for Intermountain Regional sensitive species (BA and BE for the Revision of the Boise, Payette, and Sawtooth NF Plans, Project Record).

170 Desired Future Conditions (DFC)

Concern Statement 170.01

The establishment of DFC is the single most important input to the planning process. The DFC targets that were developed were based solely on interpretation of HRV and the intent of each alternative. The Forest Service should develop a DFC modeling process that is biologically sound and achievable, so monitoring results can be meaningful and serve the purpose of suggesting necessary adjustment to management, utilizing the adaptive management concept. DFCs should not be used in the planning process as a means to limit all multiple uses of forest resources for the next 500 years, which is the actual result under the DEIS. The establishment of the DFC should have been developed under a facilitated, structured process using the knowledge of stakeholders and all interested parties, so a balanced view of the final DFC could be established. DFC goals should undergo a full public review prior to any further development of the LMPs.

Response to Concern 170.01

Desired Future Conditions for the various alternatives were developed using a variety of sources such as, but not limited to: (1) need for change; (2) response to scoping; (3) response to input from any potentially affected interest that chose to supply comment; (4) socio-economics; and (5) ecological processes. We believe the modeling process is biologically sound and achievable but also recognize that it is only a modeling process and not intended to be the only factor utilized in rendering a decision on the FEIS. The DFCs were not designed to limit all multiple uses of forest resources, but should be viewed more as goals to move towards while implementing multiple uses of the forest resources. They were designed to meet the needs of a variety of issues, concerns and opportunities brought forth by potentially effected interests. The DFCs were submitted for review by any interested party upon release of the DEIS. Comments were taken into consideration in preparation of the FEIS and the DFCs were reviewed and adjusted to more accurately reflect the intent of the MPCs assigned within Management Areas.

Concern Statement 170.02

The 20 percent DFC is too general for indexing total forest viability. The DEIS treated all intensive forest management activities as detrimental to attaining DFC; therefore, the SPECTRUM model consistently reflected management regimes that did not include harvesting trees. This is contrary to current forest practices that provide greater flexibility in silvicultural regimes that, if implemented correctly, would accelerate movement towards open-canopied large-tree forest structures. Further, the 20 percent large-tree DFC ignored vegetation density, which is a critical component for several wildlife species listed as at-risk by the Ecogroup.

Response to Concern 170.02

The DFCs for forested vegetation were expanded upon and reworked using an interdisciplinary process, as well as research for the FEIS. The 20 percent referenced is assumed to mean the large tree component in certain Potential Vegetation Groups (PVGs). The 20 percent is not the only factor taken into account when evaluating forested vegetation for DFC. Size class, canopy closure and species composition are taken into account and may vary by PVG and Management Prescription Category (MPC). We disagree, the DEIS did not treat all intensive management treatments as detrimental to attaining DFC. Many of the modeled treatments selected included precommercial thinning, followed by commercial thinning, Shelterwood harvest, and overstory removals (intensive treatments) or combinations of these activities to attain DFC. The modeled treatments depended on the location for management, the PVG, and the MPC assigned to a given area. MPC assignments varied by alternative. The model prescribed treatments (mechanical and fire use) to achieve DFC and the DFCs were reviewed as mentioned above and adjusted to more accurately reflect the intent of the MPCs assigned within Management Areas. Remember, the model is only a tool and not the only resource utilized in rendering the final decision for the Forest Plans.

175 Historical Range of Variability (HRV)**Concern Statement 175.01**

The planning team should continue to described forest conditions in an ecological classification; however, the growth-stage classes combine high density with low density types, with both based on timber size. This can mask current, as well as future, forest conditions. The planning team should split the growth stages based on density so future outcomes can be referenced against historical forest conditions

Response to Concern 175.01

Desired conditions are described using three attributes, size class, canopy closure, and species composition. These three attributes may vary by Potential Vegetation Group and MPC.

Concern Statement 175.02

The EIS should provide more discussion on the concept of HRV than what is provided on page 3-89, as HRV issues have implications for other resource issues addressed in the EIS, and because HRV is the reference condition for determining the desired future conditions for each alternative. The Ecogroup must outline the availability of historic data they intend to apply to manage forests based on the HRV concept and should discuss what resetting the landscape back to historical conditions would entail. HRV standards should be based on a minimum of 100 years of history.

Response to Concern 175.02

In the Draft EIS, Historical Range of Variability (HRV) was utilized as a baseline for comparisons with the current condition, and as a basis for determining desired conditions. The HRV characterizes fluctuations in ecosystem conditions or processes over time. A description of past ecosystem structure and its variability is useful in exploring the causes and effects of ecosystem change and provides a context for interpreting natural processes, particularly disturbances. HRV is often interpreted in combination with socioeconomic needs and other information, as a means of establishing desired conditions for management actions.

We did not develop estimates of HRV for species composition or size classes, but relied upon estimates generated in the paper “Historical range of variability of forests of the Idaho Southern Batholith Ecosystem” by Dr. Penelope Morgan of the Department of Forest Resources - University of Idaho and Dr. Russ Parsons of the Fire Sciences Laboratory of the USDA Rocky Mountain Research Station in Missoula, Montana. This paper was produced as a product to the Boise Cascade Corporation, and is also included in our project record. An updated version of this paper, dated June 12, 2001 is utilized in the Final EIS.

The Idaho Southern Batholith comprises most of the Payette, Boise, and Sawtooth National Forests. Morgan and Parsons also relied upon habitat type class data that was produced for all of Central Idaho, including the portions of the Payette, Boise and Sawtooth that are not encompassed by the Batholith. Therefore, their information is the best available information for the local area. Morgan and Parsons utilized multiple pathways, probabilistic successional models that were set with available data and expert opinion. Where available, comparisons of their estimates were made with available historical data. The time frame of their estimates is a period 100-700 years before present, encompassing the variability inherent in disturbance events over this time frame. However, they did not estimate HRV for canopy closures. We utilized available data on average canopy closures, average basal areas and average number of trees per acre for each PVG as a means of approximating historical canopy closures, only for the large tree size class. These do not represent overall canopy closures. Further details on how HRV estimates were developed and calculated can be found in our project record.

While neither of these methods provides an estimate of HRV with absolute certainty, it does however, provide us with scientifically developed information for approximating what potentially existed, aiding in our evaluation of both the changes in ecosystems and in what potentials exist for management of those ecosystems. For the Final EIS and LMPs, we have developed desired conditions, which are based on the HRV, and vary by alternative to incorporate a range of societal values. Furthermore, in the Final EIS, we expand upon the discussion of HRV, the four indicators we used (species composition, tree size class, canopy closure, snags and coarse woody debris), and the relationship to the desired conditions. The Final LMP also provides an expanded discussion on the interpretation of the desired conditions for vegetative components.

Concern Statement 175.03

The Ecogroup does not present any reasonable data ascertaining the HRV for any parameter or ecological process within the three forests. There is no scientifically established HRV for riparian areas and other aquatic resources, fish habitats, and fish populations that is based on credible statistical analysis of frequency data. Management based on HRV is unsupported by science and is, therefore, arbitrary.

Response to Concern 175.03

Scientific research was used in determining the HRV for vegetation. HRV is a concept not used for resources other than vegetation, thus is not used for fish populations, habitats or other aquatic resources. A thorough discussion of the development and use of HRV for vegetation is provided in Concern Statement 175.02.

Concern Statement 175.04

HRV should be defined in a usable manner that clearly indicates where grazing should or should not occur. The DEIS directs managers to manage towards the HRV by managing the timing of grazing seasons to protect stream banks and other riparian areas, but there are no standards to guide or ensure such management occurs. The Forest Service must disclose information regarding the variables being used, whether the management activities are designed to foster natural processes, sizes, and conditions of the sites sampled, a time span for the evidence gathered, and whether increased human intervention will be required to stay within the HRV.

Response to Concern 175.04

HRV is primarily used as a reference to determine whether community's components are within expected ranges. It does come into use in determining which non-forested vegetative areas are in need of restoration from both a historical vegetative and a non-desirable vegetation standpoint. HRV is not used to determine whether grazing is appropriate or not at the forest wide level because it is not designed to be a specific diagnostic tool. It is simply a method that assists in determining where an existing community's ecological components are in relation to its temporal or historic condition. Rangeland suitability is the proper tool utilized in programmatic or forest plan level decisions (See Rangeland Resource section of FEIS and Response to Concern 640.03). How the Forest Service accomplishes HRV is yet to be determined through project analysis and implementation. Many of the components or considerations identified in this comment are more targeted on site-specific analysis and are not appropriate for programmatic decisions. Grazing capacity determinations conducted at the allotment or project specific level can consider some aspects of HRV in the determination. Some components, such as ground cover or plant cover, may be a reason for not allowing use in a specific area and could be a factor in the process of firming up an allotment's grazing capacity.

Forest-wide and management area direction contains standards and guidelines to be followed in order to obtain certain riparian conditions. Grazing permits will be modified to include the revised forest plan direction as added to their terms and conditions as soon as practicable. In addition compliance is a function of permit administration and is beyond the scope of the revision effort. Therefore, it is not discussed in this effort.

A thorough discussion of the development and use of HRV for vegetation is provided in 175.02 above and in the FEIS.

180 Management Prescription Categories (MPC)

Concern Statement 180.01

The area around the Valleyview summer home tract and between that tract, over to Alturas Lake, should be re-designated as MPC 4.2, Roaded Natural/Modified Recreation, rather than MPC 3.2. This area is roaded and is used almost exclusively for recreation. The methods used in 3.2 should be listed in full.

The Forest Service should explain why MPC 3.2 and 4.1a cannot coexist in the same area and how the 4.1a designation does not allow for any restoration and maintenance of aquatic, terrestrial, and hydrologic conditions. The diversity of conditions, which ranges from roadless to undeveloped to semi-primitive, is too great to be lumped into 4.1a. Such diversity cannot be managed under one MPC. MPC 3.2's widespread designation of roadless areas in Alternative 3 cannot be supported.

Response to Concern 180.01

MPC 3.2 does not designate an area as roadless. MPC 3.2 and 4.1a can both be assigned in the same management area. Uses typically allowed under MPC 3.2 are described in Chapter 3 of the Forest Plans.

Recreation is allowed in all MPCs, including MPC 3.2.

Areas assigned to 4.1a are typically in an undisturbed state (by humans); therefore, not needing restoration.

Concern Statement 180.02

The application of MPCs is contrary to the Multiple-Use Sustained-Yield Act, which directs resource management of the national forests for the combination of uses that best meets the needs of the American public. MPCs will create a dominant-use or single-use principle, as they were written in a broad, ambiguous context that overlooks a variety of uses, values, and resources that the forests provide. The MPC guidance is very vague; it should include detailed, quantitative standards that emphasize conservation of aquatic and terrestrial areas to ensure the viability of species and maintenance of old growth and other critical ecosystems particular to each management area. The MPCs were also developed without public review and input.

Response to Concern 180.02

MPCs do not create a single use on the landscape for which they are applied. Each prescription allows for a variety of use levels of various activities and resource uses. All MPCs must meet the direction discussed in the Forest Plans which is set to assist in the viability of species and accomplishment of desired conditions, including those for vegetation. The MPCs were available to the public for comment and input for the Draft Forest Plans and DEIS.

Concern Statement 180.03

The explanation of differences of the MPCs in the Users Guide is inconsistent. Each MPC defines the activities that are allowed and some uses that have specific terms applied, such as “no road building or no timber harvest.” But using terms such as “limited” are subjective and can little value for the overall management direction proposed by the Ecogroup. MPCs should be eliminated as they have little value and provide no definitive management direction

Response to Concern 180.03

Improvements were made to the descriptions of the MPCs to help in defining them and describing activities and levels of those activities allowed. Federal regulation requires the Forest Service to assign management emphasis across the National Forest landscape.

Concern Statement 180.04

The Forest Service should indicate whether the MPCs are designed to address the results of the “constraint sensitivity” analysis process. The Forest Service should indicate the analysis or documentation contained in the planning record in which the rationale and assignment of a combination of MPCs per sub-watershed was determined. The MPCs should be tailored to match the landscape characteristics and current conditions within the sub-watersheds in order to conserve or restore to DFC.

Response to Concern 180.04

MPCs were designed and assigned to try and achieve the needs for change and issues, concerns or opportunities identified by interested publics, county governments, tribal governments and other regulatory, federal, and state agencies. Local Ranger Districts were directly involved in working with the Forest Supervisors and thus the Regional Forester in assigning the MPCs by alternative. Rationale is located in the project record. Desired conditions were taken into account during MPC assignment.

Concern Statement 180.05

The DEIS is inconsistent, as the roadless Alternative 6 has MPC 5.2 acres and Alternative 4 has no MPC 5.2 acres. Alternatives 4 and 6 should both include MPC 6.1.

Response to Concern 180.05

Alternative 6 contains no MPC 5.2 within Inventoried Roadless Areas. Alternative 4 was developed to respond to a different set of issues and concerns. Alternative 4 was developed to try and achieve a desired condition with predominantly passive management which 5.2 does not imply.

Concern Statement 180.06

For Alternative 3, the areas currently classified as MPC 5.1 (Forested Restoration), should be MPC 5.2 (Forested Commodity Production) instead, as these areas have been intensively managed in the past or are adjacent to intensively managed areas. Putting everything for management into 5.1 will make it more difficult to use a mechanical option to improve forest health.

Response to Concern 180.06

Alternative 7 was developed between Draft and Final to respond to comments such as this. Other alternatives also have these areas as MPC 5.2. Mechanical treatments are allowed in MPC 5.1.

Concern Statement 180.07

All alternatives should include MPCs 5.2 and 6.2, as there should be a limit to activities (recreation or commercial use) within the forests.

Response to Concern 180.07

A variety of MPCs are assigned to the alternatives in response to issues, concerns and opportunities. A range of alternatives is required under the NEPA.

Concern Statement 180.08

The plan provides that Management Area 01 will be managed under MPC 6.2 except in RCAs, which will be managed under MPC 3.2. It is impossible to determine from reading the plan, which will apply to any particular area within Management Area 01.

Response to Concern 180.08

Refer to the definition in the Glossary for riparian conservation area to provide information regarding application of MPC 3.2 within MPC 6.2.

Concern Statement 180.09

The final MPCs for specific watersheds should also include an analysis of the economic tradeoffs of limiting the treatment alternatives to only “Aquatic Restoration or Preservation.”

Response to Concern 180.09

An economic analysis was completed displaying the effects from Aquatic Restoration or Preservation treatments.

Concern Statement 180.10

The MPC for the Goose Creek/Trapper Creek Management Area should be changed from 6.2 (Shrubland and Grassland Vegetation Management for Forage Production) to 6.1 (Restoration and Maintenance within Shrubland and Grassland Landscapes). This change would benefit both fish and wildlife, as Yellowstone cutthroat trout (petitioned for listing under the ESA) are known to be present in the main perennially flowing reaches of upper Goose Creek and within tributaries of the Goose Creek watershed. These areas also contain big game summer and transitional range, as well as summer habitat for sage grouse.

Response to Concern 180.10

A variety of prescriptions are applied to areas within the Ecogroup through the different alternatives considered. Alternative 7, developed in response to comments on the draft documents, contains no 6.2.

Concern Statement 180.11

The Forest Service should apply MPC 5.1 to the following areas on the Payette National Forest:

- *The roaded areas in Goose, Fisher, Hazard, and Hard Creeks, as there is more than sufficient untreatable roadless areas to meet all other resource needs.*
- *The Fall Creek and Warren areas that have roads.*
- *The lower Secesh and Zena Creek drainages and Cow, Camp, and Buckhorn Creeks to allow for prescribed burning as a management tool.*

- *All Management Areas in the South Fork Salmon River drainage, on both the Boise and Payette National Forest drainages.*
- *All Management Areas above Payette Lake n North Fork Payette River.*
- *The previously roaded and managed areas of French and Jenkins Creeks.*
- *The Grade and Dukes Creeks areas and the west face of Hitt Mountain.*

The Forest Service should apply MPC 5.2 to the following areas on the Payette National Forest:

- *The Boulder, Mud, Brush Creeks, Round Valley, Red Ridge, and Big Creek areas, and the New Meadows face to allow for management and utilization of timber.*
- *The Paddy Flat and Sloan-Kennally Creek areas already roaded. However, the lower lodgepole pine-dominated areas should be MPC 5.1.*
- *Bear, Lick, and Indian Creeks.*
- *The roaded areas around Burgdorf and the area on the north side of the valley through Lake Creek.*

Response to Concern 180.11

A variety of prescriptions are assigned to areas through development of different alternatives. These areas had these or similar prescriptions applied in one of the alternatives.

Concern Statement 180.12

The Special Botanical Areas designation should be applied to these sites: Warm/ Tule Lake, Wardenhoff and Ditch Creek (meadows), Upper North Fork Payette River (at Squaw Meadows), Browns Pond Meadows, and Railroad Ridge. These areas could also be listed as research natural areas (RNA).

Response to Concern 180.12

These areas have a variety of prescriptions assigned to them in the alternatives considered.

Concern Statement 180.13

The LMPs should identify the level of protection that would be applied to various areas under various MPCs. For example, it would be appropriate to protect areas managed for the timber values that are found there, but trees in other areas that have little commodity value would be managed under other MPCs. Evaluations should be made before a fire, not during it. MPC application should also consider the use of adjacent lands that belong to the State of Idaho, Boise Cascade Corporation, or other private landowners.

Response to Concern 180.13

Forest-wide and/or management area standards must be met regardless of prescription assignment unless otherwise designated. A variety of issues, concerns and opportunities were taken into consideration during MPC assignments.

Concern Statement 180.14

Regarding Payette National Forest LMP, Table 1-5, the balance of the MPCs, not the content of the MPCs, will result in a reduction of the number of roads open to the public.

Response to Concern 180.14

The revised Forest Plans do not specify any roads for closure regardless of prescription assignment content or balance.

Concern Statement 180.15

Reestablish the MPC "Scenic Travel Route" instead of "forested restoration," which does not hold the same meaning.

Response to Concern 180.15

A scenic travel route MPC is not available for assignment in the final Forest Plans.

Concern Statement 180.16

Management Area 8, Payette. Only MPCs 1.2, 3.1, 3.2, or 4.1 are appropriate for this area. These areas should not be included as part of the timber base, which would degrade the value of the adjacent recommended wilderness area.

Response to Concern 180.16

Analysis was conducted with a variety of MPCs assigned to this area through development of alternatives. Effects are taken into consideration during the decision making process.

Concern Statement 180.17

In most places, the wilderness boundary does not extend up to the trailhead. Therefore, the Forest Service should create buffer zones between wilderness and MPC 4.1C areas.

Response to Concern 180.17

Buffer zones are not considered in the analysis. Instead, a variety of MPCs are assigned around wilderness areas to allow for a comparison of effects.

200 Monitoring

Concern Statement 200.01

The Forest Service should describe the Forest Monitoring Plan as shown in the DEIS on page 3-44, second paragraph.

Response to Concern 200.01

The monitoring requirements in Chapter IV have been updated from the draft to better address LMP objectives, standards, and guidelines including ecological conditions of watersheds and their aquatic ecosystems.

Concern Statement 200.02

Ongoing monitoring is required under a variety of authorities and should be emphasized in all LMPs. Monitoring is the process used to determine if plans, prescriptions, projects, and activities have been implemented and managed as designed and whether or not such undertakings are in compliance with LMP objects, standards, and guidelines. Site-specific project analysis should be tiered to monitoring data that indicates whether the goals of the overall LMPs are being met or what progress is being made towards them. The LMPs should contain requirements for implementing monitoring plans and provide a discussion of the budgets that are necessary for monitoring. Monitoring and planning actions should be identified and prioritized so the public knows what can be done in a budget short fall.

Response to Concern 200.02

Chapter IV of the Forest Plan includes the monitoring requirements under the Forest Plans. These items have been updated from the draft to better address LMP objectives, standards and guidelines as well as budget considerations.

Concern Statement 200.03

The Forest Service should provide information and data regarding the reliability of its monitoring process. Inaccurate results could lead to increased logging if the Forest Service finds there is inadequate change in distribution and amount of vegetation structural stages. This will have increased impacts on soils, water quality, and other resources by enabling additional logging and related road building. The "Monitoring and Evaluation Requirements" need additional detail. The Final EIS or LMPs should include monitoring reports and results from BMP implementation activities.

Response to Concern 200.03

The monitoring requirements in Chapter IV have been updated from the draft to better address LMP objectives, standards and guidelines. The section does include a data reliability call for each monitoring element.

Concern Statement 200.04

The monitoring programs should require consideration of fragmentation by examining landscape patterns, and core habitat and corridor patterns. The Forest Service should utilize aerial photography or satellite images. The monitoring items that address production and consumption are problematic as implementation of the proposed projects could conflict with LMP standards.

Response to Concern 200.04

The monitoring section has been revised to include provisions for consideration of fragmentation through the tracking of changes to habitats using techniques such as field surveys, landsat, and Forest-wide and project level inventories.

Concern Statement 200.05

Regarding Table IV-2 of the Payette LMP, items 2.5.2 and 2.7.2, Populations: Minimum viable populations are alluded to but the sampling techniques do not appear to match the determination. The sampling methodology appears to be biased and the reliability of data seems to be overstated. The standard of viability is not discussed and the standard of measurement and reliability seems inappropriate for making the kinds of changes proposed.

Response to Concern 200.05

The monitoring section has been revised to better address changes in habitat for and population trends for management indicator species.

Concern Statement 200.06

Regarding sections 3.2.1 and 3.2.5 of the DEIS, "Total Sales Program" – five years is too long of a time period to wait before dealing with a program that has so much effect on the local economy; it should be two years. The trigger for the review should be set at 65 percent accomplishment level. The same performance standard should be set for vegetation treatments, and results reflected in administrators' performance.

Response to Concern 200.06

The ability to meet activities such as total sale program and allowable sale quantity program is highly dependent upon numerous factors such as budget, resource concerns, appeals and litigation. Because budgets vary annually and projects may take 1 to 2 years to complete the planning, NEPA and appeals processes, 2-year reporting periods do not provide sufficient information to determine if there is a need to change program direction.

Concern Statement 200.07

The Forest Service should explain the Montreal Process (Payette LMP page IV-4, figure IV-1), why an international system is used to monitor the Payette National Forest, and is there is a chance the Forest is planning to harvest timber above any sustainable level.

Response to Concern 200.07

The DEIS used the Montreal Process as a framework for the monitoring plan. Based on internal and external comment, this framework was dropped for the final plans.

Concern Statement 200.08

Effectiveness monitoring should be a research activity, not a Forest activity.

Response to Concern 200.08

Comment noted.

Concern Statement 200.09

The Forest Service should indicate how it will monitor management success in developing “integrated and consistent Forest Plan direction to provide connectivity of fish and wildlife habitat” (Boise LMP, page 11-17).

Response to Concern 200.09

This information can be found in Chapter IV, Table 2.

Concern Statement 200.10

The proposed amount of monitoring in the LMPs is unrealistic, because there will not be an adequate amount of funding to carry out the monitoring.

Response to Concern 200.10

The Forests acknowledge that historic budget levels have been insufficient to fully support monitoring needs. The monitoring plan developed for the revised plans has taken budget levels into consideration and attempts to set a realistic program. However, it is recognized that budget levels may not be sufficient to fully fund monitoring needs.

230 Forest User Education

Concern Statement 230.01

There needs to be ongoing efforts by the Ecogroup to educate users on how to share and protect forest resources. There should be posters or handouts that promote riparian protection by anglers or motorcycle riders. Users should be taught modern ecosystem-friendly forest-use practices. The LMPs should provide much more detail on how the Ecogroup forests will undertake user education.

Response to Concern 230.01

The Forests have ongoing efforts to educate and inform customers and users about forest resources. Numerous pamphlets, handouts, and publications are available at any Forest Service office. Riparian protection is included in this available information. The Land and Resource Management Plans do include management direction to educate and inform users about management practices and policies.

250 Public Involvement

Concern Statement 250.01

The combined LMPs as a whole do not, by sheer volume, scope, and lack of specificity, comply with the spirit of the National Forest Management Act, which encourages public participation in government actions. The language and organization of the LMPs are so vague and generalized that they challenge citizen participation and comprehensibility.

Response to Concern 250.01

The Land and Resource Management Plans are voluminous because of the large amount of management information included. Forest Plans are not intended to provide as specific information as one would find in a project proposal. Similar to city and county zoning plans, forest plans provide programmatic or broad management direction. A Forest Plan is written more general in nature because it provides the management framework for an entire forest. Once programmatic direction is established in a forest plan, site-specific decisions are made based on that direction. Please see Appendix A of the FEIS for further information concerning public involvement.

Concern Statement 250.02

Much more public involvement should have been incorporated in all stages of the LMP development process and decision-making process, particularly when developing and incorporating the MPC approach to ecosystem management.

Another view was that the Forest Service should rely more on research and experience and not on public input, as reasons to change.

Response to Concern 250.02

Public participation has been an important part of this planning effort. Information has been presented and provided in numerous types of forums including the Planning Post, open houses, one-on-one meetings, and formal testimonial hearings. Input has been welcomed throughout the entire planning process as well. The Management Prescription Category (MPC) concept and application has been an integral part of all of the public involvement efforts. People interested in this planning effort have had opportunities to learn about and comment on the development and application of MPCs.

Public participation is only one aspect of the Land and Resource Management Plan revision project. Incorporating research and experience plays a very important role in all aspects of the planning process as well. Information concerning research used to develop and analyze information for the forest plans and EIS can be found in the various resource sections of the FEIS.

Concern Statement 250.03

The issue of future public input to decision making should be clarified in the Final EIS so both forest staff and citizens know if and when they can participate in decisions that affect trails and backcountry recreation.

Response to Concern 250.03

Public input and participation on proposed projects will continue after release of the Environmental Impact Statement. Involving the public in ongoing activities and projects, including those affecting trails and backcountry recreation, is required by law and is an important part of forest management.

Concern Statement 250.04

Public and stakeholder input was not part of the process that thinned the set of “potential” treatments to “viable” treatments. These viable options should be reviewed publicly prior to the development of the final alternative.

Response to Concern 250.04

The first comment is correct – the public was not involved in developing management actions for use in the SPECTRUM model. The development of variables for use in the SPECTRUM model was an internal process.

Concern Statement 250.05

Extensions of time are requested so the Forest Service can come up with a plan or alternatives that ensure the health of the forests. Extensions of time should be provided in light of national initiatives, complexity of the documents, and changed conditions of the forests.

Appreciation was expressed for the lengthy comment period in which to review all materials.

Response to Concern 250.05

An extension in time, for both public comment period and this project, has been provided.

Concern Statement 250.06

The Forest Service should note that public involvement is required before decommissioning or converting any roads.

Response to Concern 250.06

Public input and participation on proposed projects will continue after release of the Environmental Impact Statement. Involving the public in ongoing activities and projects, including those affecting roads, is required by law and is an important part of forest management.

Concern Statement 250.07

There should be better notice of public meetings by utilizing the media to a greater extent.

Response to Concern 250.07

Legal notices, news releases, and advertisements were issued to inform people of upcoming meetings. The project's newsletter "The Planning Post" was also utilized to inform people on our mailing list of meetings. The project's web site also listed all upcoming meetings.

Concern Statement 250.08

The Forest Service should listen to citizens, and it should be more apparent that their comments and concerns are being heard.

Response to Concern 250.08

Public involvement and participation is an integral portion of this project. Appendix A of the FEIS provides a detailed synopsis of the comments received on the Draft Land and Resource Management Plans and how those comments were addressed in the development of the Final Land and Resource Management Plans.

Concern Statement 250.09

The Forest Service should, through its planning and community involvement program, continue to improve and strengthen its relationship with local communities.

Response to Concern 250.09

Thank you for your input. We agree with your comment that the agency should continue to improve and strengthen relationships with local communities.

270 Social and Economic

Concern Statement 270.01

The Forest Service must incorporate natural resource benefits and externalized costs into its decisions in order to meet the requirements of the Rangeland Renewable Resources Planning Act (RPA), National Forest Management Act (NFMA), National Environmental Policy Act (NEPA), Administrative Procedures Act (APA), Forest Service Manual, Forest Timber Sale Preparation Handbook and Economic, and Forest Service Social Analysis Handbook. The DEIS failed to include any analytical process for determining whether or not the proposed LMP revisions maximize net public benefits, despite the fact that net public benefits is the preeminent goal of forest planning.

Response to Concern 270.01

The economic and financial analyses completed for the revision effort included primarily the revenues and cost associated with implementation of the various alternatives. Only those revenues and cost recorded in financial records were included in the analyses. When considering quantitative issues, financial efficiency analysis offers a consistent measure in dollars for comparison of alternatives. This type of analysis does not account for non-market benefits, opportunity costs, individual values, or other values. Though these values are important, they are often impossible to quantify and values for them have not been set by the USDA or the Forest Service. Non-market values are taken into consideration as part of the rationale for the decision. The line officer uses the effects to these non-market values that are discussed under other various resource sections of the FEIS.

Net public benefit is an important concept in the current regulations for carrying out a forest plan revision. Net public benefit is defined as the overall value to the nation of all outputs and positive effects (benefits) minus all the associated Forest Service inputs and negative effects (costs) for producing those primary benefits, whether they can be quantitatively valued or not. Thus, the net public benefits conceptually are the sum of the economic analysis plus the net value of non-priced outputs and costs. It is not the result of the economic analysis alone. This concept is the basis upon which the Regional Forester selects an alternative for implementation. Net public benefits are discussed in the Record of Decision.

Concern Statement 270.02

The Forest Service must complete the required benchmark analyses to determine the

- *Minimum level of management needed to maintain and protect the forests within the Ecogroup;*
- *Maximum physical and biological production potentials of significant goods and services, together with associated costs and benefits; and*

- *Monetary benchmarks which establish the maximum present net value of marketed resources or resources assigned market value.*

The Forest Service must incorporate information about the important economic benefits of healthy ecosystems.

Response to Concern 270.02

The minimum level of management needed has been identified through the development of direction at both the forest-wide level and at the management area level in the revised Forest Plans. Maximum physical and biological production benchmarks were set for items, such as the Allowable Sale Quantity without applying budgetary constraints and present net values were calculated.

Concern Statement 270.03

There is a discrepancy in the dollar amount the Forest Service indicates will be lost (\$8 million) as a result of logging curtailment in Valley County and the amount contained in the study from the University of Idaho (\$41 million). The jobs lost in Valley County far exceed the 28 predicted in the DEIS. Over 80 people will be laid off, and more than 375 Idaho workers were affected. Tax monies are reduced because of lost timber receipts that supported the local school system. The Forest Service states that tourism will fill the economic gap created by those lost jobs, yet it has no funding to support the tourism industry (such as campgrounds, trails, fishing). According to the Valley County study, tourism is not a viable replacement for lost logging and mining jobs. The number of recreationists would have to double in order to replace the lost mill jobs, and tourism could mean more jobs but with lower salary and benefit levels.

On page 2-73 of the DEIS, the table shows too few job losses for all alternatives except 1B and 5. The Preferred Alternative shows a loss of 385 jobs; the actual number is three times that.

Response to Concern 270.03

The University of Idaho (U of I) and the Forest Service have alternative economic models of Valley County. Both models were used to simulate the impact of closing the Boise Cascade Corporation (BCC) mill in Cascade. The fundamental difference between the two model impact estimates is this: the Forest Service Model predicts a total loss of 228 jobs, while the U of I model predicts a total loss of 225 jobs. Recognizing the inherent inexactness of this type of modeling, these alternative impact estimates might be judged virtually the same. As for dollar-expressed impacts, the U of I model reports impacts to “personal income,” a loss of \$6.2 million (see U of I report, Table 1, page 14), while the Forest Service model reports impacts to “labor income,” a loss of \$5.3 million. “Labor income,” also called “earnings,” includes wages, salaries, and proprietors’ income. Personal income is broader: it includes labor income, plus dividends, interest, and rental income and transfer payments. Given differences in the definitions of these two income measures, the associated impacts might again be judged essentially identical.

While the impact estimates of the BCC mill closure estimated with the U of I and Forest Service models are essentially the same, the U of I study reports its impacts in a rather non-traditional way that could cause some confusion among readers. In the U of I report's Table 1, they add the "regional income" (equals personal income) impacts, \$6.2 million, to "industry impacts," put at \$37 million. They go on to report the "total impact" as the sum of regional income and industry impacts, \$43.2 million. "Industry impacts" are industry gross receipts, i.e., total sales, or simply cash register receipts. Regional economists generally eschew reporting impacts on industry sales because these involve tremendous double counting (industries sell to each other). Worse yet, however, is adding sales to income. This is entirely inappropriate because sales already include earnings (businesses use sales receipts to pay wages and provide for their own incomes (e.g., profit), and to pay for produced inputs). Aside from these reporting irregularities, we can be comforted by the fact that both models generally generate the same results.

Concern Statement 270.04

The Forest LMP revision process is a good time to initiate a change in forest management direction and evaluate the costs associated with continuance of current management direction. These costs are attributed to the loss of timber from fire, insects, and disease; impacts to riparian areas; impacts to water quality from fires; and destruction of old-growth habitat. Further, the Forest Service should develop a suitable model that analyzes the long-term risk associated with insect outbreaks and disease and the long-term impact on properties and communities near the national forests.

Response to Concern 270.04

The economic analysis that was completed for revision analyzed all alternatives including continuance of current management or Alternative 1B. This analysis displayed effects to various communities within or near the three-Forest area. These impacts are displayed within the Final Environmental Impact Statement in the Socio-Economic section. The forested vegetation modeling that was used for the revision effort (SPECTRUM and Vegetation Dynamics Development Tool) included assumptions regarding Riparian Conservation Areas, which include riparian vegetation, wildfire, and insect epidemics across the forests. The SPECTRUM vegetation modeling also incorporated the direct dollar costs for management actions associated with each alternative, including the continuance of current management under Alternative 1B. The assumptions varied across the alternatives outside of the Wilderness Areas. Inside the Wilderness Areas, assumptions were held constant, as the proposed management activities for wilderness did not vary by alternative. As such, effects to riparian areas, water quality and all vegetative size classes were analyzed by alternative. Impacts to the local communities in the form of jobs and income were also analyzed using the Input-Output Model and are displayed in the FEIS. Long-term wildfire and insect hazard effects were evaluated for each alternative and are documented in the Final EIS in the Vegetation Hazard section of chapter 3.

Concern Statement 270.05

The quality of management of the Ecogroup National Forests affects the quality of life in rural recreation-based economies in Idaho. Correct or incorrect management strategies will have a direct affect on present and future options available to communities as they

strive for economic diversity. The Forest Service should actively and creatively participate in the socio-economic transition of communities. There should be support for programs that are designed to shift rural, timber-reliant economies to other opportunities for creating jobs, such as the technical and service industries. There is also concern that property taxes will increase if large amounts of people sell their homes because there are no longer jobs to support residents.

Response to Concern 270.05

The fire year of 2000 demonstrates that possibly more management may actually retain the quality of life around the communities via thinning and hazardous fuel reductions. The Forest Service mission is not to direct the development of communities. In developing the Plan, there is no direction for the Forest Service to actively and creatively participate in shifting the communities. The property values may or may not be affected by management. The 25 percent funds have been replaced by more stable funds and are discussed in the Socio-Economic section of the FEIS.

Concern Statement 270.06

There should be a better assessment of the socio-economic impacts of creating large roadless areas and removing areas that could be considered for timber management. Rural Idaho continues to struggle economically as a direct result of mill closures and uncertain availability of timber sales from National Forest land. The final LMPs should place more emphasis on commodity production rather than simply restoration in order to balance out the overall socio-economic effects.

Government economists with ICBEMP found that the economic benefits of roadless areas, as measured by their “existence value,” far exceed the value of timber and livestock forage on federal lands in the Columbia Basin. There are also the economic benefits from fishing and outdoor recreation industries, which contribute more to the economy than logging in old-growth or roadless areas. The final LMPs must address tourism and recreation as viable interests and provide suitable venues for these activities.

Response to Concern 270.06

The analysis of socio-economic impacts does not consider the impacts of creating large roadless areas. Roadless areas are not “created”. They are simply there, by definition, due to their size and roadless character. The analysis conducted did, however, consider the effects of having roadless areas either available or not available for timber harvest and development. There were alternatives considered that had higher and lower levels of commodity outputs from these areas as well as other areas outside of designated Wilderness. The alternatives were redesigned to address the concerns heard.

This presumes the need to weigh existence value against commodity value. The range of alternatives did look at output mixes associated with those alternatives. Each alternatives physical pros and cons are listed. If one aspect is determined to be desirable over another, that aspect will show up in the decision. The manager guided by public input will select the course of action based on all of the effects analysis. Restored roadless lands may actually have more value, depending on ones personal view. The EIS doesn't determine the value but simply displays the effects.

There have been publications repudiating the ICBEMP. Schallao and Mackley reported nationally on this. Estimates used in ICBEMP have been called into question. We have fallen back to the requirements in NFMA and have not placed a monetary amount on non-market values. Managed lands also have an existence value that was not counted for in ICBEMP. Recent studies show there was an overstatement of existence values. Existence value is not a measured value for the EIS. The existence value would be used by Line Officers to make the final decision. The manager's decision will reflect public values. Physical outputs by alternative are displayed in the EIS.

Concern Statement 270.07

The DEIS acknowledges that tourism is important to local economies (DEIS, page 3-387), but does not consider how the Proposed Action could impact the communities that are becoming increasingly dependent on recreation resources of the Ecogroup Forests. There is concern with this continued assumption that rural natural resource-based communities can survive on recreation dollars, yet the plans propose to curtail recreation activities. If no new recreation opportunities are developed (DEIS page 3-374) and roads and trails are obliterated (DEIS page 3-422, 423, and 426), recreation is discouraged and the dependent communities would suffer even greater burdens when coupled with the mill closures. The DEIS needs to address the economic impacts to rural communities that could result from implementation of the LMPs.

Another concern noted is with regard to table SO-8 - the data relating to impacts seems to only count Forest Service jobs related to range management, while every job remotely associated with recreation is counted for recreational effects (table SO-17). The manipulation of data, plus lumping of communities based upon population numbers as urban, urban-adjacent, or rural communities, skews the data in favor of recreation.

Response to Concern 270.07

The socio-economic analysis did include recreation via jobs and income by community. Community members, officials and County officials assisted in building the profiles that show the economic relationship by community with regards to recreation. Recreation is held constant throughout the analysis of all alternatives. Recreation economic impacts to the analyzed communities are anticipated to remain similar across all alternatives. The FEIS does address economic impacts to rural communities as a result of implementation of the forest plans.

The economic analysis for range includes non-Forest Service jobs. The primary difference between the range and recreation economic analyses is the impact on lodging facilities and the location in which the permittee resides. Permittee income is tied to their community of residence whether inside or outside the Ecogroup area.

Concern Statement 270.08

The Forest Service should reevaluate all social and economic impacts using the final socio-economic reports prepared by Forest Service consultants. The economic profiles presented in the DEIS were based on 1997 data, which, at the time, were the best available data. There is additional concern that there was very little opportunity for community review of the economic information.

Response to Concern 270.08

The community economic profiles in the DEIS have been updated for the FEIS, and they now reflect employment and income figures for the year 2000. The updates reflect recent economic developments, such as the closing of the Boise Cascade sawmills in Emmett and Cascade. Population figures for counties and communities were also updated for the year 2000, based on U.S. Census 2000 data.

As the community economic profiles were developed for the DEIS, draft profiles were sent to city clerks for comment and review in October and November 1998. Responses were incorporated into the profiles presented in the DEIS. Specific communities again reviewed these profiles at their request, following the DEIS public comment period, and review comments and revisions have been included in the profiles presented in the FEIS. Documentation of this review is included in the planning record.

The final socio-economic reports prepared by economic contractors are contained within the FEIS.

Concern Statement 270.09

The topic of Socio-Economic Environment is addressed much differently than the other program management areas and is the only topic (along with "Research") that is not carried forward in the LMPs; there is no mention of socio-economic resources in any of the 14 Management Areas.

The EIS provides a thorough analysis of the social and economic conditions of local communities, which gives the reader the impression that the socio-economic environment is one of the most important aspects of the planning process. It could be assumed that meaningful direction would be provided to further the statement under "Desired Conditions" on page III-73 that states: "Local economic development goals are considered when developing National Forest land use and management strategies." However, there are no subheadings on social and economic resources in any of the Management Area Characterization and Direction analyses. In Chapter IV of the Forest Plans, under "Southwest Idaho Ecogroup Monitoring Criteria," factors that are important to the local

economies (such as “Money spent by visitors in local communities,” “Employment of locals in resource management,” and “Community economic diversity”) are noted with “non-identified – no issues, goals, objectives, or standards relate to this criteria – outside of Forest Plan scope.”

Response to Concern 270.09

A socio-economic analysis for forest plan revision efforts is mandated as a requirement by law. In this revision effort however, it was also deemed an important item to take into consideration during the decisionmaking process; thus the need for a very lengthy and thorough analysis of the economic situation. Rationale for the decision will likely include economics as a discussion point. Economic analysis is a process carried beyond forest plan revision via Forest Service direction found in manuals and handbooks. It was decided that direction beyond what the Forest Service already must adhere to was not needed.

Concern Statement 270.10

The LMPs or EIS do not mentioned the significant contributions made to local economies by winter recreation resorts. The resorts generate direct employment and payroll and spin-off patronization of secondary businesses such as restaurants, lodging, bars, and service stations. The counties receive annual funds by collecting property taxes on resort facilities that are located on lands within counties. Further, the resorts collect and pay sales tax to the State, a portion of which is returned to the county in which it was generated. These economic factors should be considered in the Forest planning process.

The Forest Service should perform an economic analysis that compares the monetary returns generated by ski resorts, as well as other outdoor recreation, over a long period of time (for example, 50 years), to returns that could be generated from other uses such as logging and grazing. The suggestion is to demonstrate, from an economic standpoint, that the private-sector operation of ski resorts and other outdoor recreation on the National Forests is a viable business arrangement that should be encouraged.

Regarding Payette Draft LMP, page 73 (Social and Economic): The direction is so programmatic and broad that there is little meaning to the goals and objectives. The Forest Service must describe what measures it is going to take to further the socio-economic environment, specifically the management direction the Forest Service is proposing for the ski industry.

Response to Concern 270.10

These factors were all considered. Winter recreation was included in the economic analysis for the DEIS and will be for the final also. SO 14 – 16 RVD’s and 17 and 18 illustrate the amounts of RVD’s by travelway through the communities and the economic contributions. Table 17 and 18 shows the roll of recreation in the local economies. DEIS 3-528 – 3-530. Jobs and earnings are considered in econ analysis but not taxes. Permitted recreation activities were included in the financial efficiency analysis.

Forest Plans by definition are meant to be broad and programmatic. This allows for greater flexibility in determining what to actually propose at the project level to accomplish goals.

Concern Statement 270.11

McCall should be listed as a city adversely impacted by the loss of logging revenues. The Roadless Area EIS discusses funds for economic development for some cities in Valley County; McCall should be included.

Response to Concern 270.11

The economic analysis completed for the FEIS includes McCall as a city that is affected adversely by the loss of logging revenues. Anticipated timber harvest levels varied for each alternative and were analyzed. These levels also varied within the roadless areas. The amount of jobs associated with logging in McCall is listed in the community profile table.

Comments regarding the Roadless Areas Conservation EIS are beyond the scope of the revision effort and are therefore, not considered. We suggest the commenter submit these concerns into that effort for consideration.

Concern Statement 270.12

Forest Planners should use the most relevant, current, and site-specific information available in analyzing the socio-economic effects of Payette National Forest management; this information can be found in the McCall Area Comprehensive Plan that was adopted in July 2000. There is also concern that McCall was not part of the "Harris Study" on which much of the qualitative material in the Socio-Economic chapter was based. This omission may have skewed the analysis and should be remedied in the Final EIS and LMP.

Response to Concern 270.12

The community profile of McCall has been updated to include information from the McCall Area Comprehensive Plan, and the Comprehensive Plan has been included in the planning record. In developing community profiles in the EIS, several sources of information were used, including community self-assessment and profiles developed in 1996 by Dr. Chuck Harris, University of Idaho, as part of "Rural Communities in the Inland West: An Assessment of Small Communities in the Interior and Upper Columbia River Basins." As noted in the DEIS, McCall was not included as part of this study. However, the community profile for McCall-Donnelly in the DEIS and FEIS was based on several other sources of information, including information from the Economic Modeling Specialists, Inc., the Idaho Department of Commerce, and an interview with Valley County Commissioner Phil Davis. The socio-economic analysis drew upon the varied sources and types of information that created each community profile, and did not favor one source of information over another. Consequently, we do not believe the lack of a community self-assessment for McCall skewed our analysis.

Concern Statement 270.13

The social-economic studies did not include impacts to Jerome and Butte Counties nor consider the employees of the Forest Service and sawmills that reside in the counties.

Response to Concern 270.13

During early scoping, it was determined which communities would be touched most significantly by the Forest Service activities. No communities within those counties were considered to be in that category. Less than 50 or 60mbf went to mills within those counties. Even so, the economic analysis assumed that these smaller milling operations would be taken care of first. Even though Forest Service employees may live in those counties, employment figures are calculated by place of work, not place of residence. Very little direct employment is in those counties from the Forest Service activities and offices. Spending can be calculated by place of residence. Forward accounting is tenuous at best.

Concern Statement 270.14

The “Desired Condition” section under “Social and Economic” in the LMPs provides for “. . . sustainable and predictable levels of goods and services. . .” – this should not be included. Local economies have to change and it should not be up to the federal government to subsidize them.

Response to Concern 270.14

As noted in Chapter 3 of the FEIS, the revised Forest Plans were developed within an Ecosystem Management framework, with an intent of integrating “. . . ecosystem elements with human needs to strengthen the essential link between economic prosperity, social continuity, and ecosystem processes and functions.” (FEIS, page 3-2) In addition, Ecosystem Management includes social and economic components, and focuses on “. . . maintaining or restoring the biophysical components of ecosystems in order to sustain economic opportunities and support social and cultural values” (FEIS, page 3-2). Consequently, we believe future conditions supporting sustainable and predictable levels of goods and services are both desirable and appropriate.

Concern Statement 270.15

There should be an explanation why table 2-55 shows an increase in yearly earnings while table 2-56 does not.

Response to Concern 270.15

Tables provided in Chapter 2 of the FEIS are simply there to provide a general summary of the entire economic analysis. Refer to the Socio-Economic section in Chapter 3 of the FEIS for a more detailed discussion regarding the tables.

Concern Statement 270.16

The economic stability of local resource-dependent communities is not adequately addressed. There should be an ASQ that will maintain existing mills, including Emmett and Cascade. The ASQ should be a goal to be achieved rather than a ceiling where anything less is acceptable. Also, the economic study of small mills missed the link to bigger industry (i.e., firewood for tourists, posts to cattle and dairy industry). The rustic western fencing around pastures is part of the pastoral scenery and appeal of the SNRA. The value of these small mills is far greater than the value of their direct products. .

Response to Concern 270.16

Included in the economic analysis for timber is a discussion regarding current milling capacity. For many of the alternatives, the level of ASQ is higher than the current milling capacity. Projections of likely new mill sites are also discussed. Smaller mills were taken into consideration in the timber economic analysis. Those smaller mills were assumed supplied first, prior to larger operations.

Concern Statement 270.17

Regarding the last sentence in the paragraph in DEIS page 1-13, Timberland Resources, Background to Issue: It appears the Forest Service did not feel that any mills were dependent on Forest timber.

Response to Concern 270.17

Timber off of Federal lands are only a contributor to the volume that is utilized by the mills that were included in the assessment for the DEIS. None of the mills assessed were completely dependent on Federal timber. A variety of timber sources are contributors to mill operations. That is not to say that volume available from Federal land is not important, it is simply not the sole source.

Concern Statement 270.18

The EIS must provide a full economic analysis of an increased wilderness presence in central Idaho and the potential positive impact on tourist-related income.

Response to Concern 270.18

At present time, there have been no additions to the designated Wilderness area in central Idaho. Recreation related impacts to communities were considered in the economic analysis and are displayed in the FEIS. Recommended Wilderness does vary by alternative and is analyzed for effects.

Concern Statement 270.19

Livestock grazing is a viable economic contributor to the financial well-being of our local communities. According to Forest Service studies, from FY 1980 to FY 1999 there was a \$24,242 reduction in the 25-percent fund payments and a \$428,055 reduction in PILT (payment in lieu of taxes) money. This combined total of \$452,297 is a substantial amount of net loss to a county such as Cassia that has a population of only 23,000 people.

Response to Concern 270.19

Socio-economic information for Ecogroup counties has been updated in the FEIS to reflect more current information. As noted in Chapter 3 of the FEIS, a new law – the Secure Rural Schools and Community Self-Determination Act of 2000 now gives counties the option of continuing to receive payments under the 25 Percent Fund Act, or electing to receive their share of the average of the three highest 25 percent fund payments made to the State during the period of FY 1986 through FY 1989 (“the full payment amount”). For Cassia County, the full payment amount received in 2001 was \$76,400 – an increase from both the FY 1980 and FY 1999 payments under the 25 percent fund. For PILT, Cassia County’s allocation in FY 2000 was \$602,261 – less than the amount allocated in FY 1980 but more than that received in FY 1999.

Concern Statement 270.20

The Forest Service should incorporate the new economic information contained in the updated economic study for Custer and Lemhi Counties. There have been more mine layoffs and one mine closure since the DEIS was developed. Therefore, the economic effect from the proposed alternatives would be an extreme problem for the area.

Response to Concern 270.20

New information was collected and utilized in the FEIS.

Concern Statement 270.21

DEIS Tables 2-61, 2-62, and 2-63 show revenues and costs for the National Forests, by alternative, using a discount rate. The Forest Service should explain if the costs for implementing the various alternatives considered possible conversion of Idaho Parks and Recreation Department projects.

Response to Concern 270.21

We did not consider Idaho Department of Parks and Recreation projects.

Concern Statement 270.22

The EIS does not contain an economic analysis of the costs and benefits of, nor about economic stability, nor does it contain references to any economic factors incorporated into its analysis of livestock grazing suitability and economic ramifications of reductions in grazing opportunities. The Forest Service must complete a economic efficiency analysis that takes into account the budgetary impacts associated with a reduction in grazing opportunities, with grazing on land that is in unsatisfactory condition, or on land that is subject to legal requirements under the Endangered Species Act or other environmental laws. The cost of administering grazing on lands where these factors exist will be substantially higher.

Lost winter range and adjacent base property must be considered as a cost of regulations that will reduce grazing opportunities. The economic efficiency analysis must take into account the effects of non-marketed goods and services so that the suitability determination is made in a manner that maximizes net public benefits.

Response to Concern 270.22

The economic analysis does take into account the effects of livestock grazing. Range suitability and the implications of applying Management Prescription Categories to designated portions of the forest were assessed as part of the revision process. As such, the estimated effects of forest plan alternatives on livestock operations are displayed and incorporated in the analysis.

Non-market goods and services and maximum net public benefit are items the Regional Forester takes into consideration in making the decision. Effects to resources are displayed in sections other than socio-economic. Specifically, see the Rangeland Resources section, Environmental Consequences.

280 Management Indicator Species (MIS)

Concern Statement 280.01

The Forest Service should include more MIS species in its analysis contained in the DEIS and provide justification for the species that were included. The LMPs must contain goals, objectives, standards, guidelines, and mitigation measures for MIS, as directed in planning regulations and the Forest Service Manual. In addition, the EIS should identify specific biological communities MIS are supposed to represent, not just general habitat types, and should establish linkages between the viability of these species and the biological communities. The EIS should present scientific evidence that correlates measurable changes in the abundance of any MIS with other species.

Response to Concern 280.01

MIS selection and rationale is contained in the FEIS, Appendix F: Fish and Wildlife, sections on Terrestrial Management Indicator Species and Aquatic Management Indicator Species. Within each MIS species write-up, rationale is given for why they were selected as MIS in the Final Plans, or why MIS in the original plans were removed.

Forest-wide management direction (i.e. goals, objectives, standards and guidelines) is present in the revised LMPs for both terrestrial wildlife and aquatic resources. The LRMP Wildlife Resources section covers MIS and sensitive wildlife species; LRMP Soil, Water, Riparian and Aquatic Resources section covers MIS and sensitive aquatic species. Direction in the Threatened, Endangered, Proposed and Candidate Species section contains direction for other terrestrial wildlife and aquatic species of concern such as Threatened, Endangered, Proposed and Candidate species.

Concern Statement 280.02

There is little science to show that the MIS concept is reliable, and past monitoring has shown little value in the use of some species as an environmental indicator.

Ponderosa pine and Douglas fir hold the same economic importance to a timber economy in rural areas, as does the economic importance of Elk to Idaho Fish and Game and outfitter businesses. However, Ponderosa pine and Douglas fir were not selected as good economic plant management indicator species in the DEIS.

Response to Concern 280.02

The planning regulations at 36 CFR 219.19 require us to select MIS and provide direction for selected species in LMPs. The rationale for selection of MIS for the revised forest plans is contained in Appendix F of the FEIS. In addition, MIS included in the original plans that were not carried forward into the revised forest plans are also discussed. In both cases, the rationale for selection or removal is provided.

Concern Statement 280.03

The bighorn sheep is a native, resident species and should be addressed from the viewpoint of the State of Idaho and not the U.S. Fish and Wildlife Service. The Forest Service should consider historic bighorn ranges in addition to the currently occupied ranges and should follow the precedent set by the Wallowa-Whitman Forest for managing bighorn sheep.

Response to Concern 280.03

The FWS currently has no regulatory authority over bighorn sheep. The section on bighorn sheep has been updated in the Terrestrial Wildlife Habitat and Species section of the FEIS. Updated information concerning the situation in Hells Canyon area and the multi-state wildlife agencies agreement to manage bighorn sheep has been provided. Management direction relative to bighorn sheep has also been modified from the Draft LMP in management areas where bighorn sheep occur.

Concern Statement 280.04

The DEIS states that “road access increases human-related conflicts with wildlife . . . by fragmenting habitats and increasing disruption.” The Forest Service should explain why the LMP and DEIS state that more roads equate to less Elk, when the Elk density shown in the Payette LMP (page III-124 [MA6]) is less in roadless areas of this Management Unit than in the roaded portions. Elk numbers in the SWIE are at an historic high, so there should be no more reductions in public access and roads. Regarding elk vulnerability, this should be regulated by the seasons set for elk hunting, not by the Forest Service regulating people’s access to the Forest.

Another concern is that motorized access should be reduced or eliminated in areas where State objectives for elk and deer harvest, herd composition, and/or populations are not being met. The Forest Service should develop standards or guidelines to reduce elk vulnerability through limiting access. The standards should include maximum open road density and specific seasonal limits to off-road use (that is, during summer and during rifle hunting season). There is concern over increased hunter efficiency as a result of increased motorized access, increased roads, low effectiveness of access management enforcement, and loss of hiding cover.

Response to Concern 280.04

The information on elk has been updated in the FEIS, Terrestrial Wildlife Habitat and Species section, relative to the effects of roads/access on elk. These updates include information concerning status of work with State wildlife agencies and interested publics to meet State elk management objectives. The state wildlife agency Elk Management Plan identifies problems by hunting unit that are affecting management’s ability to achieve population objectives. Some of these are related to access and some are not. Management direction relative to elk has also been modified from the Draft LRMP in regards to elk habitat management and motorized access.

Public access on roads within the Ecogroup will not be directly affected by the decision on Forest Plan revision (refer to FEIS, Chapter 1, Travel Management). The current Travel management plan/maps will carry over with this revised plan. The need to change current travel management will be addressed by management on each Forest following the decision on forest plan revision.

Concern Statement 280.05

The wildlife resource objective for the Independence Lakes MA only cites the “north side of Alamo Creek”. The objective should include all of Independence Lake, Howell Creek, and Albion Mountain MAs.

Response to Concern 280.05

The management direction in these MAs has been updated to include the appropriate areas.

Concern Statement 280.06

The Forest Service should not rely solely on disease as a factor effecting bighorn sheep populations but on additional factors. For example, bighorn sheep are not an endangered or threatened species; they are classified as a big game animal and are hunted; and research has found that mineral deficiencies in the bighorn's diet have led to incidents of pneumonia that contribute to die-offs.

Response to Concern 280.06

The information on bighorn sheep has been updated in the FEIS, Terrestrial Wildlife Habitat and Species section, and includes the effects of predation and disease in Hells Canyon and other areas in the Ecogroup where bighorn sheep occur. Most of the problems are confounded because many of the populations are small and isolated. Management direction in the Wildlife Resources section of the LRMP relative to bighorn sheep has also been updated in the Final Forest Plans.

Concern Statement 280.07

If elk is to be retained as an MIS, then it should have greater population management strategies than are currently applied.

The Idaho Department of Fish and Game should be responsible for regulating elk populations by tag sales, not tasking the Forest Service to regulate populations by closing roads.

The Forest Service must manage access and habitat to meet the Idaho Department of Fish and Game's bull elk population age structure, elk vulnerability, and elk habitat effectiveness (EHE) goals. The Forest Service must perform meaningful analyses and disclose information about elk EHE, motorized road and trail densities, elk vulnerability, and forage/cover ratios. The elk habitat standards are important because they have been used to assess security for their wildlife species. The DEIS indicates that elk populations and objectives are not met in six hunting units, but it fails to state why; the FEIS must disclose this.

The Forest Service should not allow for openings more than 1,200 feet from elk hiding and thermal cover areas.

Response to Concern 280.07

Management direction relative to elk has also been updated in the final Forest Plans.

Elk are no longer an MIS. MIS selection and rationale is contained in the FEIS, Appendix F: Fish and Wildlife, sections on Terrestrial Management Indicator Species and Aquatic Management Indicator Species. Within each MIS species write-up, rationale is given for why they were selected as MIS in the Final Plans, or why MIS in the original plans were removed.

The information on elk has been updated in the FEIS, Terrestrial Wildlife Habitat and Species section, relative to the situation of roads/access and working with State wildlife agencies to meet State elk objectives. The state wildlife agency Elk Management Plan identifies problems by hunting unit that are affecting management's ability to achieve population objectives. Some of these are related to access and some are not. There may be issues other than elk population objectives for the rationale for closing or modifying road access.

Public access on roads within the Ecogroup will not be directly affected by the decision on Forest Plan revision (refer to FEIS, Chapter 1, Travel Management). The current Travel management plan/maps will carry over with this revised plan. The need to change current travel management will be addressed by management on each Forest following the decision on forest plan revision. Coordination with other State, Federal and tribal governments will be a key component of future travel management planning. This future travel management planning will also involve a focused public involvement process to ensure issues about access in specific geographic areas and its effects to resource, social and economic situations are clearly understood.

Concern Statement 280.08

The DEIS states that "All alternatives are expected to maintain the current distribution of this [willow flycatcher] species in the Ecogroup." The document, however, did not include any population numbers upon which to assess viability. Considering the degraded nature and loss of riparian vegetation around so many streams in the Ecogroup, it is likely that willow flycatcher populations will have to increase to ensure viability. The Final EIS must correct this omission of data.

Response to Concern 280.08

The willow flycatcher was not selected as an MIS because it is a migratory land bird. Population changes may be a result of situations occurring on wintering grounds that are not within the administrative authority of the Forest Service rather than a response to management authorized by the Forest Service.

MIS selection and rationale is contained in the FEIS, Appendix F: Fish and Wildlife, sections on Terrestrial Management Indicator Species and Aquatic Management Indicator Species. Within each MIS species write-up, rationale is given for why they were selected as MIS in the Final Plans, or why MIS in the original plans were removed. Status and current knowledge of population trends is provided in these write-ups.

Chapter 4 of each Forest Plan also contains monitoring requirements for MIS.

290 Threatened, Endangered, Protected, and Candidate Species

Concern Statement 290.01

The Forest Service should reference the analysis or documentation used to determine, by alternative, the risks posed to listed fish species, as shown on page 2-36.

Response to Concern 290.01

The effects analysis on listed fish species and SWRA resources has been updated for the FEIS. Direct, Indirect, and Cumulative effects have been completed in Chapter III of the FEIS for each listed fish species within the Ecogroup. Effects methodology sections have also been completed and are in Chapter III of the FEIS.

Concern Statement 290.02

The Forest Service has not considered the effects of catastrophic wildfires on threatened and endangered fish. These fires historically have far greater potential to harm fish and wildlife than any other forest activity.

Response to Concern 290.02

The threatened and endangered (T&E) species analysis supporting FEIS effects disclosures have been updated to more fully display the effects of both management activities and wildfire than what was in the DEIS. In addition, the Biological Assessment, located in the project record, contains a detailed analysis of effects related to wildfire and management activities to T&E fish species.

Concern Statement 290.03

The LMPs should provide proactive measures that promote viability of the various endangered and threatened species within the Ecogroup; otherwise, the spirit of the ESA is violated.

Response to Concern 290.03

The revision team actively worked with the National Marine Fisheries Service and USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that provided for the conservation and recovery of ESA listed species. The agency's Biological Assessment and Services Biological Opinions documenting the results of these efforts are contained in the project record.

Concern Statement 290.04

On page III-37, the statement that reads "...activities that may result in direct..." should be changed to read "activities that can be proven to be in direct..."

Response to Concern 290.04

This statement in the DEIS no longer exists because the effects analysis has been updated.

Concern Statement 290.05

Forest Service goals to identify ESA species habitat should be accomplished in conjunction with the appropriate regulatory agency, and stating that this can be accomplished in five years may not be an appropriate timeframe. The Forest Service must actively manage habitat by dealing with insect, disease, and fire management problems, so as not to jeopardize some species listed under ESA.

Response to Concern 290.05

The revision team actively worked with the National Marine Fisheries Service and USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of ESA listed species. Habitat for ESA listed species is identified in the FEIS for all listed species within the Ecogroup. The agency's Biological Assessment and Services Biological Opinions documenting the results of these efforts are contained in the project record.

Concern Statement 290.06)

The DEIS does not mention the Columbia sharp-tailed grouse or other interior forest species that could be affected by logging and grazing.

Response to Concern 290.06

The species discussion for the sharp-tailed grouse in the FEIS has been improved based on numerous public comments and additional information about the species.

Concern Statement 290.07

There should be an indication in the content of the draft alternatives that consultation with U.S. Fish and Wildlife occurred and facilitated the development of conservation strategies, identification of potential forage/denning habitat, and of other attempts to

comply with the current Threatened status if lynx Canadensis or of any other endangered, petitioned, or species of special concern that is present, potential, or historic for the Ecogroup forests.

Response to Concern 290.07

The revision team actively worked with the USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of ESA listed species, including lynx. The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service Biological Opinion (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.08

The Ecogroup Forests cannot eliminate PACFISH/INFISH and related Biological Opinions from the Preferred Alternative or any of the alternatives as a result of LMP revisions. The alternatives and LMPs must be re-written to comply with ESA determinations and their implementing reasonable and prudent measures and non-discretionary terms and conditions for native fish.

Response to Concern 290.08

As stated in Chapter III of the Forest Plans, “The revised Land and Resource Management Plan (LRMP) direction replaces Pacfish/Infish standards, guidelines, and terms and conditions specified in the 1995 BO for chinook salmon and the 1998 BOs for steelhead and bull trout”. However, goals, objectives and other direction Pacfish/Infish and related Biological Opinions played an important role development of the revised plans. The revision team has worked closely with the USDI Fish and Wildlife Service and National Marine Fisheries Service over the last few years to ensure the intent of appropriate portions of Pacfish/Infish and related Biological Opinions were incorporated in the forest plan management direction. The revision team has also worked to address short-comings of these interim plans and BOs by developing additional, or modifying existing, management direction and by developing a long-term aquatic conservation strategy (ACS).

Concern Statement 290.09

The absolute enforcement of the Clean Water Act violates the ESA by eliminating nutrients from streams, which consequently harms or creates a “taking” of anadromous fish.

Response to Concern 290.09

The Clean Water Act (CWA) does not require the complete elimination of any and all nutrient delivery to streams. The CWA requires the need for full support of beneficial uses including those water quality parameters associated with the support of cold-water biota and salmonid spawning. In fact full support of beneficial uses requires appropriate levels of nutrients and other indices for proper riparian function and ecological processes. A range of nutrient levels appropriate for the local conditions and associated beneficial uses are appropriate/needed for support of beneficial uses. Therefore, there is no scenario for the potential conflict between the CWA and Endangered Species Act in regards to any listed fish species.

Concern Statement 290.10

The Forest Service should indicate how the LMPs fit together with its ESA 7(a)(1) conservation programs for salmon, steelhead, and bull trout.

Response to Concern 290.10

Section 7 (a) (1) requires Federal agencies to use their authorities to further the conservation of listed species. Considerable effort was expended by staff from the USDI Fish and Wildlife Service, National Marine Fisheries Service, and the Forest Service on development of LRMP components dealing with listed fish species and aquatic conservation. A long-term Aquatic Conservation Strategy (ACS) has been developed to protect and promote conservation of listed fish and other aquatic species. Descriptions of this ACS approach can be found in the Biological Assessment (refer to project record) and Chapter III of the FEIS. The interagency work was aimed at meeting the Forest Service conservation commitment of Section 7 (a) (1).

Concern Statement 290.11

Two major changed conditions affecting the Ecogroup Forests are not recognized in the Changed Condition list. The LMP revisions should emphasize the major new listings of the ESA such as Chinook and Sockeye salmon, steelhead, bull trout, and lynx and the reintroduction of gray wolves, with a number of packs in the Ecogroup area. The Forest Service should provide a fuller discussion of how TES species populations and habitat (quality, quantity, and connectivity) have changed since implementation of the original forest plans, including documentation of declines or improvements. The Forest Service must take proactive measures to ensure viability of imperiled species and, as stated in the Forest Service Manual, "Develop and implement management practices to ensure that species do not become threatened or endangered...." and prepare Biological Evaluations assessing the impact of proposed actions on sensitive species. The standards identified in the LMPs are descriptive rather than providing adequate direction for conservation of threatened or endangered species.

Response to Concern 290.11

The revision team actively worked with the USDI Fish and Wildlife Service and National Marine Fisheries Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of ESA listed species. The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service and National Marine Fisheries Services Biological Opinions (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.12

There is no scientific evidence that demonstrates that limiting grazing benefits sage grouse, as is written on page 3-264 of the DEIS. Continuous heavy grazing can actually speed up the process of producing greater sagebrush cover in areas where increased cover is desired. There is no scientific evidence to show that sage grouse prefer native grass seed to non-native grass seed, as shown on pages 3-264 and 3-292 of the DEIS. Page 3-256 states that sharp-tailed grouse numbers have been increasing, primarily due to CRP seedings on private land, but in the same paragraph inference is made that non-native seedings on rangeland have been detrimental.

Response to Concern 290.12

This concern has been corrected and addressed in the FEIS.

Concern Statement 290.13

The Idaho Department of Fish and Game recommends a 15-25 percent sagebrush canopy cover and 7 inches or more of grass and forb understory during May to encourage a successful nesting period for sage grouse. Livestock grazing must be managed so as to provide for this requirement. The Forest LMPs lack sufficient detail for the long-term management of sage grouse habitat. Sage grouse habitat management objectives, standards, and guidelines should be developed and implemented and focus on identifying and protecting existing sage grouse breeding, brood-rearing, nesting, and winter habitat; enhancing sagebrush habitats capable of supporting sage grouse; and restoring degraded sagebrush habitats. Guidelines should be incorporated as detailed in Connelly et al. (2000) for management of sage grouse habitats.

Response to Concern 290.13

Selecting sage grouse as an MIS will ensure that this species is part of the evaluation during any allotment management plan updates that contain sage grouse habitat. The Connelly et al (2000) document has been used in the FEIS and revised plans.

Concern Statement 290.14

The Forest Service must designate critical habitat for bull trout, as was done for other sensitive fish species, and implement strict habitat protection standards above and beyond those implemented through INFISH.

Response to Concern 290.14

The Forest Service does not have authority to designate critical habitat for bull trout. Authority to designate critical habitat for listed fish species is retained by the USDI Fish and Wildlife Service and National Marine Fisheries Service. The revision team has worked closely with the USDI Fish and Wildlife Service over the last few years to ensure the intent of the management direction in Infish was incorporated in the forest plan management direction. The revision team has also worked to address shortcomings of Infish by developing additional, or modifying existing, management direction.

Concern Statement 290.15

The Current Conditions discussion of spotted frogs in the DEIS (pages 258-259) fails to address potential management issues, such as habitat fragmentation, and the LMPs should address long-term management direction for this species. The Forest Service and Idaho Department of Fish and Game should work together to develop specific goals, standards, objectives, and guidelines that address spotted frog habitat management and protection.

Response to Concern 290.15

The species discussion in the FEIS for the spotted frog has been improved based on public comments and additional information and management direction about the species.

Concern Statement 290.16

The tributary habitat of the SWIE has become critical to the survival and recovery of ESA-listed species in the Snake River-Columbia Basin. The EIS and LMPs should discuss the role of the SWIE tributaries in Snake River salmon recovery, the out-of-basin effects potentially limiting salmon recovery and restoration, and the identification of priority watersheds for anadromous fish recovery.

Response to Concern 290.16

The effects analysis in the Biological Assessment (refer to the project record) and Chapter III of the FEIS analyzes potential effects of resource activities authorized by the forest plans in each subbasin in which anadromous fish occur. Out of basin effects (cumulative effects) are addressed for on-going and reasonably foreseeable federal, state, county, and private actions within the action area. Downstream influences (dams, harvest, etc.) outside of the action area are also briefly mentioned.

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (priority subwatersheds, multi-scale assessments, ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. For more information on this strategy refer to Chapter III of the Biological Assessment (refer to the project record) or the FEIS.

Concern Statement 290.17

Before the Forest Service allows further mining activities, it should incorporate additional language into its planning process to address CWA Section 303(d)-listed stream and water bodies containing ESA-listed species.

Response to Concern 290.17

Additional management direction regarding activities in 303(d) listed streams has been developed for the Final Land and Resource Management Plans. Management direction provided by SWRA Standards SWST01 and SWST04 provide the highest degree of protection to aquatic resources. Where Forest Service has statutory discretion, activities would either need to maintain current conditions without retarding the attainment of properly functioning conditions, or restore current conditions to be consistent with SWRA standard SWST01.

Where 303(d) listed water bodies and State non-point source Management Plans occur, threats to turbidity, water temperature, and nutrients from lands and special use activities would be further reduced. Specifically, SWRA Standard SWST07 states, "Within legal authorities, ensure the new proposed management activities within watersheds containing 303(d) listed water bodies improve or maintain overall progress toward beneficial use attainment for pollutants that led to the listing." SWRA Guideline SWGU08 also states that proposed actions should adhere to the State Non-point Source Management Plans.

Threats to water quality from spills of fuel, oil, cleaning materials or human waste are reduced through implementation of SWRA Standard SWST11 and Guideline SWGU11. This management direction states that fuel and other toxicants storage and refueling would not be allowed in RCAs unless there are no other alternatives. If storage of fuels and other toxicants or refueling occurs within RCAs, an approved spill containment plan is required. While this direction does not eliminate spills or potential accidents, it does reduce the chance of their occurrence.

Solid and sanitary waste facilities in RCAs are prohibited unless no other alternatives exist, and then the effects must be adjusted as needed to avoid degrading effects to beneficial uses and native and desired non-native fish and their habitats, as described in Minerals and Geology Standard MIST09. Threats from

settling ponds, tailing dams, or impoundments are minimized by using a professional engineer to locate, design, construct and inspect these facilities (Mineral and Geology Guideline MIGU03). Mineral and Geology Guideline MIGU06 addresses threats from turbidity from mining roads by making sure roads would be properly constructed, maintained, and effects mitigated. Mineral and Geology Guideline MIGU08 helps to reduce threats by mitigating degrading effects to water quality. Completing and conducting monitoring plans for operation and closure to confirm predictions and ability to mitigate negative effects to biological resources address further threats. Results of inspection and monitoring should be evaluated and applied to modify plans and permits as needed to minimize negative effects to other resources (Mineral and Geology Guideline MIGU09). Finally, Mineral and Geology Guideline MIGU11 limits effect to water quality by relocating, altering, changing management strategies, and discontinuing existing facilities or management practices that contribute to the degradation and requiring operation plans that address resource protections.

Concern Statement 290.18

The DEIS and Draft LMPs do not utilize the study entitled: "A Coarse Screening Process for Evaluation of the Effects of Land Management Activities on Salmon Spawning and Rearing Habitat in ESA Consultation." The Course Screening Process provides objective, measurable criteria to evaluate aquatic habitat conditions and to determine the consistency of individual and combined land management activities with the protection and improvement of salmon habitat.

Response to Concern 290.18

The baseline data used to develop the Watershed and Aquatic Recovery Strategy (WARS) for the Forest Plan Revision incorporates many aspects of the "Coarse Screening" document mentioned above. The WARS was based on determining at the subwatershed scale, historical and current watershed and aquatic conditions and the causal mechanisms. The matrix of pathways and watershed condition indicators will be used to evaluate projects against measurable criteria to determine changes to watershed and aquatic habitat conditions. Each forest will assess how projects affect habitat and trend of watershed conditions at multiple scales using the matrix and consultation baseline documents. Refer to the FEIS, Chapter 3 of the Biological Assessment, and Appendix B of the Forest Plan for more detailed discussions/descriptions.

Concern Statement 290.19

The DEIS fails to describe, analyze, and propose adoption of an Aquatic Conservation Strategy. Such failure to adopt a Strategy across the Ecogroup Forests reflects a failure to acknowledge significant new information regarding aquatic conservation, much of which was published by the Forest Service (the Forest Service Ecosystem Management Assessment Team, July 1993).

Response to Concern 290.19

A comprehensive aquatic conservation strategy (ACS) comprised of eight components (Riparian Conservation Areas, Restoration, Monitoring, etc.) was developed through Forest Plan revision. This strategy is described in Chapter III of the Biological Assessment (refer to the project record) or the FEIS.

Concern Statement 290.20

Regarding page III-10 of the Sawtooth National Forest LMP, clarify if the statement, “In fish bearing waters, do not authorize surface diversions...” means all the current diversions will not be authorized until appropriate fish screens are in place, or the diversions will be shut off until then. This standard should be clarified. If this is not the intent of the standard, then it should be.

Response to Concern 290.20

This management direction has been clarified in the revised Forest Plans. Specifically, TEPC Standard TEST07 and SWRA standard SWST09 state:

TEST07) In TEPC fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and, if needed, include either fish screens that meet NFMS and/or FWS criteria or other means to prevent fish entrapment/entrainment.

SWST09) In fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and, if needed, include either fish screens or other means to prevent fish entrapment/entrainment.

Concern Statement 290.21

The National Marine Fisheries Service emphasized in its adoption of regulations under ESA 4(d) concerning salmon and steelhead, the diversion of water and dewatering of stream that are habitat for these listed fish may constitute a prohibited “take under Section 9 of the ESA. Federal land managers have consultation obligations under ESA 7 to address impacts from existing diversions, and may be liable for “take” under ESA 9 unless steps are taken to address problems caused by existing stream diversions on federal land.

Response to Concern 290.21

The Forest Service will continue to analyze and consult with The U.S. Fish and Wildlife Service and National Marine Fisheries Service under the Endangered Species Act as existing permits for water diversion expire and new permits are proposed.

Concern Statement 290.22

All TEPS fish strongholds should be MPC 3.1 or 3.2, depending on their degree of risk. The Ecogroup should identify remaining strongholds for steelhead, Chinook salmon, bull trout, and cutthroat trout and protect the strongholds from road building or timber harvesting activities. The Forest Service should add the goal: "Obliterate roads to contribute to the recovery of listed species."

Response to Concern 290.22

The majority of fish strongholds have a MPC 3.1 or 3.2 designations. However, not all strongholds have these MPC designations because of other resource priorities. Those that do not have this designation are typically ACS priority subwatersheds or have additional Management Area direction to address potential threats from that MPC management emphasis. ACS priority subwatersheds are expected to have a greater emphasis on aquatic restoration within the constraints under the assigned MPCs. While the ACS designation does not guarantee problems sites would be immediately addressed, it would allow projects to better compete for restoration funding.

Concern Statement 290.23

Regarding Boise LMP, page III-80: Statements on this page indicate that the Great Gray owl nests in high elevation forests. The fact is that Great Gray owl requires large wet meadows next to a forest, and this type of habitat does occur in the Boise River drainage. The owls are found as far south as Long and Round valleys but not in Boise River areas. This holds true for the Great Gray references on pages III-91, 100, 175, and 217.

Response to Concern 290.23

The species discussion for the Great Gray owl in the Final Plans has been improved based on public comments and additional information about the species.

Concern Statement 290.24

Endangered or threatened non-native fish or vegetative species should receive no special attention unless they are acting in a predacious role to a native fish or plant species.

Response to Concern 290.24

There are no endangered or threatened non-native fish or vegetation within the Ecogroup.

Concern Statement 290.25

The Ecogroup should add this standard to protect aquatic resources: Forest management activities that fragment TEPS species habitat will not be allowed.

Response to Concern 290.25

The suggested standard was not added to management direction in the revised Forest Plans. However, other management direction is in place to address habitat access and fragmentation. Some of these include:

TPEC standard TEST07) In TEPC fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and, if needed, include either fish screens that meet NFMS and/or FWS criteria or other means to prevent fish entrapment/entrainment.

SWRA standard SWST08) Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.

SWRA standard SWST09) In fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and, if needed, include either fish screens or other means to prevent fish entrapment/entrainment.

SWRA guideline SWGU13) In intermittent and perennial non-fish bearing waters, new surface diversions should not be authorized unless they provide passage and habitat for native and desired non-native aquatic species other than fish. Flows that are adequate to pass fish would also be sufficient to pass other aquatic species in intermittent and perennial non-fish bearing waters.

Concern Statement 290.26

The Forest Service must examine other alternatives and provide a census for wildlife as required by 16 U.S.C. 1531 (c) (2) and 16 U.S.C. 1531 (1) and (3).

[For purposes of clarification, the title for 16 U.S.C. 1531 is "Congressional findings and declaration of purposes and policy," (c) covers "Policy," and (2) states, "It is further declared to be the policy of Congress that Federal agencies shall cooperate with State and local agencies to resolve water resource issues in concert with conservation of endangered species." As for U.S.C. 1532 (Definitions), (1) states, "The term 'alternative courses of action' means all alternatives and thus is not limited to original project objectives and agency jurisdiction;" and (3) states, "The terms 'conserve,' 'conserving,' and 'conservation' mean to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary. Such methods and procedures include, but are not limited to, all activities associated with scientific

resources management such as research, census, law enforcement, habitat acquisition and maintenance, propagation, live trapping, and transplantation, and, in the extraordinary case where population pressures within a given ecosystem cannot be otherwise relieved, may include regulated taking.]

Response to Concern 290.26

We actively work with the state wildlife agencies, Tribes and other federal agencies to increase our understanding of both species abundance and habitat needs. Monitoring of habitat/species is an integral part of the revised plans.

Concern Statement 290.27

U.S. Fish and Wildlife has determined that mechanisms exist to protect and restore the population of Westslope Cutthroat trout, which was petitioned for listing as threatened under ESA but was denied listing. However, the proposed LMPs do not provide adequate protection for this species, and the LMPs do not ensure that this and other sensitive species will not further decline and require future listing under ESA. The small, isolated headwater areas where this trout remains are not covered by the protections provided to listed and proposed species. These areas are the most likely places that agencies will be conducting degrading activities such as logging, road building, grazing, and mining.

Response to Concern 290.27

The Forest Service as developed extensive management direction in the form of: (1) Forest-wide direction, (2) Management Area direction, and (3) MPC assignment that provide prescriptive emphasis and direction for each area where a particular MPC is applied across the Forest. Forest plan direction for the action alternatives provides a high level of protection, but it has been designed to allow for some temporary or short-term impacts in order to achieve long-term resource restoration or maintenance goals and objectives. Examples of this are found in SWRA Standards SWST01 and SWST04:

SWST01) Management actions shall be designed in a manner that maintains or restores water quality to fully support beneficial uses and native and desired non-native fish species and their habitat, except as allowed under SWRA Standard 4 below. Use the MATRIX located in Appendix B to assist in determining compliance with this standard.

SWST04) Management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except:

- Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions; or
- Where the Forest Service has limited authority (e.g., access roads, hydropower, etc.). In these cases, the Forest Service shall work with permittee(s) to minimize the degradation of watershed resource conditions.

Use the MATRIX located in Appendix B to assist in determining compliance with this standard.

These standards protect SWRA resources by restricting actions that would degrade properly functioning conditions, while allowing actions to occur that would benefit but not degrade SWRA resource conditions over the long term. This management strategy has been integrated throughout revised management direction at the Forest-wide, MPC, and Management Area levels and should help to protect westslope cutthroat subpopulations. Management prescriptions and other resource areas have similar direction to help avoid, minimize, or mitigate potential activity impacts to SWRA resources. A TEPC Species section has also been added to the Forest-wide direction to provide special emphasis and protection for aquatic and terrestrial species of concern across all resource areas. Where TEPC species and westslope cutthroat distributions overlap, the TEPC management direction will provide additional protections.

Concern Statement 290.28

The EIS and LMP revisions must include goals, objectives, standards, guidelines, and mitigation measures to protect and restore native and desired non-native plant species, and restore to sufficient quantity, quality, and distribution of specific habitat components or characteristics important to species survival. The actions described on DEIS page 3-197 (“...habitat should be defined for TEPS plant species by mapping locations and describing the habitat requirements necessary for the maintenance of viable populations...”) should be supported at the LMP level and not delegated to project-specific analyses.

Response to Concern 290.28

Efforts to document such information are encouraged to occur at above project level analysis, although not required. Many independent efforts to map and document habitat requirements occur each year as funding allows often in coordination with Universities or the Idaho Conservation Data Center. This management direction was incorporated to ensure that at a minimum such information will be recorded at the project level.

Concern Statement 290.29

*The *Spiranthes* listing, as shown on DEIS page 3-177, appears to be a political rather than scientific listing. The Forest Service should explain what it has done to point out the problem with the occurrence and reproductive capability of this species.*

Response to Concern 290.29

The listing of *Spiranthes diluvialis* by the U.S. Fish and Wildlife Service was based upon the best available distributional, trend, population, and viability data at the time of listing. To the best of our ability, the Forest Service has surveyed for populations of this species and has not found this species to date. The reproductive biology of this rare species has been greatly documented and does not appear to be problematic.

Concern Statement 290.30

The Forest should indicate whether the expected effects from recent Biological Opinions for species are also expected effects for the LMPs.

Response to Concern 290.30:

The effects of the 1995 and 1998 LRMP Biological Opinions were considered within the development of the FEIS and final Forest Plans. The revision team has worked closely with the U.S. Fish and Wildlife Service and National Marine Fisheries Service over the last few years to ensure the intent of the management direction in Pacfish/Infish and related Biological Opinions was incorporated in the forest plan management direction. The revision team has also worked to address short-comings of the interim plans and BOs by developing additional, or modifying existing, management direction and by developing a long-term watershed and aquatic recovery strategy. The short-comings and how they have been addressed by the revised forest plans is described in the effects analysis of the FEIS (refer to chapter III).

Concern Statement 290.31

The three LMPs contain only one standard that addresses the management of the Northern goshawk, a sensitive species in this area. The standard fails to define the size, distribution, and habitat quality of existing and potential nesting and post-fledgling areas and fails to define adverse activities. Most importantly, the standard does not provide for managing the goshawk forest-wide but only as a site-specific or project-level mitigation measure to protect individual goshawks during certain times of the year. The Forest Service should emphasize the importance of canopy density, aspect, and availability of prey instead of just focusing on tree size, as they do nest in medium and small trees, as well as large-sized trees.

The Forest Service should explain why they have chosen the goshawk as a Management Indicator Species. The bird's broad range of occupancy, extremely general prey base, and broad array of occupied habitat capability would not seem to portray any particular problem with this species.

Response to Concern 290.31

The northern goshawk is not a MIS for any of the three forests. The rationale for selection of MIS is given in each of the MIS species descriptions in the FEIS, as well as provided in Appendix F of each Forest Plan. Forest-wide management direction is given for the habitat features that would apply equally across all three Forests. Additionally, the Northern goshawk is a sensitive species and must be evaluated during any proposed management activities that occur within its habitat.

Concern Statement 290.32

The DEIS does not contain enough information about the lynx, wolverine, and fisher, and there are no habitat mappings or sighting records. The DEIS contains very little information about wolverine presence, population trends, surveys, and sightings. The Forest Service must also analyze other effects to species because the responsibility to protect viability is not limited to habitat. This information is needed so Forest Service decision makers can ensure adequate protection and restoration of habitat for these species. Management must focus on identifying and protecting key wolverine denning habitats, whether it is or is not known if they are currently used. The Forest Service should explain how source habitat could increase by 35 percent for wolverines and fishers, as these species prefer unroaded, undisturbed mature forests or alpine cirques. Reference is located in the DEIS as Wisdom et al. 2000.

Response to Concern 290.32

Additional information was added for each species in the FEIS as compared to the DEIS. The Wisdom et al. (2000) documents reference throughout the Wildlife section of the FEIS explain how habitat increased based on their analysis. We used it as a reference because we were within the area they analyzed (Columbia River Basin).

Concern Statement 290.33

The DEIS fails to analyze the impacts of the proposed LMPs on grizzly bears. Although the grizzly bear will be reintroduced in Ecogroup forests as a non-essential, experimental population, the Ecogroup LMPs must aid the recovery of this species. Grizzly bears in the ecosystem will have direct and indirect impacts on many of the issues highlighted in the DEIS. The November 14, 2000, decision to reintroduce the bears must be incorporated in the analysis of the LMPs.

Response to Concern 290.33

The FEIS was updated and contains current information about the grizzly bear and proposed management.

Concern Statement 290.34

The DEIS should describe the Gray wolf's historical and current geographic range and numbers in Idaho and explain the reasons for their decline. The DEIS should describe how and to what degree each of the proposed alternatives would support their recovery and what the Forest Service has set as the population threshold for recovery.

The LMPs do not address unresolved conflicts between Gray wolf recovery and livestock interests. Conflicts that should be discussed include continued issuance of grazing allotments; depletion of forage for native ungulate populations, which are the natural prey of the wolf; and Idaho's issuance of hunting licenses and its effect on the wolf's prey base. The Forest Service must protect gray wolves by minimizing conflicts with cattle and sheep; sheep should not be allowed to graze in canyons where wolves are known to occur.

The Forest Service should indicate why activities that disrupt wolves during denning would be allowed once six breeding pairs are obtained. This standard (described in the LMPs) should continue beyond meeting the recovery targets.

The Forest Service should provide a definition of the acceptable area for wolf occupancy so that impacts of forest activities can be known ahead of time. For example, timber harvest should not be affected by preemptory wolf or prey standards that would influence the timber management treatments. There should be no restriction of forest activities to favor the wolf.

Regarding wolf habitat (Payette National Forest LMP, page 111-13): the Forest Service should explain if "wolf habitat" means where wolves live or where there are conditions present for them to live. For years Patrick Butte and French Creek have contained wolf habitat, but this is not mentioned in the description areas. Central Idaho is one of the few places where wolves have enough wild country to survive and rear young.

Response to Concern 290.34

The FEIS was updated and contains additional information about the Gray wolf from a historic perspective.

The revision team actively worked with the USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of wolf. The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service Biological Opinion (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.35

The DEIS fails to provide any information about lynx, such as how much available habitat exists, what type of surveys have been completed, and if any habitat modeling has occurred. This type of information is necessary to analyze the impacts of the proposed LMPs. The Forest Service should also reference the analysis or documentation contained

in the DEIS where it was determined that Alternative 3 would have the best mix of management prescriptions to maintain lynx denning habitat over the long term. The analysis must specify potential lynx habitat and how it would be impacted by each of the alternatives, rather than simplifying the analysis by applying MPCs.

Habitat mapping, as described in the Lynx Conservation Strategy and Assessment, must be an objective and standard in the LMPs, and the Forest Service should explain if the LMPs are consistent with the ESA 7(a)(1) conservation recovery program for lynx.

Timber density management should be a consideration where lynx habitat is desired and thinning should be a major consideration. Maintaining late-successional stands with large woody debris on the forest floor is essential for lynx denning habitat.

The DEIS states that Forest plan direction has been added to manage for and protect lynx and snowshoe hare habitat, but locating information on that plan direction in the document is impossible.

The Forest Service must develop a standard that protects lynx habitat from recreational uses, such as dispersed camping and motorized access, and protects winter denning and foraging sites from motorized winter recreation.

Response to Concern 290.35

The FEIS was updated and contains additional information about the lynx and specific management direction is given in the Forest Plans.

The revision team actively worked with the USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of ESA listed species, including lynx. The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service Biological Opinion (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.36

The Forest Service should reference the analysis or documentation to support the statement that "Alternative 3 would have the best mix of management prescriptions to restore Northern Idaho ground squirrel habitat over the short-term and long-term . . ."

The decision to apply MPC 3.2 to Idaho ground squirrel areas does not fit with what is currently being proposed and carried out to enhance its habitat. Those areas should be managed with MPC 5.1. Harvesting or timber treatments could benefit the squirrel and the connectivity of the fragmented habitat areas.

Response to Concern 290.36

The FEIS was updated and contains additional information about the Northern Idaho ground squirrel. Management direction is given in the management areas where squirrel habitat occurs. The squirrel does benefit from thinning and the use of fire. This type of management will continue to improve conditions for the squirrel and is currently being used. We have been working with the USDI Fish and Wildlife Service to assure that the proposed direction will provide for the conservation and recovery of Northern Idaho ground squirrel.

The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service Biological Opinion (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.37

The standards and guidelines for bald eagles contain no information on how the plans will maintain this species' viability. The LMPs should identify the kinds of prohibited activities; the size, distribution, and habitat quality of existing and potential nest sites; the definition of "adversely affected;" and critical information about how bald eagle habitat will be managed forest-wide.

Forest Service management practices do not apply to bald eagles that nest in single trees or within a very small clump of trees along Hells Canyon reservoirs.

The Forest service should described the actions it will take to protect wintering and nesting bald eagles.

Response to Concern 290.37

Management direction has been improved for the bald eagle in the revised plans.

The revision team actively worked with the USDI Fish and Wildlife Service to ensure adequate direction was integrated into the revised Plans that will provide for the conservation and recovery of ESA listed species, including bald eagle. The Biological Assessment completed in support of forest plan revision, and the related USDI Fish and Wildlife Service Biological Opinion (refer to the project record), provide details as to the intensive consultation effort undertaken as part of development of the revised forest plans.

Concern Statement 290.38

The Forest Service should consider that closing off activities near Peregrine falcon nesting sites near Hells Canyon Dam could possibly prohibit line patrols of the transmission lines. This is in response to the DEIS statement that activities within occupied Peregrine nesting zones that adversely affect use and productivity of nest sites would be prohibited.

Response to Concern 290.38

The Peregrine falcon is a sensitive species, and management direction is needed to protect this species during critical life stages such as nesting. Management activities during critical life stages may have to be modified depending on the citation where the birds are active. However, how, or if, a project will be modified will depend on findings during subsequent project level analyses and decisions that implement forest plan direction.

300 Ecosystem Management (EM)

Concern Statement 300.01

The Forest Service should emphasize the following values when determining management direction in the LMPs: clean water, free-flowing streams, quiet hiking trails, wilderness protection, and healthy wildlife habitat. The Forest Service must follow its policy and NFMA to protect habitat from fragmentation and to sustain food and fiber production on range and forested lands.

Response to Concern 300.01

A number of issues, concerns and opportunities were considered during the revision process and analysis of effects. The above items were dealt with in a variety of ways through development of 7 alternatives. The Forest Service has followed policies and laws during the effort. The Regional Forester will utilize all of the information during the decision making process.

Concern Statement 300.02

The LMPs contain a goal that provides for “consistent direction at the forest level that will assist managers in making project decisions at a local level in the context of broader ecological considerations.” This goal can be only partially met, because all alternatives rely heavily on forest zoning, which means that almost all local decision making would be eliminated. The loss of local, project-based decision making could ultimately produce a decline in overall ecosystem health. The ecosystem management framework is not as good as a forest-by-forest approach.

Response to Concern 300.02

Because the Forest Plans are written in somewhat of a zoning approach, there are numerous methods that can be considered at the Ranger District level to implement the Forest Plan direction. It is these options that still allow for decisions and implementation to occur at the project level. The Forest Plans do not prescribe how implementation will occur, just the general parameters in which projects should strive for to move towards desired conditions. Your comment regarding forest-by-forest approach has been noted.

Concern Statement 300.03

Trees and the products they produce are one of our most valuable resources, and good management should lead to good growth and yield. It makes good sense to provide healthy vigorous stands of trees and use all other natural resources wisely. Public lands must be managed in such a way as to provide higher present net worth, which is important to present and future generations.

Response to Concern 300.03

The Forest Plans are written in such a way to lead towards healthy forests and provide for sustainable levels of products; taking into consideration multiple generations. Economics is one of the criteria in which the Regional Forester uses in development of the Records of Decision.

Concern Statement 300.04

The Forest LMPs must focus on true ecosystem management and consider a mix of uses in order to meet ecological, social, and economic objectives. The LMPS rely almost solely on ecological objectives while paying little attention to social and economic concerns. NEPA requires that all components of the environment be considered when decisions are being made and states "...create and maintain conditions under which man and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of Americans." Protecting resource values while sustaining and increasing recreation opportunities will help contribute to diversification of local economies. The Forest Service should not abandon its principle of Multiple-Use Sustained-Yield in pursuit of extensive wilderness areas. An aggressive, adaptive management option should be developed that allows for the maximum benefit from the forests.

Response to Concern 300.04

Development of the FEIS and the Final Forest Plans included numerous issues, concerns and opportunities. Ecosystem management concepts were incorporated throughout the effort as were economics, social concerns and multiple-use and sustained yield. The FEIS documents effects to resources from implementation of seven action alternatives. The Regional Forester will consider all of this information during the decisionmaking process.

Concern Statement 300.05

Closing roads locks up the forests from business and public use; this creates an unhealthy forest that is enjoyed by few, and a situation that will lead to the death of communities that depend on healthy forests. Each of the Forest LMPs contains a section entitled "Changes Under the Preferred Alternative" which, in part, states: "The intent of the [Ecosystem Management] framework is to integrate ecosystem elements with human needs to strengthen the essential link between economic prosperity, social continuity, and ecosystem processes and functions. The Forest Service should explain how it accounts for human needs when there are reductions in forest access and resource extraction activities (logging). Locking up areas by closing more roads isn't fair to the people who enjoy these lands and the restrictive standards that impinge on timber management should be reduced.

Response to Concern 300.05

Through development of a variety of alternatives that respond to various issues, concerns and opportunities, many of the items mentioned above are analyzed for their effects on the environment, social and economic interests. This planning document does not determine transportation closures. Travel management planning will begin once the Records of Decision are signed. The deciding officer decided to pull that effort out of the revision process due to its importance and interest to users of the National Forest.

Concern Statement 300.06

The Forest Service should discuss the funding process used to pay for ecosystem restoration and how it must rely on timber receipts as a source of funds for restoration. Funding can also come from Congressional appropriations but cannot be relied upon with certainty. The public is often confused as to why a project that is intended to restore the ecosystem involves timber harvesting.

Response to Concern 300.06

Funding processes and amounts of funding are dealt with at the congressional level. These budgetary items are beyond the scope of Forest Plan revision.

Concern Statement 300.07

The Forest Service should identify and significantly reduce road densities where they impact Riparian Conservation Areas. This will help improve conditions for fish and wildlife, especially where there is great potential and/or existing high priority species present.

The Forest Service must develop standards that support its general objectives and guidelines to keep road building to a minimum and maintain, decommission, or obliterate other roads as necessary. An analysis should be performed that evaluates this strategy and its affects on aquatic and other resources.

Response to Concern 300.07

Roads densities and how the Forest Service might deal with them will be part of an effort that will follow Forest Plan revision through a separate environmental process that will involve input from all interested parties. The Aquatic Conservation Strategy did assign priorities to watersheds for consideration of restoration. Standards and further information can be found in the Soil, Water, Riparian and Aquatic sections of the FEIS and revised Plans.

Concern Statement 300.08

Management prescriptions should let natural processes maintain and conserve aquatic and terrestrial ecosystems near or towards desired conditions within the historic range of variability. These prescriptions should occur in areas that are designated high-priority or strongholds for fish and wildlife populations, or habitats that are close to properly functioning.

Response to Concern 300.08

A variety of methods for moving the ecosystem towards desired conditions were analyzed in the FEIS. The Regional Forester will consider this information during the decision making process. Utilizing natural processes was one of the methods assessed.

Concern Statement 300.09

The Forest LMPs should mandate and prescribe provisions for protecting biological corridors and ensuring habitat connectivity. One mandate should be to control road densities.

A court ruling, Marble Mountain Audubon v. Rice, interprets NEPA to require the Forest Service to consider these corridors. For example is the Smokey Mountain area. It is a stronghold for mountain goats and wolverine and provides an important area of connectivity with all the adjoining areas, of which there are many. The Forest Service should ensure that linkages exist between the Smokey Mountains of the Fairfield and Ketchum Ranger Districts, the Sawtooth Wilderness of the SNRA to the north, and the Boise National Forest to the south.

Other linkages that should exist or be maintained include the Pioneer Mountain to the Challis National Forest and Challis BLM land along the Copper basins on the north side of the Trail Creek summit; the Sawtooth Wilderness Area with the Challis portion of the Salmon-Challis Forest to the north; and the Boulder-White Clouds on the SNRA and the Challis BLM lands to the north and the Smokey Mountains and Pioneer Mountains to the south.

Response to Concern 300.09

Consideration of fragmentation of terrestrial and aquatic habitats was part of the revision process. Refer to aquatic and wildlife section in the FEIS and revised Forest Plans.

Concern Statement 300.10

There is a lack of recommended Research Natural Areas. Suitable potential RNAs exist on the forests and encompass communities dominated by Douglas fir, aspen, Utah juniper, mountain big sagebrush, mountain mahogany, and many more types. Suitable RNAs exist on 1,000- to 10,000-acre inventoried roadless areas, especially those ungrazed by livestock and with large topographic relief, or those covering entire watersheds.

Response to Concern 300.10

Your comment is noted. However, the level of consideration for RNAs was deemed appropriate by the responsible official.

Concern Statement 300.11

There are more jobs created from Idaho's ability to attract tourists to its natural environment than jobs created by extractive activities.

Response to Concern 300.11

Jobs related to the management of the National Forests is described and documented in the Social and Economic section of the FEIS and in the project record.

340 Funding and Budget Constraints

Concern Statement 340.01

The achievement of future forest conditions will not be achieved without full funding.

Response to Concern 340.01

We modeled attainment of desired condition for vegetation using two different methods. The first method ran the model unconstrained by budget to set the benchmark for timber harvest levels. This run is required by the National Forest Management Act and illustrates what harvest levels could possibly be reached if there were no limitations on the amount of funding appropriated by the U.S. Congress. The second method ran the model utilizing a realistic budget level, as a constraint to the models efforts to try and achieve desired vegetative conditions. In this case, desired conditions are achievable over a long period of time, 150 years. Refer to the vegetative diversity section of the FEIS for further discussion on this topic. This concern was also addressed by a sensitivity run that limited the budget to 90 percent of the current budget. The length of time to achieve DFC was affected. It took longer and therefore, fire hazard and insect hazard were reduced at a slower rate. If budget levels drop in the future, it will take longer to achieve desired future condition. Attainment of desired condition is also dependent on many factors other than appropriated budget levels.

Concern Statement 340.02

Appendix B of the EIS (page B-25) should contain a reference to the supporting analysis or documentation that demonstrates how “budgetary requirements to implement an alternative” were determined.

Response to Concern 340.02

In the constraint section of Appendix B there is a section that discussed how budgetary requirements were determined. “These values were derived from the Budget Formation and Execution System (BFES), which the Forest Service currently uses to determine outyear budgets. Values were increased or decreased based on activity types and the intent and theme of the alternatives”.

380 Soils

Concern Statement 380.01

The Forest LMPs claim to protect soil resources by classifying sub-watersheds into one of three category groups and providing different objectives for these groups and the Riparian Conservation Areas within them. The strategy appears to arbitrarily spread

impacts around. The Ecogroup does not indicate how the soil strategies will aid in the de-listing of 303(d)-listed streams or what the cumulative effects on soil, water, riparian, and aquatic resources will be from the allowed impacts.

Response to Concern 380.01

The FEIS and Forest Plans do not classify subwatersheds into three categories as included in the DEIS. Forest-wide management direction has been developed to restore currently degraded soil conditions and maintain soil conditions where they are currently “functioning appropriately”. Forest-wide management direction addresses loss of long-term soil productivity associated with soil erosion, compaction, puddling, severely burned soil, loss of coarse woody debris, and landslides. This forest-wide management direction was developed with a logical track between caring for long-term soil conditions and the role it plays in overall watershed health. Refer to the SWRA and Vegetation Diversity Resources Forest-wide Management Direction located in Chapter 3 of the Forest Plans for a comprehensive display for forest-wide management direction for the soil resources.

Concern Statement 380.02

The Forest Service should develop helpful guidelines rather than total soil resource commitment standards. The concept of total resource commitment is one-dimensional and indicates that without a soil scientist a forest manager would not be capable of effective management. There is an expectation that some form of restoration is needed when treatments occur under less than ideal circumstances. In many areas it appears that the TRSCs that are proposed would actually hamper treatment programs. The Forest Service should explain why new standards are proposed when there was little indication from plan monitoring and evaluation that existing standards created problems or were even followed.

Response to Concern 380.02

Refer to the previous Response to Concern 380.01 that addresses Forest-wide management direction for the soil resources. Total soil resource commitment (TSRC) is not considered one-dimensional but is useful in determining cumulative effects over a spatial area, identified as an activity area. The TSRC standards are not new for the Payette and Boise National Forest, as they are in the current Forest plans. They are new for the Sawtooth National Forest. Management activities on the Boise and Payette have not been hampered with the TSRC standard but have served as useful management direction to assist in project development.

Concern Statement 380.03

The original Payette National Forest Plan had a very specific, quantifiable requirement regarding soil productivity that stated, “A minimum of 80 percent of an activity area will remain in a non-detrimentally disturbed condition.” This requirement was discarded and the current draft LMP contains a vague requirement (page III-10) to “not allow projects in areas that exceed the non-detrimentally disturbed and/or TSRC objectives unless they

improve soil productivity conditions.” However, the LMP does not list any non-detrimentally disturbed objectives. The Forest Service must determine the current values of detrimental disturbance, meet its current soil requirements, and re-assess if its detrimental disturbance standards over entire watersheds can actually be met.

Response to Concern 380.03

Forest-wide Management Direction and definitions of terms regarding detrimentally disturbed soil conditions has been improved and revised as part of the final Forest Plans. The Forest Service Soil Management Handbook FSH 2509.18 has been recently revised to include revised definitions associated with detrimentally disturbed soil conditions, monitoring methods and identification that 85 percent of an activity area must remain in a non-detrimentally disturbed condition. Refer to the Forest-wide Management Direction and in the Glossary for definitions associated with detrimentally disturbed soil conditions found in the Forest Plans as well as the revised FSH 2509.18 for more detailed discussions.

Concern Statement 380.04

The Forest Service should develop a standard that states, “There should be no logging roads, grazing, or other management in areas with highly sensitive or erosive soils, steep slopes, and/or are prone to landslides.” Domestic Sheep should not be allowed to trail on steep, fragile slopes.

Response to Concern 380.04

Forest-wide Management Direction addresses all of these concerns in a comprehensive package involving all resources. The cornerstone forest-wide management direction is provided under SWRA Standard SWST04 that states, “that management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except: Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions.” This standard serves as a fine-filter to reduce threats associated with proposed management activities evaluated at the project level. Determinations of specific management activities constraints is appropriate at the project level not at the programmatic-scale. Refer to the Forest-wide Management Direction located in Chapter 3 of the Forest Plans for a complete look at the comprehensive package for managing all resources.

400 Aquatic, Riparian, and Watershed Management

Concern Statement 400.01

Watershed boundaries cross various jurisdictional lines. Proper watershed management must include involvement of all the agencies that manage lands in a watershed. All agencies should support the same goals and methods and focus on sharing information to achieve the same desired conditions.

The LMPs do not mention the Memorandum of Understanding between the Idaho Department of Water Resources and the Forest Service that formalized a cooperative relationship for planning in the National Forests and Comprehensive State Water Planning, which is designed to help facilitate a watershed approach on Forest Service lands. All land and population management entities must openly consider each other's activities and planning if true watershed management is to become a reality.

Response to Concern 400.01

We agree that watershed management crosses various jurisdictional lines and must involve all interested parties. In Chapter Three of the revised Forest Plans, there are several Forest-wide goals and objectives in the SWRA, TEPC and several other resource areas that identify and promote this involvement. Specific mention of the MOU is not identified as this is included in the overall rules and regulations (Laws, statutes, etc.) that are not repeated in the Forest-wide direction to avoid redundancy).

The Idaho Nonpoint Source Memorandum of Understanding documents the state and federal agencies responsibilities under the Idaho NPS Water Quality Program. Under the MOU the Idaho Department of Health and Welfare, Division of Water Quality (currently the Idaho Department of Water Quality) agreed: "To conduct water quality management planning and implementation efforts by the state with other state and federal agencies and keep them updated on any changes to state standards, regulations, and guidelines. Though not a specific reference in the MOU, the Forest Service has actively engaged the Idaho Department of Water Quality, as well as many other state and federal agencies, throughout the LMP revision process in an effort to foster the best possible coordinated planning. The Idaho Department of Water Quality has had an active role in shaping many of the goals, objectives, standards, guidelines, and management direction for this Forest Plan

Concern Statement 400.02

The Forest Service should adequately examine the issue of logging increasing stream flow, as indicated in 16 U.S.C. 1601 (Renewable Resource Assessment) and 16 U.S.C. 1602 (Renewable Resource Program).

Response to Concern 400.02

Annual water yield is calculated for the SWIE Forests as identified in the SWRA Resource section, Chapter 3 of the FEIS and the SWRA Technical Report (refer to the project record). There has been a long history of research involved with forest harvest and water yield increases. Stednick 1996, in his review of research on timber harvest and water yield concluded that variable responses of annual water yield to harvesting suggest both complex and perhaps non-linear responses. He concludes that long-term catchment studies are needed to evaluate these responses. USDA 2000 identify that general water-yield increases through forest management are likely to fall in undetectable ranges. The data suggest that relying on water augmentation from national forests will not be a viable strategy for dealing with water shortages. The examination of water-yield increasing streamflow is not appropriate for a Forest Plan Revision but that of research institutions.

Concern Statement 400.03

1. *The DEIS compares the impacts of each alternative using subjective, vague determinations of how well it believes Forest Service general directions and special area management prescriptions work. The EIS should expand its explanation of how potential effects to the soil, water, riparian, and aquatic (SWRA) resources vary by alternative. Also, it appears that only the restoration management objectives of each alternative were evaluated and assessed rather than the conservation measures; this seems to skew the results toward the alternative presenting the most desirable restoration effects, which is the Preferred Alternative. The Forest Service should explain its determination that “all alternatives should provide some amount of watershed restoration, but some provide more than others...” (DEIS page 3-59, and Tables SWRA 7 and 8). The EIS must explain what will be happening under each alternative that results in lesser or greater restoration of water quality.*

2. *The assumption is that the alternative that best provides priority restoration or conservation strategies that are short-term risk averse within each sub-watershed should best lead toward the desired conditions for most SWRA concerns. The Forest Service should reexamine its assumption that there are few sub-watersheds with critical habitat components that occur within highly vulnerable sub-watersheds with high or extreme risk from uncharacteristic fire; there are many sub-watersheds with critical habitat components that occur in watersheds in the Moderate fire hazards class and, without restoration, will soon move to the High or Extreme hazard class, as shown by the FORPLAN modeling in the DEIS.*

3. *Regarding unit factors, it is not clear what these values are or how they were determined, and their significance should be explained.*

Response to Concern 400.03

1. The FEIS has a more detailed discussion and evaluation by alternative as to the effects on soil, water, riparian, and aquatic resources. The restoration effects analysis associated with Issues 3 and 4 evaluate the effectiveness of restoration (active and passive) as well as conservation strategies.

The FEIS describes that all alternatives allow for restoration based on the Forest-wide management direction and the legal obligation to adhere to several legal statutes (e.g., the Clean Water Act and Endangered Species Act). The alternatives have various MPCs applied spatially that afford different rates of recovery as discussed in the SWRA section of Chapter 3 of the FEIS. In addition, every management area has specifically identified direction for watershed and aquatic restoration.

2. There are high priority subwatersheds with currently moderate fire hazards that, overtime, will move towards the high and/or extreme fire hazard class. Based on limited budgets and personnel, it is only feasible to restore a certain number of subwatersheds. This is why those subwatersheds with critical habitat and a high and/or extreme hazard rating were prioritized and evaluated as part of the FEIS.

3. Unit factors are not used in the FEIS to assist in displaying differences between alternatives. Instead, the percentage of subwatersheds within their respective subbasins receiving restoration emphasis is used. Refer to the SWRA Resources Chapter 3 of the FEIS for more detailed discussions.

Concern Statement 400.04

Severe timber harvest restrictions in the Riparian Habitat Conservation Areas (RHCA) will eventually cause more damage by increasing fuels that will eventually burn hotter, possibly leaving the riparian areas barren and susceptible to massive soil erosion.

Response to Concern 400.04

Forest-wide and Management area direction does not preclude timber harvest within riparian conservation areas. However, this direction requires analysis and evaluations of proposed vegetation management activities to maintain appropriate riparian functions and ecological processes. Consideration of increasing fuels and potential wildfire effects within riparian conservation areas should be considered when evaluating subsequent proposed vegetation management activities that will implement the revised forest plans.

Concern Statement 400.05

1. A full spectrum of alternatives are described in the DEIS ranging from low to high outputs. Even the low output alternatives allow further degradation of watersheds and delays in salmon recovery by continuing to permit recreation, timber harvesting, road construction, and livestock grazing. These activities, under current forest plans, have led to more water quality violations, increased need for ESA listings, and are in direct conflict with federal and state regulatory laws and policies. The DEIS ignores scientific information detailing the harmful effects of grazing and other activities on aquatic habitats. Grazing is inconsistent with the goal of preserving and restoring aquatic habitats and should not be allowed within sensitive riparian areas.

2. The Final EIS should indicate how many streams are in properly functioning conditions (PFC), how many are at risk, and how many are not functioning. This information would be more useful in assessing livestock grazing management decision than the "high-risk, low-risk" watershed descriptions. Streams that are in non-functioning condition should be declared unsuitable for grazing because of the loss of fish and wildlife habitat and impacts on water quality.

3. PFC analyses are not an adequate substitute for conducting a thorough analysis of the impacts of management activities, and there is no compelling evidence that PFC is an adequate diagnostic of fish and water quality conditions. PFC ignores important spatial issues and cumulative effects, is ineffectively linked to many aquatic resource conditions,

and provides an inaccurate or skewed perception of actual aquatic conditions. Actual monitoring of stream conditions (such as substrate sediment, water temperature, bank stability) provides much more accurate information on how grazing is affecting aquatic resources, as well as the condition of and trend in those resources. The PFC approach is also not adequate for setting goals for riparian areas and may actually hinder recovery of degraded areas by allowing grazing in damaged areas that are assessed to be PFC.

4. The restoration of degraded aquatic, riparian, and hydrologic conditions to Properly Functioning Conditions (PFC), as stated in one of the objectives in the Sawtooth LMP (page III-5), is not acceptable. PFC is not the final condition a watershed should attain; it is merely trending towards improved condition from non-functioning or functioning at risk. High-quality watersheds must be in better condition than PFC and must provide high-quality habitat immediately not within ten years.

5. The Forest Service should reexamine its statements made in the Sawtooth LMP regarding Management Area 16, Howell Creek; this watershed has been faced with degradation caused by overemphasis on recreation and discontinuance of livestock grazing.

Response to Concern 400.05

1. The array of alternatives in the FEIS represent a range in potential risks associated with various levels of forest vegetation management, range management, and recreation management activities (refer to the SWRA Effects section in Chapter 3 of the FEIS). The comprehensive forest-wide management direction does not allow for unacceptable negative or adverse effects to SWRA resources or TEPC species and their habitats. The array of alternatives also represents a range in the amount of restoration of SWRA resources and TEPC species and their habitats. While some of the alternatives have less potential risks and restoration as compared to other alternatives, none of the alternatives allow for additional unacceptable degradation associated with implementation of new management activities. All alternatives provide for some level of restoration but in certain alternatives and certain subbasins, the amount of restoration may not be aggressive enough allowing for some estimated loss of fish recovery in certain subwatersheds (refer to Chapter 3 SWRA Resources in the FEIS).

Certain levels of livestock grazing and associated grazing management systems/practices are compatible with SWRA resources. The potential effects of livestock grazing have been discussed and analyzed in the SWRA Resource section Chapter 3 of the FEIS. However, actual grazing practices and the potential effects on SWRA resources needs to be identified at a more site-specific level and adjusted, as needed, through AMPs and AOIs, not as part of Forest Planning.

2. The FEIS as compared to the DEIS has an improved analysis and discussion which now includes use of the terms describing “properly functioning condition”. These descriptions were completed for all the subwatersheds and then aggregated up to the subbasin scale. Description at the stream-scale is too fine-scale for Forest programmatic characterizations and not necessary to address effects associated with management direction as disclosed in this analysis. Adjustments in livestock grazing (practices and/or numbers) needs to be determined at the project scale based on site-specific information about the biophysical conditions and the specific grazing management activities. For more information refer to the SWRA Resource section Chapter 3 of the FEIS and the SWRA Technical Report.

3. In considering the adequacy of PFC analyses as a substitute for a “thorough analysis of the management impacts of management activities” the scale of the project needs to be considered as well as the planning decisions being made. The various SWRA analyses used are appropriate for this mid-scale (7-8 million acres) project and the associated programmatic decisions to be made. Site-specific project level analysis requires more fine-scale analysis which may include analyses of fine-scale data such as substrate sediment, stream temperature, bank stability etc., as identified in Chapter Three and Appendix B of the Forest Plans.

4. In Chapter Three of the Sawtooth Forest Plan the Desired Condition for the SWRA Resources uses the term properly functioning condition. In the Forest Plan’s glossary, the definition of “properly functioning condition” means that the resource condition is within the range of desired conditions. The desired condition identified in the Forest Plan is to have “Wetlands and floodplains are maintained where they are properly functioning, and restored where degraded”. Based on the mid-scale (7-8 million acres) size and the variety of current conditions and time required for recovery of these conditions, it is impracticable to have all the wetland and riparian areas at properly functioning condition. The Forest can maintain existing properly functioning conditions in the short-term planning period, but to restore the desired condition of degraded areas may take much longer due to the extended time needed for recovery of these degraded systems.

5. The characterization for the Howell Creek Management Area SNF 16 has been updated for the revised Forest Plan. Recreation and the effects of livestock grazing are both identified as a cause of the degraded condition. Adjustment in management activities that may be contributing to these degraded conditions have been identified. Specific management area objectives have been identified to improve these degraded conditions such as:

Objective 1612 - Restore soil productivity by reducing soil compaction related to dispersed recreation activity in the Howell Creek drainage.

Objective 1644 – Whenever possible, modify developed springs and other water sources to restore natural free-flowing water and wet meadows in sage grouse habitat.

Concern Statement 400.06

1. There is confusion over watershed definitions used in the DEIS and use of those terms in the LMPs. These terms (low risk and moderate risk) refer to water quality and condition of riparian zones and aquatic habitat, and it is difficult to discern how these terms link the different land uses and their potential impacts upon streams. The relationship of the sub-watershed's condition to water quality and the rating of properly functioning condition, does not appear to be linked to the protection of beneficial uses and/or other water quality standards. Use of these terms is also confusing when used to describe watersheds containing 303(d)-listed water bodies. The Final EIS should describe the criteria for its risk ratings for water quality and define the basis for the threshold of concern.

2. *The Preferred Alternative applies a high-risk approach to the majority of the Management Areas, when current conditions described in the DEIS indicate that the aquatic and riparian habitat integrity of a large percentage of the planning area is not properly functioning, and that the higher quality habitats should be treated with low-risk management strategies.*

3. *The Preferred Alternative has entire watersheds that are already roaded and have traditionally been used for timber production assigned to MPCs 3.1 and 3.2 (examples are Cascade Lake watershed, 78 percent to MPC 3.2 and Warm Lake watershed, 84 percent to 3.1 or 3.2). These areas are capable of continuing to provide for multiple-use but are now being treated as unsuitable. The Forest Service should only apply 3.1 or 3.2 to specific stream protection zones in watersheds and apply 5.1 and 5.2 to the balance of the watersheds, which allows for better treatment of these areas. An adverse action in a drainage, no matter the size of the action, does not necessarily mean it will affect the entire drainage. The MPC assignments in Alternative 5 should be used as a guide. Alternative 5 has the most active riparian management, and modeling shows that aquatic species of concern respond just as favorably to this type of management but without the long-term risks associated with MPCs 3.1 and 3.2.*

Response to Concern 400.06

1. The FEIS and Forest Plans have improved the use of the terms and definitions identifying the current conditions of the subwatersheds. A detailed discussion on the criteria used to describe the current subwatershed condition is identified in the SWRA Resource section of Chapter 3 of the FEIS and the SWRA Technical Report (refer to the project record).

2. The “Preferred Alternative” in the FEIS also applies a variety of management prescription categories (MPCs) and the effects of these are described in Chapter 3 of the FEIS. The spatial location of the MPCs considered the current soil, water, riparian, and aquatic conditions of the subwatersheds and their respective subbasins. In addition, specific management area restoration objectives and in some specific management areas, standards and guidelines were developed to better address the objectives of both SWRA and other resources. Refer to the individual Management Areas described in the Forest Plans.

3. MPC 3.2 and to a lesser degree MPC 3.1 has been applied to previously roaded areas. MPC 3.2 while not identified as having any suited timber base does emphasize the use of mechanical thinning and fire use to manage forest vegetation to assist in attaining the desired conditions for the soil, water, riparian, aquatic and terrestrial resources. MPC 3.1 is applied to areas that are generally close to or within desired conditions with a high emphasis to maintain the soil, water, riparian, aquatic and terrestrial resources for this planning period.

Applying specific MPCs to stream management zones and other MPCs to the uplands was considered. It was decided that this fabric of MPCs would set up continual conflict between MPCs and thus it was determined to apply MPCs over streams and have specific Forest-wide management direction for all streams (riparian conservation areas) regardless of the MPCs applied.

Concern Statement 400.07

The Ecogroup should explain how incorporating the Monitoring and Evaluation Strategy would result in improved monitoring of watershed and aquatic systems and indicate if the proposed LMPs incorporate the sediment and water quality model monitoring that were contained in the original Forest Plans. Also, the Forest Service did not mention how it would gather water quality information. Management direction must change in order to increase the rate of improvement to riparian conditions. More site-specific requirements must be incorporated, as there is currently only one monitoring criteria for Riparian conditions. The following goal should be added to the LMPs: Develop and implement a schedule for water quality monitoring.

Response to Concern 400.07

The Monitoring and Evaluation Direction identified in Chapter IV of the final Forest Plans has been greatly improved as compared to the DEIS. Appropriate selection of indicators, and monitoring and evaluation of key results helps us determine if we are meeting the desired conditions identified in the Plan. Evaluation and monitoring also help us determine if we should change goals and objectives, or monitoring methods.

Adaptive management is the foundation for planning and management. Forest planning regulation requires that plans be revised every 10-15 years after plan approval (36 CFR 219.10(g)). One of the lessons learned from experience implementing current Forest Plans is that plans need to be dynamic to account for changed resource conditions such as large scale wildfire or listing of additional species under the Endangered Species Act, new information and science such as taking a systems approach, and changed regulation and policies such as the 2001 Road Management Final Rule and Administrative Policy, 2001 Roadless Area Conservation Rule, the National Fire Plan and President's Healthy Forest Initiative.

Monitoring in the original Forest Plans was updated to include the coordinated Interagency Integrated Team (IIT) monitoring. Table IV-2 in Chapter IV of the Forest Plans contains monitoring elements organized around monitoring questions. The table addresses requirements from 36 CFR 219.12(k)[4], and includes a description of:

- [i] The actions, effects, or resources to be measured, and the frequency of measurements;
- [ii] Expected precision and reliability of the monitoring process; and
- [iii] The time when evaluation will be reported.

Since data precision and reliability are tied to specific procedures and methods that change as we learn, we expect to update the Forest Monitoring Section to address such changes through the Continuous Assessment and Planning process described in Chapter IV of the Forest Plans.

Concern Statement 400.08

The Final EIS and Payette and Boise National Forest LMPs should provide a summary of the effectiveness of the restoration program in the South Fork Salmon River watershed and describe if goals and objectives are being met. Additional restoration efforts should be identified, along with goals, objectives, and timelines for implementation. The Payette LMP water section should also mention the South Fork Salmon River TMDL.

Response to Concern 400.08

The FEIS and Biological Assessment (refer to the project record) identified the current condition, which in part was based on previous restoration. Specific water quality and fisheries habitat monitoring results are documented in individual Forest reports.

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup, including the South Fork Salmon River. For more information on this strategy refer to Chapter III of the Biological Assessment (refer to the project record) or the FEIS (Appendix B).

The final Forest Plans and the associated Management Areas have been updated to reflect the presence of the South Fork Salmon River TMDL.

Concern Statement 400.09

The LMPs for each forest should disclose if “Landslide-Prone Areas” and “Riparian Conservation Areas” (as defined in Appendix B of the DEIS) occur within each of the respective forest boundaries and, if they do exist, describe those locations and how they will be managed. Also, on page B-11 of Appendix B, the Forest Service should reference the analysis or documentation that were used in order to produce the results displayed in the tables.

Response to Concern 400.09

Landslide prone areas and RCAs occur to varying degrees across all three Forests. In Appendix B of the Forest Plans, implementation guides have been prepared for use in both the identification and management of RCAs and Landslide prone areas. Describing their locations is not appropriate at the forest planning scale due to the extensive area of coverage (7.5 million acres). Forest Plans do not make decisions that result in irreversible or irretrievable commitments of resources, they make decisions that provide the framework in which future project implementation decisions are to be made to further achievement of planning goals. Appendix B of the FEIS; Appendix B of the Forest Plans; and SWRA Technical Report (refer to the project record).

Concern Statement 400.10

The Forest Service should disclose if the water quality is at low, moderate, or high risk in the Big and Little Wood River drainages (MAs 04 and 05, respectively). The Sawtooth LMP states that water quality is generally at Properly Functioning Conditions in the Big Wood River watershed, yet, according to the Idaho 1998 303(d) list, 20 stream segments in this watershed are not meeting their beneficial uses. The Sawtooth LMP also states that riparian vegetation and aquatic habitat are functioning at low risk in the Little Wood River watershed, but Fish and Muldoon Creeks are currently on Idaho's 303(d) list. The Little Wood River and one of its tributaries, Muldoon Creek, are both on the 303(d) list for bacteria, dissolved, oxygen, flow alterations, nutrients, and sediment.

Other watersheds that were shown to have low risk to riparian vegetation and aquatic habitat in the LMP, but are currently on the 303(d) list include Rock Creek (MA 11); Big Cottonwood Creek (MA 12); Sublett (MA 20); and Trapper Creek/Goose Creek; (MA 13).

In the summer and fall of 2001, the Idaho DEQ-Twin Falls Region will be assessing approximately 300 BURP (Beneficial Use Reconnaissance Program) streams, many of which are on Forest Service property, with a number of them having the potential to be placed on Idaho's 303(d) list for failing to meet criteria for beneficial uses. The Twin Falls Region also tested for E. coli in several streams that partially or entirely flow through Forest Service property, and these streams were assessed as not meeting their recreation beneficial use. These assessments should aid the Forest Service in selecting the appropriate Best Management Practices for stream segments that have been negatively impacted by anthropogenic activities.

Response to Concern 400.10

The FEIS and their Forest Plans including all the Sawtooth National Forests Management Areas have been updated to reflect the most recent conditions including the identification of the 303(d) water quality limited water bodies. Some, but not all, of these 303(d) water quality limited water bodies occur on lands administered by the Sawtooth National Forest. Several of these streams are located downstream of the Sawtooth National Forest boundary. In addition, all the Management Areas have been updated and reflect current water quality conditions and management direction to assist in the restoration of the degraded conditions.

Concern Statement 400.11

The Forest Service suggested replacing PACFISH with ecosystem-based forest direction. However, Forest zoning does not support ecosystem management. Entire watersheds were placed in the 3.1 or 3.2 MPC, which would preclude any management to take place in those areas. The Forest Service should apply PACFISH and INFISH guidelines only to stream corridors and not to entire watersheds or HUCs.

Response to Concern 400.11

MPCs 3.1 and 3.2 while not identified as having any suited timber base do emphasize the use of mechanical thinning and fire use to manage forest vegetation to assist in attaining the desired conditions for the soil, water, riparian, aquatic and terrestrial resources. MPC 3.2 is applied to areas that are generally in need of active restoration to move within desired conditions for the soil, water, riparian, aquatic and terrestrial resources for this planning period. MPC 3.1 is applied to areas that are generally close to or within desired conditions with a high emphasis to maintain the soil, water, riparian, aquatic and terrestrial resources for this planning period. Refer to Chapter Three of the Forest Plans for more specific information on MPC descriptions.

This Forest Plan Revision has replaced Pacfish and Infish management direction. Refer to the Forest-wide management direction located in Chapter Three of the Forest Plans for more specific details as to how this direction applies to proposed management activities. In addition, the agency's Biological Assessment and National Marine Fisheries Services and USDI Fish and Wildlife Services Biological Opinions for this Federal Action (refer to the project record) provide in depth discussions concerning relationships between these Forest Plans and Pacfish/Infish.

Concern Statement 400.12

The SWRA resources section of the DEIS must include a discussion of the impacts and affects of natural events such as uncharacteristic sub-watershed wildfires and climatic storm events.

Response to Concern 400.12

Discussion of natural disturbance processes such as wildfire and post-wildfire climatic events have been updated with recent research literature findings. SWRA Issues 1 and 2 include the potential effects of uncharacteristic wildfire as well as post-wildfire climatic events. Refer to SWRA Resources in Chapter 3 of the FEIS and the Biological Assessment (refer to the project record).

Concern Statement 400.13

The MPCs for the Bear Valley Creek (a tributary to the Middle Fork Salmon River) include only generalized objectives, standards, and guidelines that cannot ensure that aquatic habitats are not damaged by livestock grazing, road construction, and logging. This area

has been designated as a Special Management Area and is considered a stronghold for ESA-listed species, such as bull trout. Yet the Preferred Alternative only recommends 18 percent of it for wilderness although 62 percent is inventoried as roadless.

Response to Concern 400.13

For the entire Bear Valley Management Area there is approximately 17 percent identified as proposed wilderness with the remaining 83 percent identified as either MPC 3.1 or 3.2 both which emphasize the need for restoration or maintenance of water, fish or terrestrial habitat. There is no suitable timber base and there are no active livestock allotments within this management area. More specific management area objectives have been included addressing the needs of water quality and recovery of listed fish species. Refer to the Bear Valley Management Area (MA 12) in the Boise Forest Plan, the Chapter Three of the Biological Assessment (refer to the project record), and the SWRA Resource in Chapter 3 of the FEIS.

Concern Statement 400.14

The Ecogroup must incorporate new information in the Final EIS that is directly relevant to the environmental concerns documented in the Draft EIS regarding imperiled aquatic species and aquatic and riparian habitats. The following are the specific documents to include: (1) Consultation documents and reports developed after the 1998 Biological Opinions for Bull Trout and Steelhead; (2) Federal Caucus, Conservation of Columbia Basin Fish: Final Basinwide Recovery Strategy; (3) Final Rule on Roadless Area Conservation, January 12, 2001, and subsequent federal court temporary injunction on the rule; (4) Final Rule on Forest Transportation; and (5) Road Density Analysis Task Team 2000 reports.

Response to Concern 400.14

These documents define restoration goals, objectives, and standards for land management affecting restoration of degraded water quality and restoration and recovery of listed fish species within the SWIE Forests. These goals, objectives and standards were considered in shaping the management direction for Revision of these forest plans. Valuable insight to the development of the SWRA Multi-scale PFC Assessment, the various SWRA analyses, and the SWIE Aquatic Conservation Strategy was shaped by numerous documents (including the Final Basinwide Recovery Strategy) that provided several principles, policies, perspectives, and philosophies on management of aquatic ecosystems as well as integration with other resource areas. These documents identified policy, direction, and guidance, related information that were incorporated into the SWIE Aquatic Biological Assessment (refer to the project record) and FEIS. Refer to the SWRA Technical Report (located in the project record) for additional discussions regarding incorporation of new direction and policy into the Forest Plans.

Concern Statement 400.15

It would be helpful to provide the township, section, and range of the sub-watersheds so it is easier to locate them on a map and on the ground.

Response to Concern 400.15

There are over 650 subwatersheds with the planning area. Even with township and ranges it would be difficult to find these easily. The FEIS effects analysis and the Biological Assessment for fish has discussions of effects described at the subbasin scale. Maps are provided with the FEIS that identify these subbasins. Subwatershed specific information contained in the project record can be requested through any of the SWIE Forests.

Concern Statement 400.16

The Final EIS must

- 1. disclose riparian conditions at geographic or watershed levels to effectively guide management in those area and provide for an adequate effects determination;*
- 2. provide a more detailed description of riparian vegetation in livestock allotments and identify the allotments containing Riparian Conservation Areas and provide a more detailed description of the RCA condition within each one;*
- 3. describe, in detail, what objectives are being met or not met, and what criteria is used to make the "meeting objectives" determination; and*
- 4. explain in more detail the meaning of the subjective term "functioning at risk."*

Response to Concern 400.16

Water quality and watershed conditions have been described for each of the over 650 subwatersheds and their respective 29 subbasins. The data for this varied from actual field monitoring to use of various models and professional judgment from specialists familiar with the areas. This information was used to assist in identifying management area direction. Identification of individual RCA conditions within grazing allotments is appropriate at the project level not at a mid-scale covering several million acres. Management direction in the form of objectives has been developed for both the Forest-wide and Management Area. These objectives are developed to be more specific than were identified in the DEIS.

The Monitoring and Evaluation Direction identified in Chapter IV of the final Forest Plans has been greatly improved as compared to the Draft Forest Plans. Appropriate selection of indicators, and monitoring and evaluation of key results helps us determine if we are meeting the objectives and desired conditions identified in the Plan. Evaluation and monitoring also help us determine if we should change goals and objectives, or monitoring methods.

Monitoring in the original Forest Plans was updated to include the coordinated Interagency Integrated Team (IIT) monitoring. Table IV-2 in Chapter IV of the Forest Plans contains monitoring elements organized around monitoring questions. The table addresses requirements from 36 CFR 219.12(k)[4], and includes a description of:

- [i] The actions, effects, or resources to be measured, and the frequency of measurements;
- [ii] Expected precision and reliability of the monitoring process; and
- [iii] The time when evaluation will be reported.

Since data precision and reliability are tied to specific procedures and methods that change as we learn, we expect to update the Forest Monitoring Section to address such changes through the Continuous Assessment and Planning process described in Chapter IV of the Forest Plans.

The term “functioning at risk”, “functioning unacceptably” and “functioning appropriately” are described in detail in SWRA section of Chapter 3 of the FEIS, Appendix B of the Forest Plans and the SWRA Technical Report (located in the project record). These terms and definitions are used as relative descriptions of the conditions for the subwatersheds and their respective subbasins within the planning area.

Concern Statement 400.17

There is some confusion under Desired Condition regarding natural stream channels and the phase “stable stream channel,” which could be interpreted to mean artificially hardened, straightened, or located. The Forest Service should consider amending the sentence to read: “Riparian areas...and have features necessary to promote naturally functioning stream channels and diverse habitat conditions.” Changes should be made to the text anytime “channel stability” occurs. Also under Desired Conditions, the sentence on restoration activities should include “re-establishment of natural hydrograph.”

Response to Concern 400.17

The desired conditions for the final Forest Management Plans have incorporated the variability of riparian functions and ecological processes. The following is an excerpt of a portion of the desired condition located in SWRA section of Chapter Three of the Forest Plans:

Riparian and aquatic ecosystems have appropriate types and amounts of vegetation. There is sufficient large woody debris appropriate for land and stream channel forms to maintain water quality, filter sediment, aid floodplain development, improves floodwater retention and groundwater recharge, and contributes to diverse habitat components. Management actions result in no long-term degradation of soil, water, riparian, and aquatic resources conditions. Instream flows are sufficient to support healthy riparian and aquatic habitats, the stability and effective function of stream channels, and the ability to route flood discharges, and provide for downstream uses. Wetlands and floodplains are maintained where they are properly functioning, and restored where degraded. Improving watershed conditions contribute to the de-listing of water quality limited water bodies to meet Clean Water Act requirements. Public waters are restored where water quality does not support beneficial uses and otherwise are maintained or improved.

Concern Statement 400.18

Regarding Sublett Creek and Lake Fork stream, the Forest Service should strike statements made in the Sawtooth LMP that mention dewatering or depletion of these streams. These streams flow into Sublett Reservoir, which is located downstream from forest boundaries, and only a small portion of the water is backed up onto forestland; there is never any diversion of water from these streams while on forestland for any irrigation uses.

Response to Concern 400.18

These changes have been reflected in the final descriptions of the Sawtooth National Forest Management Area 20 – Sublett, located in the Sawtooth National Forest Plan.

Concern Statement 400.19

DEQ would like to coordinate with the Boise National Forest to ensure that water quality monitoring occurs on the North Fork Boise and Robert Lee Creek.

Response to Concern 400.19

The Boise National Forest has and will continue to coordinate with the State of Idaho Department of Environmental Quality. Specific monitoring locations and or needs will be discussed and determined at the individual Ranger District. The following Forest-wide Management Direction located in Chapter Three of the Forest Plans sets the basis for more specific monitoring coordination.

Water Quality

SWRA Objective SWOB05: Cooperate with the State, Tribes, other agencies and organizations to develop and implement Total Maximum Daily Loads (TMDLs) and their implementation plans for 303d impaired water bodies influenced by National Forest System management.

SWRA Objective SWOB06: Work with State, Tribes, other agencies and organizations to prioritize restoration needs and to bring 303d impaired water bodies into compliance with State water quality standards in a reasonable time frame.

SWRA Objective SWOB07: Work within the State’s timelines to assist the State in the identification of 303d impaired water bodies, development of TMDLs, and development of TMDL Implementation Plans.

SWRA Objective SWOB08: Work with the State of Idaho to validate whether their listings of 303d water bodies are correct or whether the water bodies have been restored adequately so that they can be considered for de-listing.

Concern Statement 400.20

The following watersheds have moderate to high natural risk of erosion and should be managed for protection and not multiple use: Deadwood River, Big Smokey Creek, and Elkhorn Creek.

Response to Concern 400.20

The vulnerability for every subwatershed partially or wholly within the Ecogroup was determined and described for all the management areas. This information along with the current conditions of these subwatersheds was used to assist in the determination of the management direction for all areas. For information specific to these three drainages refer to the following, management areas:

Deadwood River - BNF Management Area 13 – Deadwood River

Big Smokey Creek – SNF Management Area 6 – Upper South Fork Boise River

Elkhorn Creek – SNF Management Area 4 – Big Wood River

Concern Statement 400.21

The Forest LMPs must provide more detailed disclosure regarding the effectiveness of the riparian management objectives (RMO). The LMPs must provide the data to either support the contention that RMOs are unattainable for some streams or to discredit the effectiveness of the RMOs in protecting riparian resource

Response to Concern 400.21

Watershed conditions indicators (WCIs) have replaced the riparian management objectives (RMOs) that were identified in both Pacfish and Infish. The use of WCIs are described in the “Southwest Idaho Ecogroup – Matrix of Pathways and Watershed Condition Indicators” - “The MATRIX” is located in Appendix B of the Forest Plans. The MATRIX is designed to be applied over a range of analysis scales and account for a variety of environmental conditions. It provides flexibility and allowances for addressing localized information and/or project-specific variability. A certain degree of professional judgment is required and is an essential element for effectively interpreting and applying evaluation results.

Concern Statement 400.22

Riparian Conservation Areas (RCAs) are not effective in prohibiting leachates from entering streams because they are dissolved and cannot be filtered out. RCAs can actually contribute much if not more of the toxic decay leachates because of their heavy biomass loading and close proximity to the streams. Human activity can contribute to increased phenol (a natural pollutant) levels in streams, which increases the water's ability to absorb sunlight, thus increasing the water temperature. The streams with high water

temperatures tend to have more shading which contradicts the premise for having RCAs. A Boise National Forest study showed that three years after the 1992 fires, there were more redband and bull trout in streams within burned areas than there were in streams in unburned areas. This is because the fires removed the rotting biomass and reduced the phenolics in the water.

According to Tables T-4, 5, and 6, the Ecogroup's proposed burning and thinning plans are equivalent to one fire event every 125 years. A recent study showed the Bitterroot National Forest burned once every 7 years, and other studies indicate forests burn every 15 to 30 years. This means that Alternative 3's planned fire event interval of 125 years is five times too long, and biomass will continue to poison fish and heat the streams with excessive phenolic acids. This violates the Clean Water Act.

Response to Concern 400.22

The postulates provided appear to be a mixture of personal experience and a combination of literature review/citations, personal water quality monitoring and associated results and personal assumptions based on local knowledge of the area.

A primary need for change (refer to Chapter 1 of the FEIS) for revising the forest plans is based on the acknowledgement that there is a substantial forest health issue and that certain forest vegetation types are at uncharacteristic conditions. Each of the Forest Plan alternatives, to various degrees, attempts to move these vegetation conditions towards a more appropriate desired condition as compared to their current condition.

The cause and effect of increased “rotting biomass” and associated increase in phenolic acids is just part of very complex and interwoven ecosystem processes and functions. As an example, the statement that removal of biomass through fire should reduce stream temperatures and the identification of a study where fish numbers have increased following a wildfire are not directly correlated. In the study that is referred to, the stream temperatures have not decreased but have increased as a result of loss of riparian and conifer tree shading.

Peer reviewed research has been, and will continue to be, used to inform forest management decisions at both the forest planning and site-specific scales.

Concern Statement 400.23

1. The Final EIS should explain the purpose and intent of the 303(d) protocol, what it calls for land managers to do, and how the Protocol will be applied in the Ecogroup Forests. The Forest Service must provide meaningful on-the-ground water quality information to facilitate evaluation of management options for water quality protection. The LMPs and EIS must contain significant changes and additional water resource information to meaningfully achieve the objective of the Clean Water Act, “. . . to restore and maintain the chemical, physical, and biological integrity of the Nation's waters “ (33 U.S.C. Sec. 101).

- 2. The Final EIS must identify which 208 sub-watersheds are water-quality impaired and which 58 sub-watersheds have TMDL plans. Further, the Final EIS should provide specific information including number of miles of 303(d) impaired waters; number of miles of waters threatened in each watershed, number of miles of waters that contain bull trout and other endangered, threatened, or sensitive species in each sub-watershed; aquatic and riparian habitat conditions in each forest; and population data, age class information and locations of indicator species, bull trout, and other species in each sub-watershed.*
- 3. The Forest LMPs must provide specifics on how the Forests will restore water quality in impaired 303(d)-listed streams and include standards for enforcement. The Forests should remove activities from areas with water quality impaired streams or, at a minimum, develop a requirement to demonstrate that water quality of impaired streams has been improved before allowing additional activities that could cause degradation.*
- 4. The Forest LMPs must integrate into the planning process close coordination with the State agencies that administer the 303(d) portion of the Clean Water Act program and clear directions for implementing the protocol. The application schedule of 3 years for the 303(d) protocol is too long - the schedule should be developed immediately. Scheduling the protocol should be accomplished as part of sub-basin and landscape and/or watershed scale work with a goal that ensures restoration prioritization and planning in a broader context such as a Forest-wide scale.*
- 5. All 303(d)-listed streams and streams with TMDLs should be classified as MPC 3.2. The Forest must comply with the Clean Water Act and TMDLs and must, therefore, re-write the objective for SWRA that states "... where feasible meet EPA-developed TMDL ..."*

Response To Concern 400.23

1. On April 26, 2002, the Intermountain (and Northern) Regions of the Forest Service replaced the "Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters (i.e.; "The 303(d) protocol) with process guidance containing suggested language for Forest Plan Revision efforts. These revised LRMPs, Chapter III, SWRA Resource direction, have incorporated that process guidance into the Forest-wide management goals, objectives, guidelines, and standards.

When the first round of Forest Plans were written 303(d) listed water bodies did not exist. The revised LRMP's and FEIS do contain significant changes to address both this issue and other CWA objectives. Site-specific management area direction has been established with the existing condition of local water bodies. Active and passive management prescription categories have been incorporated to recognize the need to restore and maintain water quality. 303(d) listed water bodies, both with completed TMDL's and without completed TMDL's, as well as waters draining into these water bodies, have weighed heavily into the restoration priorities reflected in the Watershed and Aquatic Recovery Strategy (refer to the project record and FEIS, Chapter 3, SWRA Resources section).

2. The revised forest plans, within each Management Area, have identified both the 303(d) water quality limited water bodies and TMDLs; and occurrence of any ESA listed fish species, or sensitive fish species. Each management area also has a description of the current soil, water and fisheries conditions. Information on finer scale data such as population data, age class, number of miles of stream that contain bull trout is appropriate for a fine-scale or project analysis depending on the issues associated with the project or assessment.

3. Chapter Three of the Forest Plans has Forest-wide management direction as well as Management Area direction identifying numerous goals, objectives, standards and guides associated with restoring water quality where currently degraded and maintaining water quality where functioning appropriately. Specific as to what actions to initiate to restore water quality is appropriate at a finer scale assessment or project specific analysis when specific areas/sources of concern can be identified and evaluated.

4. See the previous response associated with the 303(d) protocol. State agencies have been in close coordination throughout the development of the LRMP, and we will continue coordination with the State during project level planning and implementation.

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries, in which there are National Forest System lands managed by the Ecogroup, that flow into the Snake River (e.g., Boise, Payette, Salmon, Hells Canyon, etc.). For more information on this strategy refer to Chapter III of the Biological Assessment (located in the project record) or the FEIS, Chapter 3, SWRA Resources section.

5. All MPCs are developed to comply with all laws and statutes including the CWA. MPC 3.2 has a high emphasis on the active restoration of water quality but other MPCs also emphasize active restoration (e.g. MPCs 5.1 and 6.1), although not to the same level as MPC 3.2. Each management area regardless of the MPC, that has TMDLs and/or 303(d) water quality limited water bodies, has specific direction identified to improve water quality, as well as the forestwide direction that applies to all management areas.

The following Forest-wide objectives identified in Chapter Three of the Forest Plans pertain to this concern:

Water Quality

SWRA Objective SWOB05: Cooperate with the State, Tribes, other agencies and organizations to develop and implement Total Maximum Daily Loads (TMDLs) and their implementation plans for 303d impaired water bodies influenced by National Forest System management.

SWRA Objective SWOB06: Work with State, Tribes, other agencies and organizations to prioritize restoration needs and to bring 303d impaired water bodies into compliance with State water quality standards in a reasonable timeframe.

SWRA Objective SWOB07: Work within the State's timelines to assist the State in the identification of 303d impaired water bodies, development of TMDLs, and development of TMDL Implementation Plans.

SWRA Objective SWOB08: Work with the State of Idaho to validate whether their listings of 303d water bodies are correct or whether the water bodies have been restored adequately so that they can be considered for de-listing.

Concern Statement 400.24

The term “stream segment” should be used generically, not when referring to DEQ classifications because Idaho generally references “303(d)-listed water bodies” or “Water Quality Limited” water bodies.

Response to Concern 400.24

The FEIS and Forest Plans have been edited to refer to 303(d) water quality limited water bodies.

Concern Statement 400.25

Idaho DEQ has found that Camas Reservoir (MA 01) to be in the “Not Full Support” assessment category and a candidate for 303(d) listing.

Response to Concern 400.25

The characterization of Management Area 01 – Lower South Fork Boise River” has been updated to include the most recent listings for 303(d) water quality limited water bodies, of which Little Camas is not identified.

Concern Statement 400.26

1. Appendix B states that the Watershed Conditions Indicators (WCI) will not be developed for the respective sub-basins until 3 to 5 years after the Record of Decision for the Forest LMPs. The Forest Service will not be able to determine if WCIs will be adequate for both conservation and recovery; they should have been defined prior to development of the DEIS and Draft LMPs. The LMPs fail to demonstrate any accountable linkage between the NMFS/USFWS MPIs (matrices and pathways of indicators) and management under the LMPs, nor do they state that management actions will have to comply with the MPIs before the action can proceed. The Forest Service contends that WCIs will be followed in project-level analysis, but the LMPs fail to require that habitat features found in the WCIs be interpreted as hard standards. The Forest Service should disclose Desired Future Conditions (DFC) by area, to evaluate specific habitat areas relative to the DFC, or link the DFC to Functioning Conditions or the WCIs.

2. *The Forest Service should maintain the Biological Opinions and PACFISH, INFISH, and specific water quality standards of the old plans until the WCIs are subjected to public review and peer review from an outside agency.*

Response To Concern 400.26

1. Appendix B Matrix direction has been rewritten since the DEIS. Watershed Condition Indicators (WCIs) have been established following the USFWS and NMFS matrix pathways and indicators currently used during project consultations. Proposed actions will be evaluated using the matrix during project planning and implementation. The result of this and other analyses will be used by interdisciplinary teams to modify a proposed action by incorporating changes to reduce negative impacts to aquatic fish species and SWRA resources.

The Matrix has been designed for application during project-specific assessments to assist in project design and analysis. The Matrix is a tool to establish what the baseline conditions are at a specific spatial location and how they change over time. Management actions do not have to meet certain functionality before they can proceed. However, if a functionality is “functioning at risk” or functioning at unacceptable risk”, management actions individually and collectively should work toward improving specific matrix indicators and pathways. If existing conditions are in a functioning appropriately condition, management actions should strive to maintain these conditions.

WCIs are not hard standards in each plan, but a tool to be used to assist in determining compliance with forest plan management direction. Forest plan management direction relies heavily on the use of the matrix and interpretation of WCIs. For example, the use of the matrix is required by SWRA Standards SWST01 and SWST04. These standards are:

SWRA Standard SWST01 - “Management actions shall be designed in a manner that maintains or restores water quality to fully support beneficial uses and native and desired non-native fish species and their habitat, except as provided for under SWRA Standard 4.

SWRA Standard SWST04 - “Management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except:

- a) *Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions; or*
- b) *Where the Forest Service has limited authority (e.g., access roads, hydropower, etc.). In these cases, the Forest Service shall work with permittee(s) to minimize the degradation of watershed resource conditions.”*

SWRA Standard SWST01 implies that all management actions, except as allow under SWST04, shall maintain function conditions if those conditions already support beneficial uses and desired aquatic species and habitat, or restore conditions if they are not supporting these resources. The degree or lack of support is determined by whether existing conditions are functioning appropriately, functioning at risk, or not functioning unacceptably. For example, a management action in a baseline condition that is currently functioning at risk (FR) must either maintain that condition or move toward the desired condition (functioning appropriately) ...except as allowed for under SWRA Standard SWST04.

Standard SWST04 emphasizes the importance of SWRA standard SWST01’s “maintain and restore conditions”, by stating, “management actions shall not degrade, nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions”. However, Standard SWST04 provides two exceptions that (1) recognize there will be situations where degrading resource conditions in the

temporary or short term must be allowed in order to realize a short- and/or long-term “demonstrable benefit” to watershed resource conditions; and (2) there are classes of actions for which the Agency has limited authority to avoid degrading effects.

When in a watershed that is “Within” Desired Conditions (DCs), maintain implies that actions can be implemented and have effects as long as those effects keep resource conditions *within the range of DCs*. Degrade, refers to changing existing conditions so that they move “Outside” the range of DCs, i.e., making the conditions measurably worse. A degrading effect cannot result in existing conditions remaining “Within” DCs. Thus, there can be no degrading actions in watersheds that are “Within” their DCs without violating SWRA Standard SWST01, with the exception of those actions described under SWRA Standard SWST04.

In watersheds “Outside” the range of DCs, maintain implies no change to conditions represented by the current baseline. To have a degrading effect in these watersheds, management actions must make the baseline conditions measurably worse than they already are. In other words, when watershed resources are already in a degraded condition (i.e., outside DC), changing their current baseline to something measurably worse would be a degrading effect. Although SWRA Standard SWST01 implies that all actions must maintain or restore the baseline, the degrading actions may be allowed under the exceptions described in SWRA Standard SWST04. Specifically, degrading actions may only occur where negative temporary or short-term effects are outweighed by short- and long-term benefits to watershed conditions. Accordingly, the rate of recovery over the short or long terms must be faster than the recovery rate under no action (i.e., not implementing a proposed project) to be justified under Standard SWST04.

2. The revised Forest Plans have replaced the 1995 and 1998 Biological Opinions and management direction identified in both Pacfish and Infish. This was completed through an extensive 2-year consultation with both the U.S. Fish and Wildlife Service as National Marine Fisheries Service. The WCI that are incorporated into Appendix B of the Forest Plans are essentially the same as identified in the Biological Opinions. Refer to Chapter Three of the Biological Assessment for more detailed discussion on the replacement of the Biological Opinions and Pacfish and Infish with the revised forest plans.

Concern Statement 400.27

The Forest Service should develop a standard for retention of all dead or downed trees and snags within Riparian Conservation Areas.

Response to Concern 400.27

The Forest-wide Management Direction has identified management direction regarding snags and logs within RCAs. Refer to the SWRA Resource Chapter Three of the Forest Plan, Appendix A and B of the Forest Plans, for more specific information concerning snags and down trees and their relation to RCAs.

SWRA standard SWST10 contained in Forest Plans specifically addresses the need to retain trees and snags in RCAs.

Concern Statement 400.28

- 1. The Forest Service must identify and accurately assess impaired or threatened water bodies, and ensure compliance with federal (40 CFR 103.7(b)(3), (5)(i)) and State of Idaho anti-degradation policies by incorporating compliance standards in the LMPs.*
- 2. The Forest Service must develop enhanced Best Management Practices to ensure water quality and provide protection and improvement of impaired waters.*

Response to Concern 400.28

1. Refer to previous responses for Public Comments 400.07 and 400.23.
2. Development of enhanced BMPs is associated with Forest Service Research and other research institutions (e.g., universities). Forest-wide management direction in Chapter 3 and Monitoring and Evaluation direction located in Chapter 4 of the Forest Plans identifies the direction to implement appropriate best management practices, as required under the CWA and related State regulations, as well as to monitor their implementation and effectiveness.

Concern Statement 400.29

The LMPs should not deviate from Historical Range of Variability and attempt to create a forest with complete canopy cover. A forest with many stages of growth will ensure that snowmelt will be spread out over a longer period of time. Fast or sudden melts increase water momentum and carve out new banks, causing landslides, debris flows, sheet erosion, and sedimentation.

Response to Concern 400.29

The desired conditions for vegetation identified in the Forest Plans were developed using the concept of historical range of variability. Refer to the Vegetation Diversity Resource located in Chapter 3 of the FEIS and Appendix A of the Forest Plans for more detailed discussions.

Concern Statement 400.30

It appears that the Forest Service is attempting to regulate stream flow, not determine it, as presented in the third paragraph on page III-8 of the Payette LMP.

Natural sediment transport should be included as a Desired Future Condition. The Forest Service should consider adding a standard that states: "Natural water flow, as calculated by flow magnitude, frequency, duration, timing, and rate of change, is maintained, and water flow impact from existing dams, diversions, and flow-altering developments are minimized to the extent legally and technically possible."

Response to Concern 400.30

The objectives pertaining to instream flows and water rights have been modified to reflect the importance of cooperation with other interested parties when developing these needs. Refer to Chapter Three of the Forest Plans that identifies the revised Forest-wide Management Direction (e.g., SWOB04; SWST06; and SWGU06).

In Chapter Three of the Forest Plans, the desired condition for the SWRA resources identifies “sediment regime” as an important component as identified in the following excerpt:

“There is sufficient large woody debris appropriate for land and stream channel forms to maintain water quality, filter sediment, aid floodplain development, improves floodwater retention and groundwater recharge, and contributes to diverse habitat components.”

Concern Statement 400.31

The Forest Service should provide a comprehensive inventory of existing diversion structures in order to address the threats they currently pose to aquatic species, particularly threatened salmon, steelhead, and bull trout.

The Forest Service should consider a suggestion to employ “non-grating” fish screening as a solution to providing adequate in-stream flow.

Response to Concern 400.31

Current information on known diversions impeding fish migration were used to assist in determining watershed and aquatic habitat condition of each subwatershed. Several of these existing diversions, where they are migration barriers to anadromous and other resident fish, have been incorporated into restoration objectives for individual management areas. A more comprehensive inventory of existing diversions may be appropriate at a finer scale assessment where detailed information about each site can be collected.

Forest-wide Management Direction located in the TEPC Resources section in Chapter III of the Forest Plans identifies a standard for appropriate fish screening as follows:

TEPC standard TEST07: In TEPC fish-bearing waters, do not authorize new surface diversions unless they provide upstream and downstream fish passage and, if needed, include either fish screens or other means to prevent fish entrapment/entrainment.

Concern Statement 400.32

The forest LMPs should include special protections for functionally critical areas within watersheds. A functionally critical area might include an estuary or forested floodplain

reach of a river that could function as a downstream refuge that provides an island of high-quality habitat for downstream-dependent species and helps sustain the current diversity of species. Creating and maintaining such habitats is a necessary part of a successful restoration program.

Response to Concern 400.32

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. The identification of priority subwatersheds was based on key concepts, in relative priority as follows:

1. Secure existing habitats (subwatershed) that support the strongest fish populations, and that have the highest native species diversity and aquatic integrity.
2. Address and fix/minimize threats to the long-term stability of high quality habitats/subwatersheds.
3. Extend favorable habitat conditions into adjacent watersheds.
4. Extend good habitat/healthy watershed conditions into more poorly represented parts of the subbasin with less favorable habitat conditions.
5. Focus work on a "limited" number of areas/subwatersheds to increase the chance of meaningful change.

For more information on this strategy refer to Chapter III of the Biological Assessment (located in the project record), the FEIS, Chapter III, SWRA Resources section, and the Appendix B of the Forest Plans.

Concern Statement 400.33

The Forest Service should add this standard to riparian, aquatic, and hydrologic resources: "Annually take snow samples and measure the levels of contaminants resulting from snowmobile use in sensitive watersheds and institute management actions that will mitigate negative effects on physical, ecological, riparian, aquatic, and hydrologic resources." A Colorado study showed snowmobile exhaust was to blame for contaminated snow.

Regarding Sawtooth MA 02, Upper Salmon River Valley: The Forest Service should conduct an analysis to determine the impact of snowmobiles on aquatic habitats (including Salmon habitat).

Response to Concern 400.33

This suggested monitoring of selected indicators and projects is appropriate to address at the project level. This fine scale information is not needed to inform decisions made in the revision of these Forest Plans (refer to Chapter 1 of the FEIS).

Concern Statement 400.34

Goose Creek is a low-gradient stream not hydrologically capable of transporting large quantities of sediment out of most of its reaches, which causes problems for native aquatic species. Beaver ponds, domestic sheep and livestock grazing, and recreational activity contribute to a reduction in riparian canopy, thereby increasing water temperature.

The characterization of Goose Creek/Hazard Creek should include the Forest Service's 500-acre conservation pool in Brundage Reservoir.

Response to Concern 400.34

The Goose-Hazard Management Area characterization has been updated to include discussions of the current conditions and causes for the watershed conditions. This includes identification of elevated stream temperature in portions of this management area.

In general, there is no discussion/identification of any existing water rights or specific instream flows for any of the Forest or Management Areas. As needed to inform future project implementation decisions under these Forest Plans, this information will be identified and evaluated.

Concern Statement 400.35

There is concern about stream blockages caused by excessive aquatic vegetation such as watercress and the beaver dams that restrict the free-flowing nature of streams.

Response to Concern 400.35

Though this can be an issue pertaining to project decisions and the ability to meet project objectives, it is not needed to inform the decisions made in a mid-scale forest planning decision (refer to Chapter 1 of the FEIS). As needed to inform future project implementation decisions under these Forest Plans, this information will be identified and evaluated. .

Concern Statement 400.36

It is not fully known if roads contribute more sedimentation to streams or if fire poses greater risks to aquatic systems. Roads, however, are necessary to fight fires. Declining budgets do not allow the Forest Service to maintain or repair road drainage structures, which creates a potential for increased erosion.

The Forest Service should develop substantive standards relating to sediment delivery, with clear management instructions on what steps to take if those sediment standards are not met.

Response to Concern 400.36

Each potential land disturbing management activity is evaluated through use of the MATRIX; refer to responses to Concerns 400.21 and 400.26. A number of the WCIs are associated with the effects of sediment from management activities. The methodology for determining RCAs located in Appendix B of the Forest Plan has a requirement that no matter which option is chosen to delineate RCAs, they must all consider potential sediment delivery distances. In addition, the monitoring and evaluation direction identified in Chapter 4 of the Forest Plans has a monitoring element to evaluate the effectiveness of RCA delineations, including sediment delivery. If sediment delivery distances exceed those anticipated during project monitoring and evaluation, then appropriate adjustments will be made at the project level, and where and when appropriate, adjustments would be made to the document "Guidance For the Delineation and Management of RCAs" in the Forest Plans, Appendix B.

Concern Statement 400.37

Road systems contribute the most significant resource issues to aquatic resources and species (such as bull trout) and cause egregious levels of watershed degradation. The DEIS must provide more information on the effects of roads on Ecogroup forests. There must be details describing resource problems associated with roads, or any linkage of roads to sub-basin, watershed, stream, or fish habitat conditions. To fully characterize current conditions, the Ecogroup must describe not only the current number and acres of roads, but also the

- 1. roaded areas per forest and per watershed;*
- 2. estimated number of uninventoried roads;*
- 3. miles of streamside or riparian roads;*
- 4. miles of roads with maintenance backlog, the mile and location of roads that are chronic sediment sources;*
- 5. number of stream crossings pre system and per watershed;*
- 6. number of problem stream crossings that are blocking fish passage;*

7. *failure rate of road systems during the past 30 years including those during floods; and*
8. *existing sediment conditions in watersheds and streams impacts by road systems and the associated impacts on aquatic habitat.*

Response to Concern 400.37

Road related disturbance and their effects on watershed and aquatic habitat condition was evaluated at the individual subwatershed scale and aggregated to the subbasin scale. With the exception of 7 above, essentially all the road indices were estimated including several other aspects of road related disturbance. Effects from roads were key in describing the geomorphic integrity, water quality integrity and aquatic integrity for all the subwatersheds and their associated subbasins. For more specific discussions on road related effects and analysis, refer to Chapter 3 of the Biological Assessment (located in the project record), the SWRA Technical Report (located in the project record), and the SWRA Resource section in Chapter 3 of the FEIS.

Concern Statement 400.38

Regarding Sawtooth National Forest Management Areas Management Area 6, Upper South Fork Boise River: One particular objective that is consistent with Management Areas 6, 7, 8, 9, and 10 is "Improve water quality by reducing accelerated sediment from the following trail." This objective should be rewritten to say, "Improve water quality through reconstruction or relocation of segments of the following trails . . ." This rewording would clarify how the reduction in sedimentation would be accomplished.

Response to Concern 400.38

The following objective in the Sawtooth National Forest Management Area 6- Upper South Fork Boise River was rewritten to address this concern:

Objective 0626 - Improve water quality through reconstruction or relocation of segments of the following trails: Vienna Creek 086, Paradise Creek 070, Emma Creek 063, High Creek 069, Bridge Creek 068, Bass Creek 061, Gold Run-Steep Creek 060, Bluff Creek 077, Big Peak Creek 076, Big Smoky Creek 072, North Fork Big Smoky Creek 074, and Narrow Creek 075.

Concern Statement 400.39

Regarding Payette LMP, page III-171, Access: The Forest should indicate if decommissioning of the 10 miles of road actually did reduce erosion.

Response to Concern 400.39

The identification of road decommissioning as identified in the South Fork Salmon River Management Area was to describe changes in overall “Access” within the management area. Separate watershed and aquatic monitoring reports for the South Fork Salmon River are available from the Payette and Boise National Forest that discuss benefits of different management activities on reducing erosion.

Concern Statement 400.40

The Forest Service could prevent water pollution by putting up gates on roads that are built primary for cleaning out deadfall or providing access for fire fighting. This would prohibit vehicle access but allow access for hikers and horseback riders.

Response to Concern 400.40

Specific type and location of best management practices are appropriately identified at a project scale. Direction in a Forest Plan provides the overall goals and objectives projects implementing the plan are to be designed to achieve (e.g., prevent water pollution), and the standards and guidelines that provide the sideboards they must operate within to meet resource conservation or protection needs and social and economic interests. The more site-specific information generated during project planning is needed to determine the desired conditions of individual road segments need to meet social and resource concerns, including what BMPs would be appropriate to implement to avoid or minimize negative effects to other resources.

Concern Statement 400.41

The Forest service should place more focus on the effects of recreation and human-caused disturbance on aquatic resources.

Response to Concern 400.41

The effects from recreation and other human disturbance on the SWRA resources was estimated for each subwatershed and overall subbasin, refer to Chapter 3 of the Biological Assessment (located in the project record) and the SWRA Technical Report (located in the project record) for more detailed discussions. Forest-wide Management Direction has several goals, objectives, standards and guides related to recreation and other human uses and their potential effects on other resources. Refer to Chapter 3 of the Forest Plans for more specific descriptions direction pertaining to aquatic resources (i.e., Soil, Water, Riparian and Aquatic Resources section) and recreation (i.e., Recreation section).

Concern Statement 400.42

The EIS should provide a reference for the analysis or documentation that identifies the geomorphic integrity (GI) and water quality integrity (WQI) rating per sub-watershed, and discuss how the Category I, II, and III ratings were determined. The management

standards that apply to these categories are not sufficiently clear to be capable of analysis, nor are these categorizations related to land classifications such as timber suitability. For example, describe how ICBEMP strongholds are used and how this compares to the PACFISH and INFISH priority watersheds.

The Forest Service should indicate in the LMPs how it is going to measure the Categories of Watersheds to the degree of accuracy listed for each category.

Response to Concern 400.42

The FEIS, Chapter 3 of the Biological Assessment (located in the project record) and the SWRA Technical Report (located in the project record) identify and document the assessment/analysis and determination of the geomorphic and water quality integrity ratings.

The Category I, II, and III classifications and associated management standards have been deleted from the FEIS and Forest Plans. The FEIS, Chapter 3 of the Biological Assessment (located in the project record) and the SWRA Technical Report (located in the project record) identify how the ICBEMP strongholds and Pacfish and Infish priority watersheds were incorporated into the SWIE Aquatic Conservation Strategy.

Concern Statement 400.43

Regarding the Sawtooth LMP, the Forest must restore water quality standards now, not within 5 years. The standards in the aquatic resources section are too broad and need specific detail; "Do not allow discretionary actions" does not meet the definition of a standard. A comprehensive aquatic conservation strategy must be developed, along with Watershed Condition Indicators (WCI).

Response to Concern 400.43

Forest-wide management direction for the soil, water, riparian, and aquatic resources has been greatly modified and improved as compared to the DEIS. There is considerably more detail as well as definitions for terms used in the management direction. Refer to Chapter 3 of the Forest Plans, Soil, Water, Riparian and Aquatic (SWRA) Resource Section, for a full description of the improved Forest-wide Management Direction. The Forest Plan glossary contains definitions of terms.

A comprehensive aquatic conservation strategy (ACS) with eight components was developed through Forest Plan revision. One of the components is the use Watershed Condition Indicators that is described in detail in Appendix B of the Forest Plans. Also, within the ACS is a watershed and aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their

respective subwatersheds across the Ecogroup. This would include all tributaries in which there is National Forest System lands managed by the Ecogroup that flows into the Snake River (e.g., Boise, Payette, Salmon, Hells Canyon, etc.). For more information on this strategy refer to Chapter III of the Biological Assessment (located in the project record) and the SWRA Resource Section in Chapter 3 of the FEIS.

Concern Statement 400.44

The Payette LMP should provide direction for management activities that will improve water quality and hydrologic conditions in Big Payette Lake, Lake Cascade, and the North Fork Payette River. One way this could be accomplished is by timely road and drainage structure maintenance and removal of abandoned drainage structures and non-system roads. Another action (particular with regard to Lake Cascade) is to reduce activities such as timber harvest, livestock grazing, and recreation. The Payette National Forest should actively participate in inter-agency water quality monitoring, planning, and coordination. Water quality improvement projects in the Payette River basins should be a high priority and fully funded program.

Response to Concern 400.44

Forest-wide management direction and management area specific direction identify goals and objectives for watershed restoration for these areas as well as all management areas. The development of the Aquatic Conservation Strategy included a Watershed and Aquatic Recovery Strategy that prioritized watershed and aquatic restoration needs for each subwatershed/subbasins and is identified in the appropriate management area.

The following excerpts from Management Area 07 – Payette Lakes, provide an example of management direction for these areas of concerns and also for all management areas.

Objective 0725 - Improve water quality and geomorphic integrity by reducing road-related accelerated sediment in the Upper North Fork Payette River and Payette Lake Watersheds, which comprise the public water system for the city of McCall and surroundings. Decommission existing roads in the watersheds that are no longer needed for public access or long-term management.

Objective 0726 - Restore riparian areas in the North Fork Payette River and Lake Fork Creek drainages by reducing localized impacts from historic and current sheep grazing related to stream down-cutting, loss of vegetation, and changes in vegetation composition.

Objective 0727 - Identify recreational campsites or parking areas that are contributing unacceptable levels of accelerated sediment or compaction to the North Fork Payette River and Lake Fork Creek riparian areas. Relocate or harden sites where needed to reduce compaction and erosion to riparian areas by end of planning period.

Objective 0728 - Maintain the meadow ecosystem and restore wet meadows in the Bear Basin area by reducing soil compaction, accelerated erosion, and loss of vegetation from motorized recreation. Install information signs and designate the area as non-motorized on the Forest Travel Map.

Objective 0729 – Restore hydrologic function in the Sater Meadows area by restoring stream channel morphology and riparian vegetation.

Objective 0730 - Improve native and desired non-native fish habitat in the Upper Lake Fork Creek Watershed by reducing accelerated sediment associated with the Lick Creek Road (Forest Road 339).

Objective 0731 - Implement watershed restoration and other management activities in the Upper North Fork Payette River Watershed consistent with Big Payette Lake Water Quality Management Plan to address concerns within the public water system.

Concern Statement 400.45

The Final LMPs should provide for the development of in-stream flow assessments, generally, and in a manner that allows for prioritization of assessments where flows are immediately threatened. In-stream-flow determinations should be required prior to permitting activities, but the Forest Service should first define what methods would be used and who would be responsible for providing data.

The Forest Service should incorporate the following language:

“Prior to applying for a permit or license for activities such as mining, hydropower development, snowmaking, or water transmission facilities, the applicant will be required to make an instream flow determination. Using the most appropriate scientific methodology, the Forest Service will evaluate the instream flow determination and establish a stream flow regime as a condition of issuance of the permit or license. For existing authorized uses and activities, minimum instream flows will be established on fish bearing streams and will be a condition of any relicensing or permit renewal.”

Response to Concern 400.45

Forest-wide management direction regarding instream flows and water rights is described in Chapter 3 of the Forest Plans. This direction addresses the suggested language offered in this concern statement. Prioritization for restoration, including instream flows, was part of the WARS developed for the three National Forest Plans. This is described in detail in Chapter 3 of the Biological Assessment (located in the project record) and the SWRA Technical Report (located in the project record).

Concern Statement 400.46

The Final EIS should incorporate information on the effect of timber harvest on water yield as contained in the study: "Monitoring the Effects of Timber Harvest on Annual Water Yield" (Stednick, 1996).

Response to Concern 400.46

Information from Stednick 1996, as well as additional research conducted locally by Walt Megahan and Jack King research hydrologists from the Rocky Mountain Research Station, Boise, Idaho was used to assist in the development of the FEIS, Forest Plans and the Biological Assessment.

Concern Statement 400.47

The best management practices (BMP) concept has failed to adequately protect salmon habitat in the Columbia River Basin, yet all alternatives rely on BMPs. Rhodes et al. (1994) and Espinosa (1997) have documented the BMP failure for the Snake River sub-basin and Clearwater National Forest, respectively. BMPs are neither management standards nor quantitative measures linked to accountability. They do not effectively deal with cumulative impacts; conversely, they encourage cumulative impacts since the adoption of any BMP is deemed sufficient consideration despite existing resource conditions.

Response to Concern 400.47

The Forest-wide Management Direction is similar to a filtering process with several screens, with each subsequent screen further reducing threats or effects from management activities (direct/indirect and cumulative). The screens are represented by (1) the comprehensive Forest-wide management direction (goals, objectives, standards, and guides); (2) Management Prescription direction and standards and guides; (3) Management Area specific direction (objectives, standards, and guides). Then at the individual project level there are additional mitigation measures that are tailored to meet the situations of the project to further avoid or minimize effects from proposed activities and further the achievement of Forest Plan goals and objectives.

The appropriate implementation of BMPs which are generally used at a project level to avoid or minimize effects have been identified in the literature as being successful, such as in the publication by Seyedbagheri 1996, "Idaho Forestry Best Management Practices: Compilation of Research on Their Effectiveness". Literature and monitoring also show cases where a BMPs may need to be adjusted to better address unique site-specific needs. Similar literature is referenced throughout the SWRA resource section of the FEIS and this information will be important for project implementation teams to consider as they design projects implementing the Forest Plan. BMPs, in addition to the other filters identified above, serve to provide a thorough framework in which to minimize the threats and associated risk from proposed management activities.

Concern Statement 400.48

The Forest Service should consider a policy that proposes additional land exchanges with the State where opportunities exist for converting from an extractive management direction on State lands in the watershed, to one which, under Forest Service ownership, could at least theoretically preserve watershed integrity and amenity values for their own sake – values that the State's endowment lands mandate does not address. Such actions would not only provide environmental benefits, but would certainly boost public support and appreciation for National Forest managers.

Response to Concern 400.48

Consideration of adjustments to the current policy for land exchanges is outside of the scope of this planning process. The Forest Plan does provide criteria for land acquisition (Land and Special Uses section, Guideline LSGU01) and land conveyance (Guideline LSGU02).

410 Watershed and Aquatic Restoration (BAER, prioritization, strategies)

Concern Statement 410.01

The statements made on page 3-64 of the DEIS assume that there will be no catastrophic fires to impact sockeye habitat, and that passive restoration was determined to be the most appropriate strategy to improve sockeye salmon habitat over the short-term, particularly in areas where there are critically low populations of sockeye. This could create another assumption that the alternative that provides the most passive restoration of sockeye habitat is the most appropriate. To the contrary, statements made on page 3-47 suggest that active management would produce short-term risks but long-term solutions by incorporating appropriate BMPs.

Response to Concern Statement 410.01

Passive restoration is recommended primarily in subwatersheds where sockeye spawn and rear to eliminate immediate risks from restoration activities. Passive restoration was assigned only to those areas where watershed and habitat was in good condition or slightly degraded and could recover on their own over time with minor adjustments to management practices. WARS assessed what was needed to maintain or improve watershed and aquatic habitat conditions. It was not intended to assign what type of management was needed to meet other resource goals and objectives.

Active management will be needed to address certain resource issues in the Upper Salmon subbasin where sockeye occur. This management may lead to temporary and some short-term risks to sockeye habitat. However, management direction provided under Soil, Water, Riparian and Aquatic (SWRA)

Standard SWST04 states, “that management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except: Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions.” This means that if effects occur from other resource activities then those effects will not retard the attainment of properly functioning habitat for the conservation and recovery of sockeye populations.

Concern Statement 410.02

Regarding Howell Creek, Sawtooth Management Area 12: The Forest Service should implement the goals and objectives listed in the Draft LMP for the Preferred Alternative and implementation of MPCs with an emphasis on restoring conditions to meet requirements and objectives for wildlife, aquatic, riparian, and water quality resource.

Response to Concern 410.02

Management direction is identified in the Forest Plan for the SNF Management Area 12 – Howell Creek, which has several management area specific restoration objectives for soil, water, aquatic, and wildlife.

Concern Statement 410.03

The DEIS does not take into consideration the impacts of catastrophic wildfire when planning for restoration of 303(d)-listed streams. The threat from catastrophic wildfire increases the risk to 303(d) streams and BAER watersheds equally, yet the DEIS states Alternative 5 is the best for BAER watersheds and the worst alternative for WQL streams.

The Forest Service should indicate the analysis, documentation, or literature contained in the planning record that support the assertion that “mechanical vegetation treatment” in BAER sub-watersheds will result in a reduction of the “post-wildfire threat”.

The high expenditures on the Boise for BAER activity are not effective in meeting goals and objectives but rather appear to have been used to obtain off-budget money to increase employment and placate local residents. It is apparent that in many cases the agency is the primary agent in the introduction of exotic species in areas where fires were not uncharacteristic and the native vegetation was capable of resprouting.

Response To Concern 410.03

The FEIS evaluated separately the effects from (1) uncharacteristic (high and extreme) forest vegetation hazards on long-term soil productivity, human life, property, and/or municipal supply watersheds and (2) the effects from management activities including watershed restoration on 303(d) water quality limited water bodies. This separation in evaluation of effects was necessary due to the causes for the listing of 303(d) water quality limited water bodies was not directly the result of wildfires but associated with

anthropogenic activities. Therefore, the restoration/conservation strategy appropriate for improving water quality conditions within a subwatershed with 303(d) water quality limited water bodies is different from reducing the risk associated with uncharacteristic wildfire. Refer to the SWRA Resource Chapter 3 of the FEIS and the SWRA Technical Report (refer to project record) for more detailed discussion.

The analysis, assumptions, documentation, and literature cited that discusses that mechanical vegetation treatments may reduce post-wildfire threats is identified in SWRA Resource Chapter 3 of the FEIS, Chapter Three of the Biological Assessment (refer to project record), and the SWRA Technical Report (refer to project record).

All large Burned Area Emergency Response requests are reviewed at both the Regional and Washington Office to qualify for funding. Proposed BAER projects are reviewed to determine if treatments are:

- 1) Necessary to protect soil and water resources from unacceptable losses or to prevent unacceptable downstream damage;
- 2) Prescribed measures are proven effective and are feasible to implement before damage producing storms;
- 3) Prescribed measures are environmentally and socially acceptable and compatible with long-term restoration needs; and
- 4) Costs are minimal while still providing for essential protection.

Concern Statement 410.04

The Forest Service should follow their proposed inventory effort with a prioritization and planning step. The prioritization should be done after consultation with other stakeholders to ensure that planning considers TMDL schedule, activities on non-National Forest system lands, and other factors. The Forest Service can then develop restoration plans for higher priority sites. Restoration plans for mixed ownership sites should be coordinated with other stakeholders, as appropriate.

Response to Concern 410.04

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries in which there are National Forest System lands managed by the Ecogroup that flows into the Snake River (e.g. Salmon River, Boise, Payette, Hells Canyon, etc.). Included in ACS are TMDLs, 303(d) water quality limited water bodies, ESA listed fish species and current conditions of the soil, water, riparian, and aquatic resources. Forest-wide management direction identifies the need to cooperate with other agencies and interested parties to develop restoration plans. For more information on the ACS refer to Chapter III of the Biological Assessment (refer to the project record) and Forest Plans (Appendix B).

Concern Statement 410.05

Concerns regarding Sawtooth National Forest Management Areas:

- 1. Upper South Fork Boise River, MA 6: The LMP must provide provisions to prevent further watershed degradations from direct human-caused disturbances and grazing. The upper reaches of the watershed should be managed to prevent road and trail erosion, overgrazing by sheep, and maintenance of the riparian areas to provide canopy shading and an abundance of large woody debris, which provides instream habitat utilized by bull trout and other aquatic species. Upland vegetated areas should be managed to reduce disturbance in areas of high use by humans and livestock.*

This area provides critical habitat for bull trout that utilize the upper watershed for spawning and early rearing. Some bull trout may also occur in some of the tributaries. Bull trout habitats must be pristine, without high levels of sedimentation and areas that are protected from high water temperatures. MPCs should be applied to preserve the pristine conditions found in most of the headwater reaches of this area and to restore the degraded reaches using natural processes. Restoration efforts should focus on allowing the revegetation of disturbed areas, excluding livestock from riparian areas and altering access points, trails, and roads where human-caused erosion is occurring.

- 2. Little Smokey Creek, MA 07: The riparian areas of this watershed are probably functioning at moderate to high risk, which is contrary to what the Draft LMP states. The Goals and Objectives in the LMP must address the poor riparian conditions found in many of the tributaries and restoration MPCs must be implemented, including a change in grazing management to allow regeneration of willows, sedges, and other riparian species.*
- 3. Lime Creek, MA 09: Due to the geologic characteristics of the area, the watershed is threatened by activities that accelerate erosion. The LMP should adopt the Goals and Objectives listed for SWRA, and MPCs need to emphasize meeting requirements for wildlife, aquatic, riparian, and water quality resources. The watershed supports rainbow trout and, possibly, bull trout. Westslope cutthroat trout are not native to this area but have been planted in mountain lakes.*
- 4. Soldier Creek/Willow Creek, MA 10: The MPCs as proposed by the Preferred Alternative should be implemented with the goal to restore aquatic and riparian conditions to a level suitable for cold-water biota. This area has several small streams that are known to support rainbow trout. It is important to maintain riparian areas that provide shading and stability for undercutting and formation of pools. Beaver ponds provide much of the refugia for aquatic resources.*

5. *Rock Creek, MA 11: This watershed has a population of rainbow trout (of wild origin) and receives hatchery rainbow trout during the fishing season. The LMP must provide a strategy to reduce sedimentation from recreationists and livestock. Some problems could be mitigated through the use of riparian fencing and allotment management strategies. MPC 4.1 should be implemented in areas of popular recreation use along the main travel corridors. Dry Creek supports a population of Yellowstone cutthroat trout, and it is critical that mitigations be employed to remove threats to their population.*
6. *Shoshone Creek, MA 14: The Forest Service should implement the Preferred Alternative with an emphasis on restoring aquatic habitat conditions to historic levels. The watersheds should be managed using MPC 4.1 in areas of popular use and provide developed access to recreational opportunities along the main travel corridors, reducing the level of use in areas that are not in Properly Functioning Condition or are at risk. The parts of Shoshone Creek that are within this MA have historically contained rainbow/redband trout. Rainbow Trout today occur only in the upper reaches. The Forest Service should work closely with the BLM in restoring this watershed. Efforts should include livestock management strategies to reduce or eliminate grazing in the riparian area and road and trail maintenance to reduce erosion and sedimentation.*
7. *Albion Mountains, MA 15: The Forest Service should employ aggressive restoration efforts to reduce sedimentation from livestock grazing in the riparian area. The Yellowstone cutthroat trout resides within the headwater sections of tributaries in this area, but populations are isolated from each by either poor habitat conditions or by water diversions at the lower sections of the watersheds. The MPCs within the Sawtooth LMP should emphasize implementation of restoration actions.*
8. *Black Pine, MA 19: The Yellowstone cutthroat trout occur in Sixmile Creek and Eightmile Creek but are isolated from all other populations because of water withdrawals during the irrigation season and habitat conditions in their lower reaches. The Forest Service should address measures to protect those isolated population by developing a plan to restore and maintain water quality and habitat conditions. Both watersheds lack large woody debris in their riparian areas, and both receive livestock grazing that contributes to bank erosion and sedimentation.*
9. *Sublett watershed, MA 20: In stream habitat conditions are generally poor because of sedimentation caused from dirt roads, livestock grazing in riparian areas, and removal of large woody debris for fuel wood. The Forest Service must incorporate Goals and Objectives to restore aquatic and riparian resources. Strategies could include placing fences around riparian areas and restricting wood gathering.*

Response to Concern 410.05

1. Approximately 95 percent of this management area is identified for passive or active watershed, fisheries or wildlife restoration and/or semi-primitive recreation. Several management area objectives focus on restoring watershed and fisheries habitat. Sheep grazing will continue with adjustments made to the grazing management strategies and practices based on project level evaluations. Refer to the Sawtooth National Forest Plan, Management Area 6, for more detailed information regarding the characterization and management area direction.

2. The management area characterization for the geomorphic integrity and water quality have been updated and identify the majority of the area to be functioning at risk. Several management area objectives focus on restoring watershed and fisheries habitat. Sheep grazing will continue with adjustments made to the grazing management strategies based on project level evaluations. Refer to the Sawtooth National Forest Plan, Management Area 7, for more detailed information regarding the characterization and management area direction.

3. Approximately 76 percent of this management area is identified as semi-primitive recreation. The remainder is evenly divided between forested and non-forested restoration. Several management area objectives focus on restoring watershed and fisheries habitat.

Westslope cutthroat are not native to streams in MA 09. Thus, specific discussions of westslope cutthroat in MA 09 are not included in the FEIS and final forest plan.

4. Extensive management direction is provided in the revised Forest Plan that directs each forest to restore aquatic and riparian conditions for TEPC fish species and SWRA resources. Specifically, SWRA Goal SWGO10) states, "Provide riparian and aquatic habitat capable of supporting viable populations of native and desired non-native aquatic species" and TEPC Goal TEGO01) states "Provide habitat capable of contributing to the survival and recovery of species listed under the ESA (see Appendix E for current list of species)". MA 10 also has several SWRA objectives aimed at improving water quality and habitat.

5. Recommendations on specific management actions such as riparian fencing are beyond the scope of this programmatic document. However, MA 11 provides management objectives aimed at improving watershed and habitat conditions. Specifically, Objective 1109 states, Reduce impacts from grazing and roads on the local populations of cutthroat trout and other native salmonids within the East Fork Dry Creek and Middle West Fork Dry Creek subwatersheds. While Objective 1112 states, Work with DEQ and EPA to validate the authenticity and causes for listing Fifth Fork Rock Creek, McMullen Creek, and West Fork Dry Creek 303(d) as impaired water bodies, and to determine any Forest Service management activities that may be contributing to the listings. To meet these objectives and other management direction, the Forest Service will work cooperatively with others to implement restoration over the life of the revised plans.

6. Recommendations on specific management actions such as developed access are beyond the scope of this programmatic document. However, MA 14 provides management objectives aimed at improving watershed and habitat conditions. Specifically, Objective 1404 states, Work with DEQ and EPA to validate the authenticity and cause(s) for listing Cottonwood Creek, Horse Creek, and North Fork Shoshone Creek as subwatersheds with impaired 303(d) water bodies, and to determine any Forest Service management activities that may be contributing to the listings. Management direction provided by SWRA Standards SWST01 and SWST04 also provide a high degree of protection to aquatic resources.

Most actions would have to maintain or improve conditions, unless demonstrable long-term benefits would justify a short-term degrade. This implies that most actions would be working toward reducing impacts to SWRA resources. To meet this direction, the Forest Service will work cooperatively with others to reduce recreational impacts over the life of the revised plans.

Recommendations on specific management actions are beyond the scope of this programmatic document. However, the Forest Service will work closely with the BLM and other agencies to improve watershed conditions. Specifically, SWRA Guideline SWGU01 states, “Federal, state, county, tribal, and regulatory agency priorities should be considered early in the process of subbasin review, fine- and site/project-scale analyses, and restoration priorities to help ensure priorities compliment each other where possible, or at least minimize conflicts”. SWRA Objective SWOB05 also states, “Cooperate with the State, Tribes, other agencies and organizations to develop and implement Total Maximum Daily Loads (TMDLs) and their implementation plans for 303d impaired water bodies influenced by National Forest System management”.

7. Streams within MA 15 fall within 5.1 and 6.1 MPCs. These MPCs emphasize restoration and maintenance of forested, shrubland, and grassland landscapes. Management activities under these MPCs will employ active or passive restoration where needed and funding allows.

8. Streams within MA 19 fall within 3.2 and 6.1 MPCs. These MPCs emphasize restoration and maintenance of shrubland and grassland landscapes and active restoration of aquatic, terrestrial, and hydrologic Resources. Sixmile and Eightmile Creeks fall within a 3.2 MPC under the Alternative 7 (i.e., the Forest Plan). This MPC is considered a high priority for aquatic restoration. The Forest Service will work, within available funding, to improve watershed and habitat conditions within this drainage over the life of the plan. Management activities under the 6.1 MPC will employ active or passive restoration where needed and funding allows

9. Recommendations on specific management actions to accomplish goals and objectives are beyond the scope of this programmatic document. However, Forest-wide and Management Area direction incorporate goals and objectives to restore aquatic and riparian resources. Some of this direction includes:

SWRA Goal SWGO10) Provide riparian and aquatic habitat capable of supporting viable populations of native and desired non-native aquatic species.

SWRA Goal 11) Manage human-caused disturbances to avoid or reduce degrading effects to aquatic populations, particularly during critical life stages.

MA Objective 2009) Work with DEQ and EPA to validate the authenticity and causes for listing Sublett Creek and Fall Creek as 303(d) impaired water bodies, and to determine any Forest Service management activities that may be contributing to the listings.

Concern Statement 410.06

The following text should be used as a replacement for the paragraph on restoration:

“Restore or maintain watershed conditions to support viable populations of fish, emphasizing native species and their strongholds. Maintain properly functioning habitat, including connectivity, and restore degraded habitat to contribute to the viability of

native species, the recovery of listed species, and productive and diverse fish populations to meet social needs. This includes maintaining or achieving optimum ranges of water temperatures, large woody debris, stream bank stability, sediment levels, water chemistry, water flow regime, and pool size and numbers, consistent with site potential. When prioritizing habitat restoration efforts consider the amount, quality, and distribution of the target habitat, fragmentation of the habitat juxtaposition to other habitats, connectivity, presence, and conditions of rods, ecosystem processes, and other influences on the habitat. Place the highest priority on native fish habitat with the greatest potential for desirable improvement."

Response to Concern 410.06

These descriptions have been incorporated into the desired conditions and Forest-wide Management Direction located in SWRA Resources Chapter Three of the Forest Plans.

Concern Statement 410.07

Concerns regarding Boise National Forest Management Areas:

- 1. The entire North Fork of the Boise River watershed and several sub-watersheds contain impaired waters and waters where bull trout are present. Those sub-watersheds include Mores Creek, Bear Valley, headwaters of the Middle Fork of the Boise River, and South Fork of the Payette. Under the Preferred Alternative, these watersheds continue to be managed for multiple-use, which includes logging and road building. The focus should instead be on restoration of water quality with restrictions on logging and road building.*
- 2. Rattlesnake Creek/Feather River, MA 2: The greatest risks to these watersheds are from road degradation and sedimentation. The LMP should employ strategies to protect riparian areas and streambeds from road encroachment and erosion and managed with MPCs that emphasize restoration. There are several other sub-watersheds that enter the South Fork Boise River downstream of the Feather River. Although bull trout have not been documented to reside in these waters, they may be present, as they do support cold-water aquatic species, including rainbow trout and tailed frogs.*

The Feather River, which is the lower-most tributary of the South Fork Boise River, is documented to support bull trout. Mining activities have caused degradation in the lower reaches of this watershed. The watersheds should be managed with MPC 3.1 to allow natural processes to dominate. The adjacent Trinity Creek sub-watershed should also be managed with MPC 3.1 because it does have characteristics that are suitable for bull trout spawning and rearing, although their presence has not been documented.

3. *Upper Boise River, MA 5: Page 111-120 of the Draft LMP states that this area provides “significant habitat for threatened bull trout, and restoration efforts for this species are currently ongoing,” yet there are not goals, objectives, standards, or guidelines for Riparian and Aquatic resources. The LMP should mention the locations where restoration is happening, where else it should occur, and what types of restorations are needed.*
4. *North Fork Boise River, MA 7: The Forest Service should give this Management Area top priority for water quality focus in the Upper Boise River system. Numerous streams are in the “Not Full Support” assessment category and are candidates for next WQL (303(d)) list. The Boise LMP should consider actions that will strengthen bull trout populations in the Bear River and Bear, Cub, Upper Crooked, Pikes Fork, and Banner Creeks. The Forest Service should focus on sediment reduction for the following drainages: Bear River, Crooked River (from Pikes Fork to Middle Fork of the Boise) and Rabbit, Camp, Hungarian, Banner, Pikes Fork, Big Owl, Little Owl, Upper Trail Creeks.*
5. *Upper South Fork Boise River, MA 10: The headwaters of the South Fork of the Boise River should be managed for protection or restoration, not multiple-use.*
6. *Lower Middle Fork Payette River, MA 14: The Forest Service should formulate methods for restoring habitat conditions along the lower Middle Fork Payette River.*

Response to Concern 410.07

The previous six comments while they vary spatially they are common in identifying the need for appropriate management area characterization of watershed and aquatic conditions and fish species. They highlight the need to identify appropriate management area direction to restore degraded water quality and fish habitat while maintaining currently “functioning appropriately” conditions. The Forest-wide management direction for TEPC Species and SWRA Resources have numerous goals, objectives, standards and guides identifying restoration of degraded conditions as well as direction to maintain currently “functioning appropriately” conditions.

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries in which there is lands managed by the Ecogroup that flows into the Snake River (e.g., Boise, Payette, Hells Canyon, etc.). For more information on this strategy refer to Chapter III of the Biological Assessment or the FEIS.

Concern Statement 410.08

Concerns regarding Payette National Forest Management Areas:

- 1. The Forest Service should manage the following areas for protection and restoration, not multiple-use: the West Mountains, the Little Weiser, and French Creek. All areas are vulnerable due to high erosion risk and have sustained heavy disturbance.*
- 2. Weiser River, MA 03: All reaches of this watershed with populations of bull trout should be labeled MPC 3.2. Page 111-99 of the Payette LMP states, "Bull trout are at high risk of going extinct due to overall poor habitat conditions"*
- 3. South Fork Salmon River, MA 12: The All-H Paper designates the Salmon River watershed as one of its priority subbasins. The watershed has been designated an aquatic stronghold and recovery area for wild Chinook, steelhead, and bull and westslope cutthroat trout. Prohibitions on logging and road building have allowed the watershed to begin passive recovery, but the watershed is still degraded. Flooding, hillslope, and road failure contribute to sediment increases. The Draft LMP proposed removing the prohibitions and allowing degradation to start over again. Vegetative treatment and road building should continue to be prohibited. Harvest-associated management is the least effective in terms of watershed recovery and often times causes added degradation. The LMP contains no accountable standards for this Management Area - the watershed should be dedicated to the recovery of the ESA-listed fish species. The Forest Service should seek active restoration through obliteration of the South Fork Salmon River Road, which contributes sediment to the river system.*

Response to Concern 410.08

1. These three drainages have a variety of MPCs applied to them based on their current conditions and desired conditions of their resources. Forest-wide management direction will greatly reduce the risk of any unacceptable degradation and management area specific direction further identifies the objectives to restore degraded conditions. Refer to the specific management area direction located in the Forest Plans for more information.
2. Forest-wide management direction will greatly reduce the risk of any unacceptable degradation of bull trout habitat. Specific management area direction further identifies standards greatly reduces any risk associated with road construction as follows:

Standard 0307 - There shall be no net increase in road densities in the MPC 5.1 portion of the Middle Hornet Creek subwatershed unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:

- a) *For resources that are within their range of desired conditions, the increase in road densities shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and*

- b) For resources that are already in a degraded condition, the increase in road densities shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- c) Adverse effects to TEPC species or their habitat are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitat.

An exception to this standard is where additional roads are required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations).

Standard 0308 – New roads and landings shall be located outside of RCAs in the MPC 5.1 portion of the Middle Hornet Creek subwatershed unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:

- a) For resources that are within their range of desired conditions, the addition of a new road or landing in an RCA shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- b) For resources that are already in a degraded condition, the addition of a new road or landing in an RCA shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats.

An exception to this standard is where construction of new roads in RCAs is required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations).

Standard 0305 – Within MPC 4.1c inventoried roadless areas, road construction and reconstruction may only occur where needed:

- a) To provide access related to reserved or outstanding rights, or
- b) To respond to statute or treaty.

Guideline 0311 – Within MPC 5.1 or 6.1, road construction and reconstruction may occur where needed:

- a) To provide access related to reserved or outstanding rights, or
- b) To respond to statute or treaty, or
- c) To achieve restoration and maintenance objectives for vegetation, water quality, aquatic habitat, or terrestrial habitat; or
- d) To support management actions taken to reduce wildfire risks in wildland-urban interface areas; or
- e) To meet access and travel management objectives.

Additional management area objectives to restore degraded conditions are identified below.

Soil, Water, Riparian, and Aquatic Resources

Objective 0318- Improve water quality and assist in de-listing 303(d) water bodies by reducing road-related accelerated sediment through a combination of road decommissioning, relocation, reconstruction, and maintenance in the Mann Creek, Pine Creek, West Fork Weiser River, East Branch Weiser River, East Fork Weiser River, Middle Fork Weiser River, and Little Weiser River drainages. The Little Weiser River drainage includes the Upper Little Weiser and Anderson Creek subwatersheds.

Objective 0319 - Restore riparian vegetation and floodplain function throughout the management area by reducing road-related impacts through relocation, reconstruction, or obliteration.

Objective 0320 - Restore riparian areas by relocating or hardening dispersed recreation sites in the Mann Creek, Cabin Creek, Lost Creek, and Anderson Creek drainages, and the horse camping area in the Jungle Creek drainage.

Objective 0321 - Avoid genetic hybridization of isolated populations of bull trout, while improving connectivity between genetically similar fish subpopulations and necessary fish habitat components in the Upper Hornet Creek, Upper East Fork Weiser River, Upper Little Weiser River, and Anderson Creek subwatersheds.

Objective 0322 - Reduce riparian road density and stream crossings in all drainages, with emphasis on those with bull trout populations or suitable habitat.

Objective 0323 – Initiate restoration of watershed conditions and fish habitat in the Upper East Fork Weiser River, Upper Little Weiser River, and Anderson Creek subwatersheds to help strengthen bull trout populations.

Refer to the specific management area direction located in the Forest Plans for more information.

3. Forest-wide Management Direction for the South Fork Salmon River is included within the following seven management areas occurring both on the Boise and Payette National Forests:

- PNF – MA 11 – Upper Secesh
- PNF – MA 12 – South Fork Salmon
- PNF – MA 13 – Big Creek/Stibnite
- PNF – MA 14 - FCRONR
- BNF – MA 19 – Warm Lake
- BNF – MA 20 – Upper Johnson Creek
- BNF – MA 21 – Lower Johnson Creek

The South Fork Salmon River subbasin, approximately 828,000 acres, has an estimated 20,800 acres of suited timber base or approximately 2.5 percent of the area. This is a reduction of over 200,000 acres of suited timber base as compared to the current forest plan, Alternative 1B.

Forest-wide management direction will greatly reduce the risk of any unacceptable degradation of bull trout habitat. Specific management area direction further identifies standards greatly reduces any risk associated with road construction as identified in the following Lower Johnson Creek Management Area - 21, which follows:

Roads and Facilities

Standard 2154 – New roads shall not be built except to replace existing roads in RCAs or directly repair human-caused damage to TEPC fish habitat in streams unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats.

Standard 2118 – New roads and landings shall be located outside of RCAs in the MPC 5.1 portion of the Lower Johnson Creek subwatershed, unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:

- a) For resources that are within their range of desired conditions, the addition of a new road or landing in an RCA shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- b) For resources that are already in a degraded condition, the addition of a new road or landing in an RCA shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats.

An exception to this standard is where construction of new roads in RCAs is required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations).

Standard 2119 – In the Lower Johnson Creek Management Area, except for the MPC 5.1 portion, do not reopen classified roads in Level 1 maintenance status or Level 2 roads that have become impassable unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:

- a) For resources that are within their range of desired conditions, reopening these roads for use shall not result in degradation to those resources unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- b) For resources that are already in a degraded condition, reopening these roads shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short- or long-term benefits to those resource conditions; and
- c) Adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short- or long-term benefits to those TEPC species or their habitats.

Where reopening these roads cannot meet these constraints, consider decommissioning. An exception to this standard is where reopening Level 1 or 2 classified roads is required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations).

Standard 2111 – Within MPC 3.1, road construction and reconstruction may only occur where needed:

- a) To provide access related to reserved or outstanding rights, or
- b) To respond to statute or treaty, or
- c) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrologic, aquatic, riparian or terrestrial resources, or health and safety, would result.

Standard 2115 – Within MPC 3.2, road construction and reconstruction may only occur where needed:

- b) To provide access related to reserved or outstanding rights, or
- c) To respond to statute or treaty, or
- d) To support aquatic, terrestrial, and watershed restoration activities, or
- e) To address immediate response situations where, if the action is not taken, unacceptable impacts to hydrologic, aquatic, riparian or terrestrial resources, or health and safety, would result.

Guideline 2122 – Within MPC 5.1, road construction and reconstruction may occur where needed:

- a) To provide access related to reserved or outstanding rights, or
- b) To respond to statute or treaty, or
- c) To achieve restoration and maintenance objectives for vegetation, water quality, aquatic habitat, or terrestrial habitat; or
- d) To support management actions taken to reduce wildfire risks in wildland-urban interface areas; or
- e) To meet access and travel management objectives.

For additional management area objectives, standards and guidelines to reduce risk from management activities and to restore degraded conditions refer to the individual management areas located in the Boise and Payette Forest Plans.

Concern Statement 410.09

The Forest Service should provide a detailed restoration schedule and standards for the South Fork in both Boise and Payette LMPs.

The Forest Service should develop a specific list of restoration goals and activities for aquatic and riparian resources and include the list in an appendix to allow for inclusion of more details, including the timelines.

Response to Concern 410.09

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS) which is comprised of three components (restoration priority of subwatersheds, dominant restoration or conservation strategy for each subwatershed, and identification of ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries in which there is lands managed by the Ecogroup that flows into the Snake River (e.g., Salmon River, Boise, Payette, Hells Canyon, etc.). Included in ACS are TMDLs, 303(d) water quality limited water bodies, ESA listed fish species and current conditions of the soil, water, riparian, and aquatic resources. Forest-wide management direction identifies the need to cooperate with other agencies and interested parties to develop restoration plans. For more information on the ACS refer to Chapter III of the Biological Assessment (refer to the project record) and Forest Plans (Appendix B).

Refer to the appropriate forest plans and associated management areas identified above in Comment 410.08 that identify more specific information regarding restoration objectives identified for the South Fork of the Salmon River.

Concern Statement 410.10

The Forest Service should address the assumption that in large areas that are to be managed as Roadless, BAER treatments should seldom occur. An assessment should be made of the vulnerability of watersheds in relation to the roadless direction.

Response to Concern 410.10

In the FEIS, SWRA Issues 1 and 2 included an evaluation of the ability of each alternative to treat subwatersheds identified as concerns to long-term soil productivity, human life, property and/or municipal supply watersheds from uncharacteristic wildfire. This analysis was partially based on the MPCs assigned that would include areas to be managed as roadless. Subwatersheds identified as

heightened concern from post-wildfire floods, landslides, and debris flows were also identified in their appropriate management area direction for potential forest vegetation treatment to reduce uncharacteristic wildfire effects. Refer to the SWRA Resource section Chapter 3 of the FEIS and specific management area direction located in the Forest Plans for more detailed information and discussion of effects.

Concern Statement 410.11

The DEIS does not take into consideration the impacts of catastrophic wildfire when planning for restoration of 303(d)-listed streams. The threat from catastrophic wildfire increases the risk to 303(d) streams and BAER watersheds equally, yet the DEIS states Alternative 5 is the best for BAER watersheds and the worst alternative for WQL streams.

The Forest Service should indicate the analysis, documentation, or literature contained in the planning record that support the assertion that “mechanical vegetation treatment” in BAER sub-watersheds will result in a reduction of the “post-wildfire threat”.

The high expenditures on the Boise for BAER activity are not effective in meeting goals and objectives but rather appear to have been used to obtain off-budget money to increase employment and placate local residents. It is apparent that in many cases the agency is the primary agent in the introduction of exotic species in areas where fires were not uncharacteristic and the native vegetation was capable of resprouting.

Response To Concern 410.11

The FEIS evaluated separately the effects from (1) uncharacteristic (high and extreme) forest vegetation hazards on long-term soil productivity, human life, property, and/or municipal supply watersheds and (2) the effects from management activities including watershed restoration on 303(d) water quality limited water bodies. This separation in evaluation of effects was necessary due to the causes for the listing of 303(d) water quality limited water bodies was not directly the result of wildfires but associated with anthropogenic activities. Therefore, the restoration/conservation strategy appropriate for improving water quality conditions within a subwatershed with 303(d) water quality limited water bodies is different from reducing the risk associated with uncharacteristic wildfire. Refer to the SWRA Resource Chapter 3 of the FEIS and the SWRA Technical Report (refer to project record) for more detailed discussion.

The analysis, assumptions, documentation, and literature cited that discusses that mechanical vegetation treatments may reduce post-wildfire threats is identified in SWRA Resource Chapter 3 of the FEIS, Chapter Three of the Biological Assessment (refer to project record), and the SWRA Technical Report (refer to project record).

All large Burned Area Emergency Response requests are reviewed at both the Regional and Washington Office to qualify for funding. Proposed BAER projects are reviewed to determine if treatments are:

- 1) Necessary to protect soil and water resources from unacceptable losses or to prevent unacceptable downstream damage;
- 2) Prescribed measures are proven effective and are feasible to implement before damage producing storms;
- 3) Prescribed measures are environmentally and socially acceptable and compatible with long-term restoration needs; and
- 4) Costs are minimal while still providing for essential protection.

440 Fisheries Management

Concern Statement 440.01

The guidelines on page 111-11 of the Payette LMP discourage stocking of non-native fish species. The Forest Service should provide a discussion on how that would change the current stocking program now carried out by the Idaho Department of Fish and Game and why the change is necessary.

The Forest Service should add this goal: "Control and eliminate where possible exotic fish species in native fish strongholds." There should be a measure to ensure that exotic fish that are stocked in alpine and subalpine lakes cannot migrate to native fish strongholds.

The Forest Service should add the following standard: "Never stock hatchery fish in habitat occupied by self-sustaining populations of wild fish."

Response to Concern 440.01

SWRA Guideline SWGU10 would address threats from fish stocking and non-native species. This direction states that "Stocking of non-native fish species in high-mountain and other Forest lakes and streams should be discouraged if stocking imperils the inherent composition, structure, or function of the lake or stream ecosystems. Coordinate management of these ecosystems with Idaho Department of Fish and Game and tribal governments."

SRWA Objective SWOB11 also states "Coordinate with state and local agencies and tribal governments annually to limit or reduce degrading effects from stocking programs on native and desired non-native fish and aquatic species."

To what extent this direction discourages or discontinues fish stocking is dependent on how potential conflicts are addressed through existing or future Memorandums of Understanding (MOU's) with the State of Idaho.

Although existing laws (e.g., Organic Administration Act, the Multiple Use-Sustained Yield Act, the Federal Land Policy and Management Act, etc.) and USDA and Forest Service policy recognize shared responsibilities between the Forest Service and State wildlife agencies in the management of fish and wildlife resources, these and other Federal statutes also recognize that States' have jurisdiction in managing resident fish and wildlife populations. Under existing laws and Federal regulations, most State actions to manage fish and wildlife populations on national forests and grasslands do not require Forest Service approval.

However, the Forest Service still has responsibility to prevent damage to resources occurring on National Forest System lands. To ensure coordination of uses and protect Federal interests, Forest Service officials shall cooperate with each State when the States or Forest Service develop wildlife and fish introductions and stocking programs on National Forests and Grasslands. Coordinate with respective State agencies to ensure that stocking and introduction efforts on National Forest System lands do not compromise Federal interests (for example, compliance with the Endangered Species Act and Wilderness Act). Disputes are resolved in accordance with procedures outlined in the Memorandums of Understanding (MOU) between the Forest Service and each State agency.

It is anticipated that through our MOU with the State of Idaho and coordination with the USDI Fish and Wildlife Service and National Marine Fisheries Service in recovery plans that opportunities to control and eliminate exotic fish species in native fish strongholds would be pursued. In fact, TEPC Objective TEOB09 states “As funding allows, implement restoration activities in accordance with the current Watershed and Aquatic Recovery Strategy or Forest Service-approved portions of recovery plans to: Restore listed fish species distribution and Conserve genetic diversity. SRWA Objective SWOB11 also states “Coordinate with state and local agencies and tribal governments annually to limit or reduce degrading effects from stocking programs on native and desired non-native fish and aquatic species.”

Concern Statement 440.02

The Forest Service should investigate approaches to reduce brook trout in “brook trout only” streams as a tool for restoration and recovery of bull trout.

Response to Concern 440.02

It is anticipated that through our MOU with the State of Idaho and coordination with the USDI Fish and Wildlife Service and National Marine Fisheries Service in recovery plans that opportunities to control and eliminate brook trout would be pursued. In fact, TEPC Objective TEOB09 states “As funding allows, implement restoration activities in accordance with the current Watershed and Aquatic Recovery Strategy or Forest Service-approved portions of recovery plans to: Restore listed fish species distribution and Conserve genetic diversity. SRWA Objective SWOB11 also states “Coordinate with state and local agencies and tribal governments annually to limit or reduce degrading effects from stocking programs on native and desired non-native fish and aquatic species.”

Concern Statement 440.03

The Forest Service should establish funding in order to acquire the necessary equipment to have bull trout genetic materials analyzed.

Response to Concern 440.03

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. Most Management Areas also have restoration objectives. Specific studies for each subbasin are beyond the scope of this programmatic analysis. However, genetic testing may be used to help determine which populations to focus restoration funding on first.

The Forest Service does not conduct genetic testing and generally sends samples to established laboratories. It is also anticipated that each Forest within the Ecogroup will work closely with Idaho Department of Fish and Game and other agencies to assess genetic purity.

Concern Statement 440.04**Concerns regarding the Payette National Forest:**

1. *The Forest LMPs should address maintenance and improvement activities on Snake River tributaries to maintain the Bull trout's coldwater habitats.*
2. *The Forest Service should develop more standards that apply to fish management. Beaver Creek has the potential to be a first-rate fishery but grazing has ruined the habitat.*
3. *Regarding DEIS, page 86 (MA 06): The Forest Service determined that catch and release of "wild" fish does not harm the fish, but then it closed areas along the Boulder Creek to public use in locations where salmon or steelhead were probably never present. There is concern that more of these types of closures will occur.*
4. *MA 05 and 14. The characterization of the Middle Little Salmon River should be modified to reflect the presence of westslope cutthroat trout in Boulder Creek. The same is true for the Frank Church River of No Return Wilderness*
5. *MA 08: The Forest Service should take steps to suppress the brook trout populations in the North Fork of Kennally Creek, Rapid Creek, Main Squaw Creek, and Third Fork Squaw Creek. Surveys indicate high densities of brook trout, making it unlikely that bull trout could re-establish.*

6. *MA 10: The Forest should provide additional detail on the sediment levels in upper Fall Creek, and reduce the levels to produce better conditions for fish, albeit not necessarily bull trout.*
7. *Big Creek/Stibnite, MA 13: The Forest Service should modify the "Characterization" section because Brook trout are not prevalent in the Upper East Fork South Fork Salmon River; only rare observations have been documented. The Final EIS must also reflect the fact that this same watershed has historically provided, and continues to provide, high-quality spawning and rearing habitat for bull trout and steelhead trout. Contrary to the description on Payette LMP page III-183, Upper Big Creek does support a healthy brook trout population with the area of bull trout occurrence.*

Response to Concern 440.04

1. A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS), which is comprised of three components (priority subwatersheds, multi-scale assessments, ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries in which there is land managed by the Ecogroup that flows into the Snake River (e.g., Boise, Payette, Hells Canyon, etc.). For more information on this strategy refer to Chapter III of the Biological Assessment in the project record or the SWRA Resource section of the FEIS, Chapter III.

2. The Forest Service as developed extensive management direction for listed fish species and SWRA resources in the form of: (1) Forest-wide direction, (2) Management Area direction, and (3) MPC assignment that provide prescriptive emphasis and direction for each area where a particular MPC is applied across the Forest.

Forest plan direction for the action alternatives provides a high level of SWRA resource protection. As appropriate, the direction was designed to allow for some temporary or short-term impacts in order to achieve long-term resource restoration or maintenance goals and objectives. Examples of this are found in SWRA Standards SWST01 and SWST04:

1) Management actions shall be designed in a manner that maintains or restores water quality to fully support beneficial uses and native and desired non-native fish species and their habitat, except as allowed under SWRA Standard 4 below. Use the MATRIX located in Appendix B to assist in determining compliance with this standard.

4) Management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except:

- Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions; or
- Where the Forest Service has limited authority (e.g., access roads, hydropower, etc.). In these cases, the Forest Service shall work with permittee(s) to minimize the degradation of watershed resource conditions.

Use the MATRIX located in Appendix B of the revised Forest Plan to assist in determining compliance with this standard.

These standards protect SWRA resources by restricting actions that would degrade properly functioning conditions, while allowing actions to occur that would benefit but not degrade SWRA resource conditions over the long term. This management strategy has been integrated throughout revised management direction at the Forest-wide, MPC, and Management Area levels. Management prescriptions and other resource areas have similar direction to help avoid, minimize, or mitigate potential activity impacts to SWRA resources. A TEPC Species section has also been added to the Forest-wide direction to provide special emphasis and protection for aquatic and terrestrial species of concern across all resource areas.

3. The above statement that catch and release of wild fish does not harm fish cannot be found in the characterizations for Upper Boulder (MA 05) or Lower Boulder (MA 04). However, studies have shown that there can be fish mortality from catch and release when certain types of gear are used. The state Fish and Game designates which streams are catch and release and what gear can be used. The Forest Service may close areas to protect spawning fish from disturbance, but would not close streams for catch and release fishing.

4. Given the scope of this analysis, fish species are not mentioned for each subwatershed in the Management Area characterizations. MA 05 does, however, mention that native cutthroat trout occur in area streams, which also infers Boulder Creek.

5. Management Area 08 list specific objectives for each resource. These objectives form the basis for project-level actions or proposals to help achieve Forest goals. The time frame for accomplishing objectives, unless otherwise stated, is generally considered to be the planning period, or the next 10 to 15 years. There are no objectives in MA 08 for suppressing brook trout. However, the USDI Fish and Wildlife Service as recently formed bull trout recovery teams that will assess restoration needs in each subbasin where bull trout exist. Brook trout suppression may occur in those streams where the benefits outweigh the costs.

6. Inchannel sediment is characterized through descriptions of water quality integrity, water quality impaired water bodies (303 d streams), and historic uses in MA10. Several specific SWRA objectives are also provided that address reducing sediment.

7. Given the scope of this analysis, fish species are not mentioned for each subwatershed in the Management Area characterizations. MA 13 does, however, mention that the incidence of introduced brook trout is low and that the risk for genetic contamination of bull trout populations is also low. The MA characterization also mentions that the Upper East Fork South Fork Salmon River is occupied by bull trout, steelhead, and chinook, and is important to the recovery of listed fish species, and as high-priority areas for restoration.

Concern Statement 440.05***Concerns regarding the Boise National Forest:***

1. *MA 02: The LMP should consider actions that will strengthen bull trout populations in Rattlesnake, Dog, and Elk Creeks and reduce sediment in Grouse Creek. The Forest Service should coordinate with the Idaho Department of Environmental Quality to ensure water quality monitoring occurs in Elk, East Fork Elk, and Alta Creeks.*

2. *MA 5: The Forest Service should consider actions to strengthen bull trout populations in Yuba, Upper Middle Fork Boise, and Upper North Fork Boise Rivers and Decker, Grouse, Sawmill, Trail, Big Silver Creeks. The Forest Service should coordinate with the Idaho Department of Environmental Quality to ensure water quality monitoring occurs in Upper North Fork Boise River and Black Warrior, West Black Warrior, and East Fork Montezuma Creeks.*
3. *MA 6: The Forest Service should consider actions to strengthen bull trout populations in Roaring River and Browns, Swanholm, Phiifer, Lostman, and Buck Creeks.*
4. *MA 8: The LMP should address bull trout that were recently found in upper Mores Creek. The Forest Service should confirm that the objective “maintain the Deadwood River as a migratory corridor for bull trout” includes passage at Deadwood Dam. The water flow regime below Deadwood Reservoir should be improved to benefit bull trout and also boating, as long as it does not create a conflict with bull trout.*
5. *The Forest Service must assess the risk to bull trout from historic mine tailings. This could provide an explanation of why there are no bull trout in the Deadwood River downstream from the Deadwood Mine.*
6. *Distribution and abundance surveys for bull trout should be performed, including associated habitat conditions surveys within this key watershed, especially Upper Middle Fork Payette, Bull Creek, Upper Silver Creek, and Long Fork.*
7. *Analyses should be performed to obtain bull trout life history information for the South Fork Payette River basin.*
8. *The Forest Service should review the Idaho Department of Environmental Quality's 1997 rod culvert inventory and work to re-establish connectivity between nodal, refuge, and focal habitats by replacing identified problem culverts or retrofitting culverts with fish passage structures.*
9. *Analyses should be performed to determine why there are no bull trout in the Second Fork Squaw Creek. The culvert in the Second Fork Squaw Creek is an obvious barrier to upstream migrating bull trout. The culvert should be replaced with a passable crossing. The lack of connection to nodal and refuge habitats is one of the primary factors limiting bull trout productivity in Bear Valley Creek.*
10. *The Forest Service should replace the culvert on FDR #326 with a new culvert or bridge that will allow fish passage. The current culvert is a barrier to upstream migrating bull trout.*

11. *Idaho Department of Fish and Game has never stocked bull trout or cutthroat trout in Warm Lake; therefore, the description of fish species is not accurate. The Forest Service should modify the characterization of the South Fork Salmon River to reflect its importance as a recreation area for sport fishery for summer Chinook. There was no mention of the Chinook salmon compensation/mitigation hatchery operations or the sport and tribal fisheries for summer Chinook salmon.*
12. *With regard to Upper Crooked River, Lower Crooked River, Pikes Fork, Salt Creek, Upper Bear River, and Lower Bear River: Brook trout are well distributed in these drainages, and adverse interactions with bull trout include competition, predation, and hybridization, which could decrease the likelihood of bull trout persistence. The Forest Service should explore opportunities to reduce or suppress brook trout populations through the appropriate science-based management strategies, taking into consideration the presence of several federally listed fish species in the drainages.*
13. *DEIS appendix C, page C-49 states that Meadow Creek only contains rainbow trout. The Forest Service should note that Brook trout is a common species in Meadow Creek.*
14. *The Forest Service should inventory the following watersheds and prepare management plans for fish passage: Feather and Roaring Rivers and Lower Trinity, Upper Trinity, Deer, Beaver, Dog-Nichols, Big Owl-Wren, Trapper-Trail, Swanholm-Hot, and Cottonwood Creeks.*

Response to Concern 440.05

1. A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS), which is comprised of three components (priority subwatersheds, multi-scale assessments, ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include lands managed by the Ecogroup in the South Fork Boise River subbasin.

Specific objectives to reduce sediment and improve bull trout subpopulations are included in the MA 02 direction. In addition, it is anticipated that each Forest within the Ecogroup will work closely with DEQ and other agencies to assess water quality. Exact locations of this monitoring have yet to be determined.

2 and 3. A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS), which is comprised of three components (priority subwatersheds, multi-scale assessments, ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include lands managed by the Ecogroup in the Middle Fork and North Fork Boise River subbasin.

Specific objectives to reduce sediment and improve bull trout subpopulations are included in the MA direction. For example, objective 0521 states “Initiate management actions designed to reduce sediment delivery from roads adjacent to North Fork and Middle Fork Boise Rivers.” There are no objectives in MAs 05 and 06 for strengthening bull trout subpopulations. However, indirectly many of the other objectives would benefit bull trout. The USDI Fish and Wildlife Service as also recently formed bull trout recovery teams that will assess restoration needs in each subbasin where bull trout exist.

It is also anticipated that each Forest within the Ecogroup will work closely with DEQ and other agencies to assess water quality. Exact locations of this monitoring have yet to be determined.

4. The Biological Assessment and MA characterization both mention that bull trout are present in the Upper Mores Creek subwatershed. The Forest Service cannot require fish passage at the Deadwood Dam because it does not have authority to do so. Improvement of the migratory corridor below the dam is within the Forest Service’s authority to address.

5. Information and risk associated with historic mine tailings was beyond the scope of analysis for this programmatic document. Potential threats from mining were evaluated based on areas where mineral deposits have historically been mined and professional opinions of each Forest’s mineral specialist. Risks to specific subbasins were displayed in the FEIS (Chapter III), and subbasins and subwatersheds in the BA (Chapter VI, pages 301 to 302 and 305 to 425, located in the project record). Threats from mineral activities would have also been analyzed in the environmental baseline for this subbasin.

6. Distribution, abundance, and habitat survey will be conducted annually to address Forest Plan and other monitoring requirements. The Boise National Forest will determine specific locations in the Middle Fork Payette subbasin for this type of monitoring in relation to program needs and issues.

7. Recommendations on specific inventories for each forest was beyond the scope of the programmatic analysis completed. However, additional inventories for bull trout will likely continue to support project level decisions, recovery efforts, and Management Indicator Species (MIS) monitoring.

8 and 9. Recommendations on specific inventories for each forest was beyond the scope of the programmatic analysis completed. Each forest intends on using all available internal and external information to identify culvert problems and where to focus restoration dollars. Additional culvert inventories by the Forest Service are planned from FY 2003 on the Boise National Forest.

Forest-wide management direction is in place to address the correction of fish passage problems. TEPC Guideline TEGU14 states “ For watersheds with listed aquatic species, essential fish habitat, or designated critical habitat, transportation system design criteria for fish passage should be coordinated with NMFS or USFWS, as appropriate.” SWRA Standard SWST08 also states, “Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.”

10. Recommendations on specific culverts needing repair or replacement was beyond the scope of the programmatic analysis. However, Forest-wide management direction is in place to address the correction of passage problems. TEPC Guideline TEGU14 states “ For watersheds with listed aquatic species, essential fish habitat, or designated critical habitat, transportation system design criteria for fish passage should be coordinated with NMFS or USFWS, as appropriate.” SWRA Standard SWST08 also states

“Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.”

11. The description in MA 19 (Warm Lake) has been modified to reflect this comment. The description now reads “Warm Lake has been stocked with westslope cutthroat trout, rainbow trout, lake trout, and kokanee salmon. Bull trout also occur.” The importance of the South Fork Salmon River for spring/summer chinook was mentioned in the Biological Assessment (Chapter V, pages 81 to 82). However, there was no mention of compensation/mitigation hatchery operations or the sport and tribal fisheries in this discussion.

12. Recommendations on specific restoration actions have been made through Management Area objectives. However, there are no objectives in MA 03 for suppressing brook trout. The USDI Fish and Wildlife Service as recently formed bull trout recovery teams that will assess restoration needs in each subbasin where bull trout exist. Brook trout suppression may occur in those streams where the benefits outweigh the costs.

13. The Biological Assessment (Chapter V, pages 10 to 11, refer to project record) mentions that brook trout occur throughout the subbasin likely occur in Meadow Creek.

14. Specific resource inventories and locations are beyond the scope of this programmatic document. However, extensive culvert inventories are being planned in FY 2003 on the Boise National Forest. The location of these will be determined according to listed fish species, priority subwatersheds determined by the WARS strategy, and other resource issues.

Concern Statement 440.06

The Ecogroup must identify the status and trend for all anadromous fish populations that utilize habitat with the Ecogroup forests. This should be done in the form of detailed data on current and historical population levels. The Draft EIS's current discussion of historical and present distribution and reasons for concern is insufficient.

Response to Concern 440.06

The Biological Assessment (Chapter VI Pages 15 to 142, refer to project record) and FEIS (SWRA Chapter III) describe the current condition of all anadromous species that occur in subbasins within the defined action area. The BA discussed the current and historic status of anadromous populations by subbasin, while the FEIS provides an overview of this information. Special population characteristics, genetically unique populations and important spawning areas were identified, drawing on information from the sources below.

Data from the WARS database was used to identify fish presence/absence and bull trout isolated local populations at the subwatershed scale. This information was compiled for the database over the course of developing the revised LRMPs from surveys and through discussions with biologists at the District and Forest level.

Where previous BAs exist and provide information on presence, status, trends and threats regarding the listed fish, they were used to supplement the multi-scale analyses. The information in the BAs generally came from Forest surveys and inventories. In cases where scant information was available from other sources (Northwest Power Planning Council Subbasin Assessments, the USFWS bull trout draft recovery plan (USFWS 2002), etc.) were used. Subbasin reviews and watershed assessments written by the Forest Service provided information here as well, as did professional knowledge.

The Ecogroup must determine and evaluate, using the best available and current scientific data, the following consequences for every watershed that support anadromous fish:

The following information was used to assess potential consequences for each subbasin that supports anadromous fish.

1. *Area and percent area subject to logging related disturbance. Subset information should address the same in terms of riparian and roadless area affects;*
2. *Existing road miles, new road construction, road density, and number of road crossings. Subset information should address the same in terms of roadless and riparian areas affected.*

Potential impacts from vegetation management activities, roads, and fire were assessed using a Cumulative Watershed Effects method (refer to Biological Assessment, Chapter VI pages 161 to 168). This analysis adapted a CWE accounting system described in (Menning et al 1996), as a method to estimate (multiple subbasin-scale CWE, with effects averaged by two and five decadal periods), potential overall watershed response (watershed and riparian functions and ecological processes) from forest vegetation management activities (mechanical, fire use, and road related activities) associated with achieving the forest vegetation desired conditions. This system assisted in: (1) spatially displaying CWE at the sub-basin-scale; (2) temporally displaying potential effects averaged by decade; (3) accounting quantitatively for potential levels of CWE (index of potential forest vegetation management intensity); and 4) identifying subbasins with high risks (Threshold of Concern exceedence) from forest vegetation management activities. The CWE method estimated the amount, type, and timing of forest vegetation management activities for each subbasin.

This CWE method was designed to provide a screening tool for identifying subbasins with the potential for concentrated forest vegetation management activities and associated risks to listed fish species, their habitats, and other SWRA resources. The method is similar (but less specificity based on the large mid-scale programmatic nature of Forest Plan Revision) in concept to other models such as the Equivalent Roaded Area (ERA), Equivalent Clear-cut Area (ECA), BOISED Sediment Yield Model, and the Cumulative Watershed Effects Process for the State of Idaho. These various models have been used throughout the National Forests (at finer scales) and are similar in that they account for a variety of management activities correlated to a common unit, and measure effects from those activities on watershed functions and aquatic systems.

The CWE method calculated the TOC for each subbasin as a result of the forest vegetation management activities for both the two and five decadal averages. Subbasins with a TOC above 100 percent could pose a higher risk to aquatic and other resources.

3. Acres grazed, rested, and total AUMs;

Effects from grazing were evaluated using the amount (percentage) of suited rangeland acres and the type of MPC (Less and More Restrictive) management strategy occurring within subbasins of concern. The two grazing management strategies group MPCs with similar management approaches for these three livestock grazing principles as follows.

MPCs where Livestock Grazing is More Restrictive (MPCs: 1.1, 1.2, 2.1, 2.4, 3.1, 3.2, 4.3) - In general, these MPCs are more constraining on the timing, frequency, and intensity of livestock use, thereby affording more temporary and short-term threat reduction in moving the rangeland vegetation toward desired conditions. There are potentially less temporary or short-term risks of loss of vegetation, soil compaction, sedimentation, nutrient loading, loss of bank stability, and loss or disturbance of aquatic habitat. Also, the rate of recovery for vegetation, soil, watershed concerns, riparian resources, and aquatic habitat and subpopulations would be quicker.

MPCs where Livestock Grazing Management Practices are more Less Restrictive (MPCs 4.1, 4.2, 5.1, 5.2, 6.1, 6.2) - In general, these MPCs are less constraining on the timing, frequency, and intensity of livestock use, thereby increasing temporary and short-term threats in moving the rangeland vegetation toward desired conditions. There are potentially more temporary and short-term risks of loss of vegetation, soil compaction, sedimentation, nutrient loading, loss of bank stability, and loss or disturbance of aquatic habitat. Also, the rate of recovery for vegetation, soil, watershed concerns, riparian resources, and aquatic habitat and subpopulations is not expected to occur as quickly as it would be for the more restrictive approach.

Standards and Guides provide protection to anadromous fish species and SWRA resources from grazing activities. However, the “less restrictive” grazing approach could have greater potential for adverse impacts than the “more restrictive” approach due to fewer constraints. Short-term recovery will occur only through implementation of more restrictive management grazing direction.

These two grazing management strategies have differing temporary and short-term threats based on their effects of grazing on rangeland vegetation and riparian functions and ecological processes. If the rangeland vegetation is managed toward desired conditions, it should provide favorable conditions for most soil-hydrologic and watershed processes. With the addition of proper timing of grazing seasons and management practices to protect stream banks and other riparian components, unfavorable conditions to aquatic resources can be kept to an acceptable minimum. Short-term recovery usually occurs only through implementation of more restrictive management strategies. Both more and less restrictive strategies will provide for long-term recovery, but more restrictive should provide for a higher degree of long-term recovery.

4. Acres mined, total, and in riparian and roadless areas;

Information was not available on how many acres could be mined in riparian and roadless areas for each alternative. Potential threats from mining were evaluated based on areas where mineral deposits have historically been mined and professional opinions of each Forest’s mineral specialist. Risks to specific subbasins were displayed in the FEIS (Chapter III), and subbasins and subwatersheds in the BA (Chapter VI, pages 301 to 302 and 305 to 425, refer to the project record). Mineral activities are not expected to vary significantly by alternative and is more of a function of market values for mining products than from opportunity provided by the alternatives.

5. *Soil compaction likely to result from the above land disturbing activities;*

Effects on the soil resource condition including soil compaction as well as soil displacement (soil erosion and sediment delivery) and severely burned soil, were evaluated based identifying the current condition using the geomorphic integrity rating for each subwatershed. This included information on the subwatersheds equivalent clearcut acres, wildfire acres, and road density. Potential land disturbing activities associated with mechanical vegetation treatments, fire use and road related activities were analyzed at the subbasin scale using a cumulative watershed effects model, CWE. The CWE model is based on accumulating the amount of disturbance by subbasin by alternative associated with forest vegetation management activities including mechanical harvest, road related activities, and fire use. For more detailed discussions refer to the SWRA resource section of Chapter 3 of the FEIS, Chapter Three of the Biological Assessment, and the SWRA Technical Report (refer to the project record). Specific concerns related to soil compaction are addressed through Forest-wide management direction identified in Chapter 3 of the forest Plans.

6. *Estimation of sediment delivery based on the above determination and the existing conditions;*

Estimation of sediment delivery is highly dependent on local site-conditions and site-specific proposed activities. Potential effects of sedimentation were included in the CWE effects model described in numbers 1, 2, and 5 above.

7. *Aquatic habitat conditions resulting from the above anticipated disturbances (expressed in both type and magnitude) together with existing conditions. The Ecogroup must reasonably forecast the resulting trends in bank stability, shading, substrate conditions, wood, pool frequency, water temperature, and aggregate fish habitat condition; and*

General threats from resource activities (grazing, mining, etc.) were assessed using the matrix of pathways and indicators in the Biological Assessment (refer to the project record) and FEIS. For each resource activity, typical threats to specific pathways were described based on literature, historic uses, MPC designations, and professional opinion. Threats were then assessed against forest-wide and MPC management direction to determine what threats would most likely remain where a given activity was likely to occur. For example, ATVs crossing through streams have effects on the streams. The Forest Service can mitigate those effects to acceptable levels, but the agency cannot guarantee that no ATV will ever cross a stream, especially when ATV use is allowed on the Forests. As long as the use is occurring, it will have some level of impacts to water quality, bank stability, fish habitat, etc. regardless of the resource protection methods applied.

Because of the programmatic nature of this analysis, specific effects to bank stability, substrates, etc. could not be predicted. However, general levels of risk to specific matrix pathways (e.g., water quality) and indicators (stream temperature) could be assumed for each subbasin where MPCs allowed an activity.

8. *Fish viability based on the above condition predictions and current viability.*

A viability analysis was completed for each alternative. Trends for select fish species were projected at 15 and 50 years in each subbasin based on current habitat and population conditions, and with how well populations responded to active and passive restoration and conservation measures. It was assumed that the temporary and short-term effects from other resource activities would not compromise the benefits of restoration nor projected population outcomes due to new and existing management direction.

Proposed Forest Service management may not in itself ensure viable populations of the imperiled species due to activities outside Forest Service influence or the scope of Revision. This is especially true for anadromous fish with downstream migration impediments, or for resident native fish suffering from impacts of exotic fish introduction, sport fishing, and habitat fragmentation. The intent of Revision is to provide direction that would best contribute toward achieving or maintaining viability among all native and desired non-native aquatic vertebrate species within the planning areas.

Concern Statement 440.07

The Forest LMPs “. . . must maintain or restore ecosystem integrity, including species viability” as mandated by CFR 219.20 (b). The LMPs must expand on this provision (and 219.27, critical watershed designation) to identify and protect critical watersheds. The Ecogroup can achieve this by establishing a network of watersheds across the landscape that can serve as near-term anchor points for restoration of broad-scale processes and recovery of broadly distributed species. The established watershed network must facilitate efforts to protect, expand, and reconnect the remaining healthier aquatic habitats, and must ensure that all the genetic pieces of each native aquatic species are retained.

Response to Concern 440.07

A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. An important aspect of this ACS was to designate a network of subwatersheds across each subbasin that could serve as anchors for species and watershed restoration. Some of this process is described below.

The process of choosing a restoration or conservation strategy begins with a determination of whether the subwatershed components are functionally intact, or whether the components are damaged by management activities and/or natural processes to the extent that it cannot restore itself to regain its former characteristic functions and processes within an acceptable time period (Wissmar and Beschta, 1998). Restoration prioritization was largely based on the principles identified by the interagency restoration team described in Restoration Task Team (2000).

The intent of the watershed restoration direction is to recognize the variability of natural systems while: (1) securing existing habitats that support the strongest populations of wide-ranging aquatic species and the highest native diversity and geomorphic and water quality integrities; (2) extending favorable conditions into adjacent subwatersheds to create a larger and more contiguous network of suitable and productive habitats; and (3) restoring soil-hydrologic processes to ensure favorable water quality conditions for aquatic, riparian, and municipal beneficial uses that will contribute to the de-listing of fish species and 303(d) impaired water bodies.

Findings in the ICBEMP Assessment identified there were more restoration needs than reasonably foreseeable levels of budgets, activities, and staff. In order to make a difference at a landscape scale, a strategically focused restoration effort is needed (USDA Forest Service 2000). The Ecogroup developed a restoration prioritization process to accomplish this strategic need.

Subwatershed restoration prioritization was largely based on the social values identified with beneficial uses serving as surrogates for this indicator, specifically the following:

High Priority Subwatersheds are those that contain: (1) part of stronghold for chinook salmon, sockeye salmon, steelhead trout, bull trout, or native cutthroat trout, OR (2) anadromous fish spawning or rearing habitat, OR (3) a highly isolated local population of bull trout or native cutthroat trout, OR (4) a TMDL in place.

Moderate Priority Subwatersheds are those that contain: (1) any current presence* of anadromous species and bull trout, including migratory habitat, OR (2) any current presence* of native cutthroat trout species, OR (3) Designated Critical Habitat** for Snake River sockeye and chinook salmon, OR (4) a 303(d) water quality impaired water body, OR (5) all or portions of a municipal supply watershed.

Low Priority Subwatersheds are all remaining subwatersheds.

Aquatic Conservation Strategy Priority Subwatershed Determination

High priority subwatersheds were further prioritized to focus recovery efforts and provide a “blue print” as to which should be the highest priority for restoration or conservation during the planning period (next 10-15 years). ACS priority subwatersheds were identified for each subbasin to represent the “highest of the high” in terms of applying management direction and restoration prioritization, especially for short-term recovery objectives. This process is designed to focus management direction and restoration prioritization for the recovery of listed fish species, their habitats, and 303(d) impaired water bodies, and other SWRA resources. Criteria used to select ACS priority subwatersheds were as follows:

- Subwatersheds identified for a “conservation” restoration strategy automatically became ACS priority subwatersheds.
- ACS priority subwatersheds had to be hydrologically linked to either a strong or depressed population of listed species (except in the subbasins without listed fish species; then selection incorporated native cutthroat trout, wood river sculpin or redband trout).
- In subbasins where listed fish species have limited distribution or are absent entirely, emphasis was placed on identifying the subwatersheds with the best aquatic habitat adjacent to those occupied by listed or sensitive fish species.
- There was a conscious attempt to develop a network of well-dispersed ACS priority subwatersheds within the subbasin to help limit the potential impacts of stochastic events on listed fish populations.
- Where appropriate incorporate needs for listed fish species with needs for 303(d) water quality impaired water bodies.
- Recognition that restoration would be more effective if a full spectrum of activities were focused on a feasible amount of subwatersheds (2-5 per subbasin) within the planning period (10-15 years).

Concern Statement 440.08

Areas of lost connectivity should be identified in the forest LMPs, as was done in the Idaho bull trout assessments. The LMPs should discuss this issue in relation to anadromous fish recovery and habitat restoration. Forests with bull trout habitat should

investigate potential culvert barriers in the watersheds. Culverts that are passage barriers on perennial streams should be replaced with an appropriate structure that ensures free fish passage.

Regarding Sawtooth LMP, Page III-5: Describe if “Provide fish passage wherever necessary” refers to high priority watersheds only. This should be done for all watersheds. This standard should be amended to read, “Fish passage will be provided for existing and potential fish-bearing streams at new stream crossing, at existing stream crossings as roads and trails are repaired or improved, at new dams and diversions, and at existing dams and diversions where they are repaired, improved, replaced, or re-permitted.” Also amend the objective to read similarly.

These two standards so also be added: “Ramping rates (up and down) that protect aquatic and riparian habitat and water quality will be a condition of any dam or diversion project on the forest,” and “In existing and potential fish-bearing waters, do not authorize surface diversions unless they will provide

Response to Concern 440.08

Recommendations on specific culverts needing repair or replacement was beyond the scope of the programmatic analysis. However, Forest-wide management direction is in place to address the correction of passage problems. TEPC Guideline TEGU14 states “For watersheds with listed aquatic species, essential fish habitat, or designated critical habitat, transportation system design criteria for fish passage should be coordinated with NMFS or USFWS, as appropriate.” SWRA Standard SWST08 also states “Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.”

Threats from hydroelectric facilities or reservoirs would be minimized to some degree by at least forest-wide eight Standards and Guidelines (Land and Special Use Permit Standard LSST13, and Guidelines LSGU09, LSGU12, to LSGU14, SWRA Guideline SWGU06, and TEPC Guideline TEGU11). The Forest Service has some authority to condition new and existing hydropower projects within the National Forest reservation. Section 4 (e) of the Federal Power Act allows the Forest Service, acting for the Secretary of Agriculture, to require that the license for a hydropower project include conditions deemed necessary to protect the National Forest’s resources while allowing the wise development of the energy resource. Section 4 (e) also requires that the Federal Energy Regulatory Commission (FERC) to license only those projects it finds are not inconsistent and do not interfere with the purpose for which the National Forest Reservation was created. FERC has final authority for authorizing or renewing hydropower projects, not the Forest Service.

Concern Statement 440.09

Regarding DEIS page 3-77, Salmon River Analysis Unit: The Forest Service should reveal if, under Alternative 3, the entire Salmon River Drainage would be managed to restore the fish species listed on that page, and if activities such as river floating, hunting, hiking, and camping would still be allowed.

Response to Concern 440.09

Alternative 3 uses the same ecosystem management principles as the Proposed Action, but provides more emphasis for watershed and vegetation restoration to achieve or approach Historical Range of Variation (HRV) for biophysical resources. Management emphasis is on restoring resources with low or decreasing resiliency and integrity, and maintaining resources that are currently functioning properly. The Salmon River drainage will be a priority area for restoration within the Ecogroup under Alternative 3 and other alternatives because of its importance to anadromous and resident fish species, and areas still retaining intact watershed conditions.

Recreation activities will still be allowed with the Salmon River drainage as long as they can meet all forest management direction.

Concern Statement 440.10

The level of detail provided in the Management Area sections is inconsistent among the areas and forests. For example, under Aquatic Resources, descriptions sometimes try to include all fish species, and sometimes only high-profile game fish species are included. Also, most Management Area sections state that native fish populations are at risk due to the presence of non-native species; this is too general of a statement to be meaningful.

Response to Concern 440.10

The new Management Area characterizations attempt to provide a consistent level of information on the status of fish species and populations within each MA.

450 Fish Habitat, Behavior, Spawning, and Rearing

Concern Statement 450.01

The Forest Service must thoroughly evaluate existing fish habitat conditions throughout the forests, and the Final EIS must disclose those conditions and anticipated land disturbance activities to ascertain the likely effects of those actions on key watersheds (including soils, disturbance levels, and sediment deliveries) and the resulting effects on fish habitat attributes, such as temperature, substrate, geomorphology, wood, and bank stability.

Response to Concern 450.01

The Biological Assessment (Chapter VI Pages 15 to 142, refer to the project record) and FEIS (SWRA Chapter III) describe the current fish habitat condition in each subbasin within the defined action area.

General threats from resource activities (grazing, mining, etc.) were assessed using the matrix of pathways and indicators in the Biological Assessment and FEIS. For each resource activity, typical threats to specific pathways were described based on literature, historic uses, MPC designations, and professional opinion. Threats were then assessed against forest-wide and MPC management direction to determine what threats would most likely remain where a given activity was likely to occur. For example, ATVs crossing through streams have effects on the streams. The Forest Service can mitigate those effects to acceptable levels, but the agency cannot guarantee that no ATV will ever cross a stream, where ATV use is allowed on the Forests. As long as the use is occurring, it will have some level of impacts to water quality, bank stability, fish habitat, etc. regardless of the resource protection methods applied.

Because of the programmatic nature of this analysis, specific effects to wood, substrates, etc. could not be predicted. However, general levels of risk to specific matrix pathways (e.g., water quality) and indicators (stream temperature) could be assumed for each subbasin where MPCs allowed an activity.

The Final EIS should provide a more thorough discussion on fish habitat and also a discussion under the sixth bolded subheading in the section, "Cumulative Effects on Fisheries." The cumulative effects analysis should reference the All-H Paper to demonstrate federal awareness and connection of different agencies' management activities and decision-making policies regarding the declining salmon populations.

The cumulative effects section has been rewritten and acknowledges more state, private, and other federal activities than the DEIS. The All-H paper was discussed in the Biological Assessment (Chapter III, page 126, refer to the project record) in context of Aquatic Conservation Strategy components.

The Final EIS must contain science-based criteria and standards to thoroughly evaluate the impacts of activities on salmon habitat and assess what uses should or should not be allowed. None of the alternatives adequately protects or restores fish habitat, which is critical to their survival. The analysis for each alternative must effectively address the impacts to aquatic resources resulting from activities such as livestock grazing.

The effects analysis in the Biological Assessment and FEIS analyze potential threats from vegetation management, grazing, and treatments to reduce impacts from uncharacteristic wildfires, and recreation for each subbasin within the project area. These threats were put in perspective of existing watershed and habitat conditions and implications to specific matrix pathways discussed.

The Forest Service should indicate how it determines effects on spawning fish. This is in response to the standard that states, "Livestock grazing and activities will not be allowed if there is direct adverse influence to the reproductive success of ESA-listed species, staging adults or incubating eggs." Although some biologists suspect the presence of livestock influences staging and spawning behavior, there is no scientific evidence to indicate that properly managed livestock activities interfere with spawning activities of staging adult fish. The Forest Service should consider the results of the Ballard and Krueger (1999) report in this regard.

Potential effects from grazing were not analyzed for specific life histories (spawning, rearing, migration, etc.). Instead, typical grazing effects on matrix pathways and species life histories were described and compared to Forest-wide and MPC management direction. This was done to see how well management direction mitigated potential effects and what type of effects that would likely remain after management direction was applied. Effects from grazing were also evaluated using the amount (percentage) of suited rangeland acres and the type of MPC (Less and More Restrictive) management strategy occurring within subbasins of concern. The two grazing management strategies group MPCs with similar management approaches for these three livestock grazing principles as follows.

MPCs where Livestock Grazing is More Restrictive (MPCs: 1.1, 1.2, 2.1, 2.4, 3.1, 3.2, 4.3) - In general, these MPCs are more constraining on the timing, frequency, and intensity of livestock use, thereby affording more temporary and short-term threat reduction in moving the rangeland vegetation toward desired conditions. There are potentially less temporary or short-term risks of loss of vegetation, soil compaction, sedimentation, nutrient loading, loss of bank stability, and loss or disturbance of aquatic habitat. Also, the rate of recovery for vegetation, soil, watershed concerns, riparian resources, and aquatic habitat and subpopulations would be quicker.

MPCs where Livestock Grazing Management Practices are more Less Restrictive (MPCs 4.1, 4.2, 5.1, 5.2, 6.1, 6.2) - In general, these MPCs are less constraining on the timing, frequency, and intensity of livestock use, thereby increasing temporary and short-term threats in moving the rangeland vegetation toward desired conditions. There are potentially more temporary and short-term risks of loss of vegetation, soil compaction, sedimentation, nutrient loading, loss of bank stability, and loss or disturbance of aquatic habitat. Also, the rate of recovery for vegetation, soil, watershed concerns, riparian resources, and aquatic habitat and subpopulations is not expected to occur as quickly as it would be for the more restrictive approach.

Standards and Guides provide protection to anadromous fish species and SWRA resources from grazing activities. However, some threats still remain even with implementation of this management direction. In particular, in those subbasins with a higher amount of suited rangeland acres and a “less restrictive” grazing approach could have a greater potential for negative impacts than those subbasins with fewer suited rangeland acres and a “more restrictive” approach. Some of these negative impacts could include the scaring/displacement of fish, trampling of redds, and/or destroying or dislodging embryos and fry. This is because cattle or sheep will not be completely removed from RCAs and streams. Thus, some use of RCAs will occur that may result in negative impacts.

Although the Ballard and Krueger (1999) report was not examined in this analysis, other studies (Satterthwaite 1994 and Dufour 1995) have shown that disturbance to spawning and rearing fish from recreation activities can occur. Studies conducted on the Rogue River have shown that juvenile salmon and steelhead passed by non-motorized watercraft exhibited both behavioral and physiological signs of stress. Swimming and wading has also been shown to disturb of adult and juvenile fish. It is assumed that if disturbance can result from splashing and wading from humans, then cattle in streams could cause similar types of stress to fish.

Concern Statement 450.02

To avoid picking on float boats and to address other recreation activities that impact fish spawning, the LMPs should amend this objective: “In TEPS species habitat, develop recreation management plans to void impacts to staging and spawning fish.”

Response to Concern 450.02

At least 16 Forest-wide standards and guidelines apply to recreational resources. This management direction address many aspects of recreation including campgrounds, trails, access, etc., in addition to floatboating.

Concern Statement 450.03

Concerns regarding the Payette National Forest:

- 1. The Forest Service should explain if Boulder Creek contains important habitat for Chinook salmon, Steelhead, and bull trout and if the habitat extends all the way up Boulder Creek or just certain segments.*
- 2. MA 01: In its discussion of historic habitat above Hells Canyon, the Forest Service should emphasize that, in addition to mainstem Snake and Columbia River dams blocking fish access, many tributary dams above the Hells Canyon Complex prevented access to sub-watersheds long before construction of the Complex. The tributaries include Powder River, portions of Malheur River, and Owyhee, Payette, and Boise Rivers.*

3. *MA 03: Portions of the Weiser River were blocked during low water years because of low instream flows and irrigation diversions. The paragraph that states, "...much of the remaining habitat has been degraded as a result of past timber harvesting..." should be edited to state, "... much of the remaining and historic habitat ..."* Tributary and mainstem dam construction did not protect these historically used habitat from being degraded by the land use practices described in the paragraph.
4. *Land managers that are responsible for areas containing bull trout habitat should investigate methods to reestablish connectivity in the Weiser River key watershed. Otherwise, this key watershed and the sub-watersheds hold little hope for recovery of complex interacting groups of bull trout.*
5. *Regarding DEIS page 3-38, last paragraph: The paragraph begins, "The ability for aquatic integrity..." This sentence suggests that spawning and rearing tributaries have been deprived from access due to construction of mainstem Snake River dams.*

Response to Concern 450.03

1. Given the scope of this analysis, extent of habitat for certain species is not described for each subwatershed. However, the Management Area characterizations for Lower Boulder (MA 04) and Upper Boulder (MA 05) mention that Boulder Creek provides important habitat for chinook salmon, steelhead, and bull trout. The characterizations also mention that habitat in Lower Boulder Aquatic is at risk due to accelerated sediment from roads, grazing, and timber harvest, and reduced stream flows from irrigation diversions. The Lower and Upper Boulder Creek subwatersheds have been identified as important to the recovery of listed fish species, and as a high-priority area for active restoration (refer to the Watershed and Aquatic Recovery Strategy (WARS) in the project record).
2. The MA 01 characterization has been rewritten for the FEIS. Access from specific tributary streams to the Snake River is not mentioned in the new characterization. However, habitat fragmentation due to naturally steep terrain is described. The baseline description for Browlee Reservoir (Chapter V, page 44) in the Biological Assessment (refer to the project record) also discusses natural barriers (Bear Creek Falls) and fish passage.
3. The MA 03 characterization has been rewritten for the FEIS and no longer contains this statement.
4. We agree that reestablishing connectivity will be one of several key elements to any recovery plan for bull trout in this subbasin. Forest-wide management direction is in place to address the correction of fish passage problems. Several Standards and Guidelines deal with fish passage and instream flows (SWRA Standard SWST06, SWRA Standard SWST08, SWRA Standard SWST09, SWRA Guidelines SWGU06 and SWGU13, TEPC Standard TEST07, and Land and Special Uses Standard LSST12). New surface diversions would not be authorized unless they provide upstream and downstream fish passage and, if needed, include either fish screens. TEPC Guideline TEGU14 states "For watersheds with listed aquatic species, essential fish habitat, or designated critical habitat, transportation system design criteria for fish passage should be coordinated with NOAA Fisheries or USFWS, as appropriate." SWRA Standard

SWST08 also states “Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.”

5. The statement in the DEIS is in regards to wide ranging species that no longer have access due to construction of Hells canyon and other dams on the Snake River. Historically, anadromous fish migrated through this portion of the Snake River and had access to several tributary streams, including the Payette and Boise River systems. Other, non-anadromous species above the dams may still have access to tributary streams where impediments from culverts, diversion, other dams, etc. are not present.

Concern Statement 450.04

The Forest Service should add this objective under the “Riparian and Aquatic” section: “Maintain over-wintering habitat for bull trout populations in Arrowrock Reservoir.”

Response to Concern 450.04

The Forest Service as developed extensive management direction for listed fish species and SWRA resources in the form of: (1) Forest-wide direction, (2) Management Area direction, and (3) MPC assignment that provide prescriptive emphasis and direction for each area where a particular MPC is applied across the Forest.

Forest plan direction for the action alternatives provides a high level of SWRA resource protection, but it has been designed to allow for some temporary or short-term impacts in order to achieve long-term resource restoration or maintenance goals and objectives. Examples of this are found in SWRA Standards SWST01 and SWST04:

- 1) Management actions shall be designed in a manner that maintains or restores water quality to fully support beneficial uses and native and desired non-native fish species and their habitat, except as allowed under SWRA Standard 4 below. Use the MATRIX located in Appendix B to assist in determining compliance with this standard.
- 4) Management actions will neither degrade nor retard attainment of properly functioning soil, water, riparian, and aquatic desired conditions, except:
 - Where outweighed by demonstrable short- or long-term benefits to watershed resource conditions; or
 - Where the Forest Service has limited authority (e.g., access roads, hydropower, etc.). In these cases, the Forest Service shall work with permittee(s) to minimize the degradation of watershed resource conditions.
 - Use the MATRIX located in Appendix B to assist in determining compliance with this standard.

These standards protect SWRA resources by restricting actions that would degrade properly functioning conditions, while allowing actions to occur that would benefit but not degrade SWRA resource conditions over the long term. This management strategy has been integrated throughout revised management

direction at the Forest-wide and Management Area/MPC levels. Management prescriptions and other resource areas have similar direction to help avoid, minimize, or mitigate potential activity impacts to SWRA resources. A TEPC Species section has also been added to the Forest-wide direction to provide special emphasis and protection for aquatic and terrestrial species of concern across all resource areas.

480 Fish Viability and Strongholds

Concern Statement 480.01

Agency scientists identified a system of “stronghold” watersheds where the healthiest fish populations remain and concluded that, “designated wilderness and potentially unroaded areas are important anchors for strongholds throughout the Basins.”

Response to Concern 480.01

It is true that most remaining fish strongholds occur in wilderness or unroaded areas. A comprehensive aquatic conservation strategy (ACS) comprising of eight components (Riparian Conservation Areas, Restoration, Monitoring, etc.) was developed through Forest Plan revision. ACS components 5 (designation of important subwatersheds) and seven (subwatershed prioritization) incorporated all wilderness and most unroaded areas as high priority conservation or passive restoration. Restoration priority was also determined based on the presence of stronghold populations of chinook, steelhead, bull trout, and native cutthroat trout (westslope and Yellowstone). A more complete discussion of this strategy can be found in Chapter III of the Biological Assessment (located in the project record) or the FEIS, Soil, Water, Riparian and Aquatic Resources (SWRA) section.

Concern Statement 480.02

The term “high priority watersheds” should no longer be used. The list of watersheds (using a new term) should be available for public review each year before it is finalized. Priority should be determined based on imperiled native fish strongholds and highly isolated local populations of imperiled native fish.

The Forest Service should develop an objective, standard, and guideline to protect or restore all (or at least some) identified native fish strongholds.

Response to Concern 480.02

A comprehensive aquatic conservation strategy (ACS) comprising of eight components (Riparian Conservation Areas, Restoration, Monitoring, etc.) was developed through Forest Plan revision. This strategy has assigned each subwatershed within the Ecogroup a recommended restoration type (active, passive, and conservation) and priority (low, moderate, and high). ACS priority subwatersheds were also assigned. These subwatersheds represent the “highest of the high” in terms of applying management direction and restoration prioritization, especially for short-term recovery objectives. This process is not intended to suggest that other subwatersheds with listed fish species are not important, but is rather

designed to focus management direction and restoration prioritization for the recovery of listed fish species, their habitats and other SWRA resources. These short-term ACS priority subwatersheds, plus the other high and moderate priority subwatersheds, are all considered in long-term recovery objectives.

Designation of subwatersheds for restoration and conservation was based upon strongholds for chinook salmon, steelhead trout, bull trout, or native cutthroat trout; anadromous fish spawning or rearing habitat; presence of highly isolated local population of bull trout or native cutthroat trout; and TMDL watershed restoration plans in place.

Management direction has been developed to maintain or restore all identified native fish strongholds.

Concern Statement 480.03

The Forest Service must identify key watersheds to be included for refuge protection; the LMPs identify none. Refugia must be recognized in order to tailor management practices to address the limitations of riparian protection strategies.

The LMPs must address the importance of protecting the salmonid strongholds and tie remediation of existing threats (primarily roads) from past management, to management constraints. The Forest Service should encourage Idaho Fish and Game to perform a thorough assessment of potential effects to native fish prior to introducing non-native fish to a watershed. This concern is in response to the recent introduction of non-native salmonids (Atlantic Salmon, fall Chinook Salmon) into Deadwood Reservoir, which could potentially threaten the already low Bull trout populations in that system.

Response to Concern 480.03

A comprehensive aquatic conservation strategy (ACS) comprising of eight components (Riparian Conservation Areas, Restoration, Monitoring, etc.) was developed through Forest Plan revision. This strategy has assigned each subwatershed within the Ecogroup a recommended restoration type (active, passive, and conservation) and priority (low, moderate, and high). ACS priority subwatersheds were also assigned. These subwatersheds represent the “highest of the high” in terms of applying management direction and restoration prioritization, especially for short-term recovery objectives. This process is not intended to suggest that other subwatersheds with listed fish species are not important, but is rather designed to focus management direction and restoration prioritization for the recovery of listed fish species, their habitats and other SWRA resources. These short-term ACS priority subwatersheds, plus the other high and moderate priority subwatersheds, are all considered in long-term recovery objectives.

Designation of subwatersheds for restoration and protection was based upon strongholds for chinook salmon, steelhead trout, bull trout, or native cutthroat trout; anadromous fish spawning or rearing habitat; presence of highly isolated local population of bull trout or native cutthroat trout; and TMDL watershed restoration plans in place.

SWRA Guideline SWGU10 would address threats from fish stocking and non-native species. This direction states that “Stocking of non-native fish species in high-mountain and other Forest lakes and streams should be discouraged if stocking imperils the inherent composition, structure, or function of the lake or stream ecosystems. Coordinate management of these ecosystems with Idaho Department of Fish and Game and tribal governments.”

SRWA Objective SWOB11 also states “Coordinate with state and local agencies and tribal governments annually to limit or reduce degrading effects from stocking programs on native and desired non-native fish and aquatic species.”

To what extent this direction discourages or discontinues fish stocking is dependent on how potential conflicts are addressed through existing or future Memorandums of Understanding (MOU's) with the State of Idaho.

Concern Statement 480.04

Regarding DEIS page 3-54, second paragraph from the bottom: The Forest Service should explain if “. . . to provide more interconnectivity . . .” means removing culverts.

Response to Concern 480.04

In some case removing a culvert may take place when a road is no longer needed or construction of a stream ford is a better option. The statement in the DEIS is not intended to imply all culverts will be removed. However, management direction has been developed to improve connectivity of aquatic resources. Existing culverts may be upgraded with larger pipes or replaced with bridges where needed.

Concern Statement 480.05

Regarding DEIS page 3-62, first sentence under “Imperiled Resident Fish Strongholds: The Forest Service should explain what is included in “all historical life stages.”

Response to Concern 480.05

All historical life stages implies that the species still retains those life stages that it had before major human development occurred in the Ecogroup. For resident fish this may include fluvial, adfluvial, and resident life histories.

520 Vegetation Management) Diversity, Inventory, Restoration, Habitat, Botanical)

Concern Statement 520.01

The focus of restoration efforts should be on reestablishing native sagebrush and bunchgrass habitats in sites dominated by juniper, which would serve the long-term needs of a wide variety of native wildlife species. Restoring juniper stands to “savanna-like conditions” would not do that.

The Final EIS should address the importance of high sagebrush canopy cover for sagebrush obligate wildlife and the subsequent effects that management would have on these species. The LMPs should provide guidelines that assess herbaceous understory vegetation within mountain big sagebrush cover types. Such guidelines would ensure that sagebrush habitats with diverse grass and forb understories greater than or equal to 25 percent canopy cover are not treated.

Response to Concern 520.01

We acknowledge that the Draft EIS was lacking in analysis for non-forested landscapes, and for some forested landscapes such as aspen and pinyon-juniper. In the Final EIS, we have remapped sagebrush cover types in the ecogroup and have modeled probable successional pathways for each alternative. We have also modeled probable successional pathways for climax aspen and pinyon-juniper on the Sawtooth National Forest. This has enabled us to provide more quantitative effects analysis for these types when comparing alternatives in the Final EIS.

We have added forest wide goals and objectives to the Forest Plans in the vegetation section to promote regeneration of certain species, including aspen, woody riparian species, and native herbaceous understory in shrub communities. Furthermore, we now have quantitative desired conditions addressing the amounts in specific condition classes (size and canopy cover) for several species and sub-species of sagebrush, climax aspen, and pinyon-juniper vegetation types. Specific management areas also contain direction regarding regeneration and restoration of these species and their communities, particularly as it pertains to obligate wildlife species. We have removed the reference to “savanna-like conditions” as it pertains to juniper stands in the management areas.

Concern Statement 520.02

The Forest Service should provide a reference that can scientifically support the statement made on under Alternative 4, page S-28 of the DEIS Summary, that says, “The risk of tree mortality from insects, diseases, and stand replacing fires is expected to increase over the long and short term.” The concern is that human vegetation

manipulations are often responsible for augmenting the frequency and intensity of stand-replacing fires, and that side effects of vegetation manipulation are often the greatest threat to ecological integrity.

Response to Concern 520.02

The statement has been removed in the Final EIS.

Concern Statement 520.03

The Forest Service should inventory and map the current and potential distribution of ponderosa pine-dominated plant communities within the Ecogroup. A high priority within the Management Objectives should be the inventory and monitoring of data on wildlife species associated with ponderosa pine stands, where these stands predominate. The Forest Service should strive to restore mid-seral old-growth ponderosa pine-dominated plant communities, including restoration of historic fire regimes and identification and conservation of existing mid-seral and old-growth stands.

Too much emphasis is placed on preserving late seral stages. This can be detrimental to wildlife species that depend on a young forest, with an abundance of brush, for their survival.

Response to Concern 520.03

We have inventoried and mapped the current and potential distribution of ponderosa pine dominated plant communities within the ecogroup. We have a Landsat mapping of existing vegetation, which characterizes stands that are dominated by ponderosa pine, and we have also developed a modeled layer of forested potential vegetation groups (PVG), including those with ponderosa pine as a cover type. In addition, there is inventory data, which is tallied on the ground, which further describes our ponderosa pine dominated vegetation. In our management direction, we developed desired conditions for each PVG, including those with ponderosa pine as a cover type or with a potential for ponderosa pine, based on the concepts of historical range of variability (HRV). Historical range of variability is often used in combination with societal values and other information to identify desired conditions. The historical range of variability characterizes fluctuations in ecosystem conditions or processes over time (Morgan and Parsons 2001, Landres et al. 1999, Haufler et al. 1996, Morgan et al. 1994). When overstory composition changes, the nature of the links that trees provide to other taxa also changes (Palik and Engstrom 1999). We recognize that the proportion of seral stages across a landscape and over time is one of the fundamental characteristics of the vegetation mosaic (Spies and Turner 1999). These amounts fluctuate over time; therefore, by developing desired conditions that are based on the historical range of variability and providing for a range of seral stages, we strive to provide the necessary pieces that would foster ecological processes, including fire regimes. Mid-seral and later seral old-growth stands are included as a portion of the large tree size class desired conditions. We also have management direction that ensures a minimum of 20 percent of the large tree class acres in each PVG of a watershed is maintained or restored, to maintain habitat for those species associated with large trees, including those associated with ponderosa pine stands.

Concern Statement 520.04

(16 U.S.C. 472) The greatest good for the greatest number in the long run clearly comes from converting your Forest back to nature's protective cover. This was discussed in the Targhee National Forest Final EIS, page IV, 3-6, and appendix E of process paper O.

Response to Concern 520.04

In the Draft EIS, we utilized the Historical Range of Variability (HRV) as a baseline for comparisons with the current condition, and as a basis for determining desired conditions. The HRV characterizes fluctuations in ecosystem conditions or processes over time. A description of past ecosystem structure and its variability is useful in exploring the causes and effects of ecosystem change and provides a context for interpreting natural processes, particularly disturbances. HRV is often interpreted in combination with socioeconomic needs and other information, as a means of establishing desired conditions for management actions.

We did not develop estimates of HRV for species composition or size classes, but relied upon estimates generated in the paper "Historical range of variability of forests of the Idaho Southern Batholith Ecosystem" by Dr. Penelope Morgan of the Department of Forest Resources - University of Idaho and Dr. Russ Parsons of the Fire Sciences Laboratory of the Forest Service Rocky Mountain Research Station in Missoula, Montana. This paper was produced as a product to the Boise Cascade Corporation, and is also included in our project record. An updated version of this paper, dated June 12, 2001 is utilized in the Final EIS.

The Idaho Southern Batholith comprises most of the Payette, Boise and Sawtooth National Forests. Morgan and Parsons also relied upon habitat type class data that was produced for all of Central Idaho, including the portions of the Payette, Boise and Sawtooth that are not encompassed by the Batholith. Therefore, their information is the best available information for the local area. Morgan and Parsons utilized multiple pathways, probabilistic successional models that were set with available data and expert opinion. Where available, comparisons of their estimates were made with available historical data. The time frame of their estimates is a period 100-700 years before present, encompassing the variability inherent in disturbance events over this time frame. However, they did not estimate HRV for canopy closures. We utilized available data on average canopy closures, average basal areas and average number of trees per acre for each PVG as a means of approximating historical canopy closures, only for the large tree size class. These do not represent overall canopy closures. Further details on how HRV estimates were developed and calculated can be found in our project record.

While neither of these methods provides an estimate of HRV with absolute certainty, it does however, provide us with scientifically developed information for approximating what potentially existed, aiding in our evaluation of both the changes in ecosystems and in what potentials exist for management of those ecosystems. For the Final EIS and LMPs, we have developed desired conditions based on the HRV and vary by alternative to incorporate a range of societal values. Furthermore, in the Final EIS, we expand upon the discussion of HRV, the four indicators we used (species composition, tree size class, canopy closure, snags and coarse woody debris), and the relationship to the desired conditions. The Final LMP also provides an expanded discussion on the interpretation of the desired conditions for vegetative components.

Concern Statement 520.05

The Forest Service should provide a clear explanation of “restoration activities following catastrophic fires.” Restoration activities do not seem to include planting trees. There is concern that since the 1989 fires, none of the burned areas have been replanted.

Response to Concern 520.05

Following wildfire, the Forest Service generally plants trees in suited areas, particularly where significant investments have been made in the past. Following the 1989 wildfires, burned areas within plantations were replanted. However, a large portion of the area affected by the wildfires was in the South Fork Salmon River drainage. Even though the current Payette Forest Plan identifies portions of the South Fork as suited timberlands, Forest Plan direction calls for limited investments in timber management activities. In addition, post-fire surveys of the burned area found a relatively large amount of regeneration from natural seed-fall. This, in combination with current Forest Plan objectives and other factors such as lack of access, were some of the considerations for determining restoration activities for those particular wildfires.

Concern Statement 520.06

The Ecogroup should substantiate its assertion in the DEIS that fire risks can be reduced via logging and other treatments. There are no data or reasonably relevant case histories that indicate such treatments reduce fire frequency, intensity, extent, or negative ecological effects. The DEIS then states that timber management and over-zealous fire suppression have created the “perilous” fire situation.

The Draft LMPs rely heavily on wildfire suppression through timber harvest, a practice that is not supported scientifically and one that will cause added degradation to watersheds and aquatic habitats.

Response to Concern 520.06

The Resource Protection Methods sections under Fire Management, Wildland-urban interface and in Vegetation Hazard were expanded to describe techniques and published information about vegetation management treatments and wildfire hazards. These papers show that vegetation manipulation can be effective in reducing wildfire hazards in some situations. Efficacy depends on vegetative communities and types of manipulations, location and extent, treatment of mechanically generated fuels, weather, and other factors.

Concern Statement 520.07

Regarding DEIS pages 3-134 to 3-137, Vegetation Diversity. The modeling process seems to put so many constraints on mechanical harvest that HRV cannot be achieved. Mechanical treatment would provide the ability to move more acres toward HRV faster and safer than all other alternatives. The Forest Service should initiate an aggressive thinning

program to bring stands back to within the Historic Range of Variability. A reduction of stand densities is needed to maintain long-term ecosystem health and integrity. And, mechanically treating stands will reduce overall sediment delivery to streams.

The DEIS should reexamine the effects and costs that catastrophic fire will have on the entire ecosystem, and those effects and costs should be weighed against the effects and costs of mechanical treatment. The DEIS's short-term risk averse strategy must disclose the effects of recent large and severe wildfire events that have removed tall forest cover from hundreds of thousands of contiguous acres, which has lethal effects on terrestrial vertebrates.

Response to Concern 520.07

The modeling process used for development of Forest Plan alternatives is designed to incorporate the requirements of the National Forest Management Act and its implementing regulations, 36 CFR 219. The constraints are applied to all modeled management actions including fire and mechanical methods. The individual alternatives are designed to address alternative specific issues and desired conditions. Management actions were developed to achieve desired conditions including actions, which are designed to reduce stand densities. The SPECTRUM model used for the Forest Plan is designed to achieve defined goals, using the available management actions, based on the allocation of management prescription categories. The extent to which desired conditions are attained thus reflects the combination management prescription allocations, modeled management actions and modeling constraints. A comprehensive description of the modeling process used for determining the effects of each alternative is found in Appendix B of the Final EIS.

The entire modeling process was reevaluated after releasing the Draft EIS and Forest Plans. Some of the base data was updated, such as the effects of the wildland fires that occurred in the year 2000. However, the basic modeling process remains intact. Running the model for the Final EIS included the goal of reducing fire hazard while allowing for slightly less attainment of desired conditions. The Vegetation Hazard section in the Final EIS and Appendix B provide further discussion about the modeling process and wildfire hazard. The alternatives analyzed in the Final EIS include various management strategies including short-term risk adverse strategies and those that provide for long-term restoration while also providing acceptable temporary and short-term impacts. The result of this analysis is disclosed in the Vegetation Diversity and Vegetation Hazard sections of the Final EIS.

Concern Statement 520.08

Regarding DEIS page 2-39, "Vegetation Diversity." Estimates should be clearly identified as estimates and not portrayed as facts.

Response to Concern 520.08

It has been our understanding all along that we are using estimates of the historical range of variability, estimates of the current condition based on broad-scale mapping and inventory, and estimates of projected conditions developed through modeling. We have attempted to make this clearer in the Final EIS.

Concern Statement 520.09

Regarding DEIS page 3-120, first paragraph. The Forest Service should reevaluate the accuracy of the LANDSTAT data used for making land management decisions.

Response to Concern 520.09

In the first paragraph on page 3-120 of the DEIS it is stated that the results of tree size classification derived from LANDSAT, for forested vegetation within riparian areas, “there is some inaccuracy compared with ground-based sampling procedures”. This statement was based on cursory comparisons between LANDSAT data and data collected during site visits. A detailed accuracy assessment was not performed. LANDSAT data provides a broadscale view of existing conditions. When comparing it to stand or site specific data differences can be executed, but the significance of the difference is not easily determined because of the differences in scales. LANDSAT data is still viewed as being applicable for use in the development of the Final EIS.

Concern Statement 520.10

Regarding DEIS pages 3-91 and 3-92. There is concern with the indicators used to measure the effects on forested vegetation. The indicators do not seem to allow for any type of assessment that would lead any place. The Forest Service should provide a better explanation of what it is trying to portray.

The EIS should provide a description of the four indicators for a healthy ecosystem. Those indicators are species occurrence, tree size class, canopy closure, and snags and coarse woody debris. It is not clear if there is an HRV for each of the indicators. The overview for this section show that qualitatively derived deviation factors were determined for each forest, PVG, and for three of the four indicators (not for snags and coarse woody debris).

Response to Concern 520.10

The indicators used for forested vegetation were species composition, tree size class, canopy closure, and large trees for snag and coarse woody debris recruitment. We are using the same indicators in the Final EIS, as they are the primary components by which vegetation can be measured and analyzed to determine how each alternative may have different effects on the landscape. There is a desired condition for each of the four components.

As requested, the Final EIS, expands the discussion of the historical range of variability and its relationship to the desired conditions, the four indicators used (species occurrence, tree size class, canopy closure, large trees for snags and coarse woody debris), and the cumulative effects of looking at all of the indicators together to assess the effects of each alternative on the landscape. A more quantitative approach is taken to examine the indicators for each of the components, rather than the qualitatively derived deviation factors used in the Draft EIS. In the Final LMP, we include an expanded discussion on the interpretation of the desired conditions for vegetative components.

Concern Statement 520.11

Regarding DEIS page 3-281, 3rd paragraph. Flaws in the model should be fixed so the Forest Service can provide an accurate representation of what is actually occurring on the ground.

Response to Concern 520.11

The entire modeling process was reevaluated after releasing the Draft EIS and Forest Plans. Some of the base data such as the characterization of individual growth stages, and management actions available for any given combination of growth stage and management prescription category, were updated for use in the model runs for the Final EIS. A comprehensive description of the modeling process used for determining the effects of each alternative is found in Appendix B of the Final EIS.

Concern Statement 520.12

Regarding DEIS page 3-199. The Forest Service should offer a scientific reference to validate the statement, "... plants in the Intermountain West have evolved with herbivory by insects, rodents, and wildlife species, thus some plants may benefit from grazing at appropriate intensity levels. The statement attempts to offer justification for grazing and trampling of TDES plants; the statement should be removed from the EIS.

Response to Concern 520.12

In an attempt to address this comment, we included a summary of a scientific study "Burkhardt, J. 1995. *Herbivory in the Intermountain West, An Overview of Evolutionary History, Historic Cultural Impacts, and Lessons From the Past*, Station Bulletin 58 of the Idaho Forest, Wildlife and Range Experiment Station, College of Natural Resources, University of Idaho." In this study, Burkhardt discloses that "plants in the Intermountain West have evolved with herbivory by insects, rodents, and wildlife species (elk, deer, bighorn sheep and possibly antelope), thus some plants may benefit from grazing at appropriate intensity levels." Natural herbivory does occur on the landscape and has throughout time. Plants may adapt or be benefited by low levels of such herbivory.

Concern Statement 520.13

The Forest Service should use data that is more current than 1977 regarding snags and down wood.

Also, the coarse woody debris and snag studies are flawed. Timber harvest and wood getting are reasons given for the numbers falling below HRV levels. The Forest Service should explain why the DEIS shows the same trends for the Sawtooth National Forest as

it does for the Boise and Payette National Forests, when the Sawtooth historically has seen considerably less timber harvest. Because the Payette Forest is over 80 percent wilderness or roadless, timber harvest or woodcutting would not likely affect that forest either.

Response to Concern 520.13

You are correct in that there are some flaws in the coarse woody debris and snag inventory data. As stated in the Draft EIS, the inventory data does not include wilderness areas, and therefore, the data is more representative of the managed areas across the ecogroup. This is particularly true on the Payette, which does contain a large amount of wilderness. Additionally, the Payette data was from an older inventory that did not separate out snags and down logs. The current condition for the Payette has no doubt changed in light of disturbance events since the inventory. We have updated the numbers for current condition in the Final EIS with the best available information. On the Sawtooth National Forest, we compared large snags (>20" dbh) with historical averages across the entire Interior Columbia Basin in the Draft EIS. We unfortunately did not have more accurate and more localized historical data. Although possessing similar PVGs, there may be some productivity differences on the Sawtooth that make it more difficult to achieve these larger tree sizes. Snags on the Sawtooth were actually quite abundant in the 5.5-19.9 dbh tree size classes, but we did not reflect this in the analysis. Coarse woody debris numbers on the Sawtooth, generally exceeded historical estimates, except for in the larger size class (>20" dbh). In the Final EIS, we have attempted to better portray current conditions and the baseline data with which we compare it.

We did not use 1977 data to determine desired conditions for snags and coarse wood. The data we used to develop this information is included in the Snags and Coarse Woody Debris technical report. To develop the current condition we used inventory data from the 1990s, the most recent available. The 1977 reference in the Draft LMP was for a conversion factor to convert numbers of pieces to tons per acre. We are aware of the decayed wood advisory panel and model (DecAid) and have tried for several years to be able to access this information; however, we have repeatedly been told that it is still under development and not available for use. This was still the case as of August 2002. In December 2002, initial release information became available, but the system was still not available for use. We too are anxious to be able to use this information for developing more specific desired conditions for snags and downed wood, and will certainly consider the information when it becomes available.

Concern Statement 520.14

The Final EIS should expand the discussion on cumulative effects with regard to vegetation hazard. Much of the cumulative effects issues, however, were addressed.

Response to Concern 520.14

Vegetation hazard, both fire and insect hazard, were reevaluated for the Final EIS. The analysis and the discussion have both been expanded with regard to the level of hazard that may be present when vegetation is within desired conditions or within the range of historical variation. Refer to the Vegetation Hazard section in the Final EIS for additional details. More information about the analysis performed for the Final EIS can also be found in the technical reports for Fire Hazard and Insect Hazard.

Concern Statement 520.15

The DEIS stated that the insect hazard rating would increase, but the context for the index rating was not provided; therefore, the reader could not determine the significance of those values. The Forest Service should indicate the index value that it is striving toward. Figure VH-1 partially addresses this concern. The Final EIS should provide the index value in the text discussion as well, including hazard indexes that are assigned to the low, medium, and high hazards characterizations. The EIS should explain why there is a decline in the insect hazard rating between the third and fourth decade.

Response to Concern 520.15

The index hazard index values are described in the Vegetation Hazard section of the Final EIS and in the Insect Hazard Technical Report. The growth stage matrix, in the planning record, identifies the insect hazard assigned to each growth stage.

The reasons for decade-to-decade changes in insect hazard are not fully evaluated in the Final EIS. Changes in hazard reflect the changes in growth stages as reported as a single moment during each decade. The fifth decade was chosen as the time period to evaluate effects, compared to the current and desired conditions. There is little difference between alternatives in the short-term while the fifth decade represents a time period when differences become most apparent. Outcomes become less reliable beyond the fifth decade.

Concern Statement 520.16

The fire hazard projections are based on a subjective rating and overly simplistic modeling of complex, stochastic processes, premised on data for current vegetative conditions that the DEIS concedes is not very accurate.

Regarding DEIS, "Vegetation Hazard," Table VH-7, page 3-167: The table shows that the Fire Hazard Index for the fifth decade, by alternative, will be greater than it currently is, but still only in the low or moderate range. One could assume that the need for prescribed burns will increase as the fire index increases over the next 50 years. If this assumption is true, then this point should be made clearer in the Final EIS.

The DEIS fails to provide any reasonable data or statistical analysis to substantiate its assertions regarding historical fire and fuel conditions. Large fires are part of the natural history and nature's disturbance regime. The fires of 1994 were not described as "catastrophic", in fact they were in most cases found to be within historical variability, but nowadays no fire is characterized this way.

Response to Concern 520.16

The uncharacteristic wildfire hazard projects are a simple methodology for comparing conditions relative to each other and are consistent with approach used to characterize conditions for the National Fire Plan (see www.fs.fed.us/fire/fuelman for an explanation of the national scale assessment). The analysis conducted for the EIS is a mid-scale assessment of the potential changes in hazard across the forest based on changes in vegetative conditions modeled for each alternative. The assessment is not intended to assess when or where a wildfire may occur but rather the potential effects of a wildfire should it occur.

The Final EIS included a goal to reduce the vegetative conditions that contribute to uncharacteristic wildfire hazard for Alternatives 2 through 7 to reflect strategic goals in the National Fire Plan. Uncharacteristic wildfire hazard indexes declined for most alternatives from the current condition with the addition of this goal. In many cases this resulted in an increase in the amount of fire use, as this is one of the modeled treatments that alters vegetative conditions.

Assumptions about changes in wildfire hazard in some fire regimes, based on the uncharacteristic wildfire hazard ratings, are consistent with changes reported by the scientific community and for other areas with similar fire regimes. The areas where wildfire effects appear to be most outside the historical range of variability are those with documented historically frequent fire (5-20 year return intervals) that was primarily nonlethal. This includes the low elevation ecosystems in the Ecogroup (Steele et al 1986). In many cases these ecosystems have not experienced fire since the advent of fire suppression in the early 1900's. While large fires have been documented in these nonlethal fire regime areas at long intervals in the past, the large and more frequently lethal wildfires of the past 20 years across the west appear to be inconsistent with the evidence about how fire operated in these ecosystems historically. However, the EIS acknowledges that large, lethal wildfires do occur in some ecosystems and that not all of the wildfires that have occurred over the past 20 years have been uncharacteristic. The Need for Change was developed based on the risk to ecosystems from uncharacteristic wildfire, and to firefighter and public safety in the wildland-urban interface from wildfire in general.

Concern Statement 520.17

The Draft LMPs listed the Forest Potential Vegetation Groups (PVG) but did not include the associated vegetation management practices and standards and guidelines that would ensure the desired numbers for each vegetation group would be met. The LMPs should also discuss the reasons for selecting the standards and guidelines. Non-forested landscapes and the "more-than-one" vegetation practice referenced in the planning regulations should also be addresses. The Forest Service should outline how it intends to measure management activities to determine the level of benefit obtained by such alteration.

Response to Concern 520.17

Standards, guidelines, goals and objectives have been written to ensure that desired numbers for each vegetation group are met. The associated vegetation management practices however, are determined at project level planning. Standards and guidelines are selected based on identified issues or to comply with various regulations. The final EIS does contain a much more in-depth analysis of non-forested landscapes. We have used predictive successional modeling for both forested and non-forested

landscapes as a way of testing and evaluating levels of various management practices and the outcomes on the landscape. The level of benefit obtained through our management activities will be addressed through our monitoring plans, both those at the level of the Forest Plan, and those that are specific to projects.

Concern Statement 520.18

The Final EIS must contain a discussion on Cryptogamic Crusts and not excuse the lack of discussion to “limited information on distribution of crusts within the Ecogroup and on the role of crusts within the ecosystem.” The Forest Service should conduct the necessary and required analyses and develop standards to protect this important part of the ecosystem.

Response to Concern 520.18

You are correct that the limited information currently possessed by the USFS on cryptogamic crusts does not excuse the lack of discussion within the DEIS. To better address the distribution of cryptogamic crusts in the FEIS, the detailed analysis of potential vegetation types and cryptogamic crust development potential completed by ICBEMP (1997c) was examined. As a result of examining this information, it was determined that the Sawtooth National Forest has the greatest potential for crust development in the Ecogroup. To proactively address cryptogamic crusts within the Ecogroup, Forest personnel will need to identify and locate areas of crust development, and areas for maintenance and restoration. The Forest Plans for the Boise, Sawtooth, and Payette National Forests (Chapter III, Forest-wide Management Direction, Botanical Resources) have an objective to promote the identification and protection of cryptogamic crusts: *Identify areas of high potential for cryptogamic crust restoration and/or maintenance.* Given the lack of current distribution data and knowledge of crust health in the Ecogroup, cryptogamic crusts were not analyzed by alternative in this analysis. Forest personnel will be encouraged to document areas of cryptogamic crust development and maintenance or restoration needs at the project level and in project surveys.

Concern Statement 520.19

The effects of the MPCs on the management of special forest products should be analyzed from both an economic and ecological perspective.

Response to Concern 520.19

The demand for special forest products varies greatly across the three forests. At present, the distribution of such products is not well known across the landscape. In this analysis we did not feel that we have enough landscape level or distribution data to analyze the effects of the MPCs on such species. Additionally, the demand and economic impacts are so little known that an analysis was determined unfeasible at this time. Several Forest wide botanical objectives (see Botanical Resources) have been designed to provide the foundation for understanding the importance of these species and providing for their ecological requirements. As a result, the three forests will strive to document the distribution of such species, their ecological requirements, and their demand.

Concern Statement 520.20

There is only one vegetation standard, one objective, and one course of action to meet a list of goals. The LMPs would be more useful if standards employed additional courses of action.

Response to Concern 520.20

The Final LMPs contain substantial differences than what was found in the Draft LMPs. A more comprehensive list of objectives has been developed to meet the goals for vegetation. Standards and guidelines describe additional courses of actions that are necessary to meet the goals for vegetation. In addition, we have now included Appendix A to describe in much more detail what the goals for vegetation are, and how they are to be interpreted.

Concern Statement 520.21

The descriptions for vegetation desired conditions (Payette LMP, page 111-16) inappropriately encourages managers to achieve static, rather than a dynamic, ecosystem state. The specified ranges for desired abundance by species are inappropriate given the spatial heterogeneity within the Ecogroup.

Response to Concern 520.21

Historical range of variability is often used in combination with societal values and other information to identify desired conditions. The historical range of variability characterizes fluctuations in ecosystem conditions or processes over time. (Morgan and Parsons 2001, Landres et al. 1999, Haufler et al. 1996, Morgan et al. 1994). Our desired conditions are based on the historical range of variability. We recognize that the proportion of seral stages across a landscape and over time is one of the fundamental characteristics of the vegetation mosaic (Spies and Turner 1999). These amounts fluctuate over time; therefore, by providing desired conditions and a range of seral stages, our intent of using a coarse-filter approach, coupled with a fine-filter for TESPC species, is not to achieve a static ecosystem, but to provide the necessary pieces that would foster ecological processes. However, we do not suppose to understand what all of the pieces and processes are, but only hope to continue deriving information about ecosystems, through our monitoring, to improve upon our management recommendations.

Concern Statement 520.22

*The common birch in the Ecogroup is Water Birch (*Betula occidentalis*) not Bog Birch (*Betula glandulosa*). The chart should be corrected, as Bog Birch only occurs in Eastern Idaho. (Refer to "Wild Trees of Idaho" by Dr. Fred Johnson).*

Response to Concern 520.22

You are correct that the common birch for the Ecogroup is the water birch (*Betula occidentalis*). We have corrected this within the documents. The *Betula occidentalis*/mesic forb group is tracked as a rare community by the Idaho Conservation Data Center as a S1 community (see Appendix G, Table G-6) because although this community type may be common in other states it is considered rare within the State of Idaho (see Rare communities discussion – Chapter III –FEIS in the Botanical Resources section).

Concern Statement 520.23

All alternatives should specify that only native plants, with local genotypes, will be used for revegetation, reclamation, and restoration of damaged areas; genetically modified trees should not be planted on federal lands.

Response to Concern 520.23

The need to utilize native plants in revegetation and restoration projects is emphasized throughout the Botanical Resources, Vegetation, and Timber sections of the FEIS and the Forest Plans. The following standards, guidelines, goals, and/or objectives have been added to the Forest Plans to address this concern: Forest personnel will cooperate with researchers, ecologists, geneticists and other interested parties to develop seed zones or breeding zones for native plants (Chapter III – BTOB13 - Objective). Land managers will be encouraged to collect seeds of native plants to be used in rehabilitation and restoration activities. Seeds will be collected in accordance with seed zones or breeding zones. Additionally, work to develop long-term storage facilities for collected seeds such as the seed bank at the Lucky Peak Nursery will be conducted (Chapter III –BTOB14 -Objective). When available and not cost-prohibitive, seeds and plants used for seedings and plantings in revegetation projects should originate from genetically local sources of native species. When project objectives justify the use of non-native plant materials, documentation explaining why non-natives are preferred should be part of the project planning process (Chapter III – BTGU03 - Guideline).

Concern Statement 520.24

The Final EIS must assess viability with reference to anticipated changes in the quantity, quality, and distribution of specific habitat components. The Forest Service should describe or reconsider the method it used to create the association between vegetation communities (and their conditions) and habitat for the different groupings of wildlife. The same method of association should then be applied to aquatic species and species associated with non-forested communities.

The information concerning potential vegetation groups (PVG) is too general, which makes it difficult to draw any credible conclusions regarding wildlife viability. Information or anticipated changes in PVG structure should be used as a complement to, not a substitute for credible wildlife viability modeling.

Response to Concern 520.24

The complete viability analysis is contained in the terrestrial technical report with portions being placed in the FEIS. The use of PVGs was necessary because it was the only vegetation data set that continues across all three Forests. A better analysis of the non-forest communities and species is contained in the FEIS vegetation section than occurred in the DEIS.

The analysis of the vegetative information will be the basis of the risk/viability analysis for predicting coarse-scale habitat changes due to the selected alternative achieving selected DFCs. Appendix A within the Plans displays the range of vegetation conditions we are trying to achieve. The vegetation DFCs found in Appendix A for the selected alternative is within HRV. A fundamental assumption of our analysis is if the selected alternative depicts an increase in macro habitat features from current conditions, the viability of the species is improving due to anticipated management actions. The analysis will be done by each Forest, the entire Ecogroup and compared to the Wisdom et al. (2000) analysis for the entire Columbia River Basin (CRB). Other known fine-scale risk concerns will have to be resolved with additional management direction such as Objectives, Standards and Guidelines. Some will need to be species specific and use project specific information and analysis.

Concern Statement 520.25

The growth-state matrix and associated transition pathways should be verified using the FVS (Central Idaho Variant) simulation model developed by the Forest Service.

Response to Concern 520.25

The growth-stage matrix was reviewed and updated for the Final EIS. It was developed based on published growth and yield tables, habitat type and successional guides, and the professional knowledge of people familiar with the forest types and growing conditions found in the Southwest Idaho Ecogroup.

The growth stage matrix represents average conditions found within each potential vegetation group. Each potential vegetation group represents several individual habitat types. The transitional timeframes in the growth stage matrix were rounded to the nearest 10-year period to facilitate its use in the SPECTRUM model.

The forest vegetation simulator was not used to verify the transitional timeframes used in the growth stage matrix. The forest vegetation simulator is designed to predict the development and potential yield for stand specific conditions and thus, would be expected to result in differences when compared to a potential vegetation group representing average conditions.

Concern Statement 520.26

Restoration efforts should not focus solely on roadless areas and other undeveloped areas, but also on forests and grasslands that have already been developed.

Response to Concern 520.26

Restoration efforts have been dispersed throughout developed and undeveloped areas of the Ecogroup through the assignment of MPCs. Many of the MPCs have some level of restoration with changing emphasis. The amount of area assigned to MPCs with restoration efforts and their distribution is dependent upon the theme of the alternative. Some alternatives do place a higher emphasis on restoration in undeveloped areas; however other alternatives emphasize restoration across all areas of the Ecogroup. Most of the alternatives have a mix of restoration, commodity production, and reliance on ecological processes dispersed throughout the Ecogroup. Even within those MPCs with an emphasis on commodity production in the developed areas of the Ecogroup, these MPCs still need to meet desired conditions that were based on the historical range of variability, thus entailing some restoration over past levels of commodity use.

530 Old Growth

Concern Statement 530.01

It has been determined (in the Targhee National Forest Plan) that for every 10 percent reduction in old growth cover, stream runoff would increase by 0.42-acre inches per acre per year.

Response to Concern 530.01

It is correct that, in general, a decrease in stand density or forest cover may result in greater water yield.

Concern Statement 530.02

The LMPs should include consideration of spatial distribution and quality of old growth.

The LMPs should contain a standard that provides protection and wise management of old growth forests and wildlife habitat, with provisions intended to meet the needs of particular growth-dependent species.

Response to Concern 530.02

Concerns about the importance and value of old-growth were fully considered during the development of the Final EIS and Forest Plans. The National Forest Management Act and its implementing regulations, 36 CFR 219, requires that forest plans provide for biological diversity by providing for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. It also requires that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species. To achieve these requirements, desired conditions have been developed which provide for biological diversity, and direction for specific habitat components needed to assure species viability have been incorporated into the proposed Forest Plans.

The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further description of these items.

Concern Statement 530.03

In situations where historical conditions of old growth forests and some types of habitat are underrepresented, the Forest Service should make allowances for the restoration of that habitat and restoration must occur at multiple scales, from watershed to regional levels.

Response to Concern 530.03

Concerns about the importance and value of old-growth were fully considered during the development of the Final EIS and Forest Plans. The National Forest Management Act and its implementing regulations, 36 CFR 219, requires that forest plans provide for biological diversity by providing for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. It also requires that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species. To achieve these requirements, desired conditions have been developed which provide for biological diversity, and direction for specific habitat components needed to assure species viability have been incorporated into the proposed Forest Plans. The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further description of these items.

Concern Statement 530.04

The Draft LMPs do not consider old growth forests as a resource for management, as was the case in the original forest plans. The LMPs focus on wildlife species that are not “old growth” dependant but rather require “mature, old forests and/or forests with large-diameter trees.” The EIS and LMPs should provide a detailed explanation for this change in wording and policy shift and explain, through the use of documentation and maps, how the previous old growth stands compare in amount to the new approach of using mature, older forest and/or forest with large-diameter trees. In other words, describe if this new approach means more or less stands of what have traditionally been called old growth forests. The LMPs do not meet NEPA obligations if the current levels of old growth are not displayed and if impacts to this resource are not addressed. Because of the change in wording, it is difficult to discern if the Forest Service has removed any old growth protections.

The remaining old growth forests have been a concern of the public for a long time and they should not “disappear” in the LMPs.

Response to Concern 530.04

Concerns about the importance and value of old-growth were fully considered during the development of the Final EIS and Forest Plans. The National Forest Management Act and its implementing regulations, 36 CFR 219, requires that forest plans provide for biological diversity by providing for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. It also requires that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species. To achieve these requirements, desired conditions have been developed which provide for biological diversity, and direction for specific habitat components needed to assure species viability have been incorporated into the proposed Forest Plans. The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further description of these items.

Concern Statement 530.05

The guidance found in 16 U.S.C. 1604 and 42 U.S.C. 4331(b) requires diversity. Old growth does not provide diversity so therefore, harvesting needs to increase. Plus, one fire could destroy an entire stand.

For reference:

16 U.S.C. 1604, National Forest System land and resource management plans, states at (g)(3)(B): “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan; . . .”

42 U.S.C. 4331, Congressional declaration of national environmental policy, states at (b)(4): “preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice; . . .”

Response to Concern 530.05

Concerns about the importance and value of old-growth were fully considered during the development of the Final EIS and Forest Plans. The National Forest Management Act and its implementing regulations, 36 CFR 219, requires that forest plans provide for biological diversity by providing for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. It also requires that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species. To achieve these requirements, desired conditions have been developed which provide for biological diversity, and direction for specific habitat components needed to assure species viability have been incorporated into the proposed Forest Plans. The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further description of these items.

Concern Statement 530.06

The extensive logging of old growth forests has created severe consequences for agriculture in that it contributes to earlier snow melts (which produces large amounts of water when it can not be used), and it contributes to flooding of agricultural lands. The construction of reservoirs would capture water for agricultural use and control flooding. The Forest Service should protect old growth stands so that, in the next 80 years, they can regenerate to a point of original sustainability.

Response to Concern 530.06

It is correct that, in general, a decrease in stand density or forest cover may result in greater water yield. However, a decrease in old-growth or mature forest should not result in a measurable increase in water yield when the area is rapidly reforested with tree or brush species.

Concerns about old-growth were fully considered during the development of the Final EIS and proposed Forest Plans. The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further information concerning old-growth.

Concern Statement 530.07

Old growth conditions were not identified or described in the DFCs. Old growth conditions have been a primary source of litigation for many years, stopping numerous planned management actions. The LMPs should explain how successional pathways replace the need to clarify and track old growth. Not doing so violates the Organic Act, NFMA, MUSY, and NEPA.

Response to Concern 530.07

Concerns about the importance and value of old-growth were fully considered during the development of the Final EIS and Forest Plans. The National Forest Management Act and its implementing regulations, 36 CFR 219, requires that forest plans provide for biological diversity by providing for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. It also requires that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species. To achieve these requirements, desired conditions have been developed which provide for biological diversity, and direction for specific habitat components needed to assure species viability have been incorporated into the proposed Forest Plans. The Vegetation Diversity and Terrestrial Habitat sections of the Final EIS provide further description of these items, including a description of the vegetation growth stages (successional pathways) used to describe desired conditions and its relationship to old forest or old-growth.

540 Noxious Weeds (Non-native Plants)

Concern Statement 540.01

Final Management Area direction should also take into consideration in its Integrated Weed Management approach the identification of areas of high susceptibility to noxious weed invasion and the extent and proximity of existing weed populations. This is in addition to the prevention, containment, and control strategies.

Response to Concern 540.01

Susceptibility to invasion along with the extent and location of existing weed populations was used in refining management direction in the Final revised LRMPs. The Forest-Wide Nonnative plant section provides prevention direction when other resource activities occur on the forests. These standard and guidelines focus on activities that can potentially have land-disturbing effects (i.e., construction, fire, timber harvest, road maintenance, etc.). The intent of direction is to minimize the number or size of potential seedbeds and to reduce seed transport potential.

The presence of noxious weed infestations and the amount of land susceptible to invasion were used in determining the containment and control direction for individual Management Areas. The Management Area Characterizations identify the extent of existing populations by species. This information was then used in conjunction with the amount of area susceptible to invasion to develop whether containment, control and eradication of specific species should be emphasized. Prevention direction was expanded at the Management Area level to address the vectors of seed transport that likely present the greatest risks to areas of high susceptibility, as needed. The vectors addressed include vehicles/roads, timber harvest activity, livestock grazing activity, and recreation use. These were ranked or prioritized based upon which ones posed the greatest risks.

Sixth level Hydrologic Units containing large proportions of areas highly susceptible to weed invasion (Nonnative Plant Technical Report II) were then identified. If certain types of activities or vectors having a potential for weed seed transport occurred over a large proportion of the same drainages with high susceptibility, then certain objectives, standards and guides were assigned to the Management Area direction. Also, noxious weeds were addressed as part of rangeland suitability under the Rangeland Resources section. Some of the FEIS alternatives carried into detailed analysis (refer to FEIS, Chapter 2) included areas to be excluded from use due to noxious weed invasions. See the Rangeland Resources section in the FEIS and Rangeland Resource Technical Report III in the project record for more detailed information.

Concern Statement 540.02

Further discussions of noxious weeds, in the Final EIS and LRMPs, should include the implementation of inventive Tribal/state/federal programs such as the Nez Perce Tribe's Bio-Control Center.

Response to Concern 540.02

The forest plan provides programmatic direction that encourages coordination and cooperation with other governmental programs. Decisions made as part of Forest Plan revision will not affect the ability of District managers to implement more site-specific biological control programs.

The Forest Plan does not limit, nor discourage the use of creative or inventive programs, such as those associated with the Nez Perce's Bio-Control Center on individual projects. District Rangers and Cooperative Weed Management Areas are encouraged and given authority to develop site-specific priorities and to implement control aspects, such as biological control.

Concern Statement 540.03

The Final EIS must fully disclose the role and significance of ground-disturbing activities and use associated with timber harvest, road construction, road maintenance, grazing, and fire suppression in the spread of noxious or exotic weeds. The Final EIS must also include data or data summaries describing the impacts of such activities on noxious weed dispersal and the specific amount of current infestation that can be attributed to each activity at a sub-basin or watershed level.

A more comprehensive and aggressive weed control plan must be developed that includes greater focus on prevention (includes reducing forest activities) and monitoring and creates more effective mitigation measures. The plan should address chemical, biological, and cultural control methods that will not adversely affect human health and the environment. The Forest Service should restrict the use of aerial and broadcast methods as much as possible to avoid deleterious effects on non-target plants and wildlife.

As part of the weed control plan, the Ecogroup forest must incorporate a monitoring program to continuously detect and monitor noxious weed infestation.

Response to Concern 540.03

This has been completed. See the Response to Concern Statement 540.01. The details of this analysis have also been included in the FEIS and the Non-native Plant Technical Reports I and II. It would be difficult to ascertain which vector is directly responsible for the establishment of new or existing infestations. However, the proximity of infestations to some vector indicators can be used to determine probable contributors (trails, roads, driveways, etc.). These factors were used to determine the areas of vulnerability described in response 540.01.

Some of the concerns in this statement are outside the scope of forest plan revision and fall within decisions already made with other finer scale environmental disclosure and decision documents. The forest plan's primary purpose and decisions made are fully described in Chapter 1 of the FEIS. While the forest plan could address some aspects of chemical, cultural, and biological control, these have already been addressed in other decisions.

The Boise, Payette, and Sawtooth National Forests have completed programmatic environmental assessments and signed decision notices (Boise N.F. 6/15/88, supplemented in 1996 & 2002; Payette N.F., 6/24/87, supplemented in 1997; Sawtooth N.F. 5/25/89, supplemented in 1995 & 2002) for their noxious weed treatment programs. All noxious weed treatments on the three forests have been limited to ground applications at this time and no “needs for change” were identified (refer to Chapter 1, FEIS). Therefore, decisions made through forest plan revision did not readdress this.

Noxious weed monitoring is a key component in any Integrated Weed Management strategy. Monitoring will be conducted concurrently at several levels. See Chapter Four of the Forest Land Management Plan for details on what will be monitored at the Forest level for nonnative plants. Also, each District conducts individual site monitoring to determine the effectiveness of the treatments applied and what the long-term trends are for noxious weeds on a site. This is consistent with decisions made by individual forests on their treatment programs. Also, the Cooperative Weed Management Areas conduct monitoring in conjunction with their annual operating plans. The Ranger Districts are continuously updating the locations of noxious weeds to ensure all populations are identified and accounted for. Typically, this information is recorded in the District’s GIS databases.

Concern Statement 540.04

The Forest Service should develop a plan that provides for the survey and control of noxious weeds in roadless areas.

Response to Concern 540.04

This has been addressed and is discussed in the FEIS. See the portion of Response to Concern Statement 540.03 about forest treatment programs and monitoring. Monitoring noxious weeds in roadless areas is not differentiated from other areas. If the Districts identify populations, they are recorded regardless of the location.

570 Wildlife Habitat

Concern Statement 570.01

The HRV provides a baseline for comparison of change and a measure of management effectiveness. The DEIS provides little or no historical context to the fish and wildlife resources of the Ecogroup, either in relation to habitats or populations. The Final EIS must contain text that

- 1. provides a context for changes in fish and wildlife since settlement and explains the importance of these resources pre and post settlement;*
- 2. describes changes in fish and wildlife affected by forces on and off Ecogroup lands;*
and

3. details the effects that management has or may have had on fish and wildlife and their habitats.

The Forest Service should explain the basis for the assumption found on page 3-270 of the DEIS: "... if management activities can produce conditions that are within HRV, then it is assumed that the species that adapted to these conditions will have sufficient habitat to meet their needs." The wildlife analysis cannot be based on this assumption about HRV, unless the Forest Service can scientifically validate the statement. Further, the DEIS points out that that modern forest management does not replicate historical, natural disturbance. The Forest Service should explain how current management activities, which are heavily dependent on disturbance activities, would ever produce conditions within the HRV.

Response to Concern 570.01

Whenever information was available to display a historical context about species, that information was used. This includes detailed information developed by Wisdom et al. 2000.

The effects to different wildlife species on lands not administered by the Forest Service is covered in the Terrestrial Wildlife Habitat and Species cumulative effects section of the FEIS for each species.

The effects to different wildlife species on Forest Service administered lands is covered in the Terrestrial Wildlife Habitat and Species effects section of the FEIS for each species.

HRV was used as a reference condition. Each alternative has its own Desired Conditions. In some alternatives, Desired Conditions fall within the range of HRV and some do not. Management activities are trying to reach Desired Conditions established for each alternative.

Concern Statement 570.02

Reduction of habitat fragmentation from past management activities should be one of the most important objectives in the LMPs, because habitat destruction and modification are the greatest threats to species survival. To avoid further habitat degradation and loss, the Forest Service should control road densities and no longer allow road building in roadless areas on National Forest system lands. Livestock grazing and planting/replacing sage and mountain shrub habitat also cause fragmentation.

The existing direction in the LMPs should be strengthened to include a very detailed implementation plan on how the Forest Service will go about restoring connectivity and linkages, not just on the individual forest, but between the Ecogroup forests. The Forest Service should establish and map important linkage zones and manage these areas for the maintenance of linking up suitable habitat and protecting these areas for the long-term.

The Forest Service should outline specific methods for considering fragmentation and linkages and should recognize there is a need

- 1. to change develop management direction for habitat fragmentation, landscape linkages, and habitat edge.*
- 2. for snag, down log, and coarse woody debris guidelines that help maintain ecosystem structure and function.*
- 3. for management direction that addresses important soil processes, such as erosion rates, mass stability, infiltration, and nutrient cycling, as they relate to desired conditions and management of other resources.*

The “Wildlife Resources” section must address the need for maintaining habitat that recognizes broad habitat needs of species. The Forest Service should examine opportunities to maintain viable corridors that are vital to the long-term survival of the plant and animal communities that exist and for the restoration and recovery of those communities at risk. The Forest Service should conduct an analysis that addresses issues such as local and regional migration routes and movement between secure areas. The Forest Service and Interagency Grizzly Bear Committee have mapped regional wildlife linkages, and American Wildlands has completed preliminary Least-Cost Path mapping and analysis for the Idaho region.

Response to Concern 570.02

Habitat fragmentation was recognized as a problem for different wildlife species. Fragmentation can be caused by management activities on Forest Service administered land and activities on other ownerships. Wildlife species whose habitat is believed to be the most departed from what historical conditions indicate, are identified in current condition discussions in the FEIS, Chapter 3, Terrestrial Wildlife Habitat and Species section. The effects anticipated could occur from management actions allowed under the revised plans have been displayed for species identified at risk. All the species evaluated display improving trends as a result of the proposed activities and management direction. Management direction is given to maintain or restore connectivity of habitats, linkage zones between Ecogroup and other Forests is also displayed in the discussed in Chapter 3 of the FEIS, as well as in Appendix F.

The effects of management activities allowed under the revised plans on snags and down logs are displayed in Vegetation Diversity of the FEIS. One of the main criteria for development of management direction for snags and down log was the habitat needs of wildlife species dependent upon these habitat elements. The importance of snags and down logs for soil properties was also considered when developing desired conditions and management direction for the numbers and amounts of snags and down logs. Appendix A of each Forest Plan provides more detailed information concerning how management direction for snags and down woody material was developed.

Concern Statement 570.03

Regarding Payette LMP, page 111-15, Big Game, 1st paragraph: The Forest Service should define the term “unacceptable.” There is concern that, if left undefined, the term could be used to unnecessarily close Forest areas.

Response to Concern 570.03

What constitutes “unacceptable impacts” is more appropriately defined at the project scale of analysis. These impacts vary by site conditions and cannot be clearly defined in a programmatic document. Analysis will have to occur at the local or project level to make the determination relative to the extent, magnitude and duration of an effect and whether this is unacceptable to big game species or its habitat.

Concern Statement 570.04

Old mining roads (with old mines) should be decommissioned as they represent a human intrusion into an area where habitat protection is needed for the preservation of animal species. This concern is directed to the Boise National Forest (the Warm Springs area, the Little Wood above Muldoon Canyon, and the eastern Pioneers).

Response to Concern 570.04

Management direction is in place to decommission roads that are causing resource problems. The proposed management direction is anticipated to decrease the total number of miles of roads over the life of the plan, based on roads analysis. Mining roads need to be evaluated as to whether the mine is still valid and included in an approved plan of operation.

Concern Statement 570.05

The water needs of wildlife should be considered before water sources are turned off at the end of the grazing season. This is the most crucial time of year for wildlife – before the fall rains begin.

Response to Concern 570.05

No one has identified this as a general concern for any location. Almost all livestock water developments are development of springs, and springs cannot be “turned off” at the end of the grazing season. The water is sometimes turned off at a trough, but the water is returned to the stream channel and should be available for wildlife use.

Concern Statement 570.06

Regarding Payette LMP page 111-12, Desired Condition, 1st paragraph, last sentence: "Habitat conditions support populations of species for recreational, commercial, traditional and cultural significance." The Forest Service should describe what "commercial" activities it anticipates in that statement.

Response to Concern 570.06

Commercial activities are considered services offered by licensed outfitters and guides. This is a situation where a person contracts with a person or firm to help them pursue wildlife or fish legally.

Concern Statement 570.07

- 1. Regarding Sawtooth LMP pages 111-12 to 16: The Forest Service should develop standards to better address the needs of a wide-ranging species and species that require unfragmented large blocks of habitat with minimal human activity.*
- 2. Many of the alternatives in the DEIS do not provide the necessary direction to maintain and improve conditions for wildlife species. There is concern about the lack of strict guidelines for protection or restoration of wildlife habitat.*
- 3. The original Payette Forest Plan contained several pages of real management standards for wildlife. The entire section in the Draft LMP provides just a few sentences about sensitive species, with a statement that the Forest Service would conduct wildlife surveys to determine presence; this is a very useless statement. There are no instructions on what the Forest Service would do with the information once the surveys were conducted.*
- 4. The Wildlife Resources standards in the LMPs explain when projects should not be allowed, they do not provide for any specific courses of action, which is what standards are designed to do. The objectives listed under Wildlife Resources should become standards, since they actually direct courses of action.*
- 5. The Draft LMP have not carried forward any standards from the original Forest Plan. The only standard the LMP contains (page 111-15) for big game states, "Restrict or prohibit management activities . . . if conflicts arise with big game while they are occupying those ranges, or if activities will result in unacceptable impacts to those ranges." This standard seems to be circular statement that means the Forest Service will not do things they have determined they would not do. Therefore, any action the Forest Service does decide to do is acceptable.*

6. *The LMP guideline, “Implement seasonal or permanent closures through special management orders to address big game vulnerability” is a good guideline that is supported by a weak management goal to consider the “. . . influence of roads and their potential adverse effects . . .” in managing habitats. The statement should be modified to include the need to implement closures to “provide non-motorized hunting and recreation opportunities” in addition to addressing big game vulnerability.*

Response to Concern 570.07

The Ecogroup contains many very large undeveloped and unroaded areas. It is estimated that over 4,000,000 acres will remain in undeveloped status. This is approximately 60 percent of the Ecogroup. Animals that need large tracks of this type of habitat should have their needs met.

Management direction is contained in both the Wildlife Resources and Vegetation sections to improve or maintain habitat conditions and maintain biodiversity. Priority was given for improving habitat of species at risk.

Surveys are to be conducted for sensitive species to determine their presence. Management activities should not cause the habitat of sensitive species to trend toward federal listing. Management direction in the LRMPS has been designed to maintain or improve the habitat conditions for sensitive species in the long term. Other species that are believed to be at risk or of special interest have management direction to maintain or improve their habitat conditions as well.

Definitions and wording of objectives, standards and guidelines were strictly followed for all management direction. The management direction for Wildlife Resources has been expanded from the direction found in the draft LRMPS. The Vegetation section also contains direction that will maintain or improve habitat conditions. Strict adherence to definitions and rules for construction of management direction were followed in order to achieve a very consistent application of these management tools to reach desired results within all resource areas.

Some of the management direction was carried forward from the previous plans, but were re-worded to be consistent with the current definitions for objectives, standards and guidelines. Public access on roads within the Ecogroup will not be directly affected by the decision on Forest Plan revision (refer to FEIS, Chapter 1, Travel Management). The current Travel management plan/maps will carry over with this revised plan. The need to change current travel management to address hunting opportunities will be addressed by management on each Forest following the decision on forest plan revision.

Concern Statement 570.08

Regarding DEIS page 3-262, which states, “With the current high population levels, present habitat conditions do not appear to be limiting the populations with the Ecogroup.” According to the Idaho Department of Fish and Game, there are parts of the Ecogroup that are below the reported Elk population objectives shown on DEIS pages 3-260 and

261. *Habitat quality is a factor that limits Elk, which is illustrated by the number of Game Management Units that failed to meet State objectives for elk and deer harvest and herd composition. The Forest Service should include the following standards to help address this problem:*

1. *Provide adequate non-hunting season habitat security in deer and elk summer range by managing access to meet elk habitat effectiveness targets.*
2. *Meet elk vulnerability targets of the Idaho Department of Fish and Game,, which are necessary to meet state objectives for elk harvest and herd composition.*
3. *Protect elk winter ranges (as well as deer, mountain goat, bighorn sheep, and wolverine).*

The Forest Service should refer to the table submitted as attachment 1, which provides an update on elk populations within the Ecogroup.

Response to Concern 570.08

Elk are discussed in the FEIS and Plans as a species of special interest because of their high social and financial interest. Winter ranges have been delineated and management direction applied as needed to place the appropriate emphasis on winter ranges. Tables showing elk objectives from state agency plans have been updated in the FEIS.

Concern Statement 570.09

The Draft LMPs lack specific long-term management direction for important wildlife species. The Draft LMPs do refer to the use of Sensitive Species Conservation Strategies and Assessments for assessing project effects. However, the LMPs must also include specific management objectives, standards, and guidelines that are derived from the Conservation Strategies and Assessment or that reference the use of a species-specific strategy wherever the appropriate species or habitat may occur. The Idaho Department of Fish and Game has the appropriate copies and citations of Sensitive Species Conservation Strategies and Assessments.

Response to Concern 570.09

Management direction is in place to follow Forest Service approved portions of Conservation Strategies and Assessments.

Concern Statement 570.10

The Forest Service should provide a greater explanation of how it will accomplish the goal to “Manage big-game habitats, including winter ranges, by maintaining or restoring desired vegetation structure and characteristics, and by minimizing human-cause disruption during critical life stages.”

The LMP further states, “Restrict or prohibit management activities, including recreation, within winter/spring ranges if conflicts arise with big game while they are occupying those ranges, or if activities will result in unacceptable impacts on those ranges.” If the goal is to minimize human impacts during “critical life stages,” then it does not seem logical to restrict or prohibit management activities only after conflicts have been documented or unacceptable impacts have been made. The Forest Service should provide guidelines that indicate how severe the conflicts or impacts would have been before the Forest Service intervenes by prohibiting further management activities.

The Draft LMPs specify requirements to consider the amount, quality, and distribution of habitats; fragmentation with habitats; juxtaposition and connectivity to other habitats; the influence of roads and their potential adverse effects; and ecosystem processes that shape habitats. The goals for managing riparian, wetland, upland forest, shrub, and grassland habitats must satisfy those requirements. The Forest Service must also consider migration patterns of wildlife when delineating harvest areas.

Response to Concern 570.10

What constitutes “unacceptable impacts” is more appropriately defined at the project scale of analysis. These impacts vary by site conditions and cannot be clearly defined in a programmatic document. Analysis will have to occur at the local or project level to make the determination relative to the extent, magnitude and duration of an effect and whether this is unacceptable to big game species or its habitat, including winter range. Wildlife use is also influenced by climatic conditions that may pose concerns one winter but not the following winter, depending on weather conditions.

Concern Statement 570.11

The Forest Service should ensure that issues pertaining to sage grouse and other sagebrush obligate or dependent species be given greater focus. Many vegetation projects involve the use of prescribed fire, which may fulfill objectives for livestock and grazing forage but does little to benefit wildlife.

The EIS and LMPs must propose actions that will negate past adverse effects and restore habitat for species that are known to be in decline throughout the West, specifically the Columbia sharp-tailed and Sage grouse. The LMPs provide some management direction but

contain an immediate commitment to act and apparent standards and guidelines to confirm when, how, and to what extent the Forest Service will employ this direction. The Forest Service should protect lands from recreation and grazing use and restore or protect those areas as sage grouse habitat.

Response to Concern 570.11

The sage grouse is identified as MIS and the revised Forest Plans include management direction specific to this species. All management areas have been identified where sage grouse is believed to occur and direction from Connelly et al. 2000 has been incorporated at the management area level.

The Columbia sharp-tailed grouse is an Intermountain Regional Forester's Sensitive species. Management areas have been identified where this species is believed to occur. Forest plan direction related to this species provides assurances that habitat changes that may affect this species through forest plan implementation will not result in a trend toward federal listing.

Fire is a natural part of the sagebrush ecosystem and likely played a major role in the structural changes in these plant communities and will continue modifying these into the future, even with our fire control efforts.

Concern Statement 570.12

Regarding Payette LMP, pages 11-15-16, 1st paragraph, 2nd sentence: The Forest Service should describe the "conflicts" it refers to in the sentence, "... roads can increase human-related conflicts with wildlife and aquatic species."

Response to Concern 570.12

Additional information about the impact of roads has been added to the FEIS. We agree that many of these roads get little use and some are closed after the harvest activity has occurred. The literature that we used that supports the conclusion about the affects of roads disclosed in the FEIS to species is referenced and included in the Reference Section of the FEIS. Some of the documented effects of roads that are facilitated by access are: habitat loss, reduction of snags, illegal shooting or trapping, habitat avoidance, habitat fragmentation, direct mortality from animals being run over, etc. We would also suggest that you read the "Roads" section in Chapter III of the FEIS.

Concern Statement 570.13

Regarding Payette LMP page 111-13, last Objective, which states, "Initiate restoration activities on specific terrestrial habitats to achieve at least a 5 percent improvement from the current condition toward the desired condition by the year 2010. Specific

habitats to be addressed will be determined on a Forest-specific basis using information from the species model.” The Forest Service should explain if the statement assumes there is no 100 percent satisfactory habitat on the Forest, or if it applies only to some known habitats that are not now satisfactory.

Response to Concern 570.13

Our analysis draws from Wisdom et al. 2000, showing what habitats have decreased or changed the most. Restoration activities should place emphasis on these habitats at risk, assuming the species that use these habitats may be at risk due to the extent of the loss/change. Direction in the LRMPs emphasizes the need to restore habitat conditions for species at risk.

Concern Statement 570.14

Regarding Payette LMP, MA 1, Hells Canyon, page III-81, the last sentence under “Wildlife Resources” states: “Overall, terrestrial habitat is near properly functioning conditions, except for the high-quality winter range and riparian areas that have been flooded by Hells Canyon Reservoir.” This land could have been high-quality winter range prior to Hells Canyon Reservoir, but no one recalls seeing a lot of use of that range.

Response to Concern 570.14

Much of this area is used as winter range (snow depth dependent) and a limited amount is under water due to the Hells/Oxbow Canyon dam pools. The MA characterization has been corrected.

Concern Statement 570.15

The special concerns for species known to use multiple forest structures (such as goshawk and lynx) were not assessed, because the Draft LMPs were not spatially disaggregated for the Ecogroup. Therefore, the habitat trend lines portrayed in Chapter 3 of the DEIS misrepresent true habitat conditions for those species, which violates NEPA and the ESA.

The forest planning team addressed the spatial distribution of habitats using RELM modeling on a subset of sixth order watersheds in the Ecogroup. Because the analysis was only conducted for large tree vegetation growth state and only evaluated the amount of that structure in the watershed, the intent of the modeling effort (ensuring that habitats generated over time were dispersed among multiple watersheds) was not met. The analysis, therefore, fell short of linking habitat amounts, quality, and spatial arrangement to organism viability.

The forest planning team must address the effects of catastrophic disturbances on habitat and resultant impacts to species viability. Without this analysis the DEIS does not meet the viability requirements of NEPA and NFMA by failing to adequately consider all of the major factors that influence the maintenance of “viable populations of all native and desired non-native wildlife vertebrate species in the planning area” (36 CFR 219.26). Viability assessment must incorporate habitat amounts, habitat quality, and the spatial arrangement of habitats.

The Desired Future Condition targets for the complete wildlife assemblage must be based on an ecologically based coarse filter.

Response to Concern 570.15

The analysis of the vegetative information was the basis of the risk/viability analysis for predicting coarse scale habitat changes due to the selected alternatives likely ability to achieve selected DFCs. Appendix A within the plans displays the range of vegetation conditions we are trying to achieve under the selected alternative, Alternative 7. The vegetation DFCs for all Management Prescription Categories (MPCs) described in Appendix A are within HRV, except for MPC 5.2.

A fundamental assumption of our analysis is if the selected alternative depicts an increase in macro habitat features from current conditions, the viability of the species is improving due to anticipated management actions. The analysis supporting FEIS effects disclosures was done by Ecological Reporting Unit (ERU), by each Forest, entire Ecogroup and compared to the Wisdom et al. (2000) analysis for the entire Columbia River Basin (CRB). We recognize that the modeling process we used is not spatially specific. However, spatial context will be provided during fine and project scale analyses supporting implementation of the revised forest plans. Other known fine scale risk concerns were resolved through Management Direction such as Objectives, Standards and Guidelines found in the revised forest plans. Other species and site-specific mitigation measures will be developed using project specific data and information during project scale analyses.

Concern Statement 570.16

Chapter 11 of the LMPs states, “There is inconsistent and insufficient management direction for some wildlife wintering areas that are also used by livestock.” This statement is in conflict with reasons mentioned under “Need to Establish or Change Management Direction” for “Rangeland/Grazing Resources” and with Management Area Objectives.

This following statement only provides justification for ignoring the real concern, and the Forest Service should edit this statement in the next revision: “Suitable ranges used by wildlife will remain the same for all alternatives. The availability of forage in localized

area for wildlife (e.g., elk, mule, and whitetail deer, and bighorn sheep) may vary by alternative, due to some suitability changes. However, no deductions to livestock suitability were made or based on livestock-wildlife ungulate competition for forage, as this was not identified as an issue.”

The combined used by livestock and wildlife could exceed desired use levels on vegetation. The Forest Service should review the field research (Lauer & Peek 1976) that indicates winter and other seasonal competition between big game species, such as mule deer and cattle, is greatest within the big sagebrush/wheatgrass communities with south facing slopes of less than 30 percent emerging as the most critical areas.

Regarding Bitterbrush: Studies show the heaviest use by domestic sheep occurs in July, August, and September. Grazing after mid-July reduces the volume of bitterbrush available for big game. As most of the Bitterbrush occurs on the south-facing slopes that are utilized heavily by big game (such as the South Fork of the Boise River), the combined use of sheep and big game foraging on the Bitterbrush will be detrimental to the long-term health of the shrub and big game winter range conditions.

The Forest Service should identify and outline big game winter ranges within the Ecogroup and address the winter range-livestock competition issue under Objectives and Standards within the Management Areas. Also, the Forest Service should consider eliminating fall and winter use of these livestock grazing areas or to limit utilization to 40 or 50 percent because of livestock/big game forest competition.

Response to Concern 570.16

Management direction for winter ranges has been changed from what was displayed in the Draft LRMPs. Where information was available, winter ranges have been identified in the Management Area characterization in each Forest Plan and corresponding direction emphasizing the importance of these limited areas was added to the Management Area.

Concern Statement 570.17

The Forest Service should identify domestic sheep allotments or sheep-mountain goat range overlaps where potential forage competition could be occurring with mountain goats. This suggestion is in response to the statement made in the Draft LMP that there appears to be a decline in mountain goat numbers in some of the Management Areas.

Response to Concern 570.17

Management direction has been added that should help resolve any forage competition problems that may be occurring between domestic sheep and mountain goats. As allotment management plans are periodically updated there is additional opportunities on these individual allotment plans to resolve

identified forage competition conflicts that were not identified during plan revision. We are not aware of any research or studies that indicate mountain goat declines are caused by forage competition with domestic sheep.

Concern Statement 570.18

Riparian zones are the breeding ground for ruffed grouse in the Ecogroup forests, not Aspens (see "Understated Elegance," pages 23-30).

Response to Concern 570.18

The FEIS has been updated to reflect use of riparian zones by ruffed grouse. There are extensive areas in the southern portion of the Ecogroup that have riparian areas that contain aspen communities and ruffed grouse are commonly observed there during the spring, summer and fall.

Concern Statement 570.19

Regarding DEIS page 3-268: The text on this page states that there are 113 species of birds that use riparian areas for nesting in Idaho. The Forest Service must ensure that the necessary amount and quality of riparian habitats are available to support viable populations of these bird species.

Response to Concern 570.19

Management direction in the Soil, Water, Riparian and Aquatic Resources, Vegetation and Wildlife Resources sections of the revised plans was designed to maintain or improve woody vegetation and other hydric species in riparian systems. Maintaining or improving vegetative conditions in riparian areas will benefit many wildlife and fish species. Emphasis has been given to maintain or restore woody vegetation such as (willows, alder, carex, etc.) in Riparian Conservation Areas (RCAs) and meadows.

Concern Statement 570.20

Livestock grazing should not be allowed until ground nesting birds have completed their nesting and have fledged their young. This is to prevent nests from being trampled.

Response to Concern 570.20

We are not aware of this being a substantial issue for ground nesting birds. Many of the ground nesting birds have finished nesting by the time livestock enter the Forest. In addition, most of the allotments use pastures on a rotation basis, so the same pasture does not get grazed the same time each year. This means a pasture may be grazed starting in June this year, but that same pasture would not be grazed until August the following year, and in some cases not grazed at all for the entire season if a rest rotation system is in place. In many cases, this allows ground-nesting birds to be present without domestic livestock use of the pasture during nesting and fledging periods.

Concern Statement 570.21

Regarding DEIS page 3-269, "Ponderosa Pine Habitat," which states: "Within the Ecogroup these habitats support two (2) priority bird species at risk, the white-headed woodpecker and pygmy nuthatch." The Forest Service should provide a discussion of its rationale behind this statement (particularly concerning the pygmy nuthatch) so it can be evaluated in relation to management programs.

Response to Concern 570.21

The discussion can be found in Chapter 3 of the FEIS, Terrestrial Wildlife Habitat and Species section. The two species mentioned were cited directly from IPIF 2000 (refer to the Reference Section of the FEIS). We were not the source of this information. The rationale for selection of species analyzed and basic habitat needs is located within the individual species discussions in this section.

Concern Statement 570.22

The Forest Service should assess if human activities are inhibiting the movement of mountain goats, which could contribute to some inbreeding in small populations.

The Forest Service should evaluate the impacts on wintering mountain goat populations and their habitats caused by winter recreation activities such as snowmobiles and helicopter skiing.

Response to Concern 570.22

All areas with a concern between winter recreation and mountain goats were evaluated in previous NEPA documents during the last several years on the SNRA and Ketchum Districts. This issue was resolved and no further management direction is needed in the revised LRMPs to address the concern. If additional issues are identified in the future they can be addressed during site-specific NEPA analyses supporting revised forest plan implementation and subsequently resolved through the project decisions, as needed.

Concern Statement 570.23

Regarding Payette LMP, page 111-12, Goals, second list: This list seems geared to closing or restricting people's access to the Forest. The LMPs make it appear that wildlife will not cross roads to get to particular areas within the forest. The Forest Service should reference the data to support this and explain where in the Forests this is happening.

Response to Concern 570.23

Additional information about the impact of roads has been added to the FEIS, Terrestrial Wildlife Habitat and Species section. We agree that there are roads that get little use and some are closed after the harvest activity has occurred. However, road closures are not decisions made through this forest plan revision effort. Travel management and maps in the current plans will be carried into the revised plans.

The literature that we used that supports the conclusion about the affects of roads disclosed in the FEIS to species is referenced and included in the Reference Section of the FEIS, such as Wisdom et al. (2000). We suggest that you also read the “Roads” section in Chapter III of the FEIS to get a better understanding of the road system that is available to the public on each Forest and other resource sections to understand the effects roads have to different resources and the social and economic environments.

Concern Statement 570.24

There is concern about the term “quality hunt.” The IDFG uses this term and it seems to mean a hunt where one must either pack the game out on ones back or hire livestock to pack it out. This discriminates against the hunter who does not have stock or the financial ability to hire a guide or livestock.

Response to Concern 570.24

Our intent is to offer many types of experiences to the recreation public. In areas that have access management restrictions in place, they have been discussed with the hunting and non-hunting public jointly, between state agencies and the Forest Service, before they were implemented. There are areas with little or no access management that produce a quality hunting experience and trophy animals are harvested.

Public access on roads within the Ecogroup will not be directly affected by the decision on Forest Plan revision (refer to FEIS, Chapter 1, Travel Management). The current Travel management plan/maps will carry over with this revised plan. The need to change current travel management to address hunting opportunities will be addressed by management on each Forest following the decision on forest plan revision.

Concern Statement 570.25

The current Idaho Department of Fish and Game Big Game Closures during the hunting season should still be enforced.

Response to Concern 570.25

All current agreements between the Forest Service and state agencies on access management will still be in affect when the revised Forest Plans become approved. There are no Idaho Department of Fish and Game closures only. All access closures are jointly agreed to and enforced.

Concern Statement 570.26

The overstocking of game can be equally as detrimental as livestock grazing. The IDFG should be considerate of landowners (public and private) and work with them to establish quotas for hunting as land managers provide the forage for game herds.

Response to Concern 570.26

The IDFG and UDWR have programs that issue special harvest permits, as well as compensation programs, for landowners that believe their land/crops have been damaged by big game. We suggest that you contact the nearest state wildlife Regional Fish and Game office in your area for information about these programs.

600 Fire Management and Prescribed Burns

Concern Statement 600.01

Alternative 4 makes the greatest use of prescribed fire and, therefore, a natural, rather than an economic approach to how forests will be shaped. The Forest Service should amend Alternative 4 to provide additional use of prescribed fire to allow a closer replication of the traditional fire cycle of forests.

Response to Concern 600.01

The amount of fire use displayed in the Final EIS is an increase over the amount displayed in the Draft EIS for Alternative 4 on all three forests. As with the DEIS, this alternative provides for the greatest amount of fire use compared to the other alternatives.

Concern Statement 600.02

The Forest Service should analyze the important ecological role of fire on forest ecosystem health and the differences in effects between fire and fire-mimicking suppression activities. Aquatic and terrestrial habitats rebound more quickly from natural wildfire, and watersheds managed with wildfires tend to be in better shape with regard to sediments than those managed by intensive timber harvesting.

There is no data to support the Ecogroup's presumption that the current fire risk is outside of the historical range of variability, and there is no data or specific information describing how different fire regimes sustain or impair different ecological communities.

Response to Concern 600.02

Assumptions about changes in wildfire hazard in some fire regimes, based on the uncharacteristic wildfire hazard ratings, are consistent with changes reported by the scientific community and for other areas with similar fire regimes. The areas where wildfire effects appear to be most outside the historical range of variability are those with documented historically frequent fire (5-20 year return intervals) that was primarily nonlethal. This includes the low elevation ecosystems in the Ecogroup (Steele et al 1986). In many cases these ecosystems have not experienced fire since the advent of fire suppression in the early 1900s. The hazard assessment conducted for the Ecogroup area is consistent with national efforts to determine whether the risk of uncharacteristic wildfire is outside of the historical range of variability (see www.fs.fed.us/fire/fuelman for an explanation of the national scale assessment). This assessment is based on research from several areas with similar fire regimes to those found in the Ecogroup. While lethal fire has been documented in these nonlethal fire regime areas at long intervals in the past, the widespread lethal wildfires the past 20 years, in conjunction with off-forest development and past timber harvesting practices, have had dramatic impacts on these low elevation ecosystems. In particular, the amount of area with large ponderosa pine has been reduced. This has had an impact on a variety of ecosystem processes and functions. Areas with longer fire return intervals do not appear to be outside the historical range of variability for most fire effects except for possibly patch size. These fire regimes most often occur at higher elevations and have not experienced the same kinds of changes that have taken place in the lower elevation ecosystems.

A description of the fire regimes and effects can be found in Fire Management, Effects Common to All Alternatives, The Role of Fire. Effects of uncharacteristic wildfire are described in Vegetation Hazard, Effects Common to All Alternatives, Uncharacteristic Wildfire Hazard.

Concern Statement 600.03

Wildlife needs must be considered in fire decisions, including food supply loss and controlled burns in the springtime during the birthing season.

Response to Concern 600.03

Forest plan direction contained in the Wildlife Resources section applies to a variety of management actions including fire use. Additional wildlife concerns and issues may be addressed in the Fire Management Plan, which implements the Forest's fire management program.

Concern Statement 600.04

Fire suppression efforts should be based on local conditions, including terrain, fuels, and weather, along with availability of fire-fighting resources at the time. Some guidelines call for a restriction on the use of heavy equipment for fire suppression in some areas; the Forest Service should never restrict suppression efforts with unnecessary political constraints.

The LMPs should outline the Forest Service's responsibility for habitat rehabilitation of all lands used for fire camps, regardless of ownership.

The Forest Service should develop a Fire Management standardized guideline that addresses the intake hose screen size to protect salmonid fry, unless a fisheries biologist allows a larger mesh.

Response to Concern 600.04

Fire suppression direction was re-evaluated following the draft EIS to ensure that it allowed for the maximum flexibility needed to protect firefighter and public safety. Direction that was in conflict with this policy requirement was eliminated or modified.

Forest Service responsibility for rehabilitation on sites affected by fire camps is described in various manual and handbook direction and is usually determined through the rehabilitation plan developed by the Resource Advisor assigned to the incident. Rehabilitation on private lands is determined by the landowner as part of the agreement to use their lands and is limited to meeting or providing mechanisms to move the area toward the condition it was in before the use.

Management direction is provided both in the Threatened, Endangered, Proposed and Candidate Species section and Soil, Water, Riparian and Aquatic sections of the revised LRMPs, that addresses the intake hose screen size needed protect salmonid fry, including the exceptions for use of larger mesh.

Concern Statement 600.05

The Forest Service should produce a history of fire on the Forests so it has an accurate baseline when the Forest documents discuss Historic Range of Variability. The document needs to show acres burned historically as far as we know and needs to make a better case for what forest conditions warrant prescribed fire and why the Forest Service believes this. This could support a better understanding of the way fire is being managed.

The LMPs should provide specific direction for prescribed fires, and the EIS should describe how this burning objective would help achieve Forest goals, objectives, and standards.

The reliance on prescribed fire management versus mechanical treatment should be weighed against the potential cost of suppression and resulting collateral damage should a prescribed fire burn out of control.

Response to Concern 600.05

Each forest annually produces a fire database that documents each reported ignition, ignition source, size of the fire, and general information about the location. In addition, the perimeter of large fires (generally over 100 or 200 acres) is recorded on maps. These "fire atlases" are of various ages across the three forests: the Boise Forest has some records that date back to the early 1900s while the databases on the

Payette and Sawtooth are more recent (1950s on the Payette, 1970s on the Sawtooth). Older fire atlases have been digitized and developed into GIS coverages. An example of a map developed from the fire perimeter coverage is displayed in the Air Quality section of the EIS. These maps however do not describe the “historical” situation as defined by the Historical Range of Variability, which uses pre-European settlement as the timeframe. Rather they are based on records kept by employees after designation of the Forest Reserves. There have been some scientific efforts to document historical fires, however, these have been primarily focused on developing fire return interval information. Determining fire size using historical re-creations is very difficult. Instead we used fire return intervals for the various fire regimes to estimate how much area may have burned historically (see Fire Management, Current Conditions, the Role of Fire).

The Fire Management section of the EIS displays levels of fire use for each alternative to meet vegetative desired conditions and other goals and objectives related to the issue of restoring fire and using fire as a vegetation or fuels management tool. The LMP provides an objective for the use of prescribed fire.

Selection of treatments at the site-specific level are evaluated relative to Forest Plan direction and other considerations including risks and potential effects and the ability to meet the purpose and need. Various factors are weighed against each other. One of the factors evaluated is the potential risk of an escape from fire use.

Concern Statement 600.06

The LMPs should provide a better definition of “limited, inappropriate, or undesirable” with regard to fire, especially as it pertains to the risk to structures in the Wildland-Urban interface.

The Forest Service should state if it has or will develop a plan to assist communities and private individuals to treat structures for fire resilience. (Jack Cohen’s research should be referred to extensively regarding this topic.) The National Fire Plan and the fire management directives in the LMPs should coincide, which would help put resources where effort is most needed.

The LMPs state as a goal the intention to “allow fire to play its natural role where appropriate,” but does not describe what conditions are “appropriate.” The Forest Service must develop categories of response to fire so the public can know when and how a given fire would be fought.

Thinning and full-scale logging should begin immediately to reduce fire risk to the communities of Warren, Secesh, Burgdorf, McCall, Yellow Pine, and others.

Response to Concern 600.06

Where applicable, areas or situations where fire use may be limited, inappropriate, or undesirable can be found in various resource sections. For wildland fire use, each management area was evaluated to determine whether it may or may not be appropriate based on social considerations, boundaries,

ownership patterns, etc. Only those management areas where implementation of wildland fire use may be appropriate provide direction for its use. Those that may be considered contain additional direction to further identify the areas where implementation may occur consistent with Forest Plan direction. Management areas also provide goals, objectives, standards, and guidelines to further direct the use of fire. The characterizations for each management area identify wildland-urban interface (including those communities listed above). Where it occurs, additional management area direction is provided. The Forest Plan also contains a forest-wide objective that focuses on achieving desired vegetative conditions and reducing fuels in the wildland/urban interface.

The Final EIS was prepared incorporating applicable components of the National Fire Plan. Counties are developing plans for community assistance and hazardous fuels treatments as outlined by the National Fire Plan. We developed the Forest Plans to provide a foundation for potential activities and cooperation in areas identified in 2001 as National Fire Plan communities as well as areas identified by the Forest as having wildland-urban interface character. However, during the time that the Forest Plans were being developed, county plans and description of wildland-urban interface had not been completed.

The approach to identifying areas where fire use (prescribed or wildland) may be appropriate is described in the first response. Wildfires, which by policy are an unwanted wildland fire, are not appropriate for restoring fire's natural role.

Concern Statement 600.07

Regarding DEIS page 3-303: The last paragraph on the page states, "Additionally, the risk of human-caused fires originating from the interface zone and spreading to federally protected lands is increasing." The statement should be removed or should be reworded to reflect that the real danger to private property is the lack of management on federal lands.

Response to Concern 600.07

The EIS acknowledges in detail hazardous vegetative conditions that occur on Forest Service lands (see Vegetative Hazard and the Wildland-urban interface discussion in Fire Management). Though the majority of starts in the Ecogroup are from lightning, an average of 22 percent of the ignitions each year originate from people. This includes abandoned campfires, trash burning, vehicles, power lines, cigarettes, children playing with matches, fireworks, and numerous other activities and sources. The potential for wildfire increases as the amount of area and number of people living in interface increases.

630 Air Quality

Concern Statement 630.01

The EPA's Interim Air Quality Policy on wildland and prescribed fire requires States to encourage alternative methods of treatment other than fire. The Forest Service should include a description of any mechanical treatments (such as thinning, harvesting, chipping,

or removal) it intends to use alone or in conjunction with fire. The discussion should also explain when the treatments are or are not appropriate to determine if alternatives were considered.

The Forest Service, through the NEPA process, should (1) evaluate air quality and visibility impacts as outlined in the seven elements contained in EPA's Interim Air Quality Policy on Wildland and Prescribed Fires section V.A.2.b, and (2) state at what point in the NEPA process those elements should be addressed.

The Ecogroup should (1) explain the Interim Policy; (2) explain how the Ecogroup currently meets the Interim Policy; and (3) describe those elements that are part of the Montana/Idaho State Airshed Group Smoke Management Program.

Response to Concern 630.01

The EIS provides an explanation of the Interim Policy and of how the planning elements were addressed for the scale of the Forest Plan revision analysis. Those appropriate for consideration at the programmatic scale were carried through. This included a discussion of the potential to consider alternative treatments to the use of fire. Appendix B of the FEIS describes the mechanical (and chemical) treatments modeled to achieve vegetation management objectives. The discussion in the EIS focused on the criteria described in the Interim Policy for the use of mechanical treatments and the conditions under which these treatments may be a viable option. The use of one type of mechanical activity versus another will be evaluated at the site-specific scale in areas where mechanical treatments are allowed consistent with the purpose and need of the project.

The planning items in section V.A.2.b served as a basis for additional analysis covered in the FEIS. Items at this scale were addressed and those items that are either best addressed or re-assessed at the project scale were included in Forest-wide direction to consider various elements appropriate at the project scale.

The EIS describes the basic elements required for a Smoke Management Program (SMP) and the current status of those programs in Idaho and Utah. Both states' smoke management programs have been certified to EPA that they meet the Basic SMP outlined in the Interim Policy.

Concern Statement 630.02

Regarding DEIS page 3-23, which states, "Alternatives 5 and 1B have the least amount of effects to public health and visibility in the short and long term. However, these alternatives may increase the risk of future wildfire smoke emissions. This statement does not make sense. Alternative 5 reduces the fuel loading, which reduces not increases the risk of future wildfire smoke emissions."

Response to Concern 630.02

In the DEIS, forest-wide vegetative hazard increased for these alternatives over the first five decades as described in the Vegetation Hazard section. For the Final EIS, vegetative hazard reduction was added as a modeling goal to Alternative 5 in conjunction with achieving the desired vegetative conditions. Hazard reduction was not included as a goal for Alternative 1B as this does not reflect the current plans. For all three forests, uncharacteristic wildfire hazard for Alternative 1B increases over the first five decades based in part on the location of treatments to achieve objectives and the desired condition. For Alternative 5 on the Boise, uncharacteristic wildfire hazard declines from the current condition over five decades. Hazard remains the same on the Payette and increases on the Sawtooth. This occurs for a variety of reasons including the desired conditions and budget available to treat vegetation. See the Vegetation Hazard section in Chapter 3 of the EIS for a more detailed discussion of the factors related to uncharacteristic wildfire hazard outcomes for the alternatives.

Concern Statement 630.03

The Forest Service should explain why Northern Ada County has been designated as a non-attainment area for carbon monoxide and particulate matter. There are gradations of poor air quality that cannot be discerned from a non-attainment label. The Forest Service should provide a better description of the affected environment by characterizing the problem in terms of source of pollution, frequency, degree of severity, and what is being done or has been done to correct the problem.

Response to Concern 630.03

The Final EIS explains in greater detail the status of the PM 10 and Carbon Monoxide Non-attainment Areas for Northern Ada County including the factors that contributed to the status relevant to the Forest Plan revision analysis. At the time of the development of the Final EIS, this area had been re-designated as a Maintenance Area for Carbon Monoxide. With this change in status comes a plan to ensure that this status will be maintained. A Maintenance Plan had been submitted to EPA for change the PM 10 status from Non-Attainment to Maintenance. This plan approval is expected in summer 2003.

Concern Statement 630.04

There is no data to support any presumption as to what smoke emissions were prior to Euro-American settlement. Therefore, the historical smoke level reference is not acceptable as a true measure of impacts on the current airsheds.

Response to Concern 630.04

Historical smoke estimates were based on assumptions about fire return intervals for the various vegetation types that occur in the Ecogroup. The intervals used were compared with data and literature available regarding historical fire return intervals. The use of historical emissions was not intended as an

actual measure of impacts to airsheds or areas but rather was used to provide a context for comparing fire use with wildfire as these produce very different magnitudes in the forested ecosystems. The use of this reference is also consistent with other planning efforts.

Concern Statement 630.05

Logging, grazing, mining, road building, oil and gas leasing, prescribed burning, and other activities included in the proposed Boise, Payette, and Sawtooth plan revisions and DEIS will exacerbate adverse changes in global climate by reducing carbon absorption function of National Forests and by releasing carbon stored by these forests into the atmosphere. The adverse ecological and economic effects of increases in atmospheric carbon released by National Forest timber sales has not been disclosed nor incorporated into decision-making by the Forest Service when it prepared the proposed Boise, Payette, Sawtooth plan revisions and DEIS. This failure is a violation of the Global Climate Change Prevention Act.

The Forest Service is required to tabulate the Carbon Release Factor for all proposed sales, all prescribed burns, and also the full carbon release of every wildfire.

Response to Concern 630.05

Global Climate Change and carbon sequestration are beyond the scope of the analysis conducted for Forest Plan revision and scale of decisions made in a Forest Plan. Global Climate Change is addressed as part of the Forest and Rangeland Renewable Resources Planning Act (RPA) Assessment and in the Forest Service Strategic Plan prepared in response to the Government Performance and Results Act (GPRA).

Concern Statement 630.06

The EIS should fully disclose the overall impacts on the affected airsheds as a consequence of management direction contained in the LMPs. To not do so is in violation of NEPA and the Clean Air Act.

The EIS should acknowledge that there could be unintentional ground-level impacts from smoke. The Forest Service should explain to the public what it would do in the event smoke does not properly disperse and describe any contingency measures it has developed to address this situation.

There is no evaluation of the timing of burning activity being limited to spring/fall for managed burns and summer for natural wildfire. The impacts of these timing constraints should be factored in when evaluating the effectiveness of burning, as well as the overall impact on critical airsheds within the Ecogroup.

The Forest Service should discuss the amount of burning that will occur annually for the life of the LMPs in terms of acres and pollution loading, and provide recent (10 years) historical activity for perspective. This will let people know if the annual emission rate will go down as the fuel loading returns to historical norms and how long that would take. The LMPs should include a map and table that show areas that need prescribed fires and the objective of the burn (that is, to reduce fuel loading, reduce insect and disease, or improve forest health).

Response to Concern 630.06

An air quality characterization of airsheds captured by a 100-kilometer area around the Ecogroup boundary was added to the Final EIS. Available air quality information was used to characterize current conditions and trends. Smoke emissions produced from acres of fire use modeled for each alternative was used to determine potential impacts to sensitive areas within the airsheds as well as Class 1 areas adjacent to or within the Ecogroup administrative boundary. Implementation of fire use for the selected alternative will be consistent with Air Quality direction contained in the revised Land Management Plan.

The potential for unintentional smoke-related impacts to public health and safety (transportation) would be disclosed at the project level as well as the selection of appropriate mitigation and contingency measures to be taken based on site-specific conditions.

Potential air quality impacts are described in general for season of burning as it relates to dispersion, wind trajectory, and potential to impact sensitive areas within airsheds. The efficacy of burning during different seasons is too fine scale to address in this analysis as it varies depending on the purpose and need of specific projects.

Available recent historic (10-year) prescribed fire acres are provided in the Final EIS. This was used to compare to the extent possible emissions that may be produced by the various alternatives. Potential emissions from fire use are also compared to potential wildfire smoke emissions. The EIS displays acres of fire use for each alternative based on assumptions, goals, and constraints developed to represent the themes and Management Prescription Categories assigned to the alternatives. The Land Management Plan for the preferred alternative contains overall goals and objectives for the use of prescribed fire. However, the information used to develop the EIS is too coarse scale to determine where, when, and why prescribed fire treatments would be applied. This step is accomplished through site-specific planning.

640 Rangeland Management (Livestock Grazing)

Concern Statement 640.01

The LMPs should provide for the curtailment of grazing if there is insufficient funding to monitor, improve, or restore watershed and riparian areas. Also, with insufficient budgets, there are no measures to refute the continued and degrading impacts of livestock grazing on fish and wildlife habitats.

Response to Concern 640.01

Direction of this type is not within the scope of decisions to be made in the Forest plan revision process. Six decisions are made through revision of these forest plans. These six decisions are discussed in Chapter 1 of this FEIS. While several of these decisions directly or indirectly relate to Rangeland Resources direction, there is no specific requirement to tie direction to annual budgets. However, the range management direction in the revised plans does try to take into consideration the historic budget levels and the general kinds of future allotment specific actions that would be expected under the various forests plan alternatives. This is discussed in the Rangeland Resources section of the FEIS.

Federal Regulations guiding the administration of term grazing permits includes requirements that must be considered in the creation of additional Forest plan direction relating to grazing. Term grazing permit system regulations provide the grazing permit holder a sufficient window of opportunity to adjust livestock operations to accommodate permit modifications made by the Forest Service. Except for extreme emergencies, the holder of a grazing permit is typically given at least a year to adjust his operation accordingly.

Annual Forest Service range budget levels can be highly variable and unpredictable from one year to the next. Congress and the current Administration establish these. If budget fluctuations occur outside of what is normally expected annually and the level of management changes accordingly, this would not allow sufficient lead-time to meet the intent of term grazing permit requirements to provide permit holders a sufficient window of opportunity to adjust operations. Reliance on budget to dictate operation guidelines would create an atmosphere of greater economic uncertainty and operation instability for the grazing permittee. As a result, this would be in direct conflict with part of the Forest Plan's Purpose and Need statement to "Provide sustainable and predictable levels of products and services from National Forest System lands on the Boise, Payette and Sawtooth National Forests".

Concern Statement 640.02

The Forest Service needs to institute a system that allows a grazing manager to make timely, site-specific decisions to reduce grazing allotments during periods of drought or other conditions that warrant a quick modification of management direction. In these instances, the Forest Service should consider evoking permits and paying the permittees for the total lost income (not just AUM costs) for as long as the permit exists. This would help areas rest and recover.

There is discussion of pre-AMS drought conditions in the EIS on page 2-25. This topic should also be covered in the LMPs as drought occurs with some frequency and applies to an entire area, not just some allotments. For example, in the Sawtooth LMP, page II-21 drought is shown as an issue that needs discussion in the revised LMP, but that is the end of the discussion. There is no direction on how to deal with livestock grazing when drought occurs.

Land managers and permittees must be given the flexibility to make sensible changes to annual management plans. Rather than apply a standard stubble height (which should not be used as management tool) across entire management units, which limits managers ability to make site-specific decisions, it would be more appropriate to consider length of stay and timing of grazing as important aspects to vegetative health and stream bank stability than remaining stubble height. There should be flexibility in management so livestock can be moved to alternate pastures based on current utilization levels within riparian areas.

Response to Concern 640.02

Initially, the Preliminary Analysis of the Management Situation did identify drought as an early issue. However, after reviewing research and trying to determine whether the forest plan would be the most appropriate location to provide direction, it was determined that responding to drought situations can be best handled through the annual administration of permits.

Current rangeland administrative procedures allow adjustments to occur in response to drought conditions in order to meet forest plan resource conservation direction (e.g., soil, water, riparian and aquatic resource direction). Under Part II of the Forest Service term grazing permit, the Forest Officer in charge, typically the District Ranger, can make the decision to move livestock because of extreme emergencies and resource conditions. Drought is considered one of these situations. The number, kind, class of livestock, period of use can also be adjusted by working cooperatively with the permittee prior to the season. During the actual grazing season, allotments or groups of allotments are monitored to determine if lengths of stay adjustments are necessary as the season progresses.

Also, the term grazing permit system and associated Forest Service policies do not allow for reimbursement beyond the grazing fee amount paid by the permittee, but did not use. Therefore, reimbursement is outside the scope of the plan decision and will not be addressed.

The Southwest Idaho Ecogroup forests and the Intermountain Region have taken a proactive approach during the last 2 years to address drought situations. Drought management policy has received substantial attention in recent years due to the continued drought situation in Idaho and Utah. Interagency Task forces of cooperating agencies have been meeting on a regular basis to address the issues that are occurring. The Forests and districts have also been providing as much information as possible to permittees, so that they can make proactive and informed decisions about their operations for an upcoming year. The forests have also informed the permittees on specific expectations for upcoming seasons of grazing and what aspects of administration will be emphasized to address concerns with drought.

Indirectly, the forest wide standards and guidelines provide protection from drought. The ones that are effective primarily focus on the frequency, intensity or timing (opportunity) aspects of grazing. The utilization standards (40-50 percent) set in the forest plan will contribute to frequency and intensity rates that improve range condition, yet provide a level of economic stability. Discontinuation of season-long grazing on upland areas where community recovery is an objective provides another method for long-term protection. The standards for open sheep herding and once-over methods limit the effects of grazing intensity and frequency. The guideline for riparian area recovery and the use of grazing systems addresses this too. If fire occurs on a site (which occur more often during drought cycles), there are guidelines regarding the timing of grazing in the following years in order to assure vegetation recovery.

While the Forest plan does provide direction that will indirectly benefit drought management, the most successful approach is still dependent on the actions taken at the individual allotment level. Those allotments that have a large range of management flexibility are more likely to be drought “tolerant.” Therefore, there is definitely some incentive to implement more intensive management that improves flexibility. Even though all rangelands can be affected by drought, those specific areas in poor to fair condition are more likely to be affected and will recover more slowly. Therefore, certain areas within an allotment may need to be managed differently and/or watched more closely, depending upon their condition. Also, when individual allotment management planning and implementation takes into consideration the intensity, frequency and timing of grazing, rangeland plants will be protected before and during drought years. This approach will inherently provide faster recovery in years of higher precipitation. This is discussed in the FEIS. Also see the Response to Concern Statement 640.16.

Concern Statement 640.03

The draft alternatives and management prescriptions reflect continued utilizing of lands that are not capable or suitable for livestock grazing. A re-evaluation should be performed that looks at other uses of Forest Service lands and provides better analysis that supports continuance of grazing or reduction of AUMs. A qualified range scientist should make grazing capability and suitability decisions based on science. The FEIS and LMPs should include all data and analysis required by 36 CFR 219.20.

The FEIS must include explanations of “suitability” and “suitable grasslands” and how the Forest Service’s understanding of the terms complies with NFMA’s requirement for suitability determinations.

Grazing should be increased in areas that provide suitable vegetation, such as burned areas with vegetation regrowth.

The Forest Service should consider “grass banking” as a management option.

Response to Concern 640.03

The most recent concepts of rangeland capability and suitability have been applied in revision of these forest plans. The most current definitions vary from those traditionally used by the Forest Service in managing rangeland resources, in order to meet the intent of the regulations outlined in 36 CFR 219.20 and definitions as defined in 36 CFR 219.3(NFMA requirements). In an April 1997 memorandum, the Deputy Chief of the Forest Service provided clarification of capability and suitability definitions contained in the National Forest Management Act for domestic livestock grazing. In follow-up, the Intermountain Regional Forester outlined further direction in February of 1998. On August 24, 1999, the United States Court of Appeals for the Ninth Circuit upheld an Arizona District court decision that procedurally supported the approach and methodology taken to determine suitability for the Prescott National Forest Land and Resource Management Plan. While the Southwest Idaho Ecogroup’s methodology is somewhat different than that taken by the Prescott N.F., it is still consistent with the court’s analysis, finding and decision.

Under the most recent terminology, Forest level suitability is being used as an indicator or method for comparing Forest plan alternatives. Past Forest Service planning activities did not make the distinction between the two terms and were used primarily at the allotment level. Capability indicators were usually combined or included with the term suitability. The Introduction to the Rangeland Resources section in the FEIS and the Rangeland Resources Technical Report #1 and 3 do define and explain the use of both capability and suitability in more detail.

The rangeland capability determination is made at the Forest Plan level, only. Rangeland capability decisions are not revisited or made at the project or allotment planning scale. Rangeland capability represents the broadscale physical attributes or characteristics of the landscape that are conducive to livestock grazing. As stated in the DEIS and FEIS, this is **not a decision to graze livestock on any specific area of land, nor is it a decision on livestock grazing capacity**. Grazing capacities are determined at the allotment level (Rangeland Resources Technical Report #2). Rangeland capability’s purpose is to establish a foundation for forest plan alternative development and evaluation. Capable

rangelands remain the same for all alternatives. This determination is not a Forest plan decision that requires public comment. However, several rangeland professionals from other government agencies did assist the Forest Service in the development of the specific criteria that were used in the rangeland capability analysis (Rangeland Resources Technical Report #1). The criteria used were supported by scientific research that has been conducted over the last several decades, some of which had occurred on the Southwest Idaho Ecogroup forests.

Suitability determinations are best made at the Forest Plan level, but they can also be made at the project or allotment level. Suitability is established either to provide prescriptive management direction for future project-level analysis and subsequent NEPA decisions or as a decision to not graze specific designated areas. Both situations may occur in the forest plan alternatives. Suitability identifies capable rangelands that could be excluded from use, due to some concern or issue. Suitable rangeland acres may vary by forest plan alternative and generally reflect those situations to not graze specific designated areas. Areas selected for inclusion in the Southwest Idaho Ecogroup forest plan alternative suitability analysis were based upon specific areas identified by Forest plan comments, consistency with the associated Management Area direction, internal Forest Service concerns, and District Ranger and Forest Supervisor review. Alternative suitability determinations were reviewed during the DEIS comment period. The Environmental Consequences in the Rangeland Resources section of the FEIS and Rangeland Resources Technical Report #3 discuss forest plan alternative suitability in more detail. Within these discussions, specific acreage deductions are identified based upon the specific issue of suitability.

Adjusting use authorized under the term grazing permit system is already an option under existing permit administration policies. District Rangers can consider extensions of season if Annual Operating Instructions are followed and resource objectives are being met. Typically utilization is the method used to determine if further use can occur on a pasture or allotment. If extensions are consistently granted over several years due extra forage being available (i.e., burned areas) and Forest plan goals and objectives are being met, there may be a basis for increasing either the number of livestock or the season authorized by the permit. This action is usually addressed through the district administration of the permit.

The use of "Grass banking" is best addressed at a national policy level, since this would be a significant change in how permits are administered. Therefore, further discussion of this topic is considered to be outside the scope of any decisions associated with the forest plan revision (See Comment Response 640.01) it is not addressed in further detail.

Concern Statement 640.04

Domestic sheep carry strains of the bacteria Pasteurella that are fatal to bighorn sheep. Clear evidence exists of the direct relationship between significant die-offs of once abundant bighorn and domestic sheep grazing on allotments managed by the Payette National Forest. The Forest Service must consider and comply with NFMA to provide animal and plant diversity on national forest lands and with the Hells Canyon National Recreation Area Act that protect, maintain and conserve wild and other values contributing to the public benefit.

The Forest Service should consider an alternative that offers vacant allotments for domestic sheep outside of bighorn sheep and other wildlife habitats or phases out sheep grazing and changes the class of livestock to cattle or horses. The Forest Service should re-evaluate if its management goals, objectives, and actions promote viable populations of bighorn sheep in areas such as the Hells Canyon corridor.

There is also concern that there be no conversion of sheep allotments or any vacant allotment to cattle use within bighorn sheep habitat.

Response to Concern 640.04

We acknowledge that disease transmission between domestic sheep and bighorns is an issue that needs to be analyzed. Moving domestic sheep from overlapping bighorn habitat to vacant allotments outside the habitat area was analyzed and considered in the development of the FEIS. See also, the Rangeland Resources Technical Report #3 for more detailed information. While the selected alternative (i.e., Alternative 7) for the Payette N.F. does not include this approach, it was considered as part of Alternatives 4 and 6. Also, the Forest Service already has the flexibility and ability to increase existing permits or issue new grazing permits for vacant allotments outside bighorn sheep habitat, provided the range resource could support the increased use. The Grant process under the Forest Service term grazing permit program (FSH 2209.13) allows additional grazing capacity to be used when certain conditions and priorities of use are met. A scenario similar to the one described in the concern statement could potentially occur regardless of which alternative was selected. Under Alternatives 1B and 5, currently vacant sheep allotments would remain open and could potentially be used.

Also, the direction in the selected alternative is consistent with the Hells Canyon Bighorn Sheep Restoration Plan developed in 1997 (Rangeland Resource Technical Report #3). A few of the Payette N.F. domestic sheep allotments in the Hells Canyon area overlap potential bighorn sheep habitat, but they were not covered under the original Hells Canyon Initiative Memorandum of Understanding. At the time of the 1997 restoration efforts, 700 bighorns in the 14-herd metapopulation were growing at a net increase of 7 percent per year and were projected to double in ten years. This trend has continued, as the core herds within the restoration area are continuing to average a 7-10 percent annual growth rate. While the restoration plan did expect this trend, it also expected some individual herds to experience die-offs or to disappear. In addition, the Hells Canyon Bighorn Sheep Restoration Committee recognized and accepted in 1997, the potential risk of disease transmission and loss of bighorns when they leave the restoration project area. The three state departments of Fish and Wildlife agreed to take whatever action was necessary to reduce further losses without adversely impacting the existing domestic sheep operators outside of the project area. All of these scenarios have occurred in recent years. Sheep die-offs in two herds have occurred, there has been some interaction of bighorn rams with domestic sheep and the Oregon Department of Fish and Wildlife has taken steps to prevent potentially infected rams from returning to uninfected herds.

The forest plans do have guidelines at the management area level that state allotments should not be converted to sheep in occupied bighorn sheep areas. It also states that vacant sheep allotments should not be stocked in these areas. Issuing permits for cattle on vacant allotments in bighorn habitat has not been addressed in this forest plan. Research has indicated there is not a threat of disease from cattle and there is very little overlap in diet and habitat. Therefore, this aspect of the comment can be eliminated from further study and will not be addressed in further detail because there are no expected effects to bighorn sheep resulting from the implementation of the plan revision relative to this concern.

Concern Statement 640.05

The proposed standards and guidelines in the LMPs, with regard to utilization, are in excess of the standard recommended by Idaho Department of Fish and Game for sensitive species, such as sage grouse, that are considered for listing.

Response to Concern 640.05

The plan's forest-wide utilization standards are designed to maintain or improve rangeland vegetation and were based upon several studies, some of which occurred within the Southwest Idaho Ecogroup and the Region. While these may allow for a higher level of use than what some may feel is necessary (i.e., nesting cover for sage grouse, drought, riparian area recovery, etc.) for specific resource needs, their design and purpose are to provide a level of use that allows individual plants to physiologically respond and recover from grazing. However, there may be site-specific situations where the retention of additional herbaceous material (stubble heights) is appropriate for particular management situations. For example, in the situation given, sage grouse nest cover protection from predation is a decision that would be best decided at the allotment or site-specific level. Several recent published studies have shown that predation has not been an over riding and widespread problem, as most sage grouse nest success rates were >40 percent. Those studies that had lower success rates suggested their findings were related more to poor quality nesting habitat. Some recent policy papers on sage grouse have identified more significant factors that are contributing to the declining population trends in sage grouse. Retention of vegetative stubble was not one of these factors. Therefore, establishing a forest wide standard that may not address the limiting factor suppressing a certain wildlife population, in this case sage grouse, is not needed and could have unnecessary effects to other resources and permittees.

This does not mean that the Forest plan is silent or void of management direction related to sage grouse. The plan's primary focus is on habitat components, such as proper functioning condition of sagebrush communities and their associated meadow community types, the density and spatial distribution of sagebrush canopy closure, herbaceous species composition in sage grouse habitat, and fire management (refer to the Vegetation Diversity section of the FEIS). See also the Terrestrial Habitat and Species section of the Final EIS that discusses sage grouse. Several recent reports and policy studies make recommendations that identify categories addressed in the revised plans and FEIS as priorities for managing sage grouse habitat. This type of direction is primarily located in the Management Area level of the plan. Certain management areas that have important sage grouse habitat provide more specific goals, objectives, standards, and guidelines relating to sage grouse habitat management. In addition, rangeland management solutions will vary and be dependent upon the type of sagebrush habitats, level of habitat degradation, duration of livestock use, grazing intensity, season of use, type of livestock, and animal distribution. These aspects are best determined and managed at the allotment level, when used in conjunction with management area direction. Allotment specific actions that address the duration, intensity and opportunity (seasonal timing) of livestock use can address issues related to grazing and sage grouse.

Concern Statement 640.06

Trend analysis should be used to assess the results of short-term monitoring and to determine if long-term objectives are being met. Trend analysis, which is not mentioned in the LMPs, must be used to make management decisions for riparian and upland area and other decisions, such as permit reductions.

Response to Concern 640.06

We agree that rangeland trend analysis plays an important role in determining whether forest-wide and management area objectives are being met. Trend analysis is discussed in Chapter IV of the Forest plans under the Monitoring and Evaluation section. There are usually three types of monitoring associated with Forest Plans: Implementation, effectiveness, and validation. These are discussed and defined in Chapter IV. Implementation and effectiveness monitoring are the most commonly used forms in rangeland resource and vegetation management. There is at least two scale levels where these types of monitoring are applied: forest-wide and the allotment levels. The monitoring and evaluation criteria associated with rangeland resources and the two scale levels are outlined throughout Table IV-1, Chapter IV of the forest plans.

Implementation monitoring is used to determine if plans, prescriptions, standards, guidelines and activities were implemented as designed. This is typically done at the allotment level. A percentage of the forest's allotment pastures are inspected or sampled at the end of the grazing season to determine if forest plan utilization direction has been met. If annual inspections consistently show that the standard is not being obtained, then further refinements in allotment management are likely to be needed. In some cases, permit administrative actions may be taken to correct management on an allotment.

Effectiveness monitoring relies heavily on the data trends generated over time. Typically, they can occur during the short (> 3 years to 15 years) and long (> 15 years) term. This type of monitoring usually occurs "close to the ground." In other words, it is data that is gathered during site-specific visits to an allotment or pasture. Rangeland resource trend monitoring has and will continue to be conducted as part of grazing permit administration and specific allotment management plan implementation. Most of the indicators used at this level are for effectiveness monitoring. The following are some examples of potential allotment level monitoring criteria: canopy closure and age class of key sagebrush community sites, upland plant composition, ground cover, herbaceous plant production, riparian greenline composition, bank cover, and bank stability, riparian community type composition, streambank woody species regeneration. This type of monitoring data can be collected to determine whether allotment specific management practices are moving resource conditions towards the allotment's and/or forest plan's goals and objectives. Also, this information can be collectively summarized with other allotments on a forest-wide basis. This information is typically stored as part of the Forest Service INFRA database.

Concern Statement 640.07

The proposed standards and guidelines for livestock grazing are inadequate and in direct opposition to recommendations made by the Idaho Department of Fish and Game, as well as in conflict with the Endangered Species Act.

The DEIS failed to adequately assess the role livestock grazing plays in creating overall forest health problems, such as soil erosion, weed invasion, and watershed instability and destruction of riparian areas. There is no information detailing the condition of riparian areas, channel reaches, and fish habitats subjected to grazing, or any data on forage use, rangeland condition, and management conflicts. Incomplete disclosure obscures the true condition of the rangelands and makes it impossible to analyze alternatives and management decisions. The EIS should provide full, competent land capability and suitability analysis for all forest lands covered by the alternatives.

The Forest Service must explain what “moving toward attainment” means.

Livestock grazing often removes the shrub and grass/forbs understory that is vital to small birds and mammals. Restoration of all watershed areas impacted by grazing is critical. The Forest Service should pursue projects that help regenerate willows, aspens, and cottonwoods.

Overgrazing by cattle and sheep needs to end. The LMPs should focus on reducing overall grazing use, timing, and season of use. Domestic sheep bands should be removed from forest lands immediately after lambs are shipped.

At a minimum, grazing should be excluded from areas that are suffering from cumulative impacts and are not meeting the legal mandates of the current LMPs or federal laws. A standard of 30 percent use and 6 inch stubble height should be imposed. Another suggestion was to require a minimum 8-12 inch stubble height for all upland bunch grasses at the end of the grazing or growing season to protect sage grouse nesting habitat.

There is concern regarding the standards established for livestock grazing in riparian areas. (LMP page III-37); they are not adequate to protect riparian areas. Regarding page III-38 of the LMP, Rewrite the 4th standard to state, “Do not allow domestic sheep to be shaded or bedded within 300 feet of all perennial streams, or in a manner that would prohibit attainment of riparian, aquatic and hydrologic goals and objectives.”

The FEIS must disclose which allotments are causing aquatic and riparian habitat degradation and are the contributing factor for streams not meeting state water quality standards. The FEIS must also discuss any changes in past allotment management and the observed effects of those changes. Trampling standards should be included in all grazing plans, especially in riparian areas, where trampling should not affect more than 5 percent of stream banks per year, coupled with a minimum 6-inch stubble height.

The Sierra Framework’s guidelines for grazing in wet meadows should be incorporated in southern Idaho.

Response to Concern 640.07

See Responses to Concern 640.05 regarding stubble height requirements for sage grouse.

We disagree with the perspective that the DEIS failed to adequately assess the role of grazing. The DEIS, FEIS, and their associated Technical Reports address numerous points of concern in the Rangeland Resources, Botanical, Threatened and Endangered Species, Nonnative Plants and SWRA sections. The Biological Assessments and Opinions developed as part of the Forest Planning analysis specifically address relationships to ESA (refer to the project record). The role livestock grazing in relation to such aspects as soil erosion, weed invasion, and watershed integrity, riparian area condition, rangeland condition, and management conflicts are disclosed in these documents. The Forest Wide and

Management Area direction provide the guidance necessary to address concerns covered in the comment. Also, the term “Moving Towards Attainment” is used to describe a positive directional change of trend that moves a community, such as a riparian area, towards forest plan desired conditions.

The Introduction (page 3-319), Current Conditions (page 3-321) and Environmental Consequences (page 3-325) sections provide a concise discussion about livestock grazing and its relationship and affects to the Forests. The technical reports (Rangeland Resource Technical Reports I through III) expand the EIS discussion points by with more detail and background information. Also the information in the FEIS was expanded in the DEIS’s Rangeland Resource, SWRA, and Nonnative plant sections. The capability and suitability analysis results are summarized and displayed in the DEIS and the FEIS as required under 36 CFR 219.20 and conform to direction provided in the April 1997 memorandum from the Deputy Chief of the Forest Service regarding capability and suitability. The analysis details are displayed in Technical Reports I-III. Also, see the Response to Concern Statement 640.03 regarding rangeland capability and suitability.

Regulatory direction of 36 CFR 219.20 states that “lands in less than satisfactory condition shall be identified and appropriate action planned for their restoration” and to provide “direction for rehabilitation of ranges in unsatisfactory condition. Both requirements have been fulfilled either in the FEIS, Technical Reports and/or the revised plan. Numerous goals and objectives, standards and guidelines have been established at the forest wide and management area levels that are appropriate to correcting vegetation and grazing problems. Not all standards and guides that may apply to livestock grazing are contained solely in the Forest Wide Rangeland Resources section. Some direction in other *forest-wide resource* sections (e.g., soil and water) may also be applied to a broader group of actions, rather than just grazing. For example, the removal of dry ewes after shipping lambs could be an option that is considered at the allotment or site-specific level if SWRA standard 2 is not being met and some type of corrective action is needed. Also, if SWRA guidelines 2 and 3 are appropriate in this situation they too could be applied. Direction in other resource sections that may potentially affect grazing is cross-referenced in the Rangeland Resources section.

The sheep bedding standard has been modified since the DEIS, as a result of consultation with USDI Fish and Wildlife Service and DOC National Marine Fisheries Service. Instead of using the guidelines for wet meadows in the Sierra Framework, the Southwest Idaho Ecogroup has used information and guidelines that are more applicable to National Forest System lands within the three forests of the Southwest Idaho Ecogroup. The three forests’ plans goals, objectives, standards and guidelines provide a framework for managing riparian areas that was generated from information derived from research and monitoring on: Forests within the Southwest Idaho Ecogroup, lands regionally adjacent to, or lands with somewhat similar habitat types, meteorological influence, and geology. See also the Response to Comment Statement 640.16 regarding the effectiveness of stubble heights and which alternatives contain the more restrictive utilization standards of 6-inch stubble height and 30 percent utilization levels. Alternative 4 and 6 had more restrictive standards as part of their design.

There is also a scale issue associated with several of statements in this concern. Forest wide standards and guides apply across all National Forest System lands on a forest and thus need to be generally applicable to all management scenarios. Forest-wide standards and guides are not and should not be designed to solve all site-specific problems associated with livestock management. Each plan’s Management Area direction gives more specific direction for National Forest Systems lands within a management area and is consistent with Forest-wide direction. Tailoring management to address more site-specific situations below a management area must occur at the site specific or AMP level, due to variations in environmental conditions. For example, specific standards, such as bank stability or woody

browsing, are not appropriate at a forest wide level because they are dependent on too many site-specific factors or variables. Also, there may be better indicators to use in certain situations. The following table was generated from Appendix III of the Rangeland Resources Technical Report #3. This is a good example of displaying the importance of applying a standard on a site-specific basis:

Grazing Strategy	Utilization	Stubble Height	Bank Stability	Browse
Season-long Grazing	45% if season ends prior to 8/15. 30% after 8/15.	Hydric species (sedges, etc) – 4” if season ends prior to 8/15. 6” after 8/15. Palatable forage species (bluegrass, tufted hairgrass, etc.) - 3 inches. May have little value where coarse substrates, steeper gradients, deeply incised channels occur.	Consider using on perennial streams where C4, C5, C6, E3, E4, E5, E6 Rosgen channel types occur. An annual maximum of 5-15% bank alteration may be appropriate, depending upon substrate and vegetative composition.	Monitoring of browse may be necessary on the alluvial channel types (C, D, E and F) streams, if: 1) riparian herbaceous vegetation has cured (late summer or fall), 2) stubble height/ utilization is not a good precursor indicator to when browsing is initiated, or 3) wild ungulate browse use is typically frequent. Monitor to limit removal of terminal buds of trees and to limit the amount of second year wood removed from trees and shrubs or 50% of first year growth..
Early Growing Season Pasture use	45-65% of current spring or early summer growth. This is dependent upon 1) the livestock removal date (when during May through early July) and 2) the riparian area elevation. Also see discussion about regrowth potential in the stubble height column.	Hydric (sedges) or Palatable forage species (bluegrass, tufted hairgrass, etc.) – 2-4 inches of current growth. This is dependent upon 1) the livestock removal date (when during May through early July), 2) the elevation of the riparian area and 3) vegetative regrowth potential. On-site studies should be the basis for determining	Not likely to be necessary where: 1) pastures containing riparian areas are large and have low to moderate stocking, 2) durations are short, or 3) stubble height is a good precursor indicator to bank alteration. Exception may be where early spring season pastures contain E4 & E5 channel types that have saturated streambanks. A range of 5-15% one	Not necessary in most situations, if utilization and stubble heights are used.

Grazing Strategy	Utilization	Stubble Height	Bank Stability	Browse
		vegetative regrowth potential when applying this approach to a grazing prescription. Stubble heights averaging less than 2" should not occur at any time during the grazing season.	year bank alteration level can be used depending upon vegetation and stream channel.	

Setting a standard that is appropriate to respond to highly variable factors important to overall achievement of desired conditions, in many cases, are more effectively established at the project level.

Concern Statement 604.08

The livestock management strategies designed to benefit Chinook salmon and Steelhead trout may inadvertently be causing habitat degradation in bull trout habitats. The Forest Service should mitigate grazing/bull trout recovery conflicts by using the long-term adaptive management approach proposed by the Bear Valley Collaborative Group.

Response to Concern 640.08

We assume that the comment's concern is directed at the strategy used on some of the allotments in the Bear Valley Management Area during the last 6-8 years. These practices were the outcome of the terms and conditions associated with a biological opinion rendered by the National Marine Fishery Service. The practice of repetitively scheduling early use for certain pastures annually in order to avoid anadromous reproductive and redd disturbance on critical spawning habitat could have had potential long-term affects on the allotment plant communities, particularly the uplands. However, this point is moot under alternative 7, since grazing has been discontinued on the allotments in Bear Valley.

Concern Statement 640.09

For all alternatives, livestock grazing remains high and the Ecogroup fails to look at an alternative that differs from current grazing levels. The Ecogroup directs managers to manage grazing toward the historical range of variability, yet provides no standards to guide such management. Therefore, it should not assume its management strategies will provide favorable conditions for hydrologic and watershed processes or will keep unfavorable conditions to aquatic resources at an acceptable minimum

Response to Concern 640.09

Also, see response to Issues Pertaining to Alternatives Concern 102.06. The Table below displays the range between Alternatives with the least and greatest suitable rangeland acres in Limited MPC groupings and Balanced MPC groupings:

	Alternative Acres of Highest Suitable Range	Alternative Acres of Lowest Suitable Range	Acres Difference	Percent Difference
Boise N.F.				
Limited MPC Grouping	232,180	11,250	220,930	95
Balanced MPC Grouping	387,140	128,600	258,540	67
Payette N.F.				
Limited MPC Grouping	206,120	11,360	194,760	94
Balanced MPC Grouping	215,720	5,640	210,080	97
Sawtooth N.F.				
Limited MPC Grouping	255,560	7,090	248,470	97
Balanced MPC Grouping	527,920	189,960	337,960	64
SWIE Total				
Limited MPC Grouping	693,860	29,700	664,160	95
Balanced MPC Grouping	1,130,780	324,200	806,580	71

As the table displays, the variation in land management prescriptions applied by alternative covers a wide range and mix of MPCs applied (64-95 percent difference). It should also be mentioned that several of the alternatives acreages are well distributed within the ranges define in the table above. Table RR-11, Rangeland Resources, in the FEIS displays this in more detail. Determining the appropriate permitted or authorized number of head, season of use, and head months of use by livestock is not within the scope of forest plan decisions and should not be the basis for defining whether the range of forest plan alternatives is adequate. The Response to Concern 102.06 explains this concept in more detail. The differences between management activities and desired outcomes by forest and management area are more telling. The existing range of alternatives provide for choices in management emphasis for the range resource based upon the management prescription categories applied. Some management areas reflect greater adjustments in grazing use through the implementation of the alternatives objectives, standards, and guidelines. This alone narrows the range of alternatives.

The intent of revision is not to return to a zero based planning as occurred in original forest planning efforts. The anchor or starting point for revision plan alternatives is the Forest plan's purpose and need statement and related "needs for change" (refer to Chapter 1 of the FEIS). There was no "need for change" identified to address resource conservation or protection needs, while responding to social or economic needs. Therefore, there was no need to evaluate an alternative in detail that included a zero AUM criteria. The Multiple Use and Sustained Yield Act provides for uses of National Forest system

lands, of which livestock is one. Considering in detail an alternative that discontinues all livestock use would be in conflict with this law's guiding intent, especially when resource conservation and protection requirements can clearly be met in conjunction with grazing use (refer to FEIS, all resource sections).

The forest plan is a programmatic or broad scale document that provides standards and guidelines for implementing projects such as Allotment Management Plans or Annual operating instructions. The appropriate scale at which livestock grazing levels are best determined is at the allotment or site-specific level using local data, appropriate NEPA analysis, and/or public involvement.

Also, the range of alternatives involving head months would likely be greater or wider if Alternative 1A (forest plan prior to Pacfish/Infish) was analyzed in detail. As stated in the FEIS, some substantial changes have occurred with the implementation of Pacfish/Infish and related Biological Opinions. The differences between Alternative 1A and the other alternatives were not displayed. See the discussion about alternative considered but not analyzed in Chapter 2 of this FEIS for more detailed information. Some Reference to the degree of change was briefly identified in the Preliminary Analysis of the Management Situation (USDA Forest Service 1997).

Concern Statement 640.10

The positive effect of well-managed cattle and sheep grazing on fuels management and in drought situations should be addressed in the EIS and LMPs. Grazing helps reduce high levels of dangerous fuel loads and, therefore, helps prevent forest fires. Also, the sheep will pick off up to 2/3 of plant blossoms, which enables the plant to use its energy to produce more viable seeds on remaining blossoms.

Commenters noted that studies (Alexander and Gilman, 1994) show that livestock grazing contributes to increased sagebrush densities.

Response to Concern 640.10

We agree that grazing can help reduce rates of spread and can play a role in fire hazard and the ability to reach desired conditions in certain vegetation types, such sagebrush. However, fuel-loading issues are more related to the forest vegetation communities and their large wood component. Discussion about this is included in the FEIS under Fire Management, Vegetation Hazard, Vegetative Diversity and Rangeland Resources.

We also agree that sagebrush densities are greater in areas where livestock-grazing management does not provide for the physiological needs of the grass and forbs understory. Documentation and research have shown that sagebrush densities can be up to 10-15 greater in these situations. However, if properly managed, sagebrush densities in grazed areas will progress through their natural successional cycle. The Vegetation Diversity, Vegetation Hazard and Rangeland Resource sections of the FEIS, and their related technical reports (refer to the project record), discuss this in more detail.

Concern Statement 640.11

All drainages in the Rock Creek Management Area contain bighorn sheep habitat and should be considered when delineating areas that could be suitable for domestic sheep grazing. Any proposed changes should be contained in the Preferred Alternative.

Response to Concern 640.11

The bighorn sheep habitat delineated in our analysis was based upon spatial information provided to the Forest Service from the Idaho Department of Fish and Game. This was based upon their knowledge of what habitat is actually being used or capable of being used by existing bighorn populations. Use of this and the location of existing domestic sheep allotments assisted in determining where management direction pertaining to bighorn and domestic sheep interactions should be applied. Some of the alternatives (Alternatives 3, 4, 6, and 7) incorporate management direction for areas where existing bighorn sheep habitat overlaps with areas used by domestic sheep. Portions of the Rock Creek drainage were identified as bighorn habitat and are included within these overlapping areas.

Concern Statement 640.12

The grazing analysis should compare the grazing impacts of 5 million buffalo on western lands versus the number of cattle on public lands.

Response to Concern 640.12

The context or relationship of historic and prehistoric grazing to current grazing was the topic of two assessment papers associated with the Interior Columbia Basin Ecosystem Management project. While this information provides for some interesting academic discussion and debate about the broad scale landscape, they do not provide any connection or correlation to specific areas within the three forests, nor does it provide a basis for discussing or identifying a need for action at lower level assessments or planning efforts, such as the forest plan revisions. Therefore, further discussion of this topic is considered to be outside the scope of any decisions associated with forest plan revision and is not addressed in further detail.

Concern Statement 640.13

The Forest Service should discontinue the practice of closing vacant allotments. Closing the allotments eliminates future management flexibility by eliminating the possibility of using the allotments to resolve future conflicts, such as grazing/recreation issues, drought conditions, and resource protection.

Response to Concern 640.13

We agree that closing allotments eliminates future potential management flexibility in resolving conflicts. However, there may also be benefits to closing an allotment. That is why allotment retention or closure was considered as part of the suitability determination and varied by alternative. The potential effects of

these actions were disclosed in the “Direct and Indirect Effects by Alternative” section of the Draft EIS on page III-329 for Alternatives 2, 3, 4 and 6. It also applies to Alternative 7, which is displayed in the Final EIS. Alternatives 1B and 5 do not close vacant allotments and while the remaining alternatives close them.

Concern Statement 640.14

The LMPs should establish consequences that livestock permittees would face for noncompliance with the terms of their grazing permits, and the “Uniform Action Guide” should be implemented.

The Forest Service should include an accountability clause in the LMPs that states that if any terms or conditions of the permits are not met, an automatic 25 percent reduction in permit AUMs would occur the following year with no hot season use on any lentic or lotic riparian areas.

Response to Concern 640.14

See the first portion of the paragraph responding to Concern 640.01. Six decisions are made through forest plan revision (refer to Chapter 1 of this FEIS). While several of these decisions relate to Rangeland Resources direction, these decisions include no specific requirement to address how to administer grazing permits. These types of administrative procedures and policies are addressed in Forest Service manual and handbook direction (FSM 2200 and FSH 2209.13). Also, additional federal regulations exist that specifically guide the administration of Forest Service term grazing permits (i.e., 36 CFR 222, Subpart B). Therefore, this comment of concern is considered to be outside the scope of any decisions associated with forest plan revision and is not addressed in further detail.

Concern Statement 640.15

The draft alternatives should include authorizations that allow for the voluntary and permanent retirement of livestock grazing allotments.

Response to Concern 640.15

This type of authorization is not one of the six decisions made through forest plan revision (refer to Chapter 1, FEIS). The Forest Service already has the authority to consider making these determinations on case-by-case, decisions. A portion of this is covered under Forest Service policy in FSH 2209.13, Section 13.2, Grant Process. Also, a permanent closure of an allotment can be a consideration in site-specific allotment NEPA decisions. The range of alternatives evaluated in this FEIS are dependent upon the issues identified, forest plan management area direction, and Forest plan Management Prescription Category emphasis. Concern Statement 640.13’s response addresses this in regards to the current forest planning effort. The permits associated with the vacant allotments being considered for closure on the Boise National Forest (as part of the suitability determination) were voluntarily retired or waived to Forest Service by the previous permittees for economic reasons.

Concern Statement 640.16

The proposed standards are too conservative and restrictive to livestock grazing, specifically in allotments where desired conditions and goals are being met. The new guideline that increases the minimum residual vegetative cover to a 6-inch stubble height will have an adverse consequence on the livestock industry; and should be given much more discussion in the EIS.

The Forest Service should explain if restrictions related to slope and cover are based on long-term monitoring data or on a best estimate when determining grazing capacity.

Response to Concern 640.16

While some of the forest-wide standards established in the plans for rangeland resources are different from the ones that previously existed (Alternatives 1A, 1B, and likely 5), this does not necessarily mean that changes will have to occur on any allotments. In many instances allotment permittees have already begun implementing these standards for a variety of reasons (threatened and endangered species habitat, soil resource protection, critical big game winter range, etc.). We agree that grazing management strategies need to incorporate several options in an integrated flexible approach, as no single option (i.e., utilization levels) will permit achievement of desired conditions. A wide variety of factors such as animal behavior, type of animal, seasons of use, forage selectivity, plant responses, plant community change, hydrology and practicality should be considered where they influence or affect plant physiology and succession of individual upland and riparian systems. However, the establishment of utilization standards provides a “common denominator” in how allotments will be managed on Forest allotments. There are numerous references, studies and monitoring results that demonstrate that grazing intensity (a close surrogate to utilization) can have a beneficial influence, particularly when used in conjunction with other practices (Rangeland Resources Technical Report #3). When utilization is combined with other options that use principles relating to grazing frequency and opportunity, positive and desired conditions can be achieved. See the rangeland analysis and “Grazing Factors Affecting Plant Physiology and Succession” under the Environmental Consequence section for more background information.

The 6-inch stubble height requirement was not considered a forest-wide standard under the plan alternatives, except for Alternatives 4 and 6. It is limited to four management areas on the Sawtooth National Forest and two management areas on the Boise National Forest under the preferred Alternative 7. Recent studies and monitoring have identified that certain stubble heights can provide conditions for effective streambank building processes, to prevent unwanted browsing of woody riparian plants, to protect water quality and to prevent breakdown of streambanks. The purpose of this requirement in some watersheds was to ensure a more rapid vegetative response in riparian habitats where Threatened and Endangered fish species have critical spawning habitat. Also, the watershed’s Management Prescription Category associated with these alternatives emphasizes aquatic habitat restoration and maintenance. The consequences of having a 6-inch stubble height were also taken into consideration along with other requirements in the economic analysis, when determining the impacts to the local communities. The effects are disclosed in the Socio-economic Environment and Rangeland Resources sections of the FEIS.

A forest guideline represents a preferred or advisable course of action that should be carried out unless there is some reasonable rationale to not implement. The forest-wide guideline pertaining to the relationship of slope and cover is something that should be considered when District Rangers are firming up grazing capacities for individual allotments. Implementation of this guideline cannot be conducted

without having first hand and specific knowledge of the allotments range conditions. This guideline was derived and based upon several research studies, some of which were conducted within the Southwest Idaho Ecogroup.

Certain landtypes in the Southwest Idaho Ecogroup tend to be more susceptible to surface erosion than others. Landtypes originating from the Idaho Batholith and the Idavada volcanic geologic formations tend to be more susceptible to water and overall erosion processes (see Soil, Water, Aquatic and Riparian technical report). Approximately 31 percent of the capable rangelands in the southwest Idaho Ecogroup occur within land capability groups 6-9, which fall in the moderately high-to-high susceptibility to erosion category. This susceptibility is dependent upon several factors such as climate, soil profile characteristics, the strength and size of surface soil aggregates, topography, and cover. The amount of ground cover is one of several ground-level indicators that determine whether ecosystems are functioning properly (Range Technical Report #2). Research and monitoring has demonstrated that maintaining litter and plant cover enhances infiltration rates, reduces runoff, minimizes erosion processes and promotes upward succession of vegetative stages (Rangeland Resource Technical Report #3).

Concern Statement 640.17

The rangeland resource goal, “manage rangeland vegetation on suitable rangelands to achieve sustainable resource uses and needs” should be changed to read: “Rangeland vegetation be managed to maintain plant litter cover, nutrient cycling, forage for wildlife species, seed production, and restoration maintenance of riparian communities and functions.” Without this change it is not possible to know what the sustainable resource uses and needs are or if management is addressing this goal or if it is being achieved, the lack of definition.

Response to Concern 640.17

As stated in the beginning of Chapter III of the revised forest plans, goals are a concise statement that describes a desired condition, which normally is expressed in timeless, broader general terms that is intended to capture all elements important to desired conditions. We agree that plant litter cover, nutrient cycling, forage for wildlife species, seed production, and riparian function are components of this goal and should be addressed. The forest plan addresses this in many ways. For example, forest-wide objectives, management area goals and objective are more specific and do address some of the components mentioned. Also, other resource sections in the plans, such as vegetation, botanical, wildlife, soil, water, riparian and aquatic have specific objectives, similar to rangeland resources. Many of these are cross-referenced in the Rangeland Resources section.

Concern Statement 640.18

The policy to ban livestock grazing on burned sagebrush areas for a minimum of two growing seasons will place an extreme hardship on permittees and could contribute to greater fire hazards because of fuel building. Recent research has shown that in some cases there is no advantage to resting a pasture for more than one growing season.

Response to Concern 640.18

We acknowledge that there can be temporary effects and changes in livestock operations, due to resting wildfire areas. This is recognized within the FEIS's Environmental Consequences section under Rangeland forage productivity. However, there is a tradeoff between minimizing short-term operational fluctuation/change and long-term site productivity and diversity, etc. There is strong evidence indicating that some important bunchgrasses and perennial forbs with woody stem bases, decrease after wildfire. It usually takes 2-3 years without further disturbances before these forbs and grasses begin to respond and recover to previous levels. Adding another disturbance such as spring or early summer grazing can set individual plant vigor back even further.

Also, a forest guideline represents a preferred or advisable course of action that should be carried out unless there is some reasonable rationale to not implement. In a few situations there may be site-specific reasons that may preclude implementing this guideline. Dormant season use could be justified in some circumstances, depending upon fire intensity, canopy closure prior to the fire, ecological status, and the actual grass and forbs recovery.

Concern Statement 640.19

Regarding LMP page 111-38: Each developed recreation site should be responsible for paying the fencing costs if livestock grazing is prohibited from utilizing that recreation site.

Response to Concern 640.19

Financing the construction and maintenance of fencing of recreation is the discretion of individual districts and dependent upon site-specific circumstances. Recreation or Range, or the grazing permittee (if it is included on the term grazing permit as a structure that is to be maintained) can be responsible for this action. In general, this is not a programmatic or forest plan level decision (refer to Chapter 1 of this FEIS). This is considered an administrative action or procedure. Further discussion of this topic is considered to be outside the scope of any decisions associated with the forest plan revision and therefore, is not addressed in further detail.

Concern Statement 640.20

The Forest Service should continue to manage grazing allotments using the rest-rotation system.

Response to Concern 640.20

There isn't any direction that conflicts with or prevents the implementation of various forms of rest-rotation grazing on Forest allotments. Therefore, this will not be addressed in further detail since there are no effects or restrictions from the plan revisions on the ability of districts to implement rest rotation grazing.

Concern Statement 640.21

The bighorn sheep is a native, resident species and should be addressed from the viewpoint of the State of Idaho and not the U.S. Fish and Wildlife Service. The Forest Service should consider historic bighorn ranges in addition to the currently occupied ranges and should follow the precedent set by the Wallowa-Whitman Forest for managing bighorn sheep.

The Forest Service should not rely on disease as a factor effecting bighorn sheep populations but on additional factors. For example, bighorn sheep are not an endangered or threatened species; they are classified as a big game animal and are hunted; and research has found that mineral deficiencies in the bighorn's diet have led to incidents of pneumonia that contribute to die-offs.

Response to Concern 640.21

The U.S. Fish and Wildlife Service does not list bighorn sheep as a Threatened or Endangered species. Rocky Mountain bighorn sheep are currently listed as an Intermountain Region sensitive species. The Forest Service does not consult with U.S. Fish & Wildlife Service on this species. However, as a courtesy, the Forest Service does provide project biological evaluations if requested. Cooperative bighorn management does occur between the Forest Service and Idaho Fish & Game. Also, see the Response to Concern Statement 640.04.

We agree that selenium deficiencies brought on in drought years, may contribute to periodontal problems, white muscle disease and viral infections. Preliminary data and studies from Wyoming indicate that bighorn sheep lamb mortality may potentially be attributed to these situations, due to lower levels of selenium in forage. The lower levels are caused by acid rain (higher concentrations occur in drought years), which converts naturally occurring selenate to selenite, a form that is not readily absorbed by plants.

However, there is substantial evidence demonstrating that interaction between domestic and bighorn sheep contributes to elevated occurrences of pneumonia. See Rangeland Resources Technical report III for more information.

Concern Statement 640.22

Maps of all livestock allotments within each Management Area should be presented in the final LMPs. Information on the maps should include stocking rates, grazing season and livestock species.

Response to Concern 640.22

The expense of adding this information has to be balanced with the benefit gained. Providing this information does not necessarily enhance the value of the forest-wide or management area direction and there are no expected effects from not including this information. This site-specific information is readily available from individual Ranger Districts or the Forest Supervisor's Office upon request. Also, the

forest allotments are one of the GIS layers included in the Forest Plan revision administrative record. It is also available upon request. Therefore, this will not be addressed further. The Forest Plan's Management Area Characterization section does identify the number of sheep and cattle allotments within each specific management area.

Concern Statement 640.23

The Forest Service should not lease land unless the leasing fees are well above the environmental and pollution costs. Each section must be allowed to lie fallow every three years.

Response to Concern 640.23

Grazing fee determination is not within the scope of the Forest Plan decision. Annual Grazing fees are determined using a standard formula established by national regulation and law.

Resting a pasture or an allotment is a practice that can be considered at the allotment level. It is not a practice that should be applied as a standard across all environments and landscapes. See Rangeland Technical Report #3 for more details.

660 Timber Management

Concern Statement 660.01

Roads should not be built in roadless areas to accommodate logging operations that are uneconomical and require taxpayer subsidies. In addition, the taxpayers are responsible for paying for the upkeep of these roads and repairing the environmental damage. The Forest Service should require that any new logging roads must have the cost of either maintaining or restoring the road to its natural condition included in the original sale. The Forest Service should set timber sales to make a profit so the money can be used to relocate roads to ridge tops, which would facilitate skyline logging and greatly minimize potential soil, water, and riparian degradation.

The biggest factor affecting soil, water, riparian, and aquatic resources is road location not road densities. The harvestable volumes in Alternative 5 could be achieved with proper road design, timber sale layout, and administration. ABOVE SENTENCE MOVED TO 660.06

Another concern suggested that the creation of roadless areas will make it economically difficult or impossible to harvest timber from designated land. That would leave the region's largest employer with only private and state forests to harvest at a volume insufficient to make continued operation possible.

Response to Concern 660.01

The decision to build roads, as part of a logging operation, considers several factors including costs and benefits. This type of decision is made for individual projects. The forest plan does not make decisions regarding when and where to build roads, but instead includes Forest-wide and Management Area direction that guides project planning and project decisions. Additionally, management prescription category allocations include direction, which, in part, address future road construction.

Monies appropriated by Congress are used to maintain much of the transportation system on National Forest system lands. Maintenance of National Forest system roads is the responsibility of the Forest Service. We agree that taxpayers are the primary source of monies appropriated by Congress.

New roads constructed in conjunction with a timber sale may be financed through the timber sale or with appropriated monies. Timber sale purchasers are typically responsible for road maintenance until the timber sale is completed. A timber sale contract may specify that roads, used during the timber sale, be obliterated, closed and blocked, or left open upon completion of use. After timber sale contractual obligations have been met the Forest Service resumes full road maintenance responsibilities.

Project decisions about the design of timber sales, including whether or not to relocate existing roads, considers many factors including costs and benefits, environmental impacts, logging systems, etc. The final decision may include road relocation separate from the degree of profit or loss that may result from the sale of timber.

Many road related factors may affect soil, water, riparian, and aquatic resources. These include road location, design, surface material, road use, road maintenance, effectiveness of drainage facilities, and road density. Which single factor, or combination of factors causes the greatest affect on soil, water, riparian and aquatic resources will vary with each segment of road.

We agree, “the harvestable volumes in Alternative 5 could be achieved with proper road design, timber sale layout, and administration”. However, these are not the only factors that lead to successfully attaining harvest levels associated with each alternative.

Roadless areas are not created. Existing roadless areas have been inventoried in accordance with established protocols. The allowable sale quantity (ASQ) has been determined for each alternative analyzed for the Final Environmental Impact Statement. The ASQ volumes range from 3.8 million board feet per decade in Alternative 4 to 2,900 million board feet per decade in Alternative 5. Approximately 892 million board feet per decade is projected as being produced in Alternative 7. Very little of this volume would come from inventoried roadless areas.

The ability of the timber industry in southwest Idaho to sustain itself based solely on the volume available from non National Forest sources is outside of the scope of this project and thus was not analyzed. Potential timber sources, other than the National Forests of southwest Idaho are highly varied. The volume of timber that may be available is dependent on many factors including the landowner’s management objectives, and the current stumpage values.

Concern Statement 660.02

The silviculture prescriptions contained in the LMPs and modeling efforts fail to achieve the desired future conditions (DFC). This is evident by the sensitivity analysis of ASQ constraints, where attainment of DFC was improved by 23 percent when ASQ constraints were removed. The Forest Service should take another look at the yield tables used in the growth and yield programs and the treatment types and intensities that were used to predict potential ASQ levels, so the ASQs that are set in the LMPs provide predictable outputs. The estimate of yield may be incorrect because the models used were developed around even-aged management. The process to develop the ASQs appears arbitrary and does not meet the multiple use objectives required under federal law.

The “Range of Sizes” table is very confusing, and appears to allow far too few smaller sizes than is needed to replace stands harvested as they mature.

It is also an unlawful approach to forest planning as it appears the planning staff may have first chosen which milling facilities would continue operation under Alternatives 4 and 6 and then prepared ASQ levels to meet those needs. The EIS analysis must utilize information gleaned by the Idaho Ecosystem Management Demonstration Project.

Response to Concern 660.02

The management activities included in each of the alternatives are designed to promote the development of desired forest vegetation conditions. The effects analysis includes an assessment of the extent to which each alternative achieves the desired condition.

Yield tables, mechanical treatment activities and the intensity of treatments were reviewed and updated for preparation of the SPECTRUM model used for analysis in the Final Environmental Impact Statement. The Allowable Sale Quantity was developed for each alternative in compliance with the regulations that govern forest planning (36 CFR 219). The specific regulations can be found in section 219.12(f) – Forest planning process, section 219.16 – Timber resource sale schedules, and section 219.27 – Management requirements. The quantity of timber available under each alternative is to be based on the principle of sustained yield and must meet management requirements for resource protection. Detailed information concerning the modeling process and the development of the Allowable Sale Quantity is found in Appendix B for the Final Environmental Impact Statement.

The yield tables used to determine volume outcomes for each alternative are based on a set of proposed management activities and associated timber yields. The management activities include both even-aged and uneven-aged management approaches.

The determination of ASQ varied for each alternative. The range of items considered in determining ASQ for each alternative included current milling capacity, recent experience with sold volume which provides a measure of demand, issues and themes around which individual alternatives were crafted, and

the potential timber production capabilities within the constraints provided in law, e.g., non-declining even flow, and maximum opening size. In no case was the ASQ set to meet the timber supply needs for an identified milling facility. Detailed information about the process used to develop the ASQ volume for each alternative is found in Appendix B for the Final Environmental Impact Statement.

Information used in the development of the EIS considered information from many sources, including the information developed by the Idaho Ecosystem Management Demonstration Project.

Concern Statement 660.03

The timber goals in the LMPs must address pre-commercial and commercial thinnings.

The Forest Service should develop a silviculture program that would intensify the management of timber from the suitable areas using a variety of silvicultural treatments that are based on ecosystem principles, especially intermediate treatments such as commercial thinning. There should be an additional guideline that puts emphasis on timber production in areas that have had past intensive silvicultural treatments, including plantations and thinnings.

The Forest Service should also re-evaluate the costs used in assessing various silvicultural operations. Any prescription for uneven-aged management will range from 1.5 to 3 times more costs because the volume recovery is much lower and the mix of products derived is much greater at each entry. The product values should also be adjusted.

Response to Concern 660.03

Concerning management actions that involve the use of pre-commercial and commercial thinnings, the revised forest plans were developed with the expectation that these activities will occur. However, the forest plans do not prescribe the application of these or other management actions. Decisions about which type of vegetation management actions to utilize are made during project planning. Project planning must comply with Forest Plan direction, including the direction associated with Management Prescription Categories.

We agree that in the revised forest plans it is important to consider areas where more emphasis is placed on timber management from suited timberlands using a variety of silvicultural treatments that are based on ecosystem principles. Varying amounts of suited timberlands have been identified for each alternative. Management actions were modeled for each alternative including both intermediate and regeneration activities. Modeled timber harvest activities were based on ecosystem principles, which include consideration of the physical, biological, social and economic environment.

Several alternatives, 1B, 2, 5, 6 and 7 include the allocation of suited timberlands to MPC 5.2 where emphasis is placed on timber management. Most of these areas are located where inherent timber productivity is moderate to high (50 or more cu. ft. of wood fiber production per acre annually). Many of these lands are in areas that have had some past timber management.

Detailed costs and timber yields were developed for each management action model, including both even-aged and uneven-aged management actions. Management actions were evaluated separately for the development of estimated timber yields and associated treatment costs. These items were included in the model used for estimating outcomes associated with each alternative. It should be noted that modeled yields and costs are averages used for programmatic planning. Actual costs, timber yields and product values resulting from the planning and implementation of individual plans will vary due to site-specific conditions.

Concern Statement 660.04

Sound logging practices will promote biological diversity and restore forest health.

Response to Concern 660.04

We agree that timber harvest can be used to promote biological diversity. Timber harvest is included in all alternatives with goals to utilize timber harvest, and other treatment methods, in a manner that will maintain, or promote the development of desired conditions.

Concern Statement 660.05

The original forest plans had realistic ASQs, but they were rarely met because of frivolous appeals and lawsuits. The EIS and LMPs should lay the groundwork to address the issues that are common to these appeals, so community stability and economic investment is protected.

Response to Concern 660.05

Forest Plan revision was based on identified need for change issues. The need for change issues and other issues identified through scoping have been addressed in the development of the Final EIS and the proposed Forest Land and Resource Management Plans. Many of these issues are similar to those that have appeared as appeal or litigation points in project plans.

Concern Statement 660.06

The LMPs fails to specify the estimated method of timber harvest as required by the NFMA. The information is necessary in order to produce a proper scientific analysis of the environmental impact of logging.

The Forest Service should encourage aerial and horse logging whenever practical, and selective logging should be strongly encouraged. Timber harvest does not have to be associated with clear-cut logging.

The Forest Service should encourage the use of more skyline logging systems instead of tractor or helicopter.

Response to Concern 660.06

Decisions made in the development of the Forest Land and Resource Management Plans do not include the specifics as to which type of timber harvest method to apply at a particular site. Timber harvest methods were incorporated in the modeling efforts and subsequent analysis for the Final Environmental Impact Statement (FEIS). Specific harvest systems to use, such as aerial or horse logging, are best identified during project planning which address site-specific conditions and issues. Timber harvest methods included in the SPECTRUM model for the FEIS are discussed in Appendix B of the FEIS.

Concern Statement 660.07

The Forest Service should follow the Idaho State Forest Practices Act, as well as the established BMPs for southern Idaho, so that more mechanical treatment options are available to the model during the development of the final LMPs. These options should be included in the DEIS, which would counter the biases in the DEIS against using mechanical harvest to solve fuel-loading and forest health problems due to short-term risks associated with mechanical harvesting.

Response to Concern 660.07

The Forest Service fully complies with the Idaho State Forest Practices Act. The Rules pertaining to the Idaho Forest Practices Act are incorporated as minimum requirements. More stringent standards and guidelines have been included in the revised plans where needed to achieve Forest Plan and Management Area goals and objectives, or the requirements of other laws and regulations. Other laws and regulations that have influenced the development of standards and guidelines include the Endangered Species Act and the Clean Water Act. Goals, objectives, standards and guidelines, and the allocation of management prescription categories were reviewed for each potential vegetation group. The combination of these elements formed the basis for vegetation treatment options included in the development of the Final EIS and Plans.

Concern Statement 660.08

If fire is going to be used as a management tool, the appropriate timber should be harvested first, and the timber harvest of fire-killed trees should be a priority.

Response to Concern 660.08

Moving vegetation toward desired conditions or maintaining vegetation within the range of desired conditions is an inherent part of management direction included in the revised Forest Plans. In some areas, such as proposed wilderness, mechanical treatments methods are precluded by law or Regional and National policies. Where mechanical treatment methods are not precluded, fire or mechanical treatment methods may be used. The specific method(s) selected will be based on site-specific conditions, management area direction and management prescription category allocations, and project specific objectives and issues. In some areas, project objectives may best be achieved through the exclusive use of fire, or through the exclusive use of mechanical methods. In other areas, a combination of treatment methods may provide the best means of achieving vegetation management and other project objectives. Decisions concerning the harvest and removal of timber before or after the use of fire will be decided during project planning where doing so is not precluded by law, regulation, or management prescription category allocations.

Concern Statement 660.09

The current growth stage matrices do not seem to allow for any transition into large tree (moderate or high-density) size classes through the use of mechanical treatments, only through the use of prescribed fire. This appears to indicate the mechanical treatment prescriptions and timing options are inadequate. The Forest Service should include additional mechanical prescriptions and timings so that treatments that encourage the transition of forest stands into moderate and high density large tree structure can be used to help achieve Desired Future Conditions.

Response to Concern 660.09

The growth stage matrices developed for use in the SPECTRUM model do not prescribe any particular vegetation treatment method. The growth stage matrices provide a characterization of the development and succession of forest vegetation. One matrix characterizes vegetation development through growth and succession in the absence of management actions and other disturbance elements. Another matrix characterizes vegetation development with the influence of vegetation management actions – including both fire and mechanical treatment methods. Both of these matrices allow for the development of forest vegetation into the large tree size class and into the medium tree canopy closure class. Where management actions are applied the high-density canopy closure class is not allowed, or expected to develop. Where management actions do not influence the development of forest vegetation, and in certain potential vegetation groups, the high-density canopy closure class is represented in the matrices.

Vegetation treatment prescriptions incorporated in the SPECTRUM model fully provide for the development of forest vegetation into the large size tree class, and the moderate and high density canopy closure classes within the limits of desired conditions.

Concern Statement 660.10

If the Forest Service goes forward with what it is currently proposing, then it would seem that everything outside of Roadless would be a 5.2 designation, and 80 percent of the forest would be set aside for no management. At least the areas that are already being managed should be managed intensely, and all areas should be 5.2 (timberland in difficult terrain should be 5.1) so that there is a full mix of tools to use on these lands.

The Preferred Alternative designates large portions on the forest to MPC 3.2. Many of these watersheds are 78 percent to MPC 3.2; Warm Lake is 84 percent to MPC 3.2. These are examples of where entire watersheds were labeled MPC 3.1 or 3.2 instead of just the stream corridors. The reason given is that there are no suited timberlands in MPC 3.2; however, there are plantations in some of those areas. All the lands except the streamside buffers should be 5.1 or 5.2.

Regarding the Boise National Forest, the following Management Areas should receive the bulk of the intensively managed timber program: 2, 4, 6, 7, 8, 11, 14, 16, and 17. In other areas, MPC 5.1 could predominate.

Response to Concern 660.10

Partly in response to this and similar comments, and partly in response to National and Regional policies being developed by the Forest Service, a new alternative – Alternative 7 – was developed for analysis in the Final EIS. In Alternative 7 most area within inventoried roadless areas were allocated to management prescription categories (MPCs) where forested lands are identified as not suited for timber production. Most of the areas outside of inventoried roadless area, and generally not in anadromous fish watersheds, were allocated to MPCs which are identified as suited timberlands – this includes MPC 5.2. The areas identified as not suited timberlands are not put aside as “no management” areas, but instead are available for the full range of management actions. The type of management tools available for use is sometimes prohibited, as is the use of mechanical treatment methods in area allocated to MPC 1.2 – proposed wilderness.

In Alternative 3 – the preferred alternative in the Draft EIS – and in all other alternatives areas that are allocated to MPC 3.1 or 3.2 -- forested lands are identified as not suited for timber production. We agree that many of these areas contain timberlands that have received past management. However, each alternative was developed in response to a unique set of issues. The inherent timber productivity and history of past management were only two of the factors. As a result each alternative displays a different mix and total acreage of suited timberlands as is displayed in the Timberland Resources effects analysis in Chapter 3 of the Final EIS.

An estimated 66 percent of the suited timberlands are allocated to Boise National Forest Management Areas: 2, 4, 6, 7, 8, 11, 14, 16, and 17 in alternative 7. The remaining 13 management areas include the remaining 34 percent of suited timberlands including 3 management areas that have none. The management prescription categories assigned to each Management Area can be found in the Forest Land and Resource Management Plan.

Concern Statement 660.11

The Preferred Alternative states that it may produce millions of board feet of timber each year as a by-product of the preferred management direction, which is fire followed by salvage logging. The Forest Service provides nothing in the options that states any acreage within the forest boundaries is suitable for timber production.

Response to Concern 660.11

Each alternative was designed to reflect a particular set of issues that provides a unique theme for each alternative. This theme was used to assist in the allocation of Management Prescription Categories (MPCs) for each alternative. The MPCs incorporate the allocation of tentatively suited timberlands as being suited timberlands (appropriate for timber production) or not suited timberlands (not appropriate for timber production). The total acreage of suited timberlands varies with each alternative based primarily on the mix of MPCs allocated in the individual alternatives. As a result, suited timberland acreage in the 7 alternatives analyzed for the Final EIS ranges from a minimum of 32,400 acres to a maximum of 2,800,200 acres for the Ecogroup. The allowable sale quantity volume associated with the 7 alternatives ranges from a minimum of 3.8 million board feet to a maximum of 2,896 million board feet in the Final EIS. Forest by Forest details for suited timberland acreage and allowable sale quantity volumes are described in the Timberland Resources section of Chapter 3 in the Final EIS.

Concern Statement 660.12

The Forest Service must retain harvest capability in the South Fork of the Salmon River on both the Payette and Boise Forests to ensure that those lands previously treated, and those lands requiring fire protection can be treated appropriately and timber produced. Those lands do not need to be intensively managed for timber, but timber programs should not be altogether excluded.

Response to Concern 660.12

Lands within the South Fork Salmon River have been allocated to a variety of Management Prescription Categories, primarily 1.2, 3.1, 3.2, 4.1c, 4.2 and 5.1. Areas allocated to MPC 1.2 – Proposed Wilderness – are managed to retain their wilderness characteristics and thus mechanical treatment methods and timber harvest are not allowed. In all of the other MPCs the full range of management actions are available for use although the management emphasis varies. Fire or mechanical treatments may be used individually in some areas while in other areas they may be used in combination. As a result of this direction timber harvest remains a potential tool throughout much of the South Fork Salmon River. While none of these lands emphasize timber production, mechanical treatment methods are available in much of the area to help reduce both wildfire and insect hazard.

Concern Statement 660.13

The planning requirements of 36 CFR 217.27(b) are only partially met in the “Timberland Resources” and “Vegetation” sections of the LMPs. Subsection (b) relates to vegetative manipulation and sets forth management prescriptions for any manipulation of tree cover (i.e., logging).

The Forest Service should provide a detailed explanation of how the LMPs will include management prescriptions that

- 1. achieve multiple use goals;*
- 2. assure adequate restocking;*
- 3. avoid permanent impairment;*
- 4. provide for desired affects on water, species, recreational uses, and aesthetic values, and*
- 5. comply with the other provisions of 36 CFR 217(b).*

Response to Concern 660.13

The management requirements included in 36 CFR 219.27 “management requirements” used to guide the development, analysis, approval, implementation, monitoring and evaluation of forest plans. The requirements enumerated in paragraph (b), Vegetation manipulation, have been incorporated into the allocation of Management Prescription Categories and in the development of goals, objectives, standards and guidelines to guide project planning and implementation.

The Forest Plans make no site-specific decisions regarding the type of vegetative treatment activities to implement or the amount of area to treat. These decisions are part of project planning. Therefore, it is not appropriate for the Final EIS or the proposed Forest Plans to include detailed explanations of how *site specific vegetation manipulation* will assure adequate restocking; avoid permanent impairment of site productivity; provide for desired affects on water, species, recreational uses, and aesthetic values, or other provisions found in 36 CFR 219.27(b)

Concern Statement 660.14

The Final EIS should contain a discussion on the off-site tree and brush planting that occurred on the Forest in the early 1960s and 1970s, an explanation of how those populations are monitored, and if there is any form of treatment for those exotics. There should be an application standard to assure appropriate seed sources are used for all vegetation regeneration. This could entail a simple implementation standard since seed source standards already exist in handbooks and various computer programs.

Response to Concern 660.14

The presence of “off-site” tree and brush planting was not identified as an issue used to guide the development of alternatives. The presence of off-site plantings is an existing condition that would not vary between alternatives. The Timberland Resources section of the proposed plans contain the goal to maintain or improve, where possible, genetic diversity within tree species. There is also Forest Service handbook direction that provides minimum standards for tree improvement practices to utilize during reforestation activities.

Concern Statement 660.15

The Final EIS should contain a revised characterization of the lodgepole pine (LPP) portion of the forest. Virtually all the LPP areas burned between 1840 and 1880 (not all in one year, but in mosaics over that 40-year period). The LPPs that remain are uniformly 120-160 years old [within the Sawtooth National Recreation Area] and are at great risk from the current pine beetle epidemic moving in from the east and years of drought. This situation produces an imminent lethal fire threat. The Forest Service should accelerate logging of LPP trees in the next few years, not slow down the process.

Response to Concern 660.15

The characterization of all forested potential vegetation groups was updated for the Final EIS, as was the analysis for fire hazard and insect hazard. The updated analysis for insect hazard does recognize the bark beetle infestation that is currently being experienced in the lodgepole pine cover type, especially in the Sawtooth National Recreation Area. The Sawtooth National Forest is currently preparing project level plans that specifically address insect damage, and the resultant fire hazard. The project decision will identify the appropriate level of timber harvest for the area. The revised Forest Land and Resource Management Plan will contain direction to manage forest stands to desired conditions which are resistant to insect epidemics.

Concern Statement 660.16

There should be an effort to include more areas in MPC 5.1 or 5.2. The percent of forested acres that have a moderate to high insect risk increases substantially over time due to increasing tree size and density. Areas treated under MPC 5.1 or 5.2 should not contribute to this higher risk due to improving tree vigor in the treated areas.

Response to Concern 660.16

The percent of forested acres in a moderate to high insect hazard rating is related more to the acres receiving treatment than it is to the management prescription category (MPC) an area is allocated to. Regardless of which MPC an area is allocated to, future management actions are intended to move vegetation toward desired conditions described in the forest plans.

Forest vegetation that is within the desired conditions is expected to have acceptable insect hazard. Different hazard levels between MPCs, within a given alternative, reflect differences in the level of management actions between MPCs. In addition to the differences in management actions between MPCs, differences between alternatives also reflect different MPC allocations, which are designed to address issues associated with the individual alternatives.

Concern Statement 660.17

Logging causes far less habitat fragmentation and disruption than the types of fire that have occurred in the area since 1987. Logging can help reduce the size, intensity, and duration of fires. Harvesting timber products promotes local economies, provides a hedge against higher lumber costs, and most importantly, protects forests from overcrowding, insect infestation, and devastating fire events. The belief that forests can be self-managing by allowing natural forests to run their course is an economic and biological unsound practice.

Response to Concern 660.17

The opinions expressed in this comment were incorporated in analysis of issues that aided in the development of alternatives. Alternatives 1, 2, and 5 most directly reflect the incorporation of the opinions expressed in this comment.

Concern Statement 660.18

There is concern that the goal in the LMP (“... provide for the restoration of watershed and vegetative resources...”) is in conflict with the management action of providing for “... an amount of volume needed to maintain a viable timber industry.” The truth is that timber harvest on public lands has resulted in extensive degradation and loss of wildlife habitat, damage to riparian areas, and recreation opportunities. Long-term and sustainable forest health would be better insured by cutting the least amount of trees necessary to restore forest health and watershed conditions.

Response to Concern 660.18

The opinions expressed in this comment were incorporated in analysis of issues that aided in the development of alternatives. Alternatives 4 and 6 most directly reflect the incorporation of the opinions expressed in this comment.

Concern Statement 660.19

The need for restoration should drive the need for tree cutting; there should not be a timber target. The standards should specify why cutting would be conducted, where it would occur (after thorough watershed analysis is conducted to determine the need), and let the actual need drive the level of restoration.

Response to Concern 660.19

The need for management actions designed to change current vegetation conditions are to be based upon the difference between current conditions and desired conditions. Desired conditions are being established in the revised Forest Land and Resource Management Plans. While treatment methods are somewhat regulated by MPC allocations the ultimate decision about which types of treatment, the amount of area to treat, and when management actions are to be implemented will be determined during project planning. The establishment of a Forest level allowable sale quantity is not established as a target but instead is identified as the maximum amount of timber that can be legally harvested from suited timberlands.

Concern Statement 660.20

Peace Rock should not be logged given the disaster that took out Breadwinner, Sheep Creek, and Danskin.

Response to Concern 660.20

The opinions expressed in this comment were incorporated during issue analysis for the development of alternatives and the allocation of Management Prescription Categories (MPCs). In all action alternatives except alternative 5, the Peace Rock Inventoried Roadless Area is allocated to an MPC which either precludes timber harvest (MPC 1.2) or which is designed to maintain the area in an unroaded condition.

Concern Statement 660.21

The forests will be eliminated if they are allowed to burn. In much of the Secesh Wilderness Study Area (WSA), there are no new trees growing because the intensity of past fires eliminated reseedling from cones. The lack of roads in that WSA and the inaccessibility due to the density of trees and the dead and downed timber means no new trees have been planted. Good logging practices can be used to thin the forests and improve the scenery, forest health, and recreation.

Nez Perce fish counts indicate that populations of Chinook salmon and Steelhead trout are increasing in the Secesh River at rates higher than other river systems in the Pacific Northwest. The only protection needed in this area is from catastrophic wildfires that could completely eradicate those fish populations and habitat. The Forest Service should

make great efforts to create larger buffers in this area to protect private property and salmon habitat by thinning, logging, and otherwise clearing some of the dead and downed timber adjacent to the Meadow area.

Response to Concern 660.21

The opinions expressed in this comment were incorporated in analysis of issues that aided in the development of alternatives. The range of alternatives address this concern to varying degrees. Please refer to the description of alternatives in Chapter 2 of the Final EIS and to the alternative maps to see how the concern for this specific area was addressed in each alternative. Also refer to the management area direction for Management Area 11 in the Payette National Forest revised Forest Land and Resource Management Plan to see the specific direction included with the selected alternative.

Concern Statement 660.22

The Forest Service should specify that all sales be staggered age 40 trees and that no two adjoining 40s be the same age (seedling, 8-inch DBH, 16-inch DBH, 24-inch DBH, and 36-inch DBH). All sales should be set back from streams and roads. Timber should be planted and harvested using the following guidelines:

- *Plant 300 seedlings per acre at 12' x 12' centers*
- *Start light grazing at 4-feet tall*
- *Leave 225 at 8-inch DBH on 14' x 14' centers*
- *Leave 150 at 16-inch DBH on 17' x 17' centers*
- *Leave 100 at 24-inch DBH on 20' x 20" centers*
- *Leave 50 at 36-inch DBH on 30' x 30' centers*

Response to Concern 660.22

This suggested treatment plan may be a feasible means for implementing management actions on some sites. However, the Forest Plan does not make site-specific treatment decisions. This particular issue is beyond the scope of forest plan revision and thus was not analyzed.

Concern Statement 660.23

Fast-growing species of trees should be grown on private lands for the purpose of timber harvest and sale, not on national forest lands. The lumber industry should be responsible for purchasing and replanting their own lands for future production of lumber and paper products.

Response to Concern 660.23

The National Forests were reserved from the public domain in part to provide for a sustainable harvest of timber. The Allowable Sale Quantity developed for each alternative is in compliance with the regulations that govern forest planning; 36 CFR 219. The specific regulations can be found in section 219.12(f) – Forest planning process, section 219.16 – Timber resource sale schedules, and section 219.27 – Management requirements.

The quantity of timber available under each alternative is based on the principle of sustained yield and meet management requirements for resource protection. Detailed information concerning the modeling process and the development of the Allowable Sale Quantity is found in Appendix B for the Final Environmental Impact Statement.

The State is responsible for regulating forest practices on private lands, including requirements to reforest harvested areas.

Concern Statement 660.24

The Forest Service should set a time limit for plantation exclosures. The policy of prohibiting livestock until trees are of adequate size to reduce damage is too open-ended. The trees never attain adequate size when cattle are fenced out due to tall grass competition and rodent girdling due to tall grass cover.

Response to Concern 660.24

We disagree. The decision as to when the trees in a plantation are of an adequate size and condition to withstand adverse effects from livestock is best determined based on site-specific conditions. Setting a specific time limit may result in livestock being excluded for too long a period on some sites, and conversely, being excluded for too little time on other sites. Therefore, we have decided not to change the language in this guideline

Concern Statement 660.25

The standards for tree regeneration shown in the current LMPs do not meet minimum State of Idaho standards.

Response to Concern 660.25

The final minimum stocking standards included in the revised Forest Land and Resource Management Plans are consistent with the Idaho State Forest Practices Act.

Concern Statement 660.26

Regarding the Payette LMP, page 111-32, "Timberland Resources Desired Conditions and Goals:" The Forest Service should explain if its intent is to manage toward the historic range of variability (HRV). Neither the LMPs or DEIS appeared to provide evidence that there is real knowledge of what HRV was; it seems to be based on estimates. The Forest Service compare the early cruise history with the predictions of HRV to see how they compare. The concept of using HRV for timber management is troublesome. The Forest Service should clarify what the management direction is to be and how it will be implemented.

Response to Concern 660.26

The description of Desired Conditions and its relationship to Historical Range of Variability has been more thoroughly described in Chapter 3 of the Final EIS. The management direction included in the revised Forest Land and Resource Management Plans is for vegetation management actions to maintain desired conditions, or to manage for long-term attainment of desired conditions. The Historical Range of Variability was used as a reference condition for the development of desired conditions, however, desired condition and Historical Range of Variability are not identical.

Concern Statement 660.27

Just a little over 15 percent of the timberland in the Payette National Forest is shown as being suitable for harvest. This number is so low that there must be a problem with the methodology used to determine suitable timberlands. The Forest Service should explain if the sale quantity on the Payette of 282 million board feet of timber over a ten-year period is accurate (see DEIS page 2-59, Table 2-41).

Response to Concern 660.27

The Final EIS describes the suited timberlands and allowable sale quantity associated with each alternative. On the Payette National Forest the suited timberland acreage ranges from 0 acres in alternative 4 to 895,100 acres in alternative 5. The allowable sale quantity varies from none in alternative 4 to 1,113 million board feet per decade in alternative 5. The suited timberland acres, the allowable sale quantity, and the process used to develop these for each alternative is described in the Final EIS and in Appendices B and E.

Concern Statement 660.28

The Forest Service should give more consideration to just growing trees, and it should explain how it can show zero acres on the three forests management for growth and yield.

Response to Concern 660.28

The area allocated to timber production varies with each alternative. In general, Alternative 5 provides the greatest emphasis to timber production, and Alternative 4 gives the least emphasis. These alternatives were developed in response to identified issues, and management concerns. Alternative 5 most directly addresses the concerns expressed by this comment.

Concern Statement 660.29

A TSPQ volume of 70-80 MMBF should be achieved on both the Boise and Payette National Forests. This level of harvest is sustainable in the long-term.

Response to Concern 660.29

Alternatives 1b, 2 and 5 on the Boise National Forest and Alternative 5 on the Payette National Forest result in an estimated TSPQ volume, which equals or exceeds 70 million board feet per year. The description of environment consequences for Timberland Resources in the Final EIS described the TSPQ associated with each alternative for each forest.

Concern Statement 660.30

The Revision Team should develop goals, objectives, standards, and guidelines that are appropriate for best management practices under an intensive timber management program for each specific management area.

Response to Concern 660.30

Goals, objectives, standards and guidelines have been developed for the revised Forest Land and Resource Management Plans. These were developed for all lands regardless of the allocated management prescription category (MPC) including MPC 5.2, which emphasizes management for timber commodities. The standards and guidelines were developed to meet or exceed the applicable best management practices contained in the Rules pertaining to the Idaho Forest Practice Act.

Concern Statement 660.31

All salvage fire provisions should be included within the ASQ. Many fires on the Payette and Boise caused the timber cut to rise significantly as a result of the salvage provisions in the Forest Plans; that should not happen.

Response to Concern 660.31

The question about how to account for salvage volume -- as volume which accrues to the Allowable Sale Quantity (ASQ) or as non-ASQ volume accounted for as Total Sale Program Volume was carefully considered during the formulation of standard. The standard included in the revised Forest Land and Resource Management Plan provides for this decision to be made on a case-by-case basis.

Concern Statement 660.32

There is concern that timber industries that produce needed products and contribute to the nation's wealth are being put out of business, while their raw materials rot or burn in minimally managed forests. The National Forests are also losing an extremely valuable and effective management tool as mills are forced to close and logging companies disappear.

Response to Concern 660.32

This issue was used in the development of several of the action alternatives. Alternative 5 most directly addresses the opinion expressed in this comment.

Concern Statement 660.33

Logging should no longer be used as a justification for sustaining local rural economies. Trees should not be cut for commercial purposes. National Forests should be protected against destruction and only private lands should be logged. Large timber sales are no longer in Idaho's best interest. Logging operations should not be continued where there are deficit sales and where the costs of roads and restoration are more than the money realized. Taxpayers should not subsidize the logging industry.

Response to Concern 660.33

The opinions expressed in this comment are reflected in the outcomes associated with Alternative 4. The Payette and Sawtooth National Forests produce no timber from suited timberlands while the Boise National Forest produces approximately 4 million board feet annually. The volume outcomes of this alternative are not designed to provide enough timber to sustain rural economies. The analysis relative to the economic consequences associated with each alternative is described in Chapter III of the Final EIS.

Concern Statement 660.34

The specific per-unit legal costs associated with mechanical harvesting as a result of frivolous lawsuits and administrative appeals is an unfair burden placed directly in timber sales, and it should either be reduced to reflect the current actual cost, or be included as part of the overall administrative costs of managing the forest. This would allow timber production to be treated fairly.

Response to Concern 660.34

The costs of the timber sale program were included in the development of the SPECTRUM model for application to each alternative. Costs included for modeling purposes included sale planning, preparation, and contract administration. The model was run with and without a budget constraint for each alternative. This allowed each alternative to be developed and evaluated in a consistent manner.

The decision regarding specific accounting procedures for timber sales is beyond the scope of the Forest Plan.

Concern Statement 660.35

There should be a 20-year moratorium from logging in national forests so the forests can recuperate for the welfare and enjoyment of future generations.

Response to Concern 660.35

A range of alternatives was developed that provide a wide range of “logging” opportunities. Alternative 4 emphasizes ecological processes and the use of fire as the primary means of achieving desired conditions, with very limited opportunities for “logging”. Other alternatives provide for restoration of forest vegetation, though the amount of restoration activity varies between alternatives. FEIS resource effects disclose that management actions designed to restore forest vegetation, and to achieve desired conditions, generally results in more rapid restoration than the restoration accomplished through ecological processes.

Concern Statement 660.36

The DEIS did not provide any data on the current level of logging or logging-related disturbance. The impacts of the alternatives cannot be analyzed with data regarding the extent of disturbance at the subbasin, watershed, riparian, and reach scales. Logging-related information that should be disclosed includes disturbance levels at all scales, identification of extensively logged and degraded watersheds, the number of skid trails and landings, riparian and landslide-prone areas logged, and the number of landslides caused by timber harvesting activities under the current forest plans.

The Ecogroup fails to adequately determine the likely levels and impacts from the salvage and fire treatment harvests that would be allowed under the LMPs.

Response to Concern 660.36

The type and amount of disturbance associated with each alternative was estimated using the SPECTRUM model. The outcomes from the model were used to evaluate effects to the environment, and to compare alternatives. The results of the SPECTRUM model are summarized in the Appendix B of the

Final EIS. The model output is also included as part of the planning record. However, the model does not prescribe the type and amount of management actions. Specifics such as the number and location of landings, the acres to be harvested, and the logging methods to be employed are site-specific decisions that will be evaluated and disclosed during project planning.

The amount of salvage harvest that may occur following implementation of prescribed fire, and the effects associated with it, can only be determined during project planning. These salvage treatments, if implemented, would have to be consistent with revised forest plan direction for each resource area. However, the treatment activities evaluated for the Final EIS do not anticipate, nor prescribe, the use of salvage harvest following prescribed fire.

Concern Statement 660.37

The current limitation on skid trails for areas open to mechanical treatment (5 percent) is unnecessarily restrictive. Past management plans have allowed up to 20 percent of an area to contain skid trails, and these areas have not shown any significant loss of productivity as a result.

Response to Concern 660.37

The proposed plans do not contain a standard or guideline that limits the area occupied by skid trails. There are, however, two standards that control the amount of ground area disturbed. One limits the amount of area in a "detrimentally disturbed condition", and the other limits the "total soil resource commitment" of an area. The total area in either category is evaluated for each area where management actions are being proposed. Site-specific conditions and treatment methods are fully considered when evaluating these conditions and these standards applied appropriately to the site.

680 Minerals Management (mining: exploration, development, reclamation; drilling)

Concern Statement 680.01

The direction for the South Salmon should be consistent with that of the Payette Forests: a one-quarter mile corridor should be withdrawn for mineral entry.

Response to Concern 680.01

This inconsistency has been corrected in the Plans. The requirement to withdraw a quarter mile corridor of the South Fork Salmon River on the Payette National Forest has been removed from the Management Area direction. The withdrawal was erroneously included as direction because the South Fork Salmon had been proposed as a Wild & Scenic River. Mineral entry withdrawal associated with Wild and Scenic River status does not occur until one year after Congressional designation.

Concern Statement 680.02

The forest LMPs must provide more detailed descriptions of mining activity allowed under the Management Area prescriptions and an assessment of the likely impacts of these prescriptions on aquatic resources. The Ecogroup provides no data to support the effectiveness of suction dredge mining in fish habitats. It did not disclose the management situation associated with the several hundred mining claims (few have approved plans) that exist in the Management Areas nor the mines' potential impacts to aquatic resources.

The following guidelines should be added to the LMPs:

Where suction dredge mining will impact spawning of listed species, the affected reaches will be closed to suction dredge mining during the spawning season for those affected fish. Suction dredge mining will not be allowed on streams managed as wild trout fisheries because of resource concerns and conflicts with other users. Suction dredge mining should not occur in stream reaches identified as nodal habitat for native and desired non-native fish species.

Response to Concern 680.02

The Management Area Characterizations in the Forest Plans do contain descriptions of the history, types of mining activities and mineral potential occurring within the area. Several Management Areas also contain objectives for reclamation. Forest-wide direction does contain guidelines pertaining to suction dredging, specifically with timing and location in order to prevent conflicts with aquatic resources and Threatened and Endangered species. Typically, the specifics of suction dredge and mining operations are addressed and dealt with during site-specific planning and decisions associated with individual operating plans. Details on the number of claims and history can be found at the Ranger District level.

Concern Statement 680.03

The EIS should discuss the Hard Rock Mining Act of 1872 (which grants the right to private individuals to explore and develop mineral rights on federal lands), its benefits and impacts, and how it may conflict with the Clean Water Act and the Endangered Species Act. The EIS should discuss important policies and court cases that provide direction to Forest Service managers regarding this matter.

Response to Concern 680.03

While the relationship between the two laws provides for some interesting legal discussion and debate, it would not contribute to the direction to specific areas within the three forests. Most of the direction for mineral management has already been established outside of forest planning. Reference locations for this

direction can be found documented in Chapter III of the Forest Plans, at the beginning of the Mineral and Geology Resources section. Further discussion of this topic is considered to be outside the scope of any decisions associated with forest plan revision and therefore, is not addressed in further detail.

Concern Statement 680.04

The EIS must provide descriptions of the historical and current effects of mining on the landscape and waterways in the planning area. The FEIS must disclose the percentage of the area historically and currently mined within the forests and identify the number of water quality-limited streams, degraded watersheds and aquatic habitats that have resulted from mining activities.

The DEIS contained only one paragraph discussing mining and little detail describing abandoned and operating mine sites and vision and direction for the future. Therefore, the FEIS should:

Discuss environmental impacts and risks from inactive or abandoned mines.

Discuss environmental impacts and risks from active mines.

Discuss the mineral outputs of the active mines.

Provide maps indicating sites of these active and abandoned mines; and

Provide maps delineating areas open and closed to mineral development.

Response to Concern 680.04

See the responses to Concern 680.02 and 680.03. Water quality limited streams and the contributing impacts were identified in SWRA analysis. Also, the Management Area Characterization sections, specifically Landforms and Soils and Water, contain information about the localized impacts that are contributing risks to the geomorphic integrity and water quality. Mining is one of the risks that were considered in this section. Specific information on claims and mines is available at district ranger offices. Specific information on active and abandoned mines and their specific mineral outputs are not included in this analysis, as it is too detailed for the scale and level of planning.

Concern Statement 680.05

The Forest Service should discuss how much legal discretion it has when considering the granting of mining permits and how each forest proposes to balance mineral development and exploration with the protection and restoration of environmental resources.

Response to Concern 680.05

See the responses to Concern 680.03. Much of the direction, legal basis and latitude for mineral management have been established through processes outside of forest planning. Reference locations for this mineral development and exploration discussion can be found documented in Chapter III of the Forest Plans, at the beginning of the Mineral and Geology Resources section.

700 Recreation Management

Concern Statement 700.01

The Forest Service should explain if recreation, including ski area management and expansion, is being treated in the same manner and given the same status as the other “Need for Change” topics in the “Analysis of the Management Situation.”

Response to Concern 700.01

Recreation, as a whole, was not recognized as a “Need for Change” topic. However, recreation management direction was reviewed and updated, as needed, in the revised Forest Plans. The revised Forest Plans include recognition that additional work addressing recreation resources will need to be completed after Forest Plan revision.

Concern Statement 700.02

The following goal should be translated into a standard and incorporated in the LMPs: “Manage dispersed and developed recreation activities and off-road vehicle travel on public lands to minimize or avoid adverse effects on watershed integrity, soil, productivity, and aquatic/riparian and terrestrial species and their habitats.”

Response to Concern 700.02

The suggested conversion of the goal to a standard was noted and considered. It was felt that a recreation goal to reduce recreation impacts to other resources was appropriate. The goal was reworded to address a broader range of resources and is now forest-wide goal REGO04. It was not felt that it needed to be converted to a standard because forest-wide Soil, Water, Riparian, and Aquatic standards SWST01, SWST04, and other standards and guidelines provide sufficient resource protection.

Concern Statement 700.03

The Sawtooth National Forest currently manages for multiple components such as wilderness and scenic integrity, recreational opportunities, biodiversity, and water and air quality as much as it does for traditional uses. To traditional users, it seems like recreational use is receiving higher priority than all other uses. The Management Prescriptions described on page 12 of the Users Guide also reflect this.

Response to Concern 700.03

Management priorities on the Sawtooth National Forest, as indicated by MPC assignment, varied across the seven alternatives. The opinion expressed in the comment may come as a result of the fact that recreation use has increased substantially in many areas of the Forest causing shifts in management focus and priority.

Concern Statement 700.04

Regarding the third paragraph on Page III-53, first sentence: "Conflicts between recreationists and with other users as well as lost recreation opportunities are minimized," - add the following text to the end of the sentence: "... minimized through collaborative meeting between representatives of user groups."

The following goal should be translated into a standard: "Manage motorized and non-motorized travel to provide for user safety, meet resource objectives, and minimize road and trail damage, maintenance costs, and user conflicts. This supplements LMP pages III-53 to 56 that address winter recreation goals, objectives, and guidelines."

The Forest Service should add the following standard: "Monitor increased recreation use, continue to provide a quality recreation experience for current users, and create and enforce separate use areas to reduce current potential conflicts between user groups."

Response to Concern 700.04

The original statement concerning conflicts was further modified and a separate sentence was added to the recreation Desired Condition statements addressing collaboration among users to reduce conflicts.

The suggested conversion of the goal to a standard was noted and considered. It was felt that an overall recreation goal to related to travel management was appropriate and was retained as goal REGO05. As written, it applies to both summer and winter travel and addresses travel-related facilities and access needs as well. It was not felt that it needed to be converted to a standard because it will serve to guide future travel planning processes and work with recreation standard REST03.

Recreation use will continue to be monitored through both observations of field personnel and through the National Visitor Use Monitoring program. Monitoring needs were addressed broadly by forest-wide recreation objective REOB10 (REOB11 in the Payette Plan) and in the Monitoring Plan in Chapter IV. Recreation goals REGO01 and REGO02 address the standards for management in recreation program. It was felt that separating uses is a last resort when addressing conflicts. Use separation represents lost recreation experiences for one user or the other. However, forest-wide recreation guideline REGU25 (REGU27 in the Payette Plan) was developed and included in recognition of the fact that in some cases, especially during winter when Forest access is limited, separation of uses may be appropriate.

Concern Statement 700.05

The Forest Service should perform an inventory of all sites in and around alpine and Nordic ski areas. Buffer zones should then be established to isolate the motorized and non-motorized users, thereby eliminating unnecessary snowmobile staging areas and their use near the ski areas.

The original Forest Plan and maps depict existing ski areas and potential future expansion areas. The draft LMP makes either general references or no reference to the existing ski areas and no mention of potential expansions for ski areas; the maps show none of the ski areas. The LMP must include delineations and accurate, detailed maps for the following areas:

- 1. Pomerelle Ski Area, expansion areas, and potential new ski areas for future downhill skiing opportunities (MA 1-D)*
- 2. Bald Mountain Ski Area and expansion area (MA 31)*
- 3. Potential Butterfield Ski Area (MAs 3-F and 4A-28)*
- 4. Potential Proctor Mountain Ski Area (MA 3J)*
- 5. Magic Mountain Ski Area and a fairly sizeable expansion area (MA 2-F)*
- 6. Soldier Mountain Ski and a large potential expansion area (MA 5-K)*

In the original Forest Plan, Mt. Harrison was shown as a Forest Service “Inventoried Alpine Ski Area.” In light of the new goal in the Sawtooth LMP, the future development of Mt. Harrison, in combination with the current Pomerelle Mountain Resort Permit, is a major concern.

Response to Concern 700.05

Motorized/non-motorized buffer zones around ski areas relates to travel planning and was deferred to future travel management processes. However, the new forest-wide recreation guideline REGU25 (REGU27 in the Payette Plan) may in some cases provide a measure of protection for developed ski areas in resolving conflict situations during future travel planning processes.

The comment regarding display of ski areas and potential expansion areas was noted. Almost all ski areas “disappear” on new Forest Plan management prescription maps due to the fact that management is largely being defined on a hydrologic unit basis (i.e., subwatersheds). Residing at the crests of ridges and mountain tops, most ski areas are dissected into two or more subwatersheds and do not dominate the management of the entire subwatershed. The sole exception to this is Bald Mountain, which occupies most of the portion of the subwatershed within the Forest boundary and was assigned to MPC 4.3 as a result. However, all existing ski areas are noted in the management area level and their use of National Forest System lands will be continued under the revised Forest Plans.

It was not felt that analyzing and displaying potential expansion zones for Sawtooth ski areas was an efficient and worthwhile expenditure of resources. Future development and expansion at existing ski areas is determined under approved Master Plans. With downhill skiing demand remaining fairly level for a number of years, the ski industry does not seem to be rapidly expanding at this point. Additional skiing supply is currently under development near Cascade, Idaho, and the need for further expansion of downhill skiing supply is uncertain at this time. A preferred approach was to develop a recreation guideline in the management area direction for each ski area on the Sawtooth to consider potential effects to ski area expansion opportunities when evaluating proposed projects that are within a specified distance to the ski area. It should also be noted that expansion and new development are not absolutely dependent on a Forest Plan allocation as an expansion or development zone. The areas where these potential ski area expansions were located are to be managed under MPCs 4.1c and 4.2 in the preferred alternative, which should largely preserve the ski area development potential and would be consistent with expanded activities such as snowcat skiing.

The Butterfield and Proctor Mountain potential ski areas were not included or addressed in the revised Sawtooth Plan due to the aforementioned lack of evidence of a need for new ski area development. However, the areas where these potential ski areas were located are to be managed under MPCs 4.1c and 4.2 in the preferred alternative, which should largely preserve the ski area development potential of these areas.

Concern Statement 700.06

Some commenters suggested adding the following to better address ski area concerns:

- 1. The LMPs should add the goal: "Manage ski-based resorts in accordance with the approved Master Development Plans for these facilities."*
- 2. Proposed expansion of downhill and cross-country ski facilities and trails should be cross-referenced and recognized in the "Land and Special Uses" and "Socio Economic" sections of the LMPs. Steps should be taken to accommodate the increased demand.*
- 3. Regarding DEIS page 3-361, first paragraph: The Forest Service should add wording to show that the eight ski areas are authorized by special use permit in order to establish a cross-reference to the "Land and Special Uses" section.*
- 4. Under "Recreation Resources," the following "Desired Condition" should be added to the Forest-wide section: "Ski-based recreation will be managed to provide a balance of safe, uncrowded conditions and affordable facilities that are attractive to recreationists of all ages and ability levels. Although forest conditions may be substantially modified to enhance public use and enjoyment and to reduce risk to public health and safety, protection of scenic values is emphasized. Facilities are used throughout the year to satisfy a variety of seasonal recreational demands. Each permit holder for each ski-based resort prepares the MDP. This is the guiding document to be used to describe expected future conditions, site development schedule, and project phasing. The MDP may include, in a conceptual manner, terrain*

into which a ski-based resort may extend in the future, in addition to existing developed sites. Areas allocated for future development are managed to avoid deterioration of site conditions that may detract from planned uses.”

5. *The following goal should be added to the LMPs: “Support alpine ski area expansion and development that meets public needs and are consistent with direction for National Forest resources.” This goal parallels the goal on page III-46 for communication sites. The goal, as it currently stands, will have a significant impact on Brundage Ski Area.*

Response to Concern 700.06

1. The comment was noted. However, since the approved Master Development Plan becomes a part of the special use authorization, including the suggested objective would be tantamount to stating: “Manage the ski area in accordance with the special use authorization.” It was not felt that it was necessary to state this.
2. We agree that developed ski area information and management direction could be mentioned in multiple sections of the revised Forest Plans. Ski areas are important recreation resources, usually authorized under special use permits, and do contribute significantly to local economies and the federal treasury. In the interest of brevity, it was decided to address recreation special uses in Recreation sections rather than repeatedly mentioning them in multiple sections of the documents. It was felt that this would be less confusing to readers. With downhill skiing demand remaining fairly level for a number of years, the ski industry does not seem to be rapidly expanding at this point. Additional skiing supply is currently under development near Cascade, Idaho, and the need for further expansion of downhill skiing supply is uncertain at this time.
3. As explained under 2 above, in the interest of brevity, it was decided to address recreation special uses in Recreation sections rather than repeatedly mentioning them in multiple sections of the documents. It was felt that this would be less confusing to readers.
4. The comment was noted. It was felt that the more general, existing desired condition statements were preferred in that they address recreation in more general terms without undue focus on one particular use. It was felt that the suggested level of detail and focus on one facet of recreation resources would create a perception of imbalanced recreation management that was not appropriate on the Ecogroup Forests.
5. The comment was noted. The goals statements referencing communication sites and hydroelectric sites were revised in the final version of the Forest Plans. Elements of these statements were combined into a new goal statement (LSGO04) that addresses all special uses rather than focusing on a few specific uses. Under LSGO04, ski area expansion and development that meets public needs, is consistent with other resource direction, and cannot be accommodated off the National Forest would be considered.

Concern Statement 700.07

With regard to page 1-5 of the DEIS, “Habitat Fragmentation and Disruption,” topic 3: The Forest Service should not close any current facilities that were created for human use in order to correct any perceived problems, except if threatened and endangered species are affected.

Response to Concern 700.07

The opinion expressed in the comment was noted. Although relatively rare, facility closures are not done without due cause. Management actions may be taken at facilities for a number of reasons. These may include the reduction of resource impacts or maintenance costs as well as the elimination safety or human health hazards. Facility impacts to resources are analyzed and alternatives are considered prior to taking actions to reduce the impacts. In most cases, site hardening, relocation, and other management techniques may sufficiently reduce impacts to acceptable levels. Usually, safety or human health hazards are remedied through modifications at the sites that may result in temporary closures.

Concern Statement 700.08

With regard to Table 2-73: The table shows the same growth in recreation for all alternatives. The differences in the alternatives, and the different kinds of recreation association with each alternative, do not support the conclusion that recreation would have the same economic value under all alternatives.

Response to Concern 700.08

The anticipated total levels of recreation are not expected to vary by alternative. This is because these levels are more of a function of population levels and demographics rather than management alternatives for the Ecogroup Forests. The single greatest factor used in projecting recreation use is population levels in Southeast Idaho counties. Population growth in the most populated counties (Ada, Canyon, Twin Falls) is more dependent on unrelated industries and would not be influenced substantially by the alternatives. The recreation use projections are directly based on population projections for the predominant counties and states in which Ecogroup recreation users live. A factor was also included for international tourists.

We also believe that the bulk of the recreation use occurs, and will continue to occur within concentrated corridors, in locations proximal to population centers, and in association with significant recreation attractions such as the Sawtooth mountain range, lakes, and developed ski areas. In the majority of these areas, management actions will be somewhat limited by considerations such as VQOs and general recreation concerns. As a result, recreation opportunities and experiences are not expected to change substantially in these areas under any alternative.

In areas outside of concentrated recreation zones, we agree that management activities such as timber harvest, prescribed fire, wildland fire use, and livestock grazing can affect recreation experiences and that these activities would likely vary by alternative. However, predicting the effects on this portion of recreation use is difficult. For example, timber harvest, prescribed fire, and wildland fire use activities may all displace recreation users from one area temporarily to another area. However, there is little or no research that shows how far or how long this displacement is likely to be. In some cases, it is also true that landscape changes resulting from management activities may displace one form of recreation activity while creating an opportunity for another. This is evident in timber sale areas where cross-country ski and ATV trails have been developed after vegetation treatments have been concluded. The high number of variables in these situations such as recreation use types, fire intensities, the types of vegetation treatment, and timing of treatments, all combine to make any reasonable prediction of user shifts

questionable at best. The situation is further complicated by management direction that can result from national influences such as the Roadless Area Conservation Rule (RACR). If implemented, the RACR may further limit treatments and potential change from human development over 49 percent of the Ecogroup. It was not felt that this level of uncertainty of effects should be carried into the economic analysis.

Concern Statement 700.09

Large, uncharacteristic wildfires can impact wildlife populations, which can impact hunting activities. This is not discussed in any detail.

Response to Concern 700.09

Vegetation and animals evolved with fire being a common occurrence in the environment. The changes in vegetation resulting from fire can have positive or negative effects on different species depending on the fire intensity, frequency, and timing. Although hunting was not specifically mentioned, potential adverse effects on recreation from wildland fire were discussed in the recreation effects section.

Concern Statement 700.10

The similarities and exact wording in the Summaries make it very difficult to determine the differences between the effects of Alternatives 2 and 3 to the future of recreation on forestlands. Even the table (RE-13 on page 3-386) shows essentially no difference between the two alternatives.

Response to Concern 700.10

Differences between Alternatives 2 and 3 in their effects on recreation are not expected to be dramatic. Both alternatives carry relatively high levels of restoration prescriptions and recreation is not a dominating theme in either. Specific to the analysis cited in the comment, the analysis depicted in Table RE-13 has been replaced with a more direct analysis that provides acres and miles of non-motorized and motorized recreation experiences by alternative. However, in that the travel regulations do not vary between Alternatives 2 and 3, there would be no differences between these alternatives.

Concern Statement 700.11

Recreation opportunities should be developed where conflicts between recreationists and other users, as well as lost recreation opportunities, are minimized; local communities, partnerships and volunteers are involved and benefit from their roles in providing recreational opportunities.

Response to Concern 700.11

The comment re-stated a section from the draft Desired Condition for recreation on the Ecogroup Forests. The statement was further refined for the final Plans to incorporate the Forests' desire to seek resolutions for conflicts through collaboration among users. Forest-wide management direction was included in the final Plans to provide direction in achieving these desired conditions. This direction includes recreation goals REGO03 and REGO07, objectives REOB11 (REOB12 in the Payette Plan), REOB15 (REOB16 in the Payette Plan), REOB25 (REOB26 in the Payette Plan), and guidelines REGU01, REGU04, REGU05, REGU25 (REGU27 in the Payette Plan), and REGU26 (REGU28 in the Payette Plan).

Concern Statement 700.12

Summer and winter developed recreation opportunities should receive more emphasis. Winter sports (snowmobiling and skiing), although not a replacement for well-paying mill jobs, would provide some economic boost and diversity for rural areas. Public and private financing should be obtained for development of permanent recreation facilities to add to the economy of Valley County and surrounding rural counties. Developed facilities could serve a wide range of people and would encourage longer visitor stays. This approach could complement an ecosystem restoration strategy, since developed recreation can be constructed with effective mitigation measures incorporated into the planning process.

Response to Concern 700.12

Currently, Forest Service recreation managers have observed that demand for developed camping and picnic sites in popular recreation areas and travel corridors is currently at or above capacity during peak summer weekends and summer holidays. At the same time, other recreation facilities are much less than full during the same periods or prior to Memorial Day and after Labor Day. Developing new recreation facilities may be warranted in the future. However, exacerbating the current situation of inadequately maintained facilities is not desired. Forest-wide recreation guideline REGU18 (REGU19 in the Payette Plan) was included to guide decisions related to developing new recreation facilities. Recreation objectives REOB11 (REOB12 in the Payette Plan) and REOB15 (REOB16 in the Payette Plan) recognize that recreation resource capabilities can be extended through collaboration and cooperation with other government agencies, recreation partnerships, and volunteer organizations. Numerous other goals, objectives, standards, and guidelines address developed facility location, design, and management.

Concern Statement 700.13

The Forest Service should consider the potential and cost efficiency of including the existing Forest recreation sites under an agreement with Idaho Department of Parks and Recreation to manage developed recreation sites.

Response to Concern 700.13

The comment was noted and recreation objective 1851 was developed and incorporated into management direction for Management Area 01 in response to this comment. On a forest-wide basis, recreation objectives REOB11 (REOB12 in the Payette Plan) and REOB15 (REOB16 in the Payette Plan) recognize that recreation resource capabilities can be extended through collaboration and cooperation with other government agencies, recreation partnerships, and volunteer organizations.

Concern Statement 700.14

A recreational activity that should be added is boating from Black Rock campground to the Middle Fork confluence.

Response to Concern 700.14

The comment was noted and the information was added to the recreation characterization information in Management Area 07 in the Boise Forest Plan.

Concern Statement 700.15

There are many visitors who do not like the park-like atmosphere of campgrounds along the shores of Hells Canyon reservoirs. Dispersed and primitive recreation should be sustained in Hells Canyon. The recreation, riparian and aquatic, and wildlife resource objectives written for this Management Area conflict with each other and will lead to developed recreation and impacts to big game ranges. The recommendation is to remove the Big Bar campground development objective from the Riparian and Aquatic Resource section on page 83 of the Payette Draft LMP.

Response to Concern 700.15

Recreation Goals 0122 and 0123 in Management Area 01 in the revised Payette Forest Plan were developed in recognition of the desire to maintain primitive camping experiences while still providing for recreation access and mitigation of recreation impacts to other resources.

Concern Statement 700.16

The Mores Creek parking lot should be expanded and part of the parking area should be designated for vehicles without trailers.

The Forests should develop and maintain high-altitude winter time access and parking for non-motorized users in the following areas:

- *Jughandle Mountain - there is no realistic access in the Smith's Ferry-McCall corridor*
- *Bogus Basin Road*
- *Snowbank Mountain to a least 6,000 feet.*

Response to Concern 700.16

The comments were noted and considered. Specific management objectives were incorporated in Boise National Forest Management Areas 04 and 08 addressing these needs on the Bogus Basin Road and State Highway 21 corridor (objectives 0435 and 0845 respectively). It was felt that forest-wide management direction, such as recreation objectives REOB22 (REOB23 in the Payette Plan) and REOB24 (REOB25 in the Payette Plan) addressed the need in the Smith's Ferry-McCall corridor. The situation on Snowbank Mountain is complicated by a combined special uses need and a public safety concern.

Concern Statement 700.17

Regarding management direction in the Payette Draft LMP:

1. *Under the "Lands and Special Uses" section on page III-128, the following objective should be added: Manage the Brundage Mountain Ski Area in accordance with the Master Development Plan for this site.*
2. *On page III-125, under "Recreation Resources," it should be noted that Brundage Mountain Ski area and the Little Ski Hill both operate under special use permits (to cross-reference with the "Lands and Special Uses" section).*
3. *Management Area 5. The development of any new snowcat skiing areas should be outside of established snowmobile use and backcountry ski areas.*
4. *Management Area 6. The plan should clarify that one of the highest recreation use areas on the Forest is concentrated around the Goose Creek Trailhead, Brundage Mountain, and the Little Ski Hill. Areas such as Hazard Lake and Rainbow Lake do not receive as much use.*
5. *The "Recreation" section should include boating as an activity in the South Fork Salmon River and Big Creek areas.*

Response to Concern 700.17

1. The comment was noted. However, since the approved Master Development Plan becomes a part of the special use authorization, including the suggested objective would be tantamount to stating: "Manage the ski area in accordance with the special use authorization." It was not felt that it was necessary to state this.

2. It was not felt that recreation special uses needed to be mentioned in two separate sections and all recreation special uses were included in Recreation sections in the final Forest Plans.
3. Snowcat skiing development options will be addressed in the Brundage Master Development Plan planning process rather than the Forest Plan.
4. The recreation characterization of Management Area 06 in the revised Payette Forest Plan characterizes the area as “one of the highest recreation use areas on the Forest, and that use can be characterized as high in the summer, and even higher in the winter.”
5. The comment was noted. The recreation characterization of Management Area 12 in the Payette Plan was revised to acknowledge white water boating on the South Fork of the Salmon River. Management Area recreation characterizations were not modified to include the Big Creek use because it was not felt that the level of boating use of Big Creek merited inclusion. The intent was to highlight the major recreation uses rather than every recreation use.

Concern Statement 700.18

Regarding the management direction in the Sawtooth Draft LMP:

1. *Management Area 2, Upper Salmon River Valley and Management Area 3, East Fork Salmon River/White Clouds. The LMP should provide more for recreation in these areas other than just the forest-wide goals, objectives, standards, and guidelines.*
2. *Management Area 7. The objective on page III-129 provides for snowmobiling opportunities outside of designated elk winter-feeding areas, wolverine denning areas, and lynx habitat; however, other winter recreation activities should also be included, such as backcountry skiing and helicopter skiing, which have as much or more impact on winter feeding areas and denning areas. There is also concern that this objective could force closure of some snowmobile trails due to lynx habitat.*
3. *Management Area 10. The management area direction contains an objective that states: “Consider decision that sustain Soldier Mountain Ski Area, enhance snowmobile recreation opportunities, and enhance summertime recreation as viable income generators for residents in Camas County”. Camas County currently has a successful snowmobile program that depends not only on Management Area 10, but also 7 and 9. The objective should be rewritten to include the other two areas.*

4. *Wood River Valley. Management direction should contain clear strategies for dealing with increasing recreation needs. Problems could occur because semi-primitive recreation could be too limiting in light of current and future user projections. Motorized and non-motorized activities need to be carefully planned to reduce conflicts, as motorized recreation (including snowmobiling) will see a great increase in users over the next 10 to 20 years. Planning should also consider a great increase in non-motorized recreation (cross-country and backcountry skiing) in the Valley.*
5. *LMP page III-87, Recreation Resources, first paragraph: add "Valley View Recreation Residence Tract between Pettit Lake and Alturas Lake."*
6. *LMP page III-104, Recreation Resources: after the word "camping," add "Recreation Residences Tracts."*
7. *LMP page III-135, Recreation Resources: after the words "the summer home tract," add "Big Smoky Recreation Tract."*
8. *LMP page III-104, Regarding Land and Special Uses: after the words "Newman Creek," add "Rooks Creek/Warm Springs Tract, Anderson Creek Tract, North Fork-Logged Creek Canyon Tract, and Cathedral Pines and Dooley Creek Recreation Residence lots."*
9. *LMP page III-136, Land and Special Uses: after the words "eleven recreation residences," add "Big Smoky Tract."*
10. *LMP page III-195, Land and Special Uses: after "recreation residences," add "Thompson Flat Tract."*

Response to Concern 700.18

1. We agree. Management direction for recreation has been added to Management Areas 02 and 03 in the final Sawtooth Plan.
2. The comment was noted and the objective was broadened to address all winter recreation opportunities. This objective does not force closure of any existing groomed and/or designated snowmobile trails. Forestwide standard TEST34 allows no net increase in groomed or designated routes in areas important to lynx habitat.
3. The comment was noted and similar objectives were added to Management Areas 07 and 09 in the final Sawtooth Forest Plan.
4. The comment was noted and recreation management direction for Management Area 04 in the revised Sawtooth Forest Plan has been expanded to include a number of objectives, standards, and guidelines that respond to increasing levels of recreation use. Some examples of direction relating to these issues include objectives 0461 and 0469; and standards 0474 and 0478. At the same time, additions were also made to

forest-wide recreation management direction related to conflict management such as goals REGO03 and REGO06; objectives REOB23 (REOB24 in the Payette Plan) and REOB24 (REOB25 in the Payette Plan); and guidelines REGU04, REGU25, and REGU26. The Forests are also committed to updating travel planning in the near future, which will address recent travel issues.

5-10. All references to recreation residence tracts have been reviewed and updated. Specific information and management direction regarding recreation residences has been gathered under Recreation and moved out of the Lands and Special Uses sections. Continuance statements in the management direction are not specific to tracts and remain as generic statements. All suggested inclusions of tract names have been made in the management area characterization sections.

Concern Statement 700.19

Regarding management direction in the Boise Draft LMP:

- 1. Management Area 4. The Forest Service should create an objective to develop more trails for both motorized and non-motorized use in this area.*
- 2. Management Area 7. There should be objectives to address increased dispersed recreation needs, as this area contains the Idaho City Park N' Ski trail system and several other valuable recreation facilities.*
- 3. Management Area 7. Groomed cross-country ski trails (Banner Ridge, Elkhorn, Summit, Skyline, and Beaver Creek) should be protected from snowmobile use.*
- 4. Management Area 8. The trail system from the Gold Fork lot to Beaver Creek Summit should be protected from snowmobile use. The west side of the Idaho City Park and Ski areas from Beaver Creek Summit to Edna Creek Road should be closed to snowmobiles, as this area has a long tradition of cross-country ski use.*
- 5. Management Area 12. The plan should state that Bear Valley Creek is a popular canoe and kayak reach.*

Response to Concern 700.19

1. The comment was noted. Recreation objective 0436 was added to the management direction in Management Area 04 in the revised Boise Forest Plan to reflect this comment.
2. The comment was noted. Recreation objectives 0442 and 0743 in the revised Boise Forest Plan were developed, in part, to address increasing use within the management area.
3. The comment was noted. Recreation objective 0741 was added to the management direction in Management Area 07 in the revised Boise Forest Plan to reflect this comment.
4. The comment was noted. Recreation objective 0846 was added to the management direction in Management Area 08 in the revised Boise Forest Plan to reflect this comment.

5. The comment was noted. The recreation use was added to the recreation uses listed in the recreation characterization of Management Area 12 in the revised Boise Forest Plan to reflect this comment.

Concern Statement 700.20

Under Recreation, the following objective should be amended to avoid picking on float boaters and other recreation activities: "In TEPS species habitats, develop recreation management plans to avoid impacts to staging and spawning fish."

Also, the following standard should be modified: "Where floatboating may impact spawning of listed species, the affected reaches will be closed to floatboating during the spawning season for those affected fish species." It is unacceptable to close rivers to boating because there "may" be an impact. The Forest Service must prove that boating will impact spawning fish and must show that the quantity of boaters on the stream in question would cause the negative effect. If there is a proven impact, all methods to eliminate the impact, short of closing the river to boating, should be tried first. This standard also unfairly attempts to curb only one activity, while doing nothing to restrict other users who may impact spawning of listed species.

Response to Concern 700.20

The comments were noted. The standard was re-worded to address some of the stated concerns and incorporated in forest-wide management direction for Threatened, Endangered, Proposed, and Candidate Species as standard TEST33. It was deleted from management areas in which it previously appeared. The revised standard maintains its focus on floatboating activity but all recreation practices are addressed by forest-wide recreation guideline REGU07 and would come under the same level of scrutiny.

Concern Statement 700.21

The LMP should consider that the forestland area on the west side of Cascade Lake could accommodate increased day use and overnight camping.

Response to Concern 700.21

The comment was noted. Recreation objectives 1848 and 1850 were included in the direction for Management Area 18 to address the comment.

Concern Statement 700.22

Regarding LMP page III-58, Recreation Access: The Forest Service should describe how trail capacity is determined.

Response to Concern 700.22

The referenced management direction that included the term “trail capacity” has been revised and no longer includes the term.

Concern Statement 700.23

The Guidelines under General Recreation, Draft LMP pages 57-59, should be identified in specific Management Areas.

Response to Concern 700.23

As forest-wide management direction, these guidelines apply to all management areas. To repeat them in selected management areas would be repetitious and potentially confusing.

Concern Statement 700.24

There really is no “conflict” between winter user groups, just bad behavior, which isn’t exclusive of any group of recreationists.

Response to Concern 700.24

The opinion stated in the comment is noted. In the EIS, the term “conflict” is used to describe situations where at least one user group feels that another use has substantial adverse impacts on their experiences or use of the Forest. It is felt that some of these situations arise due to inherent characteristics of a particular use rather than just “bad behavior” of a portion of the users.

Concern Statement 700.25

The Forest Service should consider creating or expanding recreational opportunities and facilities in seasons other than the high-peak periods of July and August. This would utilize capacity, thus reducing costs and increasing profitability for Valley County businesses.

Response to Concern 700.25

The comment is noted. We agree in the sense that we would favor an expanded summer recreation season that would reduce use on peak weekends and increase use during May, June, and September. However, partly due to access limitations in the beginning of the season and the perception of inclement weather in September, recreationists seem to strongly favor the months of July and August. This trait is also reinforced culturally to some extent. Expansion of facilities for periods other than July and August is unnecessary since ample capacity exists at developed recreation sites to accommodate additional

recreation use. The Forest Service is very open to cooperative efforts with local governments and organizations to work towards the creation of recreation events and other marketing opportunities that would expand the current recreation summer season. Forest-wide recreation objectives REOB11 (REOB12 in the Payette Plan) and REOB15 (REOB16 in the Payette Plan) were included specifically for this purpose.

Concern Statement 700.26

An objection was expressed concerning the application of MPC 4.2 to whole subwatersheds within the Twin Falls Ranger District. A greater emphasis on recreation will cause adverse impacts, such as increased sedimentation and wildlife disturbance, especially in undeveloped areas. Recreation use should only be emphasized in current recreation sites and in locations where significant new investments have been made for recreational use. Locations beyond popular recreation sites should be maintained for historic uses such as wildlife, grazing and timber management.

Response to Concern 700.26

In the final version of the Forest Plans, Inventoried Roadless Area boundaries were available for use in defining management. In effect, this allowed management to be differentiated between highly used recreation corridors and adjacent undeveloped areas. This capability was used in some cases, in Alternative 7, for that purpose. Management priorities on the Minidoka Ranger District, as indicated by MPC assignment, varied across the seven alternatives and included non-recreation priority assignments.

Concern Statement 700.27

Intrusion into undeveloped recreation areas should not occur as a result of following the guideline that reduces concentration on existing developed areas. Implementing that guideline would lead to more noise and pollution from motorized recreationists.

Response to Concern 700.27

The direction referenced in the comment represents one of the listed criteria to be used under forest-wide recreation guideline REGU18 (REGU19 in the Payette Plan) to guide decisions regarding the construction of new recreation facilities. At the programmatic level, it is impossible to assess whether the development of new facilities would lead to more noise pollution from motorized recreationists. This would have to be assessed on a case-by-case basis, during project level planning. This would be part of a NEPA process and would allow full public involvement. The extent of effects associated with motorized uses is also dependent on access management and would likely be more affected by the results of future travel planning efforts than the development of new recreation facilities.

Concern Statement 700.28

Reducing the number of acres available for motorized (ORV/OHV) use will unreasonably concentrate use, create user conflicts (motorized vs. motorized and motorized vs. non-motorized), and affect the remaining areas' ability to sustain a variety of recreational activities. There should be more designated four-wheel drive and ATV routes.

There is concern that the following positive benefits of responsible OHV use are not acknowledged for their importance: OHV user groups and organizations protect the environment by promoting user ethics; OHV users contribute thousands of hours each year on volunteer programs that protect and preserve natural resources; OHV users support managed recreational opportunities on Forest Service lands; and most OHV users support the original intent of the 1964 Wilderness Act to protect untrammelled lands.

Response to Concern 700.28

The revised Forest Plans strive to provide a range of recreation opportunities where recreation uses can be accommodated given the limitations presented by land and resource capabilities. Objectives were included in a number of management areas throughout the Ecogroup, such as Management Areas 14 and 16 on the Boise Forest Plan, to identify and provide for ATV opportunities where the potential exists for expansion or development of motorized trail opportunities. Forest-wide Roads guideline FRGU03 was also developed to expand trail opportunities that would be appropriate for ATVs. The results of this direction will be felt largely in future travel planning processes and trail development proposals.

We certainly agree that many OHV users do contribute to volunteer efforts to maintain trails, educate users, and provide other needed services. The EIS acknowledges that there is a greater reliance upon partnerships and volunteerism to manage recreation resources and OHV users are among those that contribute to recreation management efforts. However, it was not felt that any one particular user group should be mentioned in this context. To do so would be a disservice to the other user groups that also make significant contributions to meeting this challenge.

Concern Statement 700.29

Regarding DEIS, page 2-61, last paragraph on the page: The Forest Service should explain what effect Alternative 3 will have on these sites and if people's use will be restricted.

Regarding DEIS, page 3-384: "Developed Recreation," last paragraph: The Forest Service should explain if it is planning to close or move recreation facilities on any of the forests and if so, list the names of the facilities.

Response to Concern 700.29

In that the Forest Plans and EIS are programmatic and do not include site-specific analysis, it is not possible to determine precise effects to specific recreation sites and uses. The Forest Plans do not make site-specific decisions so no sites or uses will be closed, moved, or restricted as a result of the Forest Planning process. Where conditions warrant, recreation sites will be further analyzed on a case-by-case and management actions will be proposed as site-specific projects. These proposals will be analyzed in a NEPA process with full public involvement.

Concern Statement 700.30

Snowmobiles should be reclassified as OSV, or Over-Snow Vehicles. Snowmobiles can ride over areas in winter that might be appropriately closed to motorized vehicles in summer. Management policy should reflect the difference in vehicle types.

Response to Concern 700.30

The opinion stated in the comment is noted. We agree that their reduced level of ground disturbance affords snowmobiles greater access capabilities than summer OHVs. This is reflected in the current travel plans. However, we do not agree that the statement is necessarily true relative to social or wildlife disturbance issues. We also choose to continue to use the term “snowmobiles” to avoid potential confusion over use of the term “over-snow vehicles”.

Concern Statement 700.31

The Bernard area should be addressed as containing quality snowmobiling, trail, and cross-country opportunities.

Response to Concern 700.31

The comment was noted and the recreation characterization of Management Area 13 was revised to reflect the comment.

Concern Statement 700.32

The Forest Service should consider that human-powered snow sports enthusiasts require non-motorized recreation areas that provide quality experiences.

Response to Concern 700.32

The comment was noted. The comment was recognized in the development and inclusion of forest-wide recreation guideline REGU25 (REGU27 in the Payette Plan).

Concern Statement 700.33

The Forest Service should develop a standard that permits snowmobiling in designated areas only when the snow depth is 2 feet or more.

Response to Concern 700.33

It was felt that minimum snow depth limitations and machine specifications can be better addressed during travel planning processes in which site-specific differences in local conditions, resources, and access needs can be taken into account. Travel planning processes are scheduled to be initiated after the Forest Plan revision effort is completed.

Concern Statement 700.34

The general descriptions for MPCs, shown in the DEIS on page 2-7, clearly call for ski areas to be given a 4.3 classification. There should be a consistency in the way ski resorts are addressed in the MPC classification. Sun Valley is the only ski resort in the Ecogroup that is given a 4.3 MPC.

Response to Concern 700.34

The comment regarding assignment of MPC 4.3 to all developed ski areas was noted. Almost all ski areas “disappear” on new Forest Plan management prescription maps due to the fact that, with few exceptions, management is largely being defined on a hydrologic unit basis (i.e., subwatersheds). Residing at the crests of ridges and mountain tops, most ski areas are dissected into two or more subwatersheds and do not dominate the management of the entire subwatershed. The sole exception to this is Bald Mountain, which occupies most of the portion of the subwatershed that’s within the Forest boundary and was assigned to MPC 4.3 as a result. However, all existing ski areas are noted at the management area level and their use of National Forest System lands will be continued under the revised Forest Plans.

Concern Statement 700.35

A goal should be added to the LMPs that states: “Encourage ski-based resort development in keeping with public demand.”

Response to Concern 700.35

The comment was noted. It was felt that with downhill skiing demand remaining fairly level for a number of years, the ski industry does not seem to be rapidly expanding at this point. Additional skiing supply is currently under development near Cascade, Idaho, and the need for further expansion of downhill skiing supply is uncertain at this time.

Concern Statement 700.36

A local newspaper stated that during an observation by the Forest Service, over 100 campers were utilizing the Baker Creek area, yet the Forest Service had plans to only construct 60 campsites. The Forest should explain where the other 40 campers would go. Also, the Forest Service, now in the process of closing many campsites along the Big Wood River, should explain where people are to camp as a result of the closures.

Response to Concern 700.36

The comment was in reference to a separate planning process on the Ketchum Ranger District that addressed dispersed recreation camping impacts through the identification and delineation of dispersed camping sites in areas of heavy impact and is beyond the scope of Forest Plan revision. The revised Forest Plans strive to provide a range of recreation opportunities where recreation uses can be accommodated given the limitations presented by land and resource capabilities. Use within highly popular recreation use areas may be more limited if necessary to maintain other highly important resources such as fisheries, water quality, and vegetation.

Concern Statement 700.37

The yurts in the Idaho City Park N' Ski area are operating at capacity. The Forest Service should allow construction of additional Yurts in order to meet demand, which would help create more income to maintain the trail system.

Regarding DEIS page 3-367: Corrections should be made to reflect the fact that the Idaho Department of Parks and Recreation provides funding to the county snowmobile programs and provides the equipment, but it is not responsible for grooming the snowmobile and cross-country trails. The cross-country ski program at Idaho City does provide yurt rentals, but the rentals are only available to non-motorized recreationists, not snowmobiles.

Response to Concern 700.37

The comments were noted. Recreation management objectives to develop or expand yurt accommodation opportunities were included for a number of management areas such as Management Areas 08 and 18 in the Boise Forest Plan (e.g., objectives 0845 and 1852, respectively). The EIS text was corrected to more accurately reflect the Idaho Department of Parks and Recreation role in snowmobile trail grooming programs.

Concern Statement 700.38

The Forest Service should prepare a comprehensive “Winter Use Plan” similar to the Master Development Plan the Forest Service requires of ski-based resorts. The Plan, in part, would address user conflicts. The Plan should be analyzed under the NEPA process.

Response to Concern 700.38

The comment was noted. In that most winter recreation conflicts are associated with types of access allowed, most conflicts will be addressed during future travel planning processes. In a number of areas, development of new facilities for winter recreation access was also identified. With the combination of future travel planning and needs identified under revised management area direction, it was felt that most winter recreation management needs will have been addressed and that the need for an additional management planning effort is not certain.

Concern Statement 700.39

For consistency, the LMPs should use the term “off-highway motorcycling” when referring to motor biking or trail biking.

Response to Concern 700.39

The comment was noted and terminology was adjusted.

Concern Statement 700.40

The Forest Service should resolve the conflict in the ski area parking lot where the current septic system for commercial use was approved by the State of Idaho under a domestic water right and built on top of springs in the Spring Creek area.

Response to Concern 700.40

Resolution of the situation described in the comment is beyond the scope of Forest Plan revision and is being addressed at the local level.

Concern Statement 700.41

The Forest Service should consider the development of a rest rotation system for dispersed recreation sites located near critical riparian areas. If such a system is implemented, the Forest Service should educate the recreationists using signs and maps and not block areas using fences or other types of closures.

Response to Concern 700.41

The comment was noted. Rest rotation of dispersed recreation sites may be an appropriate management tool for rehabilitating some dispersed recreation sites. It represents one of a number of tools that may be used to address dispersed recreation impacts to other resources under forest-wide recreation goals REGO02 and REGO04. Forest-wide recreation objective REOB09 (REOB10 in the Payette Plan) addresses the use of education and interpretation techniques to reduce dispersed camping impacts.

Concern Statement 700.42

The LMPs must address livestock and recreational conflicts in high-use recreational areas (such as in and around Galena Lodge).

Response to Concern 700.42

The comment was noted. Livestock grazing and recreation conflicts were addressed in a number of ways in the revised Forest Plans. Forest-wide guidelines RAGU10 and REGU17 (REGU18 in the Payette Plan) were included in Rangeland Resources and Recreation management direction respectively. At the management area level, objectives 04111, 04113, 04114, and 1644 were included in Management Areas 04 and 16 of the revised Sawtooth Forest Plan. Conflicts with recreation are also being addressed outside of Forest Plan revisions in grazing permits themselves. For example, the Annual Operating Instructions for the allotment in the Galena Lodge area require sheep trailing to occur at least 0.5 mile from Galena Lodge when crossing Gladiator Creek. This area has been closed to grazing to rehabilitate the effects of past grazing as well as to maintain wildflower meadows valued by recreationists.

Concern Statement 700.43

Commenters expressed several concerns regarding ATV opportunities and OHV recreation:

- 1. According to the Idaho State Comprehensive Outdoor Recreation and Tourism (SCORPT) Assessment and Policy Plan that was referred to on page 3-367 of the DEIS, semi-primitive motorized recreation opportunities are in the shortest supply. It seems with each Travel Plan revision, more trails are closed to motorized recreation. So, instead of further restricting motorized access, more opportunities should be created. Dispersed use is a good way to manage OHV recreation.*
- 2. The SCORPT also discusses the lack of opportunities for ATVs in Idaho and urges land management agencies to provide more designated ATV routes. Single-track trails should not simply be widened. Old logging roads can be designed into trail systems that provide a place to go for the ATV users.*

3. *The draft tends to lump motorcycle and ATV use into one use. Most motorcycle trail riders prefer single-track trails, while an ATV converts a single-track trail to a two track, which should not be allowed. Both users prefer a different type of experience.*

Response to Concern 700.43

The revised Forest Plans strive to provide a range of recreation opportunities where recreation uses can be accommodated given the limitations presented by land and resource capabilities. Objectives were included in a number of management areas throughout the Ecogroup, such as Management Areas 14 and 16 on the Boise Forest Plan, to identify and provide for ATV opportunities where the potential exists for expansion or development of motorized trail opportunities. Identification and/or development of ATV opportunities should also help preserve single-track motorized experiences on other trails. Forest-wide Roads guideline FRGU03 was also developed to expand trail opportunities that would be appropriate for ATVs.

Concern Statement 700.44

The Forest Service should develop more motorized riding trails to reduce overuse of the existing trail system. Trails should provide loop rides wherever possible.

Response to Concern 700.44

The comment was noted. Objectives were included in a number of Management Areas, such as Management Areas 14 and 16 on the Boise Forest Plan to identify and provide off-highway vehicle (OHV) opportunities. Forest-wide Roads guideline FRGU03 was also included to expand both motorized and non-motorized trail opportunities.

Concern Statement 700.45

The Forest Service should make use of the best available data from federal, state, and local sources to determine what is currently happening in recreation use and patterns.

Response to Concern 700.45

Recreation use data from a variety of sources was used. Although it did not provide RVD data, the National Visitor Use Monitoring Project did provide some recreation visitor data for the Boise and Sawtooth National Forests as of 2000. Data and information from the 1999-2000 Idaho Statewide Motor Vehicle Traveler Study, a number of Idaho State and University of Idaho studies of 1997, RPA assessments of 1999, and U.S. Census Bureau population statistics based on the 2000 Census were used in calculations of recreation use projections and recreation supply estimations.

Unfortunately, usefulness of much of the available recreation data is limited by the fact that it is not specific to the areas comprised by the Ecogroup Forests. Idaho State regions and RPA regions differ from the Ecogroup Forests. Sampling zones different from the Ecogroup Forests has the potential of yielding misleading results.

Concern Statement 700.46

The “Outcome and Activities” tables for each forest contained no outcome evaluation for any aspect of outdoor recreation. This remained the case even after recreation was added as a significant issue to the DEIS.

Response to Concern 700.46

Recreation components were not included in the Outcome and Activities tables due to the fact that estimated recreation outcomes, such as overall recreation use, and activities, such as new developed site construction, were not expected to vary significantly by alternative.

Concern Statement 700.47

MPC 4.3 (Rural/Urban Recreation Emphasis), using an administrative boundary approach, should be applied to National Forest lands around Lake Cascade, Warm Lake, Silver Creek Plunge, Upper Payette Lake, Lost Valley Reservoir, Brundage Ski Area, and the McCall Little Ski Area. These destination points are considered a Valley County influence zone.

Response to Concern 700.47

Assignments of MPCs reflect important resource needs and/or priorities based on a subwatershed scale. As such, individual or combined developed recreation sites were not usually the dominant consideration for MPC assignments. However, this does not mean that management of individual sites would not be a priority within a Management Area as reflected by management area direction. The developed recreation sites listed in the comment are all important recreation resources that will receive consideration regardless of MPC assignment.

Concern Statement 700.48 (Comment letter 422)

The methodology used to estimate the major recreation activities shown in Table RE-5 (page 3-370), seems to have resulted in an underestimate of trail activities. The results of a year 2000 OHV study shows that 8 percent rode their ATV or trail bike 1-7 days; 14.9 percent rode 8-14 days; 23.6 percent rode 15-21 days; and 13.5 percent rode 22-28 days. These figures resulted in RVDs of over 180,000 on the Boise and Payette Forests.

Response to concern 700.48

The comment may very well be true. The recreation use estimates shown in Table RE-5 were estimates for 1997. Both ATV and trail bike use, like many other recreation uses, has likely increased since 1997.

Concern Statement 700.49

Page 3-374 of the DEIS shows a projected increase in recreation across the Ecogroup Forests, and goes on to explain that, because of several factors, there is a level of uncertainty regarding the Forests' ability to respond to developed recreation needs. The statements made suggest that in addition to concerns about economics, timber supply, and forest health not being met by the LMPs, recreation needs would also not be met. The data and basis for the conclusion that recreation will increase, and an analysis of the cumulative impacts must all be included in the DEIS, not merely assumed.

Page 3-384 of the DEIS discusses the effects that MPCs 3.1 and 3.2 will have on recreation facilities. The Preferred Alternative has 52 sites with this designation. The DEIS explains that new construction of recreation developments within these MPC areas would not be precluded, but that mitigation measures could substantially increase the costs for facilities. The DEIS states that "Resource protection considerations would also far outweigh user convenience or other recreation-driven considerations for determining the locations of new facilities. It would be assumed from this statement that the future development of new recreation facilities would be greatly impacted by the MPC designations made within the Preferred Alternative. The LMPs should give greater consideration to what effects the MPC designations would have on recreation and adjust the MPCs as necessary.

Response to Concern 700.49

The EIS represents a summary of the detailed analyses that are completed for each alternative. Data and recreation use projection methodology are detailed in the Recreation Technical Report, which is available upon request.

The potential effects on recreation resources were considered when MPC assignments were made. Assignments of MPCs reflect important resource needs and/or priorities based on a subwatershed scale. The management emphasis for MPCs 3.1 and 3.2 are to keep management-related impacts from degrading existing conditions for TEPCS fish, wildlife, and botanical species or 303(d) impaired waterbodies, and to maintain or actively restore conditions for TEPCS fish, wildlife, or botanical species or 303(d) impaired water bodies, respectively. As such, individual or combined developed recreation sites were not usually the dominant consideration where MPC 3.1 or 3.2 assignments were made. However, this does not mean that management of individual sites would not be a priority within a Management Area as reflected by management area direction. In any case, effects from the assignment of MPCs 3.1 and 3.2 will be determined on a case-by-case basis for each developed recreation site to which they are applied. It is difficult to accurately predict the results without site-specific analysis, but in some cases, these MPC applications may have little or no effect.

Concern Statement 700.50

Regarding “Recreational Access” on LMP page III-56: The term “unacceptable resource damage” should be defined.

Response to Concern 700.50

The objective statement has been modified and converted to a standard in the final Forest Plans and no longer includes the term: “unacceptable resource damage”.

760 Sawtooth National Recreation Area (SNRA)

Concern Statement 760.01

The SNRA map is incorrect because it shows that SNRA is being managed as semi-primitive recreation; that is not the case.

Response to Concern 760.01

Alternative 1B (current Forest Plan direction) assigns the SNRA to *Designated Wilderness* (MPC 1.1) for that portion of the SNRA within the Sawtooth Wilderness, *Recommended Wilderness* (MPC 1.2) for the Boulder-White Clouds area, and the majority of the remaining area to *Roaded Recreation* (MPC 4.2). Only two areas, the Railroad Ridge and Big and Little Casino Creeks areas, are assigned to *Undeveloped Recreation: Maintain Unroaded Character with Allowance for Restoration Activities* (MPC 4.1c). These areas make up less than 15 percent of the SNRA total area. The MPC assignment for these areas is consistent with direction from the 1987 Forest plan.

Concern Statement 760.02

The Sawtooth LMP does not address the impacts of increased recreation use on the resources, wildlife, and fragile ecosystem of the Upper Salmon River, which is located in the central portion of the SNRA.

The management direction for the Boulder/White Cloud area should consider all recreationists. The current management plan allows the maximum use with minimum impact. The minor resource damage that does occur is generally due to poor trail location or design.

The LMP should include these two standards: “Manage proposed wilderness Boulder White Clouds and Hansen Lake areas as wilderness” and “Manage recreational activities to support the natural, scenic and pastoral values of the SNRA and to mitigate impacts on wildlife, water, air quality, and riparian and aquatic resources.

Response to Concern 760.02

Forest-wide and management area direction has been improved to better address resource concerns associated with recreation use. Alternatives were considered under which the Boulder-White Clouds and Hansen Lakes recommended wilderness areas would be managed using an access management strategy similar to that of designated wilderness but neither of these alternatives was selected. This is because it was felt that maintaining the wilderness values could be accomplished without managing these areas as designated wilderness.

Concern Statement 760.03

The Sawtooth Wilderness Management Plan, Appendix E of the Sawtooth LMP, is incorrect and not consistent with the Wilderness Plan adopted in September 197, and revised in accordance with 36 CFR 251.999. Several changed issues that are not correct deal with bear bating, group sizes, permits, education, mapping, large group sites, stock numbers, pack stock, outfitter use days, trail maintenance, and user conflicts.

Response to Concern 760.03

An incorrect version of the Sawtooth Wilderness Management Plan was included in the DEIS. This has been corrected for the FEIS.

Concern Statement 760.04

The Forest Service should not allow development adjacent to the SNRA in order to avoid conflicts.

Response to Concern 760.04

Management direction protecting SNRA values was included in all the adjacent management areas in the revised Boise and Sawtooth Plans. This consisted of a guideline that was included in management direction for Management Areas 05 and 10 in the Boise Plan and Management Areas 04 and 06 in the Sawtooth Plan. Potential conflicts with SNRA values should also be identified and mitigated during project analysis for those projects proposed on National Forest System lands. The ability to control project development on private lands adjacent to the SNRA is beyond the scope of the Forest Plan.

Concern Statement 760.05

Public Law 92-400, which established the SNRA, recognizes the continued use of related natural resources but states “. . . their utilization will not substantially impair the purposes for which the Recreation Area is established.”

The LMP should incorporate management direction contained in the original Forest Plan and should implement the “no substantial impairment” standard, with specific guidance regarding wolves and other wildlife. The LMP lacks the ability to meet Public Law 92-400 mandates to prevent substantial impairment to wildlife and recreational opportunities and to provide guidance for SNRA staff on how to protect these values. The LMP should provide a definition of “no substantial impairment” standard with regard to specific values.

The original Forest Plan had a General Management subsection for the SNRA. The proposed LMP takes a Management Area watershed approach that results in a single management direction for both the SNRA and general National Forest lands. SNRA lands required special management obligations that prioritize recreation and wildlife opportunities over other types of use. The public should have an opportunity to determine, based on evaluation of management directives, if SNRA values are adequately protected.

Response to Concern 760.05

The final plan has been revised to include more direction specific to the SNRA and Public Law 92-400.

Concern Statement 760.06

In low snow years, snowmobiles are running over sagebrush and are impacting hillside vegetation. The Forest Service should create a minimum snow depth of 2 feet before snowmobiling is allowed and a restriction on 2-stroke engines. (See also 700.24 and 700.41.) The LMP does not mention the impacts caused by off-highway vehicle and snowmobile use on the pastoral, scenic, natural, and historic values of the SNRA.

Response to Concern 760.06

It was felt that minimum snow depth limitations and machine specifications can be better addressed during travel planning processes in which site-specific differences in local conditions, resources, and access needs can be taken into account. Travel planning processes are scheduled to be initiated after the Forest Plan revision effort is completed.

790 Scenic Environment

Concern Statement 790.01

The Forest Service should, at a minimum, determine what constitutes an opening in order to meet minimum NFMA standards, particularly when a plantation is considered established. There should be standards for the small amount of forest area that will be managed for timber, and there should be very few areas that are not identified currently where another standard would apply. The Forest Service should determine when it is necessary to establish a standard for a Management Area or Management Prescription.

The guidance for sensitive viewpoints proposes a standard that regeneration harvest areas are required to have tree heights of 40 feet or more, on less than 35 percent of the area, in order to treat more of the VQO modification area. This does not allow for mixed VQO areas. It also uses the term “regeneration harvest,” which applies to every silvicultural method from single-tree selection to clear-cut harvesting. A unique standard should be developed for each viewshed during the planning process.

Response to Concern 790.01

“Openings” have been defined in the revised Forest Plans and standards and guidelines regulating their creation have been developed and included. Cumulative visual impacts from existing “openings” and potential new “openings” will be analyzed on a case-by-case basis in consideration of existing conditions, assigned VQOs, and visually sensitive locations during project-level planning. The above referenced guideline was an attempt to provide definition and clarity regarding visual “openings”. However, it was felt that it was too limited in application and was deleted from the final Scenic Environment management direction.

Concern Statement 790.02

The EIS must provide a discussion of the natural impacts associated with large, uncharacteristic wildfire and insect/disease events on the overall visual quality within the Ecogroup forests.

Response to Concern 790.02

The effects analysis for the Scenic Environment was expanded to include an analysis as suggested.

Concern Statement 790.03

A Forest Service objective states it will convert its Visual Quality Objective (VQO) system to the new Scenery Management System (SMS), and it required Idaho Power Company to conduct its Visual Resource survey for the Hells Canyon Complex hydroelectric relicensing using the SMS. The objectives, standards, and guidelines in the proposed LMP, however, are stated using the old VQO system, which is contradictory; therefore, the Forest Service is applying a double standard. Also, the old VQO system designations stated in the standards and guidelines are tied to a map that was not provided in the LMP. The VQO designations cannot be converted to the SMS designations because the new system includes considerations not included in the old system, such as constituent analysis and ecological integrity. The LMPs should be changed so the standards and guidelines reflect the SMS, not the VQO.

Response to Concern 790.03

Implementation of the SMS was not incorporated into this Forest Plan revision process. This is because of the need to meet court-ordered time constraints placed on the revision effort. Instead, an objective was included to implement SMS either through a Continuous Assessment and Planning process following Forest Plan revision or as part of the next Forest Plan revision. When SMS is implemented, it will include an amendment to or a revision of the Forest Plan direction, including new standards and guidelines that replace those based on the Visual Management System.

Admittedly, potential difficulties will arise during the Hells Canyon Complex hydroelectric relicensing process in trying to use both systems. Visual resource staff on the Wallowa-Whitman and Payette National Forests will work closely to resolve these difficulties during the relicensing process.

Adopted VQO maps for the Ecogroup Forests were not included in the maps packet but are available upon request from each Forest.

Concern Statement 790.04

The Forest Service should modify the guideline dealing with underground electrical power lines and consider other constraints when making decisions. Installation of underground lines is generally more costly for the developer.

Response to Concern 790.04

The guideline reflects the fact that in some visually sensitive areas across the Ecogroup, scenic quality may take precedence over economic considerations. Such areas are mapped and may be taken into consideration during utility development planning. The guideline also accommodates situations where it might be physically unfeasible to bury powerlines.

800 Tribal Interests (Treaties, trust obligation, fishing rights)

Concern Statement 800.01

The EIS should address the implications of government-to-government consultation, which involves more than letter writing. The Presidential Memorandum regarding government-to-government consultation requires that federal agencies "... assess the impacts of federal government plans, projects, programs, and activities on Tribal trust resources and assure Tribal government rights and concerns are considered during the development of such plans, projects, programs, and activities ..." and "... proactively protect Tribal interests and treaty-secured rights through a formal process of negotiation, cooperation, and mutual decision-making. Consultation is a long-standing policy of the Forest Service and the Tribes should have played a more active role in drafting the DEIS and should be consulted during the preparation of the Final EIS.

Response to Concern 800.01

The Forest Service consulted with the affected tribes numerous times during the Forest Plan Revision effort. Consultation occurred under a variety of methods. The method by which a consultation meeting would occur was mutually agreed to between the Forest Service and the Tribe prior to the event. Methods that were utilized included: (1) meeting face to face at the National Forest Offices; (2) meeting face to face at Tribal Offices; (3) meeting face to face off site for either the Forest Service or the Tribe; (4) meeting face to face between the Regional Forester and a Tribal Executive Committee or Business Council; (5) meeting via conference calls with multiple telephone lines and locations involved; (6) supplying geographic and text information via electronic systems, (7) supplying hard copy information as requested; and (8) via formal written letters between governments. Consultation efforts were held under a manner that the Forest Service and affected Tribe agreed to. The Shoshone-Bannock and the Shoshone-Paiute Tribes conducted both technical and formal consultation in a face-to-face manner with the Forest Service monthly until they deemed consultation to be complete. Two additional face-to-face meetings were held later at the request of the Shoshone-Bannock. The Nez Perce conducted both technical and formal consultation with the Forest Service, using a variety of methods, until they deemed consultation to be complete.

Tribes were encouraged to supply written narrative for the tribal sections of the Environmental Impact Statement and the Forest Plans. All written material received as well as verbal exchange from the consultation meetings, were used to develop the tribal sections for the document, develop action alternatives, assess effects, and develop direction in the Forest Plans. As the process continued, the Tribes were given opportunities to see how their input and comments were incorporated and utilized.

Attempts to engage the Tribes prior to the completion of the Draft Environmental Statement and Draft Forest Plans were only partially successful. Letters were sent to the Tribes to inform them of the revision and scoping effort. The Shoshone-Paiute responded in writing. In addition to writing letters, the Nez Perce Tribal Liaison worked with the Forest Service on numerous occasions. Our efforts were not

successful until written draft documents were available for review. The Shoshone-Bannock and Shoshone-Paiute worked with the Forest Service to develop a process that was acceptable to both parties. Until this process was agreed to, contact had only been in written format. At the end of consultation with the Shoshone-Bannock, the use of a Tribal Liaison was incorporated.

Concern Statement 800.02

The LMPs do recognize the federal trust obligation to Tribes, but admittedly fail to satisfy this obligation. The recognition of Tribal fishing rights does not satisfy the Forest Service's trust obligation, and it must prescribe measures that will fully ensure treaty-fishing rights and protection and restoration of anadromous fish (and habitat) upon which the Tribes depend. Sustainable and harvestable levels of salmon must be assured within the forest LMPs. The federal trust obligation continues even after fish runs become viable and requires that management practices will ensure future harvestable fish populations. In addition to fishing rights, treaty rights also include the right to hunt and gather within the planning areas.

The EIS or LMP should identify Tribal production goals and discuss how the proposed habitat management strategies and allocations will affect the production programs or Tribal harvest regimes. The Ecogroup must present a full, detailed discussion on Tribal rights and interests.

Response to Concern 800.02

Trust obligations are the responsibility of the Federal Government, which the Forest Service is an agency within. The Federal Government, in completion of the All-H report, identified habitat as a key component to anadromous fish species recovery. National Forest lands located within the three Forests involved in this planning effort have many areas that have been identified as critical habitat for anadromous fish species. Any discussions beyond habitat is outside the scope of this planning effort, as the three National Forests involved have no authorities or jurisdiction over the other elements deemed important to salmon recovery. Actions of the Forest Service have no effect on the fish hatcheries, the salmon harvest levels nor the hydroelectric dam facilities. Therefore, one aspect the planning effort is focused on is the protection and restoration of anadromous fish habitat. Management prescription assignments were made and Forest-wide and Management Area direction was developed to assist in the effort. Tribal fishing, hunting and gathering activities are not prohibited with these Forest Plans.

Habitat management strategies and harvest goals, discussed in “Spirit of the Salmon”, were considered and discussed during development of the Watershed and Aquatics Restoration Strategy which is depicted in Appendix B of the Forest Plans. Effects specific to “Spirit of the Salmon” are not addressed but are instead incorporated within the general effects discussion regarding anadromous fisheries in the FEIS. “Spirit of the Salmon” is referenced in the Tribal section and the Soil, Water, Riparian and Aquatics section.

Concern Statement 800.03

The report fails to realize that “Tribal interests” refers to all aspects of forest management. The report must acknowledge and consider the following:

- *Tribal interests occur in all levels of management, and the Tribes should be an active partner in the management of all Ecogroup forests.*
- *The Tribes should be an active partner in developing the forest-wide standards and guidelines.*
- *The Tribes should seek to become managers of certain management areas or be an active partner in establishing management areas and future activities.*
- *The Tribes should be consulted before any area of land is designated suitable for timber production to ensure that no cultural or natural resources or sacred sites will be disturbed or damaged.*
- *The Tribes should become active participants in establishing monitoring requirements through the development of monthly consultation meetings to review areas undergoing monitoring and establishment of monitoring requirements.*
- *The Tribes should be consulted prior to any wilderness recommendations.*

Response to Concern 800.03

Tribes were consulted during the Forest Plan revision process until such time that they deemed formal consultation to be complete. As required through law and Forest Service direction, Tribes will continue to be consulted at the project level. Tribes were provided opportunities to assist in development of Forest-wide direction for the plans. Input received was taken into consideration and utilized. Management areas were simply identified based on hydrologic boundaries to allow for a common denominator between various resources and data. Timber suitability is based on a variety of factors. Tribes will be consulted during timber harvest proposals to determine if there are any areas that should be protected and/or avoided. At project level consultation, Tribes will have input into any monitoring deemed necessary and will be kept abreast of the results of Forest-wide monitoring efforts. The Tribes were consulted regarding recommended Wilderness.

Concern Statement 800.04

Although the report acknowledges that the Shoshone-Paiute Tribal members gather resources from the three Ecogroup forests, the report states “there are other national forests outside the scope of this study that are in closer proximity to the reservations of these tribes, and that are more frequently used by them.” The report further assumes that the Tribes would not be significantly impacted by any management changes to the Ecogroup forests. It is not appropriate for the Forest Service make these assumptions.

Response to Concern 800.04

Those assumptions are removed from the final documents.

Concern Statement 800.05

The DEIS failed to consider any disproportionate impacts of the projects on the Tribes, which violates the Presidential Memorandum accompanying Executive Order 12898 that instructs federal agencies “ . . . to analyze the environmental effects, including health, economic, and social effects, of Federal actions, including effects on minority communities and low income communities, which such analysis is required by NEPA.”

Response to Concern 800.05

The effects of the alternatives on civil rights are included in Chapter 3 of the FEIS, as required by FSM 1973.20. A discussion of the effects on environmental Justice is also included in Chapter 3. The FEIS includes analysis on environmental effects and socio-economic effects. Tribal issues were identified and discussed in the Tribal section, Chapter 3, of the FEIS.

Concern Statement 800.06

The Payette LMP, page 111-68, states “Tribes should be considered as a possible partner for land tenure, adjustment opportunities, particularly when such lands are within their ceded lands/territories.” The Forest Service must explain how this partnership would be accomplished without violating non-Indians’ constitutional rights to equal protection under the law.

Response to Concern 800.06

This has been reworded in the FEIS. Under government-to-government consultation requirements, Tribes must be consulted during Forest Service project proposal and development. Under other referral regulations, any interested party is encouraged to provide written comment and have input into the process.

Concern Statement 800.07

The Forest Service should refer to the tribal restoration plan as a resource tool for Salmon recovery and strive for a management direction consistent with that Plan. The Plan is entitled: “Wy-kan-ush-mi Wa-kish-wit, Spirit of the Salmon, The Columbia River Anadromous Fish Restoration Plan of the Nez Perce, Umatilla, Warm Springs, and Yakama Tribes.”

Response to Concern 800.07

“Spirit of the Salmon” defines restoration goals, objectives, and standards for restoring anadromous fish species of the Columbia River system. This direction was considered in shaping the management direction for the Revision of the forest plans. Valuable insight to the development of the SWRA Multi-scale Properly Functioning Condition Assessment, the various SWRA analyses, and the SWIE Aquatic Conservation Strategy was shaped by numerous documents including “Spirit of the Salmon”, that provided several principles, policies, perspectives, and philosophies on management of aquatic ecosystems as well as integration with other resource areas. This information was also incorporated into the SWIE Aquatic Biological Assessment and FEIS.

Concern Statement 800.08

Regarding DEIS appendix D, page D-7, Governance: In the first sentence, change “Tribal” to Tribe.” The FEIS should clarify if self-governance was ever attained, and if they were, discuss the implications for government-to-government consultation and other issues mentioned in the DEIS.

Response to Concern 800.08

The change has been made in the first sentence of this section in Appendix D. The Tribes are self-governing sovereign nations. It is beyond the scope of Forest Planning to make a determination about another entity and their form of governance. As discussed in the Final EIS, the Constitution of the United States, treaties, Executive Orders, statutes, and court decisions establish a trust responsibility between the U.S. Government and federally recognized tribes. As such, we consult with the various tribes on Federal actions.

820 Cultural Resources

Concern Statement 820.01

The historical evidence of pioneer activity should not be erased; therefore, reclamation of old mining sites should not occur unless there is a threat to public safety. Old mining sites are part of the historical record of an area. Reclamation activities will cause more disturbance to what should be an historical cultural resource. The destruction of the environment from mining will be repaired under existing laws.

Response to Concern 820.01

We agree that old mining sites can be very important cultural resources. There are a number of mining-related sites within the Ecogroup, such as the South Boise Historic Mining District, that are listed on the National Register of Historic Places. Potential impacts to cultural resources are identified and analyzed

during project-level planning for reclamation projects. Mitigation of these effects is incorporated in the design of the project activities to ensure the protection of significant cultural resources. All project activities are also reviewed by the State Historical Preservation Office prior to the completion of project planning.

Concern Statement 820.02

The Forest Service should develop standards, objectives, and guidelines that require full analysis and protection of the historical, cultural, and natural aspects of natural heritage prior to and during Forest activities, such as road building and logging. An “archaeological preserve” should be established for an area that contains significant cultural resources, to ensure it is not subjected to disturbance.

Response to Concern 820.02

Full analysis and protection of cultural resources is required by the National Historic Preservation Act, the National Environmental Policy Act, and other related legislation. These regulations require coordination and review by the State Historical Preservation Office and consultation with Tribes as part of project planning. In addition to existing legislation, the Ecogroup Forests have developed forest-wide and management area direction for cultural resources that are contained in the revised Forest Plans. Potential impacts to cultural resources are identified and mitigated during project-level planning and implementation.

The Forest Service has no authority to establish “archeological preserves” but can and does create archeological districts and historic districts in areas that meet specific criteria. A district must possess a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. The density of most cultural sites within the Ecogroup does not warrant establishment of a district. However, in some cases, areas of concentrated sites, such as the South Boise Historic Mining District, have been listed on the National Register of Historic Places. It is felt that in most cases, protection of cultural resources can be achieved without the establishment of districts.

Concern Statement 820.03

Regarding the Payette National Forest LMP:

- *Page III-81 states that historic mining occurred at higher elevations. For clarification, historic mining occurred along the river.*
- *Page III-90 – under “cultural theme,” also list Native American, homesteading, and ranching, not just mining and Forest Service administration.*
- *Page III-93 – develop additional cultural resource objectives other than just “maintain the historic character of Sturgill Peak Outlook.”*

Response to Concern 820.03

Management area characterization and management direction sections for cultural resources were both revised as appropriate to reflect these comments.

830 Travel Management (Access, parking, plans, inventory, maps)

Concern Statement 830.01

Commenters stated that, if recreation is to offset the significant economic impact from the downturn in the timber industry, recreation must be given greater emphasis. It was suggested that this could be done if the Forest Service would prepare a long-range plan to address access to and from the forest for various user groups.

Response to Concern 830.01

Access voids on the three Forests were identified as part of the Forest-level roads analysis that was completed as part of the revision process. Some local recreation access improvements were also noted in Management Area objectives. However, funding for the construction of new recreation access roads is not likely to increase dramatically and new road construction is not expected to increase substantially.

Management of existing access is represented by the current Travel Maps on each Forest. These maps are periodically updated in public involvement processes to better reflect current access needs and new transportation devices. The revised Forest Plans include a recreation objective, forest-wide REOB17, (REOB18 in the Payette Plan) to initiate travel management planning processes following completion of the Forest Plan revision process.

Concern Statement 830.02

The Forest Service should provide more and/or better signage to advise recreationists of motorized and non-motorized use areas. Commenters stated that there is not a consistency in signage or other form of identification, and often, a road may have a number but the number does not appear on the travel plan map. It was also noted that there doesn't seem to be a standard for management that applies to a road or trail, which is reflected by this lack of consistent signing.

Regarding Sawtooth Management Areas 8, 9, 11, 12, 13, and 14: ATV use is increasing rapidly within these Management Areas, although much of the trail system is only designated for single-track vehicles. There should be better signing on these trails to clearly mark what uses are allowed.

Regarding Peace Creek Trail. There should be better signing to clearly mark what uses are allowed. There is a problem with ATV use on trails designated for only single-track vehicles. The Emmett Ranger District should provide a solution for stopping ATV intrusion.

Response to Concern 830.02

The need for adequate signing is noted. It was felt that providing adequate signing for recreationists would be addressed under forest-wide Recreation goal REGO02 and objective REOB10 (REOB11 in the Payette Plan). Road and trail signing quality will also be addressed during future travel planning processes and implementation of the decisions made in the travel planning processes.

Specific management area and trail comments were noted and considered. Recreation objectives addressing the need to reduce inappropriate ATV use of trails intended for single-track motorcycle use were developed and incorporated in management area direction for a number of management areas where management efforts to this end have not yet been initiated. These objectives address this problem in a broader fashion and include signing as well as any other measure that would reduce the problem. ATV use in general will be examined more closely during future travel planning processes.

Concern Statement 830.03

The Forest Service should develop a standard that states, "Roads and trails specifically closed to motorized use will be posted 'closed' and all other roads and trails not marked are open for all travel." This is to counter the confusing objectives or standards that can be interpreted as "closed unless posted as open."

An opposing view stated that all roads be considered closed unless posted as open.

Response to Concern 830.03

The recreation objective in the Draft Forest Plans that included language similar to the comments was reworded as Forest-wide recreation standard REST03. It was felt that this particular issue needs to be a coordinated effort between the State of Idaho, the Bureau of Land Management and the Forest Service. Differing approaches between agencies create potential confusion for the public. Collaborative efforts, outside of forest plan revisions, are currently in progress to address this travel management issue.

Concern Statement 830.04

Discontinue labeling areas of the Forest as roadless when in fact maps of the area dating for many years show roads, Jeep trails, and Indian trails.

Response to Concern 830.04

Despite their name, Roadless areas **can** contain low-standard “roads”. Criteria for Inventoried Roadless Areas are provided in Forest Service Handbook 1909.12, which states: “They do not contain improved roads maintained for travel by standard passenger-type vehicles, except as permitted in areas east of the 100th meridian.” As such, classified roads and other roads that were designed, constructed, and maintained for access or resource management needs are generally excluded from IRAs. However, a number of IRAs within the Ecogroup contain user-created “roads” or “travelways” that were never designed, planned, physically constructed or maintained. Many people think of these travelways as “roads” and are confused when the surrounding area is referred to as “roadless”. In this regard, the “Roadless” name is, in some cases, a somewhat confusing misnomer. There are also some cases of classified roads within IRAs, which should not be the case. Forest-wide objective WROB01 was developed specifically to address these cases.

Concern Statement 830.05

The Forest Service should provide the Districts with specific direction for developing travel management plans and revising travel maps and indicate a reasonable schedule for completion of forest-wide transportation analysis and the conditions under which a roads analysis (that includes a needs assessment) would be required. Preferably, the travel management plans should be revised immediately following implementation of the LMPs.

The Ecogroup Forests must also commit to NEPA review and preparation of environmental assessments for travel plans. A monitoring plan must be part of the assessment. The NEPA review process must provide opportunities for public notice, review, and comment.

Response to Concern 830.05

Resource conditions, access needs, and management direction will all play a role in determining future access management. Forest-wide recreation objective REOB17 (REOB18 in the Payette Plan) addresses these comments. It is the intent of the Ecogroup Forests to initiate travel management processes as soon as possible following completion of Forest Plan revision efforts. These processes will be NEPA-compliant planning processes and will provide opportunities for full public involvement. It is difficult to establish a time schedule for completion of travel planning since it is one of the most emotionally charged and complex issues facing the Forest Service. Recent travel planning processes on other Forests have been variable in duration and may take as long as four or five years to complete depending upon other Forest management needs and resources.

Concern Statement 830.06

To mitigate the parking problems at trail access points in Blaine County, the Forest Service should assist with the development of a plan and facilities improvement program and incorporate the following standard in the Sawtooth LMP: "Develop a management plan in cooperation with local jurisdictions and the Idaho Department of Transportation to ensure public access to federal land and to reduce parking impacts on residential neighborhoods."

Response to Concern 830.06

Recreation objective 0469 was added to the Big Wood River Management Area direction to address the suggestion made in this comment.

Concern Statement 830.07

The forest LMPs should be revised to comply with Executive Order 11644, "Use of Off Road Vehicles on Public Lands." This order requires the Forest Service to designate areas as open or closed to off-highway vehicles, including snowmobiles, in order to minimize conflicts among the various users.

The Forest Service should not change snowmobile access areas and open areas. Gates should not be placed in areas to limit winter access.

The Forest Service should retain the current Travel Maps for the Ecogroup Forests, as they are fair to all users of the forests and reflect the popularity of recreational vehicle use, including off-highway use, on the forests, especially in consideration of the length and steepness of trails.

All roads and trails should be given a label to denote the type of travel allowed (that is, foot, mountain bike, horse, ATV, ORV, or snowmobile).

Response to Concern 830.07

Access designations for National Forest System roads, trails and lands will be reviewed during subsequent travel planning process as noted by Forest-wide recreation objective REOB17 (REOB18 in the Payette Plan). It is the intent of the Ecogroup Forests to initiate travel management processes as soon as possible following completion of Forest Plan revision efforts. It was felt that the majority of travel-related issues can be better addressed during travel planning processes in which site-specific differences in local conditions, resources, uses, and access needs can be taken into account. These processes will be NEPA-compliant planning processes and will provide opportunities for full public involvement. These processes will also analyze resource impacts and user conflicts associated with different access types.

Concern Statement 830.08

The Forest Service should incorporate the following goals and objectives:

- 1. Protect likely wolverine winter denning sites;*
- 2. Protect delineated deer, elk, bighorn sheep, and mountain goat winter ranges from disturbance;*
- 3. Provide adequate habitat security and habitat effective in deer and elk summer range through managed access at a watershed or game management unit scale; and*
- 4. Use a cooperatively developed elk vulnerability and effectiveness model to define and meet mutual elk vulnerability targets necessary to meet access management and elk harvest and herd composition objectives.*

The Forest Service Management Areas and Idaho Department of Fish and Game GMUs (Game Management Units) should coincide to help simplify rules and regulations. Area closures and access prescriptions within overlapping landscapes are preferred over individual road and trail prescriptions to sustain elk hunting recreation.

Response to Concern 830.08

Management direction to avoid or minimize disturbance at denning or nesting sites that would disrupt reproductive success as well as wintering big game is contained in the Wildlife Resource and Recreation sections of the revised Forest Plans. Examples of forest-wide management direction include goal REGO06, objectives WIOB02, REOB18 (REOB19 in the Payette Plan), REOB22 (REOB23 in the Payette Plan), REOB23 (REOB24 in the Payette Plan), and REOB24 (REOB25 in the Payette Plan). Specific locations of wolverine denning sites could not be determined at the programmatic level and will have to be identified during project level planning. A map of elk winter ranges was included in the revised Forest Plans.

Due to the great diversity of topographic, vegetative and ease of access conditions that exist on big game summer ranges within the Ecogroup no quantitative description of habitat security could be described that could apply to all situations. Direction has been provided on how to evaluate situations locally depending on the variables that influence security that may be present at a project and influenced by any management proposal.

Delineation of Management Areas was identified by each Ranger District's staff to facilitate management of all resources, not just wildlife resources. During future travel management analysis road, trail and area closures can be implemented depending on local conditions and desired management objectives of the restrictions.

Concern Statement 830.09

Commenters expressed concerns regarding access and road or trail designations at specific locations:

- 1. The Grouse Creek Road is not part of the “roadless area” and should be fully restored. The culverts that were removed in 2000 should be replaced or improved. Historically, snowmobiles, hunters, and other users could take the road to War Eagle Lookout and exit around Chimney Rock. Reducing access to that “loop” has increased the potential for accidents.*
- 2. Regarding Payette LMP, Management Areas 2 and 3: The Lick Creek Lookout Trail should be reopened to motorized use; there have been many complaints about the closure.*
- 3. Current access to the Independence Lakes complex should be maintained for recreational uses, as provided for in the MPCs.*
- 4. Boise National Forest Management Area 11. The Sheep Creek Trail should be rebuilt in a new location.*
- 5. Trails 181, 321, and 357 were closed to motorized access because they are in an area north of Boulder Creek that has been designated a Research Natural Area, which is designed to protect native plant communities. No direct impacts to these communities occur from motorcycles; horses and llamas pose more of a threat. Those trails should be reopened to two-wheeled motorized access.*
- 6. The Bass Creek, South and North Fork Ross Fork, and Perkons Creek trails should be permanently closed to off-road vehicle use because of their beauty, tranquility, environment, and remoteness. Although these areas are not designated Wilderness Areas, closure will help protect these fragile areas.*
- 7. Management Area 9. Off-highway motorcycle trail opportunities must be preserved on the Lake Creek and French Creek trail system to avoid conversion of use. There is concern because the plan recommends French Creek for inclusion in the Wild and Scenic River system. The French Creek trail is a popular motorcycle trail that has received Motorbike Recreation Fund monies for reconstruction.*
- 8. The Copper Mountain/Bull Trout Point and Galena Summit should be designated as wintertime non-motorized use areas.*
- 9. The following trails should continue to be managed for semi-primitive, two-wheeled motorized access: trail #144 to access the lakes near the headwaters of Clear Creek; trails 06, 147, and 148; trails 050, 051, and 052 in the Swanholm Peak area; and trail*

053, which follows Black Warrior Creek. There are already millions of acres of wilderness just north and east of these areas that provide exclusive access for non-motorized (foot and horseback) opportunities.

- 10. The following areas should be addressed for non-motorized recreation: Adams Gulch, the Warm Springs area beyond the end of the snowplowed portion of the road and surrounding hills, and Greenhorn Gulch; and the drainages for Deer Creek, Trail Creek, Eagle Creek Lake Creek, and East Fork of the Big Wood River.*

Response to Concern 830.09

Although good reasons may exist to review the transportation system and access management on a site-specific basis within the Ecogroup, it was decided to defer the majority of site-specific transportation system and cross-country travel suggestions to subsequent planning processes such as watershed-scale analyses and travel management planning. It was felt that addressing travel elements in this process would add significantly to the difficulty of meeting the court-mandated timeframe that was imposed on the Payette National Forest for Forest Plan revision. It was also felt that site-specific differences in local conditions, resources, uses, and access needs can be better taken into account in separate, site-specific planning processes. Follow-up planning processes addressing the transportation system and travel management will be NEPA-compliant planning processes and will provide opportunities for full public involvement.

Concern Statement 830.10

Regarding Payette LMP, Management Area 12, page 111-171: The plan should show South Fork Road (Number 674) as winter access for Yellow Pine, Zena Creek Ranch, and the Johnson Creek property owners.

Response to Concern 830.10

South Fork Road (National Forest System Road 674) is listed as being the primary access route to the southern portion of the Management Area, which includes the mentioned locations.

Concern Statement 830.11

In the planning process, the Forest Service should develop guidelines for systematized and non-motorized use, for implementing access management, and to establish road density standards.

The LMPs should contain standards for travel planning that address what kinds of trails can remain open, under what circumstances non-system trails can be added to the map, or under what conditions new trails can be built.

The LMPs must contain standards dealing with increased motorized use and also conflicts between motorized and non-motorized uses.

All roads and trails in alpine environments should be closed to motorized vehicles, with their use confined to lower elevations.

The plans should consider the growing conflicts between non-motorized and motorized recreationists and the growth of winter recreation activities. The Forest Service should make a commitment to reducing conflicts between snowshoe and ski areas and snowmobile areas through travel planning and collaboration. The imbalance between non-motorized terrain for skiers and accessible terrain for snowmobiles could be corrected by requiring areas of non-motorized skiing opportunities in all areas of the Forest, regardless of classification.

Motorized ORV use should be limited to areas already heavily impacted and ORV use should not be expanded. In areas where snowmobiles (or any other motorized vehicles) are permitted, only 4-stroke engines should be allowed.

Response to Concern 830.11

Programmatic travel management direction was reviewed and adjusted in the Forest Plan revision process. These can be found in the “Recreation Access” portions of the Forest-wide recreation goals, objectives, standards and guidelines. Additional direction related to conflict resolution was also developed and included in the revised Recreation management direction. Few specific restrictions were identified at the Forest Plan level in an effort to provide as much flexibility as possible for future travel planning and other site-specific projects. This was done to allow site-specific differences in local conditions, resources, uses, and access needs to be better taken into account when considering the opinions and suggestions related to travel management. In reality, most motorized/non-motorized use conflicts will not be resolved during programmatic planning and will require site-specific travel planning that addresses specific areas, trails, and roads.

Maximum road density standards were not included in the revised Forest Plans because it was not felt that it provides an accurate indicator of road-related effects to other resources. Research has shown that management of road access rather than the presence of roads is of far greater importance in providing for elk security. This is also believed to be true relative to disturbance of other ungulates and wildlife. Research has also shown that there are a number of factors, aside from road density, that determine impacts from roads on water quality. It is currently felt that road location, stability, and design have far greater bearing on road effects than does road density. This is why some watersheds with high road densities can still have few water quality impacts and some watersheds with low road densities can still have high levels of impacts.

Concern Statement 830.12

The recreation visitor day (RVD) numbers shown in Table RE-5 confirm the fact that more terrain should be designated on all three Forests for non-motorized winter sports such as skier and showshoer trails.

Response to Concern 830.12

It is uncertain whether the 1997 recreation use estimates shown in Table RE-5 (DEIS) actually support the conclusion stated in the comment. We agree that developing more non-motorized winter trail opportunities might be desirable in some locations. Recreation goal REGO06 and objectives REOB22 (REOB23 in the Payette Plan) and REOB25 (REOB26 in the Payette Plan) as well as guideline REGU25 (REGU27 in the Payette Plan) were all developed to provide for winter recreation experiences. However, site-specific trail designations will be deferred to future travel management processes when local conditions and access needs can better be taken into account.

Concern Statement 830.13

The Forest Service should conduct an analysis to determine if snowmobiling will or will not harm or endanger wildlife habitat or other users. This should be done before snowmobile use is allowed, or there should be a prohibition on current use until the analysis is completed.

Response to Concern 830.13

Analysis has been done in a number of areas regarding some of the effects of snowmobile use. For example, effects on wildlife can be found in Effects of Recreation on Rocky Mountain Wildlife: A Review for Montana, 1999, by G. Joslin and H. Youmans. On a local basis, effects of snowmobiling have also been assessed in NEPA processes associated with snowmobile trail grooming proposals. Existing research and study has established potential impacts of snowmobile use to wintering wildlife. These potential effects are mitigated in a number of ways. The most direct action that is taken involves periodically monitoring wildlife winter range in popular snowmobile areas in cooperation with State Fish and Game agencies. Emergency closures are used when needed to protect wintering wildlife. Mitigation measures are also developed through project planning processes to reduce potential effects. Forest plan direction has also been added or revised to address recreational impacts to wintering wildlife. These include forest-wide recreation goal REGO06 as well as objectives REOB18 (REOB19 in the Payette Plan), REOB22 (REOB22 in the Payette Plan), REOB23 (REOB23 in the Payette Plan), and REOB24 (REOB25 in the Payette Plan). Forest travel plans will also be updated during future travel planning processes and will be able to take more recent information concerning snowmobile use and wildlife populations into effect.

Although terrain conflicts between snowmobilers and non-motorized users have been increasing, to our knowledge no one has been physically harmed. With the growth of both motorized and non-motorized forms of winter recreation, some winter recreation experiences in some areas have been affected.

Recreation guidelines REGU25 (REGU27 in the Payette Plan) and REGU26 (REGU28 in the Payette Plan) were developed specifically to address conflicts between winter recreationists. Forest travel plans will also be updated during future travel planning processes and will be able to take more recent information concerning winter recreation conflicts into effect.

Concern Statement 830.14

Regarding Management Area 3 on the Sawtooth National Forest: Concern was expressed regarding trail access across private lands, and it was requested that an objective be developed to address this concern.

Response to Concern 830.14

The above comment was noted and considered in the development of management area direction. Management Area Lands objective 03126 addresses priority cases of access needs across private lands.

Concern Statement 830.15

The LMPs must not incorporate the 40-inch restriction previously contained in 36 CFR 262.12. The 40-inch restriction was removed in 1990 to provide discretion to Forest Supervisors and to eliminate necessary changes to trail management rules as trail vehicle designs changed.

Response to Concern 830.15

The revised Forest Plans did not incorporate a 40-inch restriction on trail width.

Concern Statement 830.16

Overall, the LMPs provide for preservation of quiet, pristine areas; however, there must also be enforcement to keep off-road vehicles from going across private properties and through areas where there are no established or designated trails. Therefore, the Forest Service should strengthen the current standard by changing it to read: "On all land outside of designated travel ways, motorized uses will be prohibited." This would protect the three forests by prohibiting cross-country, off-designated route travel by off-road vehicles and snowmobiles.

Response to Concern 830.16

The suggested revision to the management direction was noted and considered. It was felt that the original wording was preferred for programmatic direction in the Forest Plans. However, cross-country travel allowances will be addressed in subsequent travel planning processes rather than the Forest Plan revision process.

Concern Statement 830.17

The Forest Service should correct the imbalance between motorized and non-motorized trail opportunities. In a comparison of surveys performed in 1978 and again in 1999 of the Payette National Forest trail system, results show that motorized users have lost far more trail opportunities, while non-motorized trails have increased.

Response to Concern 830.17

The levels of motorized use opportunities is determined more by land and resource capabilities to accommodate motorized use impacts rather than any set “balance point”. Trail access designations, along with other site-specific travel elements, will be addressed in subsequent travel planning processes rather than the Forest Plan revision process.

Concern Statement 830.18

MPCs 1.2, 2.1, 2.2, 3.1, and 3.2 limit motorized recreation. It is difficult to tell what effect these different MPCs will have on travel plan management and there is no mention of how the MPCs will limit motorized recreation or close trails. Closing trails to recreation use should be a last resort; other management techniques, such as trail relocation and reconstruction, should be used first.

The values found in MPCs 4.1 and 4.2 should be incorporated into policy directions for travel planning.

Response to Concern 830.18

Motorized/non-motorized travel implications associated with individual MPCs was re-characterized in the revised Forest Plans. It was not intended that travel regulations vary with specific MPCs. The intent was that under certain MPCs such as 3.1 and 3.2, non-recreation resource concerns would be more likely to affect travel management decisions than under other MPCs such as 4.2 and 5.1. However, this also does not mean that motorized uses would not be restricted under MPCs such as 4.2 and 5.1. It was felt that given a stated MPC emphasis for restoration or maintenance of aquatic or wildlife resources such as would exist under MPCs 3.1 and 3.2, there is likely to be greater concern for recreation impacts of all sources. This could potentially result in increasing restrictions on motorized uses in such areas during future travel planning processes.

Management direction associated with all of the MPCs in areas as assigned in the revised Forest Plans will be used to guide future decisions in subsequent travel planning processes.

Concern Statement 830.19

The Forest Service should comply with the following standards before designating a motorized trail:

- 1. No motorized trails where the primary values of the area include unique scenery, or solitude, or a previous history of only hiking;*
- 2. Roads that are closed to motorized vehicles during hunting season should also be closed to all ATVs and motorcycles; and*

Response to Concern 830.19

The Forest Service embraces a multiple use management approach. In recreation access terms, we strive to provide a range of recreation opportunities where recreation uses can be accommodated given limitations imposed by land and resource capabilities. Motorized users also enjoy unique scenery and being able to access areas that are infrequently visited. There are numerous areas within the Ecogroup Forests, both within designated Wilderness and in other undeveloped areas where motorized access is prohibited. Trail and road access designations, along with other site-specific travel elements, will be addressed in subsequent travel planning processes rather than the Forest Plan revision process.

Concern Statement 830.20

The recreation standard should be strengthened to state: "On all land outside of designated travel ways, motorized use will be prohibited."

The following goal should be translated into a standard: "Manage motorized and non-motorized travel to provide for user safety, to meet resource objectives, and to minimize road and trail damage, maintenance costs, and user conflicts. This supplements LMP pages III-53 to 56 that address winter recreation goals, objectives, and guidelines."

Response to Concern 830.20

The recreation standard was re-worded as Forest-wide recreation standard REST03 but does not provide the level of limitation suggested by the comment. It was felt that this particular issue needs to be a coordinated effort between the State of Idaho, the Bureau of Land Management and the Forest Service. Differing approaches between agencies create potential confusion for the public. Collaborative efforts, outside of forest plan revisions, are currently in progress to address this travel management issue.

The suggested revisions to the management direction were noted and considered. It was felt that the original wording was preferred in that it also addressed access needs and travel-related facilities. It was also felt that it was more appropriate as a goal rather than a standard.

Concern Statement 830.21

There should be a significant reduction of off-road vehicle use in all un-inventoried roadless areas and IRAs.

Response to Concern 830.21

The comment was noted and considered. It was determined that the comment would be better addressed during subsequent site-specific travel management planning processes rather than through programmatic direction in the revised Forest Plans.

Concern Statement 830.22

The appendix should reference CFRs 295.2 and 295.4 and the two presidential orders that require off-road vehicle management.

Response to Concern 830.22

The comment was noted and the two Executive Orders and CFR references were added to the Legal Framework appendix in the revised Forest Plans.

Concern Statement 830.23

Discontinue labeling areas of the Forest as roadless when in fact maps of the area dating for many years show roads, Jeep trails, and Indian trails.

Response to Concern 830.23

Despite their name, Roadless areas **can** contain low-standard “roads”. Criteria for Inventoried Roadless Areas are provided in Forest Service Handbook 1909.12, which states: “They do not contain improved roads maintained for travel by standard passenger-type vehicles, except as permitted in areas east of the 100th meridian.” As such, classified roads and other roads that were designed, constructed, and maintained for access or resource management needs are generally excluded from IRAs. However, a number of IRAs within the Ecogroup contain user-created “roads” or “travelways” that were never designed, planned, physically constructed or maintained. Many people think of these travelways as “roads” and are confused when the surrounding area is referred to as “roadless”. In this regard, the “Roadless” name is, in some cases, a somewhat confusing misnomer. There are also some cases of classified roads within IRAs, which shouldn’t be the case. Forest-wide objective WROB01 was developed specifically to address these cases.

850 Road- and Trail-Related Disturbance, Construction, Maintenance, and Improvements

Concern Statement 850.01

There is concern regarding Payette LMP, page III-9, Standards, second paragraph, which states, "Do not allow actions that have the potential for long-term negative effects on physical, ecological, riparian, aquatic, and hydrologic resources and processes." The Standard could be interpreted to mean that all road building should be constrained or restricted, which could alter the entire planning direction without even evaluating the consequences under the NEPA process.

Response to Concern 850.01

The draft standard referenced by the comment was replaced in the final versions of the revised Forest Plans. This Forest-wide Management Direction allows some flexibility in implementing management activities (including road construction) to meet the desired conditions of other resources while providing a comprehensive framework to maintain good watershed and aquatic habitat conditions and restoring them where currently degraded. The Forest Service has developed extensive management direction for listed fish species and SWRA resources in the form of: (1) Forest-wide direction, (2) Management Area direction, and (3) MPC assignment that provide prescriptive emphasis and direction for each area where a particular MPC is applied across the Forest.

Forest plan direction for the action alternatives provides a high level of SWRA resource protection, but it has been designed to allow for some temporary or short-term impacts in order to achieve long-term resource restoration or maintenance goals and objectives. Examples of this are found in SWRA Standards 1 and 4.

These standards protect SWRA resources by restricting actions (including road related activities) that would degrade properly functioning conditions, while allowing actions to occur that would not degrade SWRA resource conditions over the long term. This management strategy has been integrated throughout revised management direction at the Forest-wide, MPC, and Management Area levels. Management prescriptions and other resource areas have similar direction to help avoid, minimize, or mitigate potential activity impacts to SWRA resources. A TEPC Species section has also been added to the Forest-wide direction to provide special emphasis and protection for aquatic and terrestrial species of concern across all resource areas. In addition, Forest Service Handbook 7709.56.2.32 provides guidance for road location, and design.

Concern Statement 850.02

Commenters suggested the following actions be implemented:

- 1. Reduce road sediment production in priority 1 or 2 sub-watersheds with high substrate fine sediment characteristics and those with road densities in the RHCA greater than or equal to one mile per square mile.*
- 2. Reconstruct existing roads with effective cross-drain spacing and drain dip location to turn water to slope filtration, rather than to first order streams.*
- 3. Utilize existing DEQ culvert survey data and gather additional road-related sediment data to recommend road improvements, closures, and obliterations in the Middle Fork Payette River watershed;*
- 4. Conduct a road sedimentation survey and locate high priorities for road restoration and maintenance in the Squaw Creek watershed. Sediment from roads is limiting bull trout in this watershed;*
- 5. Utilize the road sedimentation survey in the Boise Cascade Corporation Watershed Analysis (Appendix B) to help locate high priorities to road sediment reduction for the Gold Fork watershed.*
- 6. In general, where any road delivers sediment to streams, the drainage should be redesigned to direct runoff to the forest floor rather than to stream channels. Roads should be graveled that have high potential runoff.*
- 7. The Forest Service should improve water bars on all roads to create drivable dips, as they are currently a safety hazard and, in some cases, cause more erosion not less.*
- 8. Place bio-filters along newly constructed paved road areas where more than nine primary spring sources were disrupted during construction. This would resolve the Forest Service's violation of the Clean Water Act.*

Response to Concern 850.02

The concerns described above relate to the effect of roads or best management practice measures to reduce these road related effects on watershed and aquatic habitat condition. As briefly identified below, roads and their effects (direct, indirect, and cumulative) were used to assist in determining: the current conditions for the SWRA resources; and determining the appropriate type and priority of restoration opportunities for listed fish and to assist in the de-listing of 303(d) water quality limited water bodies. Forest-wide, Management Area, and MPC direction (objectives, standards, and guidelines) provide a comprehensive framework to further avoid or minimize any additional unacceptable road related effects.

The current forest plans lack a process/plan to prioritize restoration and recovery of listed fish species and 303(d) water quality limited water bodies (including road related effects). A comprehensive aquatic conservation strategy (ACS) was developed through Forest Plan revision. Within this ACS is a watershed aquatic recovery strategy (WARS), which is comprised of three components (priority subwatersheds, multi-scale assessments, ACS priority subwatersheds). This strategy identifies restoration and conservation needs in each subbasin and their respective subwatersheds across the Ecogroup. This would include all tributaries in which there are lands managed by the Ecogroup that flows into the Snake River (e.g., Salmon River Boise, Payette, Hells Canyon, etc.). New Forest-wide management direction calls for an update of new available information every 2 years so as to keep this strategy current.

Road related disturbance and their effects on watershed and aquatic habitat condition was evaluated at the individual subwatershed scale and aggregated to the subbasin scale. Several road related disturbance indices were calculated or estimated for each subwatershed and aggregated up to assist in describing the current condition of the subbasins. Effects from roads were key in describing the geomorphic integrity, water quality integrity and aquatic integrity for all the subwatersheds and their associated subbasins. This information in part was useful in determining the appropriate type and priority of restoration. For more information on this strategy refer to Chapter III of the Biological Assessment or the SWRA Resource Chapter 3 of the FEIS.

Forest-wide Management Direction, Management Area specific direction and MPC management emphasis and associated standards and guides related to road management offers specific road related restoration opportunities. Specific best management practice measures as identified in Concerns 2, 6, 7, and 8 are appropriate to identify at the project level. For more specific discussions on road related effects and analysis, refer to Chapter Three of the Biological Assessment, the SWRA Technical Report, and the SWRA Resource in Chapter 3 of the FEIS.

Concern Statement 850.03

The DEIS indicated that with improvement of the nine priority roads within the Ecogroup, recreation use will likely increase. The Forest Service should perform, or reference, an analysis to validate that statement and further explain if the road improvements would impact wildlife connectivity and private lands.

Response to Concern 850.03

Past experience and traffic counter surveys have shown that road surfacing improvements, over more than short stretches of road, usually result in increased use by recreationists. This is especially true when native or gravel surfaced roads are paved. The list of priority road improvement projects referenced by the comment was deleted from the final EIS. These road improvement projects are still at a very early stage of development and are not certain at this point. Their approval and completion are dependent upon a number of factors including the status of roads-related legislation and the availability of funding. In that their effects are not fully known at this time, it was felt that their inclusion in a programmatic effects analysis was not appropriate. Complete environmental analysis of the effects of these projects will be accomplished on a case-by-case basis in future NEPA processes. The projects are listed in the Roads Analysis report.

Concern Statement 850.04

A commenter stated that the biggest factor impacting soil, water, riparian, and aquatic resources is road location, not road density. It was suggested that roads be constructed on ridge tops, not in draw bottoms.

Response to Concern 850.04

We agree that high road densities, in and of themselves, do not constitute the greatest impacts to soil, water, riparian, and aquatic resources. Road densities were among a number of characteristics used in modeling efforts to identify subwatersheds where aquatic integrity might be compromised. Research has shown that there are a number of factors, aside from road density, that determine impacts from roads on water quality and aquatic habitat. Road location, stability, and design have far greater bearing on road related effects than does road density alone.

Many of the existing roads were constructed within RCAs and on landslide prone areas without the engineering and environmental standards that are available today. Forest Service Handbook 7709.56.2.32 provides guidance for road locations within drainages and draws.

In addition, the Forest Service as developed extensive management direction for listed fish species and SWRA resources in the form of: (1) Forest-wide direction, (2) Management Area direction, and (3) MPC assignment that provide prescriptive emphasis and direction for each area where a particular MPC is applied across the Forest. Refer to Response to Concern 850.01 for additional discussion.

Concern Statement 850.05

The LMPs should indicate (1) the existence of the Idaho Centennial Trail and the agreements made by the individual Forests as stated in the Memorandum of Understanding, and (2) the Forests' commitment to maintain the Trail in accordance with its importance and types of users it serves.

MA2 contains a significant portion of the Idaho Centennial Trail. An objective should be developed that states, "Maintain the Idaho Centennial Trail with its intended use." This area is known internationally for its backcountry trail opportunities.

Response to Concern 850.05

The existence of the trail was noted in every Management Area characterization section in which it is located. Trail maintenance objectives were included in management areas in which the trail conditions or levels of use indicated the need for added attention.

Concern Statement 850.06

43 U.S. C. 1762 (Roads) (a) and (c) stipulate that road maintenance is to be born by each user and shall be proportionate to the total use. This means you must charge recreational users of roads as well as loggers. Enforcement of this law would give you adequate income to build and maintain new roads.

Response to Concern 850.06

We disagree with the interpretation of 43 USC 1762 (Roads) (a) and (c). We do not feel that this regulation, or the National Forest Roads and Trails Act of 1964, as codified by 16 USC 537 and 36 CFR 212, require recreational users to be charged. These regulations guide administration of National Forest transportation system components and allow the Chief of the Forest Service the option to recover maintenance and reconstruction costs from road users. Generally, the Forest Service limits maintenance and reconstruction fees to commercial users of Forest System roads and does not assess road use fees on the general public. In any case, charging road use fees for general recreational access is beyond the scope of Forest Plan revision.

Concern Statement 850.07

Regarding Sawtooth National Forest Management Areas:

- 1. MA 4, Big Wood River. The Forest Service should plan for the construction of a bridge at Warm Springs Creek on the Red Warrior Trail, which would improve user safety, particularly in high-water years.*
- 2. MA 4, Big Wood River. No goals, objectives, standards, and guidelines exist for this area although large areas are designated as MPC 4.1 and 4.2. This MA receives some of the highest trail use in Idaho.*
- 3. MA 5, Little Wood River. The Sawtooth LMP notes on page 111-12, that opportunities exist to reconstruct or relocate a number of trail segments; however, the area's goals and objectives do not address these opportunities, which if implemented, would improve visitor safety and resource conditions.*

Response to Concern 850.07

1. The comment was noted and recreation objective 0468 was developed in response to the comment and added to the management direction for Management Area 04 in the revised Sawtooth Forest Plan.
2. We agree. The recreation management direction for Management Area 04 in the revised Sawtooth Forest Plan has been substantially expanded to include a number of objectives, standards, and guidelines.
3. The comment was noted and recreation objective 0548 was developed in response to the comment and added to the management direction for Management Area 05 in the revised Sawtooth Forest Plan.

Concern Statement 850.08

Regarding Boise National Forest Management Areas:

- 1. MA 1, Lower South Fork Boise River. Most of this area is designated as MPC 6.2 under Alternative 3. This area contains valuable recreation resources, and the Danskin-Willow Creek trail system is one of the heaviest used off-highway motorcycle facilities in Idaho. The Forest Service should incorporate this guideline: "Reconstruct trails in the Danskin-Willow Creek area to reduce resource impacts, improve recreation opportunities, and improve visitor safety."*
- 2. MA 2, Rattlesnake Creek/Feather River. As there is no specific guidance associated with trail use in this area, it can only be assumed that Forest-wide goals, objectives, guidelines, and standards would apply. The trails in this area provide valuable dispersed recreational opportunities, but many of them require relocation or reconstruction. A guideline should be developed that provides for reconstruction or relocation of trails that are not meeting resource objectives.*
- 3. MA 3, Arrowrock Reservoir. The Forest Service should develop a guideline that states, "The trails within the Sheep Creek Drainage and on Lava Mountain should be reconstructed to reduce resource impacts and improve recreational opportunities."*
- 4. MA 4, Boise Front/Bogus Basin. The Forest Service should create more designated trails (for both motorized and non-motorized use) within this MA and develop an objective to implement construction.*
- 5. MA 5, Upper Boise River. The Forest Service should incorporate an objective to repair, as soon as practicable, the trail system south of Atlanta that was damaged by the Trail Creek fire.*
- 6. MA 8, Mores Creek. The Forest Service should make it a priority to develop a trail system within the Boise Basin (Mores Creek).*
- 7. MA 19, Warm Lake. Several trails within the area need reconstruction in order to improve visitor safety and enjoyment and to reduce resource impacts. The Lodgepole/Boulder Creek Trail (#108) needs relocation in some areas along Boulder Creek, as the trail in these areas passes through wet meadows. As a protective measure, puncheon or turnpike could be placed in the trail treads. Rock Creek Trail (not shown on the Travel Plan Map) should be reestablished. The trail is in relatively good condition and would only need minor relocation to make it an expert (mechanized and non-mechanized) trail.*

8. *The Forest Service should build a bridge across the Deadwood River for the Bitter Creek and Stratton Creek trailheads to improve user safety.*
9. *The Forest Service should rebuild the bridge over the Johnson Creek/East Fork Rivers and redevelop an access road along the Yellow Pine side of the river.*

Response to Concern 850.08

1. The comment was noted and recreation objective 0145 was developed in response to the comment and added to the management direction for Management Area 01 in the revised Boise Forest Plan.
2. The comment was noted and recreation objective 0237 was developed in response to the comment and added to the management direction for Management Area 02 in the revised Boise Forest Plan.
3. The comment was noted and recreation objective 0333 was developed in response to the comment and added to the management direction for Management Area 03 in the revised Boise Forest Plan.
4. The comment was noted and recreation objective 0436 was developed in response to the comment and added to the management direction for Management Area 04 in the revised Boise Forest Plan.
5. The comment was noted and recreation objective 0538 was developed in response to the comment and added to the management direction for Management Area 05 in the revised Boise Forest Plan.
6. The comment was noted and recreation objective 0847 was developed in response to the comment and added to the management direction for Management Area 08 in the revised Boise Forest Plan.
7. The comment was noted and recreation objectives 1958 and 1959 were developed in response to the comment and added to the management direction for Management Area 19 in the revised Boise Forest Plan.
8. The comment was noted and recreation objective 1345 was developed in response to the comment and added to the management direction for Management Area 13 in the revised Boise Forest Plan.
9. The comment was considered. The previous bridge provided access to an existing airstrip. When the airstrip was relocated, the need for the bridge, and the access it provided, became questionable. With the expense of maintaining the bridge and road access, it was determined that the bridge was unnecessary. There is not a strong need for road access related to Forest management needs and there has been little interest expressed by the public to establish or re-establish road access to this area. Given this and the sensitive resources within this watershed, it was not felt that the bridge and access road were appropriate inclusions as objectives in the revised Forest Plan.

Concern Statement 850.09

Regarding Payette National Forest Management Areas:

- 1. MAs 2 and 3, Snake and Weiser Rivers. Many of the trails on Cuddy Mountain and Sturgill Peak are difficult to follow because of past resource activities. The Forest Service should develop an objective to improve signing on the trails in this area. This also pertains to Council Mountain.*
- 2. The LMP notes that Rush Creek Falls is difficult to reach because private landowners block access to the nearest trailhead. Access to the falls could be improved if Boundary Trail #425 was improved.*
- 3. MA 9, Lake and French Creeks. Several of the trails have access problems because of private ownership. The trails should be rerouted around private land or easements should be obtained. This would support the Forest Service objective to establish loop trails between the Little Salmon River and Main Salmon River access points to expand recreational opportunities in the area.*
- 4. MA 12, South Fork Salmon River. Many of the trails in this area are below standard. Improving these trails will reduce erosion and improve riparian and aquatic resources. Funds have been provided to the Krassel Ranger District for rehabilitating trails in this system.*
- 5. Forest Road 413. Maintenance to this road and all main access roads should be an important part of the LMP.*
- 6. The objective to install a bridge across the Secesh River at Chinook Campground should be deleted from the final Forest Plan since District managers have indicated the bridge will be completed prior to the publication of the Plan making the objective unnecessary.*

Response to Concern 850.09

- 1. The comment was noted and recreation objectives 0260 and 0358 were developed in response to the comment and added to the management direction for Management Areas 02 and 03 respectively in the revised Payette Forest Plan.*
- 2. The comment was noted and recreation objective 0257 and lands objective 0389 were developed in response to the comment and added to the management direction for Management Area 03 in the revised Payette Forest Plan.*
- 3. The comment was noted and lands objectives 0939 and 0940 were developed in response to the comment and added to the management direction for Management Area 09 in the revised Payette Forest Plan.*

4. The comment was noted and recreation objective 1249 was developed, in part, in response to the comment and added to the management direction for Management Area 12 in the revised Payette Forest Plan.
5. Road maintenance direction is provided by forest-wide facilities and roads guideline FRGU07. Individual road maintenance priorities are not included in the revised Forest Plans because priorities need to be able to shift to respond to emergency and other conditions that are beyond Forest Service control.
6. The comment was noted and the objective was deleted from the final version of the Payette Forest Plan.

Concern Statement 850.10

The EIS should reference the analysis or documentation that was used to determine that "Forests have achieved full maintenance standards on an estimated 24 to 34 percent of the transportation system across the Ecogroup."

Response to Concern 850.10

This data was gathered from annual accomplishment reports for each Forest and are referenced in the Facilities and Roads technical report, which is available upon request.

Concern Statement 850.11

A commenter noted that all trails have value, especially in emergency situations, and that monies should be available to maintain the trails rather than close them. The commenter also suggested that horses do not do that much harm to trails and that we should maintain horse access for those who are disabled and cannot hike with packs.

Response to Concern 850.11

Trails are a valued component of the transportation network on the Ecogroup Forests and play a major role in providing a broad range of recreation opportunities and experiences. However, some of the trails within the Ecogroup Forests contribute to impacts to other resources such as stream sedimentation. This can be the result of a number of possible causes such as poor location, allowed types of use, seasonality of use, and trail design. In some cases, the trails were user-created and were never designed or located to consider potential resource impacts. Trails can also be threatened by management activities such as timber harvest and livestock operations. At the same time, recent funding levels for trail maintenance have not provided for adequate maintenance of the trails on the National Forest Trail System let alone the user-created ones.

Under the revised Forest Plans, management direction was developed to address the current trail situation described above. The revised management direction includes elements to:

- protect existing trails such as forest-wide recreation objective REOB19 (REOB20 in the Payette Plan) and guidelines REGU 22 and 24 (REGU23, and REGU26 in the Payette Plan);
- evaluate and address resource impacts associated with trails such as forest-wide recreation objectives REOB01, REOB20, and REOB21 (REOB21, and REOB22 in the Payette Plan);
- expand the existing trail system where appropriate such as forest-wide recreation objective REOB05 (REOB06 in the Payette Plan), guideline REGU24 (in the Payette Plan), Facilities and Roads guideline FRGU03, and Boise Management Area 04 recreation objective 0436;
- make improvements to the existing trail system such as Boise Management Area 04 recreation objective 0433; and
- provide the basis for maintenance priorities such as forest-wide recreation guideline REGU21 (REGU22 in the Payette Plan).

The intent, under the revised Forest Plans, is to mitigate resource impacts from trails on a case-by-case basis while identifying trails that contribute little to recreation experiences. This will assist in focusing trail management decisions related to trail maintenance, construction, and reconstruction as well as types of use allowed.

We recognize that our trail maintenance capabilities can be extended and have been extended through the use of volunteers, cooperating organizations, and other government agencies. Forest-wide recreation objective REOB12 was developed, in part, to provide direction to use a variety of co-operative resources to accomplish recreation goals.

Trail access determinations are not being made as part of Forest Plan revision and are being deferred to subsequent travel management processes. Damage to trails may result from virtually any type of use depending upon the trail conditions and levels of use. Individual trail capabilities will be considered on a case-by-case basis during future travel planning processes as well as providing for a range of access opportunities across the Forests.

Concern Statement 850.12

1. In general, the Forest Service must develop a comprehensive inventory of classified and unclassified roads and should re-inventory the currently Inventoried Roadless Areas. This inventory could be called a "Transportation Atlas" (Forest Service Manual 7711). The inventory should describe the level of use for each road, current conditions, and maintenance/repair requirements. The inventories should identify lightly roaded areas for protection as Research Natural Areas.

2. Regarding Payette LMP, Page III-51, fifth Guideline, which states, "At both the Forest-wide and local levels, transportation system analysis and related documentation should identify the following . . . Desired Public Access . . ." - The Forest Service should clarify whether the access is desired by the public or by the Forest Service.

Response to Concern 850.12

1. All three Forests have complete inventories of their classified roads and partial inventories of their unclassified roads. The Forests' classified and unclassified road databases are subject to frequent revision due to on-going management activities that construct, reconstruct, and decommission roads based on project-level analysis and the continued development of user-created unclassified roads. The most current roads information from existing databases was used for revision analyses. The Transportation Atlas was defined by direction contained in Forest Service Manual 7711.01 (codified in 36 CFR 212.2). Level of use for each road, current conditions, and maintenance/repair requirements are reflected in the Road Management Objectives that are developed for each classified road and are a part of the Transportation Atlas.

As part of the current Forest Plan revision process on these Forests, the inventories of roadless areas were further reviewed and updated. During the re-inventory process, changes were made to the roadless area boundaries based on project-level development and by examining boundaries for areas that may have been missed for inclusion. Roadless area boundaries were adjusted to reflect project developments such as timber harvest units, new road construction, and utility corridors; undeveloped areas missed in previous inventories; and areas that have changed, over time, affecting their eligibility for classification as roadless and undeveloped. Roadless acreages also changed due to the use of new technology (GIS) to determine acreages of defined areas. As inferred by their title, RNAs are established for research purposes. Designation of areas as RNAs because they are lightly roaded is not consistent with direction for why RNAs should be established.

2. The guideline referenced by the comment was deleted from the final version of Facilities and Roads management direction because it was felt that transportation system analysis methods would be determined by new national roads analysis regulations.

Concern Statement 850.13

Commenters stated that more maintenance money has been spent obliterating or decommissioning a road than the original cost to build the road. Considering limited budgets, the Forest Service's priority should be to maintain roads in already disturbed areas instead of building new roads in more delicate, pristine areas.

Response to Concern 850.13

The comment was noted. In some cases, the short-term cost to obliterate or decommission a road might exceed its construction cost. However, the comment fails to consider maintenance costs over the long term and recurrent resource damage that might be eliminated or reduced by obliteration or decommissioning. Each road is a unique situation and needs to be evaluated on a case-by-case basis weighing costs and risks as well as benefits and values. There will probably be cases that fit those described in the comment but there will also be cases where obliteration or decommissioning is determined to be the most cost-effective strategy.

Concern Statement 850.14

There is concern that many of the roads within the Ecogroup Forests are inadequately maintained and contribute to high degrees of sediment delivery. The LMPs must contain substantive standards to guide road management, specifically regarding sediment delivery, and instructions that specify what must be done if the sediment standards are not met.

The Forest Service must develop standards that support its general objectives and guidelines to keep road building to a minimum and maintain, decommission, or obliterate other roads as necessary. An analysis should be performed that evaluates this strategy and its affects on aquatic and other resources. The Forest Service should identify and significantly reduce road densities where Riparian Conservation Areas are impacted.

Response to Concern 850.14

Road related effects have had and continue to have a major influence on the soil, water, riparian, and aquatic resources. The new Forest-wide, management area specific, and MPCs direction provides a comprehensive package to greatly avoid or minimize negative effects associated with roads as well as provide a priority for restoration of degraded conditions associated with roads. Refer to the Responses to Concerns 850.01, 850.02, and 850.03 for more specific management direction related road management.

Recently developed regulations in Forest Service Manual 7712.1 require the completion of a roads analysis at both the Forest scale as well as watershed or project scale. The intent of these regulations, also known as the “Roads Rule”, is to inform decisions, at both the programmatic and project levels, of road system opportunities, needs and priorities that support land and resource management objectives.

Concern Statement 850.15

The Forest Service should comply with the following standards before designating a motorized trail:

- 1. No trail grades in excess of 4-degree slope;*
- 2. A trail must have a high maintenance budget to build and clean water bars and dips on a regular basis;*
- 3. No trails in marsh areas;*
- 4. No trails with multiple stream crossings or fords;*
- 5. No trails with highly erodable soils; and*
- 6. No trails with extensive runs of steep-side hills, which would impede passing.*

Response to Concern 850.15

The comment was noted. We do agree that trails designated for motorized uses, as well as any other type of use, should be appropriate for that type of use. However, the standards proposed by the comment were not included in the revised plans because it was felt they would be far too limiting. Trails are long linear features on the landscape. It would be difficult to find a trail on the Ecogroup Forests that did not possess at least one of the listed characteristics. For example, grades in excess of 4 degrees are common throughout the Ecogroup and short stretches of trail may occur within highly erodible soils or marshy areas. Also, budgets for trail maintenance fluctuate from year to year and cannot be guaranteed. The proposed standards would provide no flexibility to address these sensitive areas through trail design and technology applications. It was felt that each trail presents a unique situation and should be evaluated on a case-by-case basis when making use designation determinations. Forest Service Handbook 2309.18.2.3 provides guidance for new trail location practices for all types of trail use. Motorized and non-motorized trail designation determinations are deferred to future travel planning.

Concern Statement 850.16

OHV users donate thousands of hours each year to volunteer programs that protect and preserve natural resources. The LMPs should acknowledge the volunteer work that goes into trail maintenance and make it an integral part of forest management, which will result in a better forest and a better relationship with forest users.

Response to Concern 850.16

We agree that volunteer efforts play a large role in providing recreation opportunities and experiences on the Ecogroup Forests. In fact, the EIS acknowledges the fact that there is a greater reliance upon partnerships and volunteerism to manage recreation resources today. Volunteers were included in the Desired Condition statements for Recreation resources as well as forest-wide recreation objective REOB11 (REOB12 in the Payette Plan).

Concern Statement 850.17

Regarding Payette LMP, page III-10: The Forest Service should define what it means by light road reconstruction. The planning document should identify areas where road maintenance and new road construction would likely occur and where access would be controlled or denied.

Response to Concern 850.17

The standard referenced by the comment was deleted and the term is no longer used.

Concern Statement 850.18

Regarding "Issue Statement Background to Issue," DEIS page 1-15, regarding roads: There is agreement with the order of importance by which the Forest Service has listed the items in the second sentence, and the last sentence describes how the roads are maintained. It is questionable, however, why the Forest Service is now showing concern about maintenance, as the agency has done very little road maintenance in the past. The best condition some roads have been in over the years was when there was a large timber sale. Along with less timber sales goes more road maintenance for the Forest Service. If the roads will not be maintained, the Forest Service should disclose if they plan to close them.

Response to Concern 850.18

Road maintenance budgets have fluctuated during the past 10 years. However, traffic volumes on the Forest road system have steadily increased. Because of fewer timber sales, commercial user contributions to road maintenance also have declined. This affects not only recurrent maintenance, such as seasonal blading, but also deferred maintenance such as long-term surface replacement. Local population growth has increased the burden on county-maintained road systems, while budgetary constraints have concentrated maintenance priorities on roads closer to urban areas. Consequently, not all roads have been maintained to the level prescribed in management objectives. Currently, about 30 percent of the roads in Forest Service jurisdiction are being maintained to the RMO standard while most other Forest System roads receive minimal or only necessary maintenance. Road decommissioning occurs when a road is no longer needed for resource management and when maintenance requirements and/or resource impacts outweigh access needs and benefits. The determination to decommission specific roads is not done in the Forest Plan revision process. Road decommissioning will be determined in subsequent planning efforts such as Travel Management planning and watershed-scale analyses. Road maintenance and road decommissioning issues are addressed in greater detail in the *Roads* section of Chapter 3 in the EIS.

860 Roadless (general concerns)

Concern Statement 860.01

Commenters emphasized that roadless areas have important values, such as clean water, unfragmented wildlife habitat, and semi-primitive recreation experiences. As such, roadless areas should be managed to protect these important values by maintaining them as undeveloped, without new roads, logging projects, etc.. Tourism will decrease if roadless areas are not protected, as they will become just another area impacted by human activities.

Response to Concern 860.01

We agree that IRAs do have important values. An appendix has been added to the FEIS that examines values of each individual IRA. Current conditions and desired conditions within each IRA were considered during assignment of MPCs. In many cases where current conditions vary from desired conditions, it was felt that managers needed the ability to take management actions that would result in some level of development within IRAs. It was also felt that MPC assignments within IRAs in the preferred alternative present an adequate level of protection of important resource values while providing some level of treatment options to managers where treatments are most needed. Under the preferred alternative, Alternative 7, approximately 23 percent of the area within Ecogroup IRAs would remain undeveloped while approximately 72 percent of IRA areas were assigned to prescriptions that would allow low levels of development. Only about 5 percent of IRA areas were assigned to prescriptions that would allow a full range of development.

Concern Statement 860.02

Roadless areas should be managed or designated as Wilderness, with ORV use prohibited.

Response to Concern 860.02

Forest Plans can only recommend areas to be considered for wilderness designation. Actual designation can only be done by Congress and is thereby beyond the scope of Forest Plans. Two alternatives were considered under which recommended wilderness areas, which are part of or entire IRAs, would be managed using an access management strategy similar to that of designated wilderness but neither of these alternatives was selected. This is because it was felt that maintaining the wilderness values could be accomplished without managing these areas as designated wilderness. In portions of IRAs outside of recommended wilderness areas, it was felt that travel management decisions would be deferred to a subsequent site-specific travel management process to address each situation on a case-by-case basis.

Concern Statement 860.03

Some commenters felt that logging and road construction should not be allowed in roadless areas while other commenters felt that roadless areas should be managed for multiple-uses that would allow a full range of management and treatment options.

Response to Concern 860.03

The seven alternatives represent a wide array of management of lands within IRAs. Resource management needs within each Inventoried Roadless Area were considered during the assignment of management prescriptions consistent with the themes for each alternative. Under Alternative 5, approximately 92 percent of the lands within IRAs would be available for either a full range or low levels of development. In contrast, Under Alternative 6, none of the lands within IRAs would be available for any level of development. The remaining alternatives fall somewhere in between Alternatives 5 and 6. Alternative 7, the Preferred Alternative, as developed, was formulated following interim direction for managing roadless areas. Under Alternative 7, approximately 23 percent of the area within Ecogroup

IRAs was assigned to prescriptions that would greatly limit management actions and treatment options to largely the use of prescribed fire and wildland fire use. Approximately 72 percent of IRA areas were assigned to prescriptions that would allow some level of vegetation treatments but road construction would be greatly limited or not allowed. In the remaining 5 percent of IRA areas, a full range of treatments and development would be allowed.

Concern Statement 860.04

The EIS should provide a better discussion concerning the Forest Service's ability to manage roadless area boundaries and the problems with on-the-ground identification and dispute resolutions.

Response to Concern 860.04

Roadless area boundaries are the results of an inventory process and are generally not “managed”. Technology not available at the time of the original Forest Plans and roadless area inventories has made tracking IRA boundaries much easier. IRA boundaries are mapped and tracked using GIS technology as is commonly done with most other Forest resources. IRA boundary information is readily available to the public and resource specialists for any project planning need. Also, guideline WRGU06 was included in the forest-wide management direction in the revised Forest Plans. This guideline directs project designers to review IRA boundaries when developing plans for projects within or adjacent to IRAs. Given the national prominence of Roadless Area related issues, tracking IRA boundaries is an agency responsibility and not a discretionary action. As such, it was felt that developing further discussion and analysis of this function was not required or warranted.

Concern Statement 860.05

The Forest Service should place a limit on the number of designated roadless areas. Do not use roadless designations to create de-facto Wilderness, as there is already a system in place to designate and manage Wilderness Areas.

Response to Concern 860.05

Roadless areas are not “designated.” They represent an inventory based on landscape development features. The attributes of each IRA were considered during assignment of MPCs and MPC assignments within IRAs vary. For example, 79 percent of the Ecogroup IRA acres were assigned to recommended wilderness (MPC 1.2) under Alternative 4 while 76 percent of the Ecogroup IRA acres were assigned to MPCs that allow development under Alternative 5. Under the preferred alternative, Alternative 7, approximately 23 percent of the area within Ecogroup IRAs would remain undeveloped, 72 percent would potentially experience low levels of development, and 5 percent would be available for a full range of management actions and potential development. The MPC assignments were developed by comparing current conditions with desired conditions. It was felt that MPC assignments within IRAs in the preferred alternative present an adequate level of protection of important resource values while providing some level of treatment options to managers where treatments are most needed.

Concern Statement 860.06

The DEIS contradicts what the public was told during public meetings, that motorized users were assured that existing trails in roadless areas would remain open. However, the DEIS states that non-motorized use is emphasized in roadless areas, as well as in Wilderness and proposed Wilderness areas and are treated with the same MPC. The roadless designations are in direct conflict with the fact that the fastest growing sector of the recreation economy is in motorized recreation.

Response to Concern 860.06

Under Alternatives 4 and 6, all mechanical transport would be prohibited within recommended wilderness areas only. This leaves access in all IRAs or portions of IRAs that are not recommended wilderness to be managed as it is under current travel regulations. In all other alternatives, access would be managed as it is under current travel regulations on all portions of the Ecogroup. This was the situation that was described in public meetings and in the DEIS text. However, the non-motorized use emphasis statements in the alternative descriptions in Chapter 2 of the DEIS were in error and have been corrected in the FEIS. In that motorized recreation opportunities will be present within IRAs under any alternative, it is difficult to accept the premise that IRAs, in and of themselves, represent a conflict with the growing demand for motorized uses.

Concern Statement 860.07

The Forest Service should explain the discrepancy in Table IRA-11, wherein the 800,000 acres that were originally included in the "Undeveloped" category (no road building) no longer appear in the table.

Response to Concern 860.07

We are unsure of exactly what this comment is referring to. Further review of Table IRA-11 revealed two typographic errors in the first two entries in the Southwest Idaho Ecogroup column. The value for Alternative 1B should have read 1,753,000 instead of 2,753,000 and Alternative 2 should have read 1,804,000 instead of 2,804,000. All other values in the table were correct. These errors amounted to 1,000,000 acres and not 800,000 acres. No other discrepancies in the information that was presented have been found. In any case, all of the IRA development potential for each alternative has been re-calculated in the FEIS, which, hopefully, will also correct the perceived discrepancy.

Concern Statement 860.08

The EIS should provide the location and area of currently unprotected roadless areas greater than 1,000 acres and less than 5,000 acres outside of wilderness areas that are not protected.

The Forest Service must develop a better standard of identification, designation, and mapping, otherwise, it will not be able to identify roadless areas between 1,000 and 5,000 acres that were not previously identified as IRAs.

Response to Concern 860.08

Under the planning regulations governing this revision process, there are no process requirements to identify, designate, map, or otherwise track “roadless” areas greater than 1,000 acres and less than 5,000 acres. As with all other areas within the Ecogroup, resource conditions and treatment needs were identified and addressed through the land management allocation process. A mapping exercise for unroaded areas was completed for Alternative 6 and all of the resultant areas were assigned to MPC 4.1b in that alternative. It was felt that tracking areas fitting these criteria would amount to the creation of an additional inventory of over a thousand land parcels (as opposed to 78 IRAs), which would outweigh possible benefits or needs. Value determination for unroaded areas is better suited to a project level assessment and will be accomplished as projects are proposed and analyzed. A development outcome does not necessarily mean that resource values would not be protected.

Concern Statement 860.09

Although the Danskin Trail area was designated as an IRAs, effective May 15, 2001, it does not have the roadless values that were intended for roadless areas. The new legal status of the area contradicts the data contained in the DEIS and LMP. The Danskin area has been converted to a motorized trail complex and more trail work to enhance motorized use is planned. This might be acceptable if there was zoning for motorized and nonmotorized use, but there isn't and the current changes at Danskin are not fully acknowledged in the documents. If the focus of Danskin, as an IRA, is on motorized use, then its value and potential for wilderness is decreased.

Response to Concern 860.09

Actually, the Danskin IRA was inventoried and evaluated in the 1990 Boise National Forest Land and Resource Management Plan. IRAs are not “designated”. They represent an inventory based on landscape development features. The revised Forest Plan does not affect the “legal status” of the Danskin IRA, only the management prescription that has been assigned. The dense network of motorized trails has adversely affected wilderness characteristics of the area and it’s potential value as Wilderness. With the established, heavy, motorized use, its capability for designation as Wilderness may also have been affected at this point. However, given the fact that only parts of the IRA have been heavily impacted, the decision was made to retain it within the roadless inventory. The impacts of motorized recreation on wilderness characteristics have been further recognized in new sections within Appendix C and the FEIS.

Concern Statement 860.10

A number of commenters suggested that evaluation of IRAs be augmented or expanded in a variety of ways including:

- 1. The Forest Service should provide a thorough re-evaluation of the Roadless areas as required by the Regional Office and not just a cursory redrawing of maps. The re-evaluation should include the areas of high ecological value that were missed or barely missed by the arbitrary 5,000-acre cutoff.*
- 2. The Roadless area re-evaluation also did not describe past logging and other development that occurred in the IRAs during the last cycle of the Forest planning.*
- 3. The Final EIS should include a comparative analysis of Forest Service data with the data contained in the Wilderness Society's report entitled, "Vanishing Wild Lands: A Status Report on Roadless Areas in Idaho's National Forests."*
- 4. A site-specific evaluation must be performed for each IRA in order to have an accurate assessment of the impacts of each alternative on timber management and other resources. Only then will the public and Forest Service decision maker have the ability to review and understand the impacts of designating large areas as roadless.*
- 5. A site-specific analysis should be performed for each road closed or proposed to be closed.*
- 6. The Forest Service should further evaluate IRAs not only for their Wilderness attributes but also from an ecosystem context or for their potential to preserve or recover watershed integrity, water quality, and listed fish species.*

Response to Concern 860.10

The evaluation for wilderness recommendations (Appendix C) and the Roadless section of Chapter 3 in the FEIS have both been revised and improved to include some of the additional analyses mentioned in the above comments. A new appendix (Appendix H) analyzing selected ecological and social characteristics within each IRA has also been developed and added to the FEIS. Maps have been added to Appendix C illustrating the additions and deletions to the roadless area inventory since the original Forest Plans were developed.

However, some of the analyses suggested above were not included in the final documents. Analysis of undeveloped areas less than 5,000 acres that are not adjacent to existing Wilderness, descriptions of past logging activity or other development, and comparative analyses with other analyses were not added to the EIS. Site-specific analyses were also not included. It was felt that these suggested additions were either unnecessary, did not contribute anything significant, or were inappropriate at the programmatic Forest planning level. The revised Forest Plans would also not close any roads in and of itself. A site-specific analysis is required for any road closure proposals stemming from revised Forest Plan direction. This will likely occur during subsequent travel planning processes or project-specific activities.

Concern Statement 860.11

The ongoing controversial debate over roadless area protection should be acknowledged in the “Need for Change” section, and/or roadless areas should be included in topic 8 as a Management Emphasis Area.

Response to Concern 860.11

Given the still uncertain outcome of the Roadless Area Conservation Rule as well as the current conditions within IRAs, it was not felt that listing roadless area protection as a Need for Change was appropriate. However, through the land management allocation process that was part of the Forest Plan revision effort, management direction for areas within IRAs was examined and an array of prescriptions was developed under each of the 7 alternatives.

Concern Statement 860.12

The EIS should provide better definitions and criteria for roadless areas and make it easier to locate information on RARE I and RARE II. There should be a clear explanation of the treatment of roads in the roadless areas.

IRAs should not be represented as being roadless, as many mechanized recreational opportunities exist in these areas. Many “ghost roads” existed prior to the Roadless Area Review and Evaluation (RARE I, 1972 and RARE II, 1977). The ghost roads that currently exist in IRAs should be inventoried and recognized as being part of the Forest Service travel system, otherwise it could be interpreted that if they were never inventoried, they never existed.

These ghost roads do not necessarily have to be maintained, but they should be evaluated for their usefulness. Those that are deemed useful and not causing undo ecosystem damage should be made available to the public for semi-primitive recreation involving motorized and non-motorized use.

Response to Concern 860.12

Additions were made to both the Roadless Section of Chapter 3 in the FEIS as well as Appendix C to address IRA criteria and the relationship of roads to IRA inventory determinations. Added text explains the fact that classified and unclassified roads and other travelways do exist within IRAs and that in most cases, their presence does not invalidate classification of the area as an IRA. Additionally, forest-wide management direction was added to identify and address classified roads within IRAs. Analysis of transportation system needs is addressed in the Facilities and Roads forest-wide management direction as well as the Forest Service Roads Management Strategy (Roads Rule), which requires completion of roads analysis during both Forest Planning and project-level planning processes.

Concern Statement 860.13

The Forest Service should establish a management proposal for all unroaded lands of 1,000 acres or more and include the same criteria and management allocations under which IRAs are evaluated.

Response to Concern 860.13

Under the planning regulations governing this revision process, there are no process requirements specific to unroaded areas greater than 1,000 acres. As with all other areas within the Ecogroup, resource conditions and treatment needs within unroaded lands were identified and addressed through the land management allocation process. A mapping exercise for unroaded areas was completed for Alternative 6 and all of the resultant areas were assigned to MPC 4.1b in that alternative.

Concern Statement 860.14

Concerns regarding information in DEIS appendix C were expressed in the following statements:

- 1. "Alternatives and Environmental Consequences," page C-289: The Forest Service should clarify why the IRA disposition by alternative shows approximately 30,000 acres for all alternatives (except alternative 6), but under "Potential for Future Development," the acres shown for all alternatives is zero. This does not fit with the goals of the Forest Service or those of Pomerelle Mountain Resort to provide for the recreation demands of the public.*
- 2. The text mentions a road up Granite Creek; this was a road years ago but is currently only a trail and too narrow for even a jeep to navigate. The text also mentions the Grouse Creek Road, which has been closed, fenced, and posted for years. This road was #291 on a 1966 Forest Service map, but was deleted on the 1988, 1995, and current Travel Plan maps.*
- 3. The assumption that Deadwood is popular with motorized users (C-124), without mention of non-motorized hikers and bikers, is difficult to understand. What data is used? The trail register shows a preponderance of non-motorized users on the Deadwood Ridge Trail. While our experience and review of the trail registers show most of the use is by hikers, all of the trails are motorized and none are non-motorized. This imbalance in trails should be corrected, as should the perception of it being a motorized user dominance.*
- 4. The interest in wilderness designation or other protection for the Deadwood area has increased tremendously in the last six years.*

5. *Page C-193. Ingress and egress are discussed across Boise Cascade and State lands. The Forest Service should note that access across State lands is not provided by the Boise Cascade cost share agreement.*

Response to Concern 860.14

1. These values presented in the IRA disposition comparison represent the potential, long-term outcomes of managing the IRA based solely upon its MPC assignments. The areas shown as “available for development” are ultimately “available” but may not be likely to be developed. The values presented as “potential future development” represent the amount of area within each IRA that is likely to become priority areas for development activities over the course of the next two or three decades. These figures are the result of combinations of management emphasis/direction (MPCs), and existing conditions represent a further refinement of the level of development within each IRA that may result under each alternative. Not all types of potential development are represented in the estimates in Appendix C in that the analysis is more focused on development that is proposed by the Forest Plan and development that is represented in other completed analyses. As a result, the potential development estimates largely consisted of development arising from timber growth and yield, and uncharacteristic fire hazard and fuel reduction treatments. In the case of potential ski area expansions, it was felt that estimates of potential development would be based on approved Master Plans. Absent implementation of the Roadless Area Conservation Rule, it is more appropriate to focus on the assigned management prescription (MPC) rather than the potential development estimates in Appendix C when trying to get a sense of development allowances.
2. The comments regarding the Granite Creek and Grouse Creek roads are noted. The text in the Final Appendix C has been revised to reflect the comments.
3. Part of the intent in the descriptions of the trail systems in the Deadwood IRA, as well as other IRAs, is to highlight existing mechanized travel recreation uses and opportunities because they would be lost with wilderness designation. The text in the Final Appendix C has been revised to include recognition that non-motorized use of the Deadwood Ridge trail by hikers and mountain bikers is also popular. As far as travel designation for these trails are concerned, consideration of changes of travel allowances is deferred to subsequent site-specific travel planning processes.
4. The comment regarding the level of public interest in wilderness designation or protection for the Deadwood IRA is noted. The text in the Final Appendix C has been revised to reflect the comment.
5. The comment regarding access potential in the Needles IRA is noted. The text in the Final Appendix C has been revised to delete State of Idaho lands from this discussion since the land exchange has taken place and access to these lands is no longer in question.

Concern Statement 860.15

A commenter stated that IRAs should be considered for mechanical treatment only after the other higher priority areas are addressed and only if it does not degrade ecological values. Mechanical treatments should be done from existing roads, in both the IRAs and the already roaded forests.

Response to Concern 860.15

Treatment priorities are based on existing conditions and their departure from desired conditions. In cases such as uncharacteristic fire hazard treatments, it is not appropriate to base priorities on whether an area in need of treatment is within an IRA or outside of an IRA. This is because the same conditions may exist on either side of the IRA boundary and limiting treatment to areas outside of IRAs may reduce the overall effectiveness or their likelihood for success. Effects on ecological values are assessed during project level planning.

Levels of new road construction differ by alternative. All alternatives would result in some level of new road construction although new road construction would be a very low level under Alternative 6. In some cases, limiting mechanical treatments to existing roads may adversely affect the ability to treat large areas with appropriate treatments. Under Alternative 7, the Preferred Alternative, overall new road construction would be at a substantially higher level than Alternative 6, however, new road construction within IRAs would be a very low level due to the assigned MPCs.

Concern Statement 860.16

All “roadless” federal lands, not currently designated as Wilderness, should be reviewed for their importance to back country recreationists and considered for designation as “Back Country Recreation Areas” within the next two years. This designation would encourage cooperation between diverse recreational interests and between recreationists and resource industries.

Response to Concern 860.16

Areas assigned to MPCs 1.2, 4.1a, and 4.1c would provide a range of primitive and semi-primitive recreation experiences comparable to that of a “Back Country Recreation Area” designation. In addition, a number of MPCs such as 3.1 and 3.2 represent very low levels of development potential and would also continue to provide semi-primitive recreation experiences. The combination of these MPCs and their numerous applications in IRAs should continue to provide a range of semi-primitive recreation experiences across the Ecogroup. It was not felt that designating another, separate MPC for this purpose was necessary.

Concern Statement 860.17

The Forest Service should manage travel within roadless areas in accordance with current rules, permitting both motorized and non-motorized recreation uses that do not compromise their roadless character or result in unacceptable resource impact

Response to Concern 860.17

The opinion stated in the comment was reflected in Alternatives 1B, 2, 3, 5, and 7, under which travel within IRAs would be guided by the current travel plans.

870 Roadless Area Conservation Rule

Concern Statement 870.01

Commenters stated that the Roadless Area Conservation Rule should be adopted and fully implemented to protect all roadless areas from logging and road construction.

Response to Concern 870.01

Resource management needs within each Inventoried Roadless Area were considered during the assignment of management prescriptions in Alternative 7, the Preferred Alternative. Approximately 23 percent of the area within Ecogroup IRAs was assigned to management prescriptions that are fully consistent with the Roadless Area Conservation Rule. The final disposition of the RACR was still undetermined at the time of these assignments. If the RACR is upheld in court, management activities must be designed and implemented consistent with the Rule, or will not be allowed to occur.

Concern Statement 870.02

Commenters expressed concern that the Inventoried Roadless Areas should not be locked up by the Roadless Area Conservation Rule. Forest roads, properly constructed and maintained, are an investment and a critical part of forest management, emergency response, and recreation use.

Some commenters desire to see the Clinton Roadless Initiative overturned.

Response to Concern 870.02

Resource management needs within each Inventoried Roadless Area were considered during the assignment of management prescriptions in Alternative 7, the Preferred Alternative. Approximately 23 percent of the area within Ecogroup IRAs was assigned to management prescriptions that are fully consistent with the Roadless Area Conservation Rule. The final disposition of the RACR was still undetermined at the time of these assignments and is beyond the scope of the revision effort.

Concern Statement 870.03

The DEIS must be amended to reflect the U.S. District Court of Idaho's and the current Administration's decisions on Roadless issues. It is premature to apply the Rule to the Forest LMPs, which is not even portrayed in a meaningful way. In light of Judge Lodge's injunction on the Roadless Rule, the roadless portion of the document should be stricken or significantly modified until the dispute is resolved. Also, in light of Judge Lodge's decision, suitable acres within the inventoried roadless areas should be managed under MPC 5.1 and 5.2.

Response to Concern 870.03

Resource management needs within each Inventoried Roadless Area were considered during the assignment of management prescriptions consistent with the themes for each alternative. Alternative 7, the Preferred Alternative, as developed, was formulated following interim direction for managing roadless areas. Under Alternative 7, approximately 23 percent of the area within Ecogroup IRAs was assigned to management prescriptions that are fully consistent with the Roadless Area Conservation Rule. The remainder of the IRAs have prescriptions assigned that allow some level of restoration, salvage harvest, or other development that was deemed appropriate given the resource conditions of each individual IRA. The final disposition of the RACR was still undetermined at the time of these assignments.

Concern Statement 870.04

The Final EIS should explain how other activities would be managed under the Rule. For example, the Forest Service should describe how a needed ski area expansion or a new ski area for which roads are required, or for which some inventoried "Roadless" areas are involved, would be affected.

Response to Concern 870.04

In that the RACR is not final, its implementation is still uncertain. Under the Rule, road construction and timber harvest would be allowed for new ski areas or ski area expansions within IRAs provided that the expansion or construction was approved in a signed decision document prior to the publication date of the RACR (1/12/01).

880 Road and Trail Decommissioning, Obliteration, and Closures

Concern Statement 880.01

The Forest Service should decommission unnecessary spur and secondary roads and focus on maintenance of main roads. New roads are not needed. Existing roads should be inventoried and maintained for mixed-use or obliterated.

Response to Concern 880.01

The opinions expressed in this comment were considered during development of management direction for the preferred alternative. Related management direction for managing the road system can be found in goal FRGO01, objective FROB06, and guidelines FRGU04 and FRGU07. It was not felt that an overall ban on new road construction was appropriate because new road construction may be needed in a number of situations such as to provide access for vegetation treatments and recreation facilities, to respond to emergency situations, and/or to fulfill legal obligations such as treaty rights and mining access.

Concern Statement 880.02

The Forest Service should indicate the analysis or documentation used to estimate the number of miles of road obliteration and newly constructed roads per alternative per year (DEIS page 3-275).

Response to Concern 880.02

Estimates for miles of new road construction and road obliteration used in the effects analysis are modeling output estimates from one of the Spectrum vegetation models. Generally, the EIS represents a summary of the results of effects analyses that are completed. Model details and assumptions are fully explained in technical reports that are part of the planning record and are available upon request.

Concern Statement 880.03

The Forest Service should explain who determines what roads are no longer needed.

Response to Concern 880.03

Decisions to decommission roads can be part of the decisions made in a variety of types of projects ranging in scale from District to Forest. As such, these decisions are usually made by either District Rangers or Forest Supervisors depending upon the type or scale of project and upon specifically delegated authorities.

Concern Statement 880.04

The Forest Service should share information with search and rescue units so they know what local roads have been, or are scheduled to be, restricted or obliterated.

Response to Concern 880.04

Decisions to close or obliterate roads are generally done in public involvement processes with involvement by local county governments. Seasonal road closures are represented in travel maps.

Concern Statement 880.05

The LMPs state that unneeded roads and trails would be actively decommissioned and returned to productivity, but no further explanation was provided in the DEIS regarding what effect this would have on the overall availability of trails. The Forest Service should prepare an analysis of the effect this action would have on recreation and backcountry access, as the removal of trails would concentrate backcountry use and contribute to localized environmental damage.

Further, roads should not be decommissioned or obliterated but, rather, converted to a trail under the roads-to-trails conversion program. If a road is closed, it could be bermed and seeded and used as a multiple-use trail. Within a few years many shrubs and trees will have set root, the trail will have been stabilized, and the erosion problem will be solved; yet, there would still be access for trail bikes and ATVs.

Response to Concern 880.05

The recreation effects analysis for the FEIS was expanded to include an analysis of potential levels of recreation road access and motorized trail opportunities under each alternative. The Inventoried Roadless Area effects analysis also includes a trails analysis, similar to the recreation analysis, but expanded to include mechanical transport devices such as mountain bicycles. In that trail decommissioning occurs far less frequently, no analysis of potential trail decommissioning was included. In most cases, resource impacts from trails are mitigated through access management or by relocation or reconstruction techniques.

Roads to trails conversions are addressed by inclusion of Facilities and Roads guideline FRGU03, which calls for consideration of trail conversion prior to decommissioning roads.

Concern Statement 880.06

Road restoration or road decommissioning should not be linked to timber sales. Instead, funds should be gained through other sources.

Response to Concern 880.06

The EIS statement that generated this comment was a simple recognition of the fact that road restoration and decommissioning are occasionally accomplished as elements of timber sale packages. The statement implied that these activities are also accomplished using funding sources other than timber sales. It is felt that no opportunities for the accomplishment of road restoration and decommissioning should be categorically dismissed or eliminated.

Concern Statement 880.07

There is concern that road closures and obliterations can be prevented by local county ordinances, even when closures are written into logging plans. Therefore, the LMPs should not allow new road construction unless the new road is necessary and will not cause undue ecological harm, and the Forest Service has guaranteed congressional funding to adequately maintain the new road. Because Forest Service budgets are not sufficient to adequately maintain current roads, new ones should not be built and existing roads should be retired.

Response to Concern 880.07

It was not felt that a complete ban on new road construction was appropriate because new road construction may be needed in a number of situations such as to provide access for vegetation treatments and recreation facilities, to respond to emergency situations, and/or to fulfill legal obligations such as treaty rights and mining access. Recent experience on all three Forests has been that the levels of road decommissioning have far exceeded the levels of new road construction. Revised management direction in the Forest Plans will serve to minimize impacts of any new roads that are built. Funding for any program or resource cannot be guaranteed.

Concern Statement 880.08

The scar from reclamation of the road in the Slate Creek drainage is an example of what can result from road obliteration. The scar can be seen for miles, and inadequate water barring allows water to be channeled thus, accelerating velocity and increasing erosion. Road retirement activities should include adequate drainage, reseeding, and the use of closure gates rather than obliteration. The road should be left intact, but with access limited in order to protect against erosion, safeguard wildlife values, and provide recreational opportunities such as mountain biking, hiking, and horseback riding. If immediate access is needed for fire suppression, only minimal repairs should be made to allow fire crews access to the area.

Response to Concern 880.08

Generally, a number of options are considered when it is determined that a road is not needed. Conversion to trail status, seasonal closure, physical closure, and obliteration might all be considered. Determination of the appropriate measure to use is usually based on a number of factors such as resource impacts, long-term access needs, recreation opportunities, topography, and rehabilitation potential. Road obliteration results can vary on a case-by-case basis depending upon site conditions. Those cited in the comment are not always the result. In some cases, little or no evidence of the road prism may be evident within short-term time spans. Although obliteration may not be the optimal solution in some situations, it was felt to be inappropriate to categorically remove obliteration as potential road management option.

Concern Statement 880.09

Commenters stated that forest roads and trails, when properly constructed and maintained, are an investment and a critical part of forest management, emergency response, and recreational use, and must be treated as significant capital investments. Without roads and access, more homes would be lost to fire.

Another commenter mentioned studies that show fires in roaded areas burn hotter and more destructively than fires in roadless areas. There is concern that roads provide access and careless people in the forest are a far greater threat than lightning strikes.

Response to Concern 880.09

We agree that many roads are important capital investments that provide needed access to many portions of the Forests and facilities. However, determining where road access is needed is complicated. Even roads that are properly located, constructed, and maintained can still have undesired impacts.

In general, road access for wildland fire suppression needs to structures within interface areas is already in place. However, it was felt that road access in some areas would need to be augmented to facilitate treatments to reduce fuel loadings and restore desired vegetation conditions. Road construction allowances under MPC 3.2 were adjusted to provide for these situations and prescriptions were assigned immediately adjacent to interface areas to allow for needed treatments. The Forests have relied more in the past on air attack resources for wildland fire suppression needs in unroaded areas. This has developed air attack resources to the point where road needs for fire suppression outside of interface areas are less certain.

Recreation uses and experiences vary. Roads are needed to provide access to recreational facilities such as campgrounds and trailheads. However, not all recreation uses require high levels of road access and constructing new roads purely to provide recreation access is not desirable in areas where primitive and semi-primitive recreation experiences and settings are desired.

The comment regarding fire intensities did not supply information about the mentioned studies or information related to the differences between roaded and unroaded areas that resulted in differing fire intensities. As such, it cannot be determined whether conditions similar to those in the mentioned studies also exist within the Ecogroup.

Fire occurrence data for the Ecogroup shows that on the Boise and Payette Forests, at least eight of the ten largest fires on each Forest were caused by lightning. On the Sawtooth, five of the ten largest have been caused by lightning. The opinion that human presence poses more of a risk than lightning is not supported by local Ecogroup fire history data. It is likely that roads play a role in some cases of human-caused fire starts. However, fire prevention patrols and contacts are generally focused on roaded areas as roads allow for greater coverage and more contacts with the available prevention resources.

Concern Statement 880.10

Commenters expressed concern that closing or obliterating more roads would contribute to greater user conflicts and lower visitor satisfaction. With the downturn in the timber industry, recreation must be given greater emphasis. Therefore, road and trail opportunities should be expanded, and the travel plan revision process should ensure no net loss of motorized and non-motorized trail opportunities.

Response to Concern 880.10

Recreation demand does not take precedence over the land's capability to provide recreation opportunities without unacceptable resource damage. Good land stewardship requires that other resource needs as well as resource impacts associated with roads, trails, and recreational use be addressed. In some cases, this may mean road and trail closures or decommissioning. Although alternatives to closures and decommissioning will usually be examined, a no net loss of trail opportunities cannot be guaranteed.

Concern Statement 880.11

The Forest Service should keep roads open unless they are considered to be detrimental to the forest, which should be determined by the local District Ranger. Trails that are contributing to increased sedimentation should be repaired or rerouted to mitigate erosion. Simply closing a trail should be the last option. Grant funding is available for trail improvement projects from the Idaho Department of Parks and Recreation.

Response to Concern 880.11

The Forest transportation network is managed to achieve a number of objectives including but not limited to public recreational and administrative access, commodity production and removal, reduction of impacts to other resources, and minimization of maintenance costs. A range of possible management actions may be used to address unneeded roads and trails or associated impacts to other resources. These management actions include but are not limited to road to trail conversions, reconstruction, relocation, seasonal restrictions, physical closure, and obliteration. Decisions to decommission roads can be part of the decisions made in a variety of types of projects ranging in scale from District to Forest. As such, these decisions are usually made by either District Rangers or Forest Supervisors depending upon the type or scale of project and upon specifically delegated authorities.

In the case of trails, resource impacts from trails are usually mitigated through access management or by relocation or reconstruction techniques. Usually, trail closure is the last option unless the trail has been determined to not be needed.

State trail grant funds have proved to be a valuable source of funds to improve and maintain trails within the Ecogroup. It is anticipated that cooperative efforts such as this will continue to improve recreation opportunities and experiences in the future under the revised Forest Plans.

Concern Statement 880.12

The Final DEIS should incorporate the policies of the recently completed "National Forest System Road Management Strategy."

Response to Concern 880.12

Forest-level roads analyses were completed and considered as part of the Forest Plan revision process in conformance with new road management regulations.

Concern Statement 880.13

The Forest Service cannot close roads in accordance with 16 U.S.C. 530, 531, and 532.

Response to Concern 880.13

We do not agree with the interpretation of 16 U.S.C. 530, 531, and 532 stated above.

16 USC 530 authorizes the Secretary of Agriculture to cooperate with interested State and local governmental agencies and others in the development and management of the national forests and does not constrain the ability of the Forest Service to close roads.

16 USC 531 specifically allows for “making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources;”.

16 USC 532 requires "an adequate system of roads and trails." Through project and access management planning processes, the Forest Service determines and provides for an adequate system of roads. Forest Plan direction for closing roads is directed at those roads no longer needed and/or those causing unacceptable resource damage. The statute does not categorically prohibit road closures.

Concern Statement 880.14

Trails that were historically in the trail inventory should be considered for inclusion back into the trail system.

Response to Concern 880.14

In many cases, trails that have been decommissioned or removed from the National Forest Trail system were removed due to resource impacts associated with location or construction features, duplication of access, or general lack of use. Current trail maintenance budgets require that additions to the trail system must be carefully weighed relative to maintenance capabilities and public access needs. Subsequent travel management processes will serve as opportunities for the identification and consideration of trail system additions.

885 Aviation (airports, runways)

Concern Statement 885.01

The DEIS and LMPs should evaluate aviation resources in a fashion similar to how the other resources were evaluated. There were a number of Forest Service and state airports that were not mentioned in any of the planning documents. Without an evaluation, airport resource could be negatively impacted.

Aviation resources are directly affected by several of the “Resource Issues and Indicators” considered in the DEIS and draft LMPs. After review of the estimated outcomes and activities, by alternative, Alternative 3 is the choice for the LMPs.

Most MPCs are acceptable if there are no restrictions on public-use airport accessibility and maintenance related to MPCs 3.2 and 5.1. There is concern with MPC 1.2, "Recommended Wilderness," which allows natural processes to dominate. This MPC would be acceptable as long as either wilderness aviation protections are included in the enabling legislation, or backcountry airports (such as the Graham Airport) are excluded from the wilderness and protected and maintained under the LMPs.

Response to Concern 885.01

A need for change associated with aviation resources was not identified by internal or external scoping and there are no requirements to analyze facilities as part of the Forest planning process. As a result, it was felt that evaluation of aviation resources will be done in the future on an as needed basis. The comment regarding the Graham airport was noted and the airport has been excluded from recommended wilderness in Alternative 7, the preferred alternative. The stipulations of enabling wilderness legislation are beyond the scope of the Forest Plans.

Concern Statement 885.02

There is concern about future off-airport aviation operations that may occur in the IRAs. Concern is focused primarily on helicopter operations associated with fire suppression activities, timber sales, search and rescue, Forest Service administrative activities, and law enforcement. The DEIS does not specifically address these activities.

Response to Concern 885.02

In general, the EIS and revised Forest Plans do not specifically address or place limitations on helicopter operations. At the programmatic level, the greater, overall effects of the timber sales, fire suppression and other activities are addressed. Effects from needs associated with helicopter operations are more appropriate at the project-level scale.

Concern Statement 885.03

The goals state that each Forest would minimize the issuance, re-issuance, and expansion of special use permits on National Forest lands that create a permanent encumbrance. It is important that implementation of these goals does not compromise airport use, maintenance, and safety. The special use permits should be user-specific, especially for airports.

Response to Concern 885.03

The comment was noted. This goal was removed from the final version of the Forest Plans.

Concern Statement 885.04

There is concern regarding seasonal airport closures for reasons other than airstrip safety, repair, and operational emergency considerations. Any closure must include agency coordination and public involvement, and all temporary closures of a non-emergency nature should also be done in consultation and cooperation with the Idaho Transportation Department Division of Aeronautics and other involved state and federal agencies.

Response to Concern 885.04

Forest-wide management direction in the revised Forest Plans includes an objective to coordinate the management of transportation systems with other federal, state and county agencies, tribal governments, permittees, contractors, cost-share cooperators, and the public to develop a shared transportation system serving the needs of all parties to the extent possible.

Concern Statement 885.05

The Forest Service and Division of Aeronautics should cooperate on an annual program to facilitate Forest Service airport inspections and maintenance. It is suggested that the Forest Service provide the materials and supplies and the personnel to work with backcountry pilots from the Idaho Aviation Association, the 99s, and other citizen pilot groups. The annual program would distribute the effort to those best able to perform while keeping the responsibilities with the proper agencies. It would also give the user-based aviation community a stake in the system.

Response to Concern 885.05

Forest-wide management direction in the revised Forest Plans includes an objective to coordinate the management of transportation systems with other federal, state and county agencies, tribal governments, permittees, contractors, cost-share cooperators, and the public to develop a shared transportation system serving the needs of all parties to the extent possible. Although valued, the specific suggested activity is beyond the scope of the Forest Plan.

Concern Statement 885.06

Each Forest should have an aviation plan that contains Forest-wide and airfield-specific goals and objectives. The plan should include an individual maintenance program with budgeted annual funding for each airport. Airports should be recognized as important recreational and administrative access points that deserve the same planning and maintenance considerations as roads, trails, trailheads, and campgrounds.

Response to Concern 885.06

The comment is noted. We agree that airports are important recreational and administrative access points and that they deserve to be properly managed. A management objective specific to airfields and helispots was included in the revised Forest Plans for this purpose. However, development of a specific maintenance program with annual budgeted funding is beyond the scope of this revision effort. Although many of the Forests' airports receive frequent use, their use by the public is substantially less than the level of use experienced on Forest roads, trails, trailheads, and campgrounds.

890 Wilderness and Recommended Wilderness

Concern Statement 890.01

Public comments indicated the desire and/or need for varied levels of recommended wilderness. These ranged from none to every acre of every Inventoried Roadless Area (IRA).

Response to Concern 890.01

Public opinions for wilderness recommendations were diverse reflecting a wide variety of opinion and desire among the public regarding additions to the Wilderness Preservation System. Acres of recommended wilderness ranged widely from 0 acres in Alternative 5 to approximately 2,538,000 acres in Alternative 4. Although every IRA was not selected for wilderness recommendation under Alternative 4, about 80 percent of the total recommended wilderness nominations from comments were represented in Alternative 4. Alternative 7, the preferred alternative, recommends almost 662,000 acres within 7 different IRAs for wilderness designation. It was felt that this level of additional wilderness would be sufficient to meet future demands for wilderness experiences. The areas selected for wilderness recommendation, such as the Boulder-White Clouds, all possess outstanding wilderness characteristics and sustained public interest. At the same time, almost 2,000,000 acres within the remaining IRAs are assigned to management prescriptions that do not allow road construction, making the majority of those acres likely to again be available for wilderness recommendation analysis during the next Forest Plan revision process.

Concern Statement 890.02

Specific IRAs were suggested for management as recommended wilderness or for management as something other than recommended wilderness.

- 1. Although every IRA received at least one response in favor of wilderness recommendation, the following IRAs received an elevated level of support for designation as Wilderness: Deadwood, Peace Rock, Snowbank, Smoky Mountains, Boulder-White Cloud, Pioneer Mountains, Caton Lake, Needles, Secesh, French Creek, Patrick Butte, and Rapid River.*

2. *Some comments suggested that specific IRAs not be recommended for wilderness designation; these included Boulder-White Cloud, Red Mountain, Secesh, and Needles.*

Response to Concern 890.02

Again, public opinions regarding specific IRAs reflect a wide variety of opinion and desire among the public regarding how these areas should be managed. Under Alternative 7, approximately 25 percent of these IRAs are assigned to MPC 1.2; 24 percent to 3.1; 14 percent to 3.2; and 31 percent to 4.1c. The remaining 6 percent is spread between MPCs 2.2, 4.1a, 5.1 and 6.1. For the most part, these assignments represent more of a custodial management approach rather than commodity production within these areas. They also reflect a high priority on aquatic and terrestrial wildlife resources, water quality and recreation values within these areas. Portions of the Boulder-White Cloud, Red Mountain, Secesh, and Needles IRAs remain assigned to recommended wilderness (MPC 1.2) because of their outstanding wilderness characteristics.

Concern Statement 890.03

Numerous public comments addressed how recommended wilderness areas are to be managed.

1. *Some commenters favored managing recommended wilderness as wilderness and/or management that would prohibit motorized or mechanized transport.*
2. *Other commenters were opposed to managing these areas as wilderness unless designated and/or management that would not allow motorized uses and mechanized transport within recommended wilderness areas.*

Response to Concern 890.03

Management of recreation uses within areas recommended for wilderness designation is a growing concern for many people. In response to this issue, Alternatives 4 and 6 included management direction that would prohibit motorized and mechanized transport within these areas. Under Alternatives 1B, 2, 3, 5, and 7, access management was defined by the current travel plans and maps. Public opinions were generally polarized either in support of the prohibition or against it. In Alternative 7, the preferred alternative, it was not felt that motorized or mechanized uses within recommended wilderness necessarily constitute long-term loss of wilderness characteristics. However, it was felt that this issue should be considered individually on a site-specific basis in future travel planning processes rather than programmatically in a Forest Plan. This will allow greater flexibility for assessing and considering traditional access methods and needs within these areas while maintaining motorized and mechanized recreation opportunities where feasible.

Concern Statement 890.04

Commenters offered numerous statements concerns regarding DEIS appendix E.

- 1. The appendix shows the Sawtooth Wilderness Area divided into Opportunity Classes (OC) I, II, III, and IV. The map on page E-44 divides the Wilderness into OCs. The Forest Service should explain if the OC designations are permanent or if the Wilderness will eventually be changed to all OC IV as more and more people use the area. The Forest Service could set visitor limits, and one way to do this is through Wilderness permits. If visitors exhibit good stewardship, then more people would be allowed to visit the area.*
- 2. Page E-72, Segment 1 should note that the State section that was dropped from the "State No. 5 Land Exchange" should be considered in future land exchange proposals.*
- 3. Page E-7: The Forest Service should explain what laws are going to be enforced.*
- 4. Page E-11: "Outfitters provide a quality service necessary to enable the public . . ." This should be " . . . enable a certain portion of the public."*
- 5. Page E-14: "Dogs must be under except . . ." This is unclear or it could be a typo.*
- 6. Page E-15: Add, "Violators may be prosecuted and may lose their right to have a permit."*
- 7. Page E-14. : Regarding the guideline that all users must have permits: day-use permits should be different than overnight permits, as overnight involves greater impact because it allows travelers to cover greater distances into more sensitive areas.*
- 8. The Sawtooth Wilderness Management Plan, Appendix E of the Sawtooth LMP, is incorrect and not consistent with the Wilderness Plan adopted in September 197, and revised in accordance with 36 CFR 251.999. Several changed issues that are not correct deal with bear bating, group sizes, permits, education, mapping, large group sites, stock numbers, pack stock, outfitter use days, trail maintenance, and user conflicts.*

Response to Concern 890.04

Appendix E, the Sawtooth Wilderness Management Plan, was developed in a separate planning process culminating with a decision on September 15, 1997. As such, it was not intended to be subject to comment and review in the Forest Plan revision process. The version of the Sawtooth Wilderness Management Plan that was included in the Draft Sawtooth Forest Plan had a number of technical and typographic errors, which were corrected in the Final Sawtooth Forest Plan. However, suggestions for substantive changes to the Wilderness Management Plan were not considered in this process.

Concern Statement 890.05

The current LMPs only recommend for wilderness designation portions of Secesh, Needles, Red Mountain, Ten Mile-Black Warrior, Hanson Lakes, Pioneer Mountains, and White Cloud-Boulder Roadless Areas; a total of only 0.704 million acres. Alternatives 2 and 3 do not improve upon this small amount. The only other choices for recommended wilderness are none or 2.425 million acres, which does not provide a wide-range of choices.

Response to Concern 890.05

In the selected alternative, the decision is not limited to only what was specifically represented in each of the alternatives. Rather, the decision maker can select a combination of features from different alternatives as long as the combination lies within the bounds of what was analyzed in the EIS. A decision anywhere within the range of 0 to about 2,500,000 acres of recommended wilderness would be within the bounds of what was analyzed in the EIS. As a result, the recommended wilderness options open to the deciding official are quite numerous.

Concern Statement 890.06

The Forest Service must resolve conflicts, address travel management issues, and preserve roadless areas if wilderness resources are to be protected.

Response to Concern 890.06

Some conflicts were addressed at the programmatic Forest Plan level through new management direction and/or MPC assignments. For example, Alternatives 2, 3, 4, 6, and 7 reduce or eliminate grazing in two areas highly popular with recreationists (Adams Gulch, a portion of the Big Wood drainage, and Howell Canyon) in an effort to reduce recreation / livestock grazing conflicts. New forest-wide management direction has also been incorporated into the revised plans including Recreation goals REGO03 and REGO06, objectives REOB23 and REOB24, and guidelines REGU04, REGU24, and REGU25. However, some conflicts, such as motorized/non-motorized conflicts, ultimately must be addressed at the site-specific level through review and revision of the Travel Map in a separate planning process.

It was decided to defer site-specific travel management to subsequent travel planning processes. It was felt that addressing travel elements in this process would add significantly to the difficulty of meeting the court-mandated timeframe that was imposed on the Payette National Forest for Forest Plan revision. It was also felt that site-specific differences in local conditions, resources, uses, and access needs can be better taken into account in separate, site-specific planning processes.

Travel regulations within recommended wilderness were addressed in the revision effort to the extent that mechanical transport was prohibited within recommended wilderness under Alternatives 4 and 6.

The seven alternatives represent a variety of management alternatives for Inventoried Roadless Areas. Under Alternative 6, all IRAs were assigned to Management Prescription Categories that would preserve their status as IRAs. Under Alternative 7, the preferred alternative, only 5 percent of the area within Ecogroup IRAs was assigned to MPCs that would allow a full range of development. 72 percent of the area within IRAs was assigned to MPCs that would potentially allow low levels of development. These assignments were based on resource conditions and needs within these areas.

Concern Statement 890.07

It was noted there are many areas that have been recommended for wilderness designation; however, some acres in the recommended areas are no longer fully suited for that designation. Since the last Forest planning cycle, increased human use has caused changes to many areas, and the need for sanctuary for biotic species has changed with listing of additional species under ESA. The Forest Service should use the criteria for wilderness evaluation that is contained in the Forest Service Manual and reanalyze the recommended areas.

Response to Concern 890.07

Wilderness evaluations documented in Appendix C of the EIS include updated resource conditions and descriptions. A new appendix, Appendix H, describes and evaluates roadless characteristics in each IRA. These evaluations were considered in the formulation of Alternative 7, the preferred alternative. Development of the wilderness evaluation in Appendix C was guided by Federal regulations presented in 36 CFR 219.17 and Forest Service policy presented in Forest Service Handbook 1909.12, Chapter 7.

Concern Statement 890.08

There are State lands in the French Creek and Secesh IRAs, and the Payette National Forest should seriously consider exchanging these lands before they are recommended for wilderness designation; the State will oppose that recommendation if the lands are not exchanged.

Response to Concern 890.08

There are no lands in the French Creek IRA recommended for wilderness designation under Alternative 7, the preferred alternative. Parcels of land, within the portion of the Secesh IRA that is recommended for wilderness designation, that are not in federal ownership would not be included in the recommendation and would be excluded in the event of formal designation as Wilderness. The portion of the Secesh IRA that is recommended for wilderness designation under Alternative 7, the selected alternative, was updated from the version that was recommended under the current Payette Forest Plan in 1988 with the addition of several parcels of land that were acquired from the State of Idaho as part of a land exchange agreement.

Concern Statement 890.09

The Guideline on page III-70 of the LMP states, “Non-conforming uses in recommended wilderness should not be promoted.” That language is too vague and should state “not permitted” or “not allowed.” Also, this statement does not address existing uses such as transmission lines. The Forest Service should explain if such use would be grandfathered under designated and recommended wilderness.

Response to Concern 890.09

The term “promote” was added to the glossary and defined in the context of recommended wilderness management in the final, revised Forest Plans. Substitution with the terms “not permitted” or “not allowed” do not accurately reflect the intent of the management direction.

Concern Statement 890.10

The Forest Service should reference the analysis or documentation used to determine the recommended Wilderness Areas in Table II-3 in the Boise National Forest LMP).

Response to Concern 890.10

Table II-3 lists recommended wilderness areas under the current Boise Forest Plan. Those wilderness recommendations were based on wilderness evaluations that were documented in Appendix C of the EIS. The text has been revised to reflect this.

Concern Statement 890.11

The Forest Service should manage wilderness for non-motorized recreation, with specific exceptions outlined in the laws. Non-motorized recreation should be a management emphasis of MPC 1.2.

Response to Concern Statement 890.11

Non-motorized recreation is already emphasized in all designated wilderness areas within the Ecogroup. In Alternative 7, the preferred alternative, it was felt that motorized/non-motorized decisions should be considered individually on a site-specific basis in future travel planning processes rather than programmatically in a Forest Plan. This will allow greater flexibility for assessing and considering traditional access methods and needs within these areas while maintaining motorized and mechanized recreation opportunities where feasible.

Concern Statement 890.12

Table C-3 should reflect the current acreage of each IRA to use as a comparison for the net acres recommended for wilderness for each IRA. It would then be clear that less than half of the acres in the specific IRAs recommended for wilderness are actually included in the recommendation. Calculations show that the only 190,000 of the 460,000 available acres in the Boulder-White Cloud IRA are recommended for wilderness, and only 116,000 of the 248,000 acres of the Secesh IRA are recommended for wilderness. There should be another column in Table C-5 showing the acreage recommended for wilderness for each IRA, and another column reflecting the total acreage in IRAs today with the total amount recommended for wilderness.

Response to Concern 890.12

Table C-5 (Table C-3 in the DEIS) was modified to include current IRA acreages for IRAs having wilderness recommendations. The suggested modifications for Table C-5 (in the DEIS) represent repetition of information that is presented in Table C-5 in the FEIS and were not included.

Concern Statement 890.13

The adoption of alternative 4 or 6 would involve re-payment of Idaho Department of Parks and Recreation grant funds due to motorized trail conversions within recommended wilderness area boundaries. The value of State grants that would be converted under Alternative 4 was estimated to be \$1,086,000. More detailed maps are needed in order to complete the analysis for Alternative 6. In the event of a project conversion, the applicant is responsible for repaying the appropriate recreational program fund account an amount determined by investment amortization through use, project life expectancy, and depreciation or appreciation of the facilities or equipment or providing a replacement facility. It is suggested that these costs be figured into the costs for alternative 6.

The Ecogroup Forests should commit to not spending Off-Road Motor Vehicle funds in proposed wilderness areas. Spending these funds creates an expectation of continued motorized use in these areas, which creates conflicts with the management goals and visitor expectations.

Most of the useable trails in areas such as the Secesh and Needles recommended Wilderness Areas and many other areas of the Forests are cleared and maintained voluntarily by mountain bike and motorcycle users. There is concern that if the trails are closed to all mechanized vehicles, this free maintenance will not occur.

Response to Concern 890.13

Acknowledgement of potential re-payment costs to the State of Idaho under Alternatives 4 and 6 have been added to the FEIS. Forest-wide management direction addressing the solicitation and use of State off-road motor vehicle capital investment funds within recommended wilderness was included in the draft revised Forest Plans and was retained in the final versions. The effects on trail maintenance volunteerism under Alternatives 4 and 6 are not certain. There may be higher levels of volunteer maintenance on fewer miles of trails under Alternatives 4 and 6, which could compensate for losses on recommended wilderness trails. Trail maintenance needs may also be somewhat lower on recommended wilderness trails as a result of conversion to non-motorized and non-mechanized use.

Concern Statement 890.14

Regarding the Boise LMP, Trail 051: The trail should be kept out of any proposed wilderness area. The trail provides access to Warrior Lakes, and the only method of access to the lake for older users is by motorcycle.

Response to Concern 890.14

Although, a couple short segments of Forest System trail 051 do lie just inside the current boundary of the Tenmile-Black Warrior recommended wilderness area, the trail is open to two-wheeled motorcycle use. There is no direction in the revised Forest Plan under Alternative 7, the selected alternative, which would change access on that trail.

Concern Statement 890.15

Too much emphasis is placed on motorized vs. non-motorized. It is an unnecessary distinction and reflects a "wilderness values" mentality.

Response to Concern 890.15

The effects analysis that was completed relative to proposed management in recommended wilderness under all the alternatives addressed potential effects to both motorized and mechanized uses because both would be affected. The prohibition on mechanical transport within recommended wilderness under Alternatives 4 and 6 stemmed from an issue tied to protecting wilderness values.

Concern Statement 890.16

The FEIS should state how many miles of trails would be lost to snowmobile, 2-wheel motorcycle, ATV, and mountain bike users if alternative 4 or 6 were implemented.

Response to Concern 890.16

In the DEIS, both motorized and mechanized uses were combined and considered together as “mechanized uses.” In the FEIS, motorized and mechanized uses were analyzed separately. Estimates for miles of groomed snowmobile trails, miles of summer motorized and miles of summer mechanized trails that would be affected have been included in the FEIS analysis. Effects to individual types of summer motorized uses were not broken out in the FEIS due to the lack of distinguishing representation in GIS databases that were available.

895 Wild And Scenic Rivers**Concern Statement 895.01**

Regarding the Payette National Forest:

1. *Payette LMP, page E-6. The following statement is in error: “If Congress does not act within three years, the river segments (those determined non-suitable and those determined suitable and recommended for designation) are released from protective management requirements under the Act.” The Act does not prescribe the length of time Congress has to act on river designations. Direction for interim protection comes from Forest Service Manual, Section 8.12 and Forest plans.*
2. *Management Area 12, South Fork Salmon. Wild and Scenic River designation will close the rivers to kayakers and other boaters. Some of the best stretches of whitewater (South Fork Salmon, East Fork South Fork Salmon, and Secesh) in Idaho would be taken away. Recreation should be recognized as an outstanding value on the South Fork Salmon. Wild and Scenic River classification of the Secesh (from Lon Creek to Chinook Campground) should not eliminate the current trail bike opportunities on the Secesh River Trail.*
3. *The East Fork Lake Fork Creek is the only river listed as having outstandingly remarkable recreational value. The Forest Service should explain why the others were missed. The planners should re-evaluate recreation values on the Forest's rivers in order to complete the inventory properly.*
4. *The following streams (from source to mouth) should be designated Wild and Scenic as they all present outstanding wild river attributes and outstandingly remarkable recreational value: The following rivers - Secesh, Crooked, and South Fork Salmon, and these creeks – Marble, Chamberlain, Cabin, Belvidere, Warren, Monument, Big, French, Black Tree, Box, East Fork Lake Fork, Lake Fork, North Fork Lake Fork, Bean, Banton, Browntree, Kinney, Sick, Sturgill, Cold Spring,*

Hazard, Caney, East Fork Fall, Fall, Enos, Loon, Midnight, Adams, Dunnick, East Fork Lost, Grizzly, Grouse, Hannot, Token, Little Johnson, Mann, North Hollow, Rush, Shingle, Stacy, and Warm Spring.

- 5. Management Area 03, Weiser River Sub-basin. The Weiser River has outstandingly remarkable heritage values but was not included as being eligible for Wild and Scenic designation. There must be other rivers that have remarkable heritage values. The Forest Service should also review other resource values (scenery, wildlife, fisheries, and recreation) in this basin.*
- 6. Development along Wild and Scenic rivers should be allowed, within reason. Recreational, private, or commercial development should be back from the river (not visible) and not degrade the environment. Development that already occurs on the South Fork is reasonable and there is room between developed areas. There should be some additional public recreation areas.*

Response to Concern 895.01

Payette LMP, page E-6: You are correct. Congressional approval timing has been corrected in the final documents.

Management Area 12, South Fork Salmon: Wild and Scenic River designation does not eliminate kayaking and boating from the SFSR, nor will it eliminate mountain biking from the trail along the Secesh. These activities are still allowed.

All streams at the USGS 1:100,000 scale were evaluated to determine the presence of an outstandingly remarkable value(s) (ORV). Rivers were evaluated to determine if they had a scenic, recreation, geologic, hydrologic, fish, wildlife, heritage, and ecological/botanical ORV. If the river met the ORV criteria then it was carried forward as eligible for wild and scenic rivers status. Please refer to Appendix D for further information about the eligibility process and ORV criteria.

Concern Statement 895.02

Regarding the Boise National Forest:

- 1. The following streams (from source to mouth) should be designated Wild and Scenic as they all present outstanding wild river attributes and outstandingly remarkable recreational value: The following rivers - South Fork of the Salmon; South, Middle, and North Fork Payette; Gold Fork and North Fork Gold Fork; South Fork Boise; and Deadwood; and these creeks – Feather, Trinity, Silver, Sixteen-to-One, Rock, Fivemile, Eightmile, Wilson, Basin, Stevens, Trail, Ninemile, Bull, Sheep, Secesh, Elk, Fall, Rattlesnake, Canyon, Clean, Deer, Scott, both Warm Springs, Whitehawk, Burntlog, Johnson, Rinden, Trail, Syndall, Burn Valley, Bearskin, Doggin, Poten, and Wyoming.*
- 2. The Forest Service should explain its rationale for recommending Squaw Creek for Wild and Scenic River designation when the shrubs and trees have been savaged by over grazing.*

Response to Concern 895.02

All rivers at the USGS 1:100,000 scale, regardless of current protection already in place (such as rivers in wilderness areas or within the Sawtooth National Recreation Area), were originally assessed to determine the presence of an outstandingly remarkable value according to established criteria within a region of comparison. If the above-mentioned rivers were identified as having outstandingly remarkable value(s) they were carried forward throughout remaining eligibility process. Please refer to Appendix D in the Land Management Plans for a description of the eligibility process and the rivers considered eligible for wild and scenic river status.

Squaw Creek was originally determined to have a fisheries outstandingly remarkable value. On further review Squaw Creek is no longer considered eligible for wild and scenic river status.

Concern Statement 895.03

Regarding the Sawtooth National Forest and Sawtooth National Recreation Area:

- 1. Tributaries in the SNRA are already managed under strict guidelines, and should not be recommended for Wild and Scenic River designation. The stream corridors are protected from development and listing them would only focus attention to the area and creation negative impacts.*
- 2. The following streams (from source to mouth) should be designated Wild and Scenic as they all present outstanding wild river attributes and outstandingly remarkable recreational value: The following rivers - Big Wood, North Big Wood,*

West Fork North Fork Big Wood, South Fork Payette, Salmon, South Fork East Fork Salmon, East Fork Salmon, Letter Wood, South Fork Boise, Middle Fork Boise, North Fork Boise, and Queens, and these creeks – Alamo, Baron, Mays, Clyde, Benedict, Meadow, Onemile, Fall, Park, Bullet, Dirt, Pellit Take, Stinam, Pinchat, Pig Tail, Pole, Boulder, Snail, Red Fish Lake, Cherry, Alpine, Hyndmen, Alturas Lake, Braven, Stanley Lake, Prairie, Big Boulder, Snap, Snail, Big Casino, Valley, Stanley, Saldin, Big Lake, Livingston, Big Tatoo Wood, Boulder, Chainsaw, Warm Springs, Chamberlain, West Pass, Muldeen, Champion, Wickiup, Basett, Crooked, Bluff, Decker, Lime, Paradise, Elk, Ross Fork, Fischer, Fish Hook, South Fork Ross Fork, Fourth of July, West Fork Saldin, Frankman, Brandman, Den Land, Letter Smokey, Den Mania, North Fork Ross Fork, Dust, Sahorn, Gold, Hell Roaring, Helman, Huckleberry, Rock, Lynx, Marter, Iron, Job, Battle Boulder, Williams, and Yellow Belly Lake.

Response to Concern 895.03

All rivers at the USGS 1:100,000 scale, regardless of current protection already in place (such as rivers in wilderness areas or within the Sawtooth National Recreation Area), were originally assessed to determine the presence of an outstandingly remarkable value according to established criteria within a region of comparison. If the above-mentioned rivers were identified as having outstandingly remarkable value(s) they were carried forward throughout remaining eligibility process. Please refer to Appendix D in the Land Management Plans for a description of the eligibility process and the rivers considered eligible for wild and scenic river status.

Concern Statement 895.04

The future of Idaho is in river protection. Standards should be prepared for all proposed Wild and Scenic rivers, and all 176 rivers should be protected until Congress decides whether or not to designate them as Wild and Scenic. The Forests should provide protection, as described in the LMPs, until management plans can be prepared for rivers that were recommended but found not suitable for designation.

Dams, dewatering, dredging, and diversions should be prohibited on potential Wild and Scenic rivers.

Response to Concern 895.04

Standards for managing wild and scenic rivers are established in Forest Service Handbook Direction and the Wild and Scenic Rivers Act. If determined eligible, suitable, or designated the forests will manage the rivers to protect their outstandingly remarkable values, classifications, and free flowing status.

Concern Statement 895.05

The Forest Service should be commended for the good management standards in the draft LMPS for proposed Wild and Scenic Rivers and for recognizing the importance of keeping them protected.

Response to Concern 895.05

Thank you for your input.

Concern Statement 895.06

Jetboat use on Wild and Scenic rivers does not conform to the goals outlined in the forest LMPS, which provide for protection of the natural values of the river environment.

Response to Concern 895.06

Motorized uses, included jet boating are allowed on rivers with scenic and/or recreational classifications. If a river is determined to have an outstandingly remarkable recreation value because of its motorized recreation usage these uses will be maintained and / or enhanced to protect the outstandingly remarkable value

Concern Statement 895.07

The two-part screening process was confusing and did not work to identify all rivers with outstandingly remarkable recreation values. The criteria should not only focus on high or potentially high use (quantity), but also on quality. A river may have outstandingly remarkable recreation values but not a lot of use because it is difficult to access. Also, the region of comparison should be much larger than a sub-basin. At this point, it is not appropriate for planners to prioritize outstandingly remarkable values.

Response to Concern 895.07

Prior to release of the Final Land Management Plans an interdisciplinary team consisting of resource specialists from the three Forests was assembled to address these concerns. The specialists expanded the region of comparison and revised the criteria to determine outstandingly remarkable values to ensure the eligibility inventory was indeed a national inventory. As an Ecogroup the specialists then re-applied the revised criteria and region of comparison to ensure consistency between the three forests. Further information concerning the revised criteria and regions of comparison can be found in the Land Management Plan Appendix D. The determined values are not prioritized and the eligible rivers will all be managed as though they are designated to protect their classifications and outstandingly remarkable values until a suitability study is conducted. Once a suitability study is completed the river will either be offered to Congress for formal designation or returned into general forest management.

Concern Statement 895.08

The word “potential” should be removed from the sentence, “. . . the Forest Service will recommend [name of river] for potential designation under the Wild and Scenic Rivers Act,” and the final LMPs should contain no “potentially” eligible rivers. Eligible and suitable Wild and Scenic Rivers should be classified as MPC 2.1. The Payette and Boise forests both have designated Wild and Scenic Rivers that should be classified 2.1.

Response to Concern 895.08

The word “potential” was used in the Draft Land Management Plans as the rivers being considered eligible had not undergone public and Forest Service Specialist review. Once the Draft Plans were published the input received was utilized to reevaluate the rivers considered “potentially” eligible. The rivers remaining are considered eligible for potential designation under the Wild and Scenic Rivers Act.

Concern Statement 895.09

The Forests should work together and be consistent in the way they classify rivers that flow across Forest boundaries. For example, the Sawtooth Forest found many rivers that have scenic Outstandingly Remarkable Values, while the Payette Forest found none.

Response to Concern 895.09

Prior to release of the Final Land Management Plans an interdisciplinary team consisting of resource specialists from the three Forests was assembled to address this concern. The specialists expanded the region of comparison and revised the criteria to determine outstandingly remarkable values to ensure the eligibility inventory was indeed a national inventory. As an Ecogroup the specialists then re-applied the revised criteria and region of comparison to ensure consistency between the three forests. Further information concerning the revised criteria and regions of comparison can be found in the Land Management Plan Appendix D. The determined values are not prioritized and the eligible rivers will all be managed as though they are designated to protect their classifications and outstandingly remarkable values until a suitability study is conducted. Once a suitability study is completed the river will either be offered to Congress for formal designation or returned into general forest management.

Concern Statement 895.10

The Desired Condition for Wild and Scenic Rivers states that consumptive uses and management activities are compatible with river designation and potential classification. The rivers serve as strongholds for threatened, endangered, and sensitive species, are often areas of high ecological integrity, and may provide exceptional recreational experiences, Yet, the LMPs removes any restrictions that apply to management in these special river corridors. Further, the Desired Condition, Standards, and Guidelines are inadequate and do not comply with the Wild and Scenic Rivers Act.

Response to Concern 895.10

Standards for managing wild and scenic rivers are established in Forest Service Handbook Direction and the Wild and Scenic Rivers Act. If determined eligible, suitable, or designated the forests will manage the rivers to protect their outstandingly remarkable values, classifications, and free flowing status.

Concern Statement 895.11

Following a river's designation to Wild and Scenic, management should be reduced not increased. It seems that the number of scientists, management personnel, and law enforcement personnel increases anytime a special classification is applied.

Response to Concern 895.11

Once a river is considered eligible or suitable or is designated as a Wild and Scenic River management activities are required to protect or enhance the outstandingly remarkable value(s), classification(s), and free flowing status of that river. Although the amount of personnel may not need to increase to manage the eligible, suitable, or designed river all proposed management activities will need to address the river's unique status.

Concern Statement 895.12

Please classify all 176 rivers, including the East Fork of the South Fork of the Salmon River, as eligible for Wild and Scenic protection.

Response to Concern 895.12

The 176 rivers determined potentially eligible in the Ecogroup, including the East Fork South Fork Salmon, will be further reviewed to ensure they are truly eligible for wild and scenic river status. The results and details of this review can be found in Appendix D.

Concern Statement 895.13

I have heard that you are evaluating the South Fork Salmon, Secesh, and East Fork of the South Fork for Wild and Scenic status. These rivers provide exceptional recreational opportunities and deserve protection.

Response to Concern 895.13

Thank you for your comment.

Concern Statement 895.14

The following statement is entered verbatim from a form letter submitted to the Forest Service.

Management standards for proposed Wild and Scenic Rivers are good.

Response to Concern 895.14

Thank you for your comment.

Concern Statement 895.15

Regarding Payette Draft LMP page E-24: The top paragraph should note that Big Creek flows through two state sections.

Response to Concern 895.15

Thank you for your comment. We will note that Big Creek flows through areas managed by the State of Idaho.

Concern Statement 895.16

Management Area 20. Sublett Creek does have the potential to become a recreational stream, as stated in the LMP.

Response to Concern 895.16

Based on additional analysis, Sublett Creek was dropped from further eligibility consideration as the drainage is considered only average for the "province 342-intermountain semi-desert" Region of Comparison. The stream also does not meet any of the criteria evaluation for the DEIS identified ecological or botanical outstandingly remarkable value. In addition, the stream does not meet the evaluation criteria for the remaining outstandingly remarkable values.

Concern Statement 895.17

Big Creek has been described as the "essence of whitewater" by Idaho Whitewater. Recreation value should be recognized.

Response to Concern 895.17

Thank you for your comment. Based on additional analysis, Big Creek was dropped from further suitability consideration.

900 Utility Developments

Concern Statement 900.01

The Forest LMPs should disclose locations of future utility corridors and identify a process for locating future corridors. A statement should be added that reads, "Continue working with utilities and others to identify potential areas for additional designated utility and communication facilities." If this is not done, the reliability standards could limit the opportunity to increase the power supply to some communities by only providing for the upgrade existing facilities.

Response to Concern 900.01

The suggested direction was added as an objective to the forest-wide management direction for Lands and Special uses.

Concern Statement 900.02

The Forest Service should identify all existing transmission line corridors as "designated" corridors and clearly depict them on LMP maps. Additional information should be included such as width of each designated corridor and if the corridor was designed to accommodate future growth (i.e., line upgrades or additions).

Response to Concern 900.02

Existing transmission line corridor locations have been identified as "designated" corridors in the Management Area characterization sections in the final versions of the Forest Plans. Maps showing the transmission lines as designated corridors have also been added to the final versions of the Payette and Boise Forest Plans.

Concern Statement 900.03

Utility corridors are unacceptable locations for cell towers, and the Forest Service should not allow them to be constructed.

Response to Concern 900.03

The comment was noted. It was felt that determinations regarding locations of all proposed communication facilities, including cell towers, should be made on a case by case, site-specific basis rather than categorical prohibitions at the programmatic level. This allows flexibility to account for public safety and other public needs.

920 Hydropower/Dams (presence, licensing, re-licensing)

Concern Statement 920.01

The Forest Service must use its authority under the Federal Power Act to require fish passage and minimum stream flows at all hydropower dams located on National Forests.

The Forest Service should develop an objective specific to the Goose Creek hydroelectric project that protects natural stream flow, up and downstream fish passage, and preservation of normal water temperature.

Response to Concern 920.01

Management direction related to fish passage and instream flows has been included in Forest-wide management direction. Several Standards and Guidelines deal with fish passage and instream flows (SWRA Standard 6, SWRA Standard 8, SWRA Standard 9, SWRA Guidelines 6 and 13, TEPC Standard 7, and Land and Special Uses Standard 12). New surface diversions would not be authorized unless they provide upstream and downstream fish passage and, if needed, include either fish screens. This would prevent fish entrapment and entrainment against diversion screens and fragmentation/isolation of additional fish habitat. Sufficient flows for aquatic resources would be a condition of every permit or license issuance. Where the authority was retained, water diversion structures would be monitored to limit water withdrawals to the amount of the water right and the time period of the water right. Where the authority was not retained, changes to meet other Forest resource objectives would be negotiated wherever possible. Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.

Project-specific management direction is not needed in that stream flows, fish passage and water temperature are all addressed by revised forest-wide management direction.

Concern Statement 920.02

The Forest Service should go beyond just coordinating with FERC on existing hydropower facilities. The Forest Service must

- 1. use its conditioning authority under section 4(e) of the Federal Power Act and its authority under the Federal Land Planning and Management Act to ensure that the two hydropower projects are consistent with Forest LMP directions;*
- 2. petition FERC to reopen licenses if they believe new or changed conditions are warranted;*

3. *include objectives relevant to these projects (i.e., improve flow to enhance fish habitat;*
4. *do more than just cooperate with other forests on Hells Canyon Dam relicensing;*
5. *modify operations of the project to better protect resource values;*
6. *use its authority under the Federal Power Act to ensure the project is consistent with the purposes of forest preservation;*
7. *call for off-site mitigation and/or decommissioning of a project if the hydroelectric project does not conform to the purposes of the LMPs;*
8. *oppose any new or existing hydropower dam that interferes with the Forest Service's mandate to protect National Forests.*

The Forest Service should modify the following standard to emphasize that responsibility for the hydroelectric project is that of the owner, not the Forest Service: "Require hydroelectric facilities that must be in Riparian Conservation Areas be located, operated, and maintained so as not to prevent or retard attainment of riparian and aquatic goals."

Response to Concern 920.02

Aquatic, hydropower and FERC-related management direction was reviewed relative to the above comments. In a number of cases, the management direction has been revised to more accurately reflect the Forest Service relationship to the FERC in hydropower licensing processes. Management direction for soil, water, riparian, and aquatic resources has also been revised to include improved management direction related to maintaining instream flows and fish passage. Threats from hydroelectric facilities and smaller dams would be minimized to some degree by at least seven forest-wide Standards and Guidelines (LSST13, LSGU9, LSGU12 LSGU13 LSGU14, SWGU6, and TEGU11). Although fish passage direction specific to dams is not included, it was felt that other broad direction such as TEST04, TEST06, SWST01, SWST04, SWST05, LSST07, and LSST11 would also provide for fish passage needs at dams. Some of the comments extend beyond the scope of Forest Plan revision and into re-licensing processes.

Concern Statement 920.03

The Forest Service should develop a standard requiring that all hydropower licensees operating on National Forests establish a dam decommissioning fund or post sufficient bonds so hydroelectric operators are financially capable of removing the facilities once they have outlived their usefulness or function.

Response to Concern 920.03

The comment was noted and a guideline to consider the requirement of a bond to cover decommissioning costs was included.

Concern Statement 920.04

The intent of the “Lands and Special Uses” standard is unclear. It specifically addresses existing ancillary facilities of hydroelectric projects, but states that where riparian and aquatic goals cannot be met, such facility should be relocated. The Forest Service should explain if “ancillary” means “accessory” or “secondary facility,” and does not mean dam, powerhouse, penstock, spillway, etc. Obviously, a dam, powerhouse, penstock, or spillway cannot be “relocated,” unless the intent is that the project be decommissioned. If the intent is that a project would be decommissioned, Idaho Power Company objects to the inclusion of this standard in the LMP.

Response to Concern 920.04

The intent was that “ancillary facilities” would *not* include a dam, powerhouse, penstock, or spillway in the case of a hydroelectric dam. Ancillary facilities are considered to be support facilities for which there is far greater location latitude. The term has been defined and added to our glossary to reduce potential misinterpretation.

Concern Statement 920.05

The LMPs must provide mitigations for environmental problems caused by hydropower dams.

Response to Concern 920.05

The revised Forest Plans include an array of management direction, both at the Forest-wide and Management Area levels, that address potential effects of dams and upstream land management on anadromous fish populations. Threats from hydroelectric facilities and smaller dams would be minimized to some degree by at least seven forest-wide Standards and Guidelines (LSST13, LSGU9, LSGU12, LSGU13, LSGU14, SWGU6, and TEGU11). Although fish passage direction specific to dams is not included, it was felt that other broad direction such as TEST04, TEST06, SWST01, SWST04, SWST05, LSST07, and LSST11 would also provide for fish passage needs at dams. At the management area level, numerous goals, objectives, standards, and guidelines have been included that would contribute to the continued restoration of anadromous fish habitat. However, not all of the effects of hydropower dams can be mitigated by the Forest Service and complete restoration of all the effects of hydropower dams is beyond the scope of Forest Plans.

Concern Statement 920.06

The Forest Service should amend the following guideline in order to clarify its intent: "Energy potential as a forest resource should be one consideration when making decision concerning hydroelectric projects. During re-licensing, conditions that require flows and habitat conditions that maintain or restore aquatic, riparian, recreational, scenic resources, water quality, and channel integrity should be supplied to FERC. Projects that are inconsistent with the purposes for which National Forests were created should not be recommended to FERC for approval."

Response to Concern 920.06

Aquatic, hydropower and FERC-related management direction was reviewed relative to the Forest Service relationship to the FERC in hydropower licensing processes. The statement was modified slightly to more accurately reflect the role of the Forest Service in the FERC licensing process. Originally, this direction was included specifically to highlight riparian and aquatic resources and channel integrity. The comment does accurately present other important resources that could be mentioned. However, all resources are covered by the Forest Service Manual and Handbook direction and Lands and Special Uses Guideline 10. It was not felt that it was necessary to list every resource that could be listed.

Concern Statement 920.07

Some of the language dealing with FERC, with regard to hydropower use, needs a closer review, as there are some inaccuracies. For example, the LMPs state that investigative permits will not be given; however, the Forest Service does not have that authority.

Response to Concern 920.07

We agree. FERC-related management direction was reviewed relative to the Forest Service relationship to the FERC in hydropower licensing processes. The statement was modified to more accurately reflect the role of the Forest Service in the FERC licensing process.

940 Land Designations, Exchanges, Ownerships, Rights-of-Way

Concern Statement 940.01

The LMPs should clarify the priority levels of land exchanges of State lands already included within Wilderness Areas, IRAs, or proposed Wild and Scenic Rivers. Lands dropped from recently completed exchanges should not be given low priority for exchange. Land exchange should be specifically mentioned as a goal in each of the management area characterizations and directions.

Response to Concern 940.01

Land exchange priorities are identified by Guidelines within the Lands and Special Uses management direction in the revised Forest Plans. Lands within designated Wilderness and Wild and Scenic River corridors would be among the highest priorities in that they are considered to be Lands needed for protection and management of administrative and Congressionally designated areas. Lands within IRAs are not categorically addressed in the priorities but often contain resource needs that meet criteria for high priority. A number of management areas throughout the Ecogroup contain specific land exchange direction (such as Boise MA 01) where land exchange opportunities or needs exist.

Concern Statement 940.02

The Forest Service should confirm the status and exact location of the “Hells Canyon Scenic Byway.”

Response to Concern 940.02

The Hells Canyon Scenic Byway is a state-designated scenic byway. This was confirmed by the State Scenic Byways director and is listed and fully described in Idaho State Scenic Byway pamphlets.

Concern Statement 940.03

The Forest Service should edit wording in the “Lands and Special Uses” section to reflect the fact that MA 17 on the Boise National Forest borders a section of State land (Section 16 T14N, R5E), and its only reasonable access is through the Forest.

Response to Concern 940.03

Comment is noted but the characteristics mentioned in the comment would apply to numerous parcels of other ownership existing on National Forest boundaries and are not really pertinent to Forest Plan level issues or management direction.

Concern Statement 940.04

The Forest Service must protect private property rights from a taking, and LMP proposals must assess the “takings” implication of all proposed policies and actions on private property interests. This requirement is supported by the Attorney General’s guidelines requiring the completion of a “Takings Implications Analysis.” Failure to consider takings could be in violation of the Administrative Procedures Act, 5 U.S.C. 553 et seq., because all relative factors were not considered.

Response to Concern 940.04

Executive Order 12630 (March 15, 1988) required executive departments and agencies to review their actions to prevent unnecessary takings of private property. Such reviews are internal deliberative processes within the government and are intended only to improve management of the Executive Branch. The Executive Order does not create any right or benefit, substantive or procedural, enforceably at law by any party against the government.

Concern Statement 940.05

The Forest Service should not ignore the historical RS 2477 roads that have been inventoried throughout the Forests and claimed by the counties. Old dated maps that show these roads have been removed from the Department of Interior's map libraries, and those that remain have been whited-out to removed any evidence of roads, including historical wagon roads and trails. This is a federal crime.

A right-of-way granted under the provisions of RS 2477 provides the best example of an interest in land being conveyed to and owned by the public. Therefore, the LMPs should state that ownership of the rights-of-way (any public access route, including but not limited to trails, roads, rights-of-way, and waterways) belongs to the public, regardless if title to the roadway belongs to the state, county, Forest Service, or a private entity. Also, Section 108 of the Omnibus Consolidated Appropriations Act of 1997 states: "No final rule or regulation of any agency of the Federal Government, pertaining to the recognition, management, or validity of a right-of-way pursuant to RS 2477 (43 U.S.C. 932) shall take effect unless expressly authorized by an act of Congress subsequent to the date of enactment of this Act."

As stated in the DEIS, all road planning should be coordinated with city, county, and state agencies, and should incorporate public input in the process. The county of jurisdiction should be provided an inventory of all access routes, including but not limited to trails, roads, rights-of way, and waterways, within the county, that have been restricted and/or closed since October 21, 1976. If the county determines that the access route has been closed or restricted, the Forest Service should remove the restriction or closure at the Forest Service's expense.

The Forest Service should have a mechanism in place that does not create new rights-of-way or infringe on private properties. Currently, it simply allows for a process whereby an existing right-of-way is designated as such.

Response to Concern 940.05

RS 2477 validity and rights-of-way determinations are made on a case by case basis rather than categorically in a programmatic Forest Plan. Forest Plan management direction related to RS 2477 as well as coordination and cooperation with Tribes, local governments, and other agencies has been included in the Facilities and Roads section.

Concern Statement 940.06

The Forest Service should only consider land sales or exchanges if there will be no net loss of taxable acreage or if the exchange or acquisition enhances county taxes, as well as agency objectives. The Forest Service must recognize the impact land acquisition and exchange have on rural counties in Idaho, especially counties that contain a high percentage of federally owned lands.

Response to Concern 940.06

We recognize potential impacts to the tax base in NEPA analysis that is done for exchange proposals. There are other considerations such as TES habitat and cultural resource protection that may be a higher priority in some cases and that outweigh potential impacts to tax bases. Land exchange and acquisition regulations and policies are set at the national level and are beyond the scope of this Forest Planning process.

Concern Statement 940.07

There is concern that people will make up for lost timber revenue by selling off land holdings in and around the National Forests. The Forest Service should decide if it is an improvement to stop logging but accelerate portioning of land, which among other things, will contribute to a loss of big game winter ranges. Therefore, the Forest Service is requested to not be pressured into acting hastily on environmental mandates such as roadless areas and work with people to develop sound economic systems that enhance the whole ecological system.

Response to Concern 940.07

Acting or not acting on legal requirements is not a discretionary determination. If the Roadless Conservation Rule survives all legal challenges, management of the Southwest Idaho Ecogroup Forests will need to be consistent with the Rule. At the same time, the revised Forest Plans include management direction that fosters coordination and cooperation with Tribes, local governments, and other agencies to achieve mutual benefits and sustainable ecological systems.

Concern Statement 940.08

It appears that land exchanges and other land acquisition actions are to be based, for the most part, on improving the ecological conditions on the Forests. The guidelines include a list of priority lands to acquire, as well as the type of lands that can be traded away. It is hoped that the priority lists will truly guide the land exchanges. This is a good time for the Forest Service to list in the LMPs the lands it would like to acquire; lands that are important. Too often land exchanges are initiated by corporations that choose the land that will be traded and acquired. The Forest Service must take a more proactive role in identifying lands they want to acquire, which would make land exchanges more beneficial.

Response to Concern 940.08

Land exchange opportunities are dynamic and change relatively often. Including them in the Forest Plans would require Forest Plan amendments during each change in opportunities. It is more efficient to track high priorities for resource values to be considered in determining whether or not to proceed with a land ownership adjustment.

950 Special Use Permits

Concern Statement 950.01

The Forest Service should create a new section entitled "Organization Camps" in the Sawtooth LMP under "Lands and Special Uses" and add a Standard that provides for development and growth relating to organization camps in the SNRA to meet increasing public use demands. A Guideline should be written to state that land on which existing organization camps occupy, may be privately held; the original forest plan provides for such holdings. The Forest Service LMPs must recognize the tenure and operation and growth of Organization Camps.

A specific concern is the Maranatha Camp at Warm Lake; the tenure issue was omitted for this camp and should be inserted in the Boise National Forest LMP, as there are still about 18 years left on the lease.

Response to Concern 950.01

Expansion and development of organizational camps is regulated by Forest Service policy. Current Forest Service Manual direction limits new facilities to only where they would replace similar existing facilities. Therefore, the comment suggesting a standard for growth of organization camps is beyond the scope of the Forest Plan revision process. Land uses within the Sawtooth National Recreation Area are governed by Public Law 92-400. Although not prohibited under existing law, conversion of public lands to private ownership must be consistent with Forest Plan objectives.

Continuance of the Maranatha Camp at Warm Lake was addressed in the final version of the revised Boise Forest Plan (See Recreation Objective 1961 in Management Area 19 management direction.

Concern Statement 950.02

Regarding Payette LMP, page III-129, under “Standards and Guidelines:” The Forest Service should create a new standard that states, “Brundage Mountain Ski Area and Little Ski Hill are withdrawn from mineral entry.”

Response to Concern 950.02

The suggested standard is not needed because Brundage Mountain and the Little Ski Hill have already been withdrawn from mineral entry.

Concern Statement 950.03

The Forest LMPs should contain wording under the “Lands and Special Uses” section to this effect: “Special Use Permits generate significant monetary returns in the form of user fees and property taxes to the U.S. Treasury and to the counties in which they are located.” The wording would create a cross-reference between the “Lands and Special Uses” section in the LMP and the “Social and Economic” section in the EIS.

Response to Concern 950.03

While the statement may be true, it is not appropriate in the Forest Plans since there is no discussion of economics within each resource or program section of the Plans. It would also not be appropriate to cite contributions from ski areas and not mention contributions from other sources such as other special uses, campground receipts, timber sales, grazing fees, etc. Returns to the U.S. Treasury from all sources, including permitted ski area fees, were included in the revenue/cost analysis that appears in *Chapter 2* of the EIS.

Concern Statement 950.04

The objective found in the Sawtooth Draft LMP on page III-90 (“Provide for continued use of the existing organization camps and recreation residences within established recreation residence tracts”) should be changed to read, “Provide for the enhancement of recreation values and opportunities, including the continued use and expansion of recreation residences in existing tracts and in surveyed but not presently used tracts.” Another suggestion is to insert the words “provides for continued use and development of . . .”

This change is requested because Public Law 92-400 states the SNRA was, in part, established “to provide for the enhancement of recreation values associated therewith” and that the Forest Service policy was to encourage and expand recreation residence use. With this in mind, the Forest Service should allow the remaining Valley View lots to obtain permits, including the other surveyed tract containing an additional 50 lots.

Response to Concern 950.04

Expansion and development of recreation residences is regulated by Forest Service policy. Current Forest Service Manual direction limits new facilities to only where they would replace similar existing facilities. Therefore, the suggested rewordings to the objective and comment to allow for growth or development of recreation residences are beyond the scope of the Forest Plan revision process.

Concern Statement 950.05

The Forest Service should delete this goal under “Lands and Special Uses,” page 111-46, that states, “Minimize the issuance, re-issuance, and expansion of special use permits on National Forest System lands that create a permanent encumbrance.”

Response to Concern 950.05

The comment was noted and the goal was deleted from the final forest-wide management direction.

Concern Statement 950.06

The Forest Service should consider adding the following: “Issue and administer special use permits for recreation uses that serve the public, promote public health and safety, and protect the environment.”

Response to Concern 950.06

Adding this is unnecessary since the forest-wide goal LSGO05 applies to all special uses making the suggested statement redundant.

Concern Statement 950.07

Some of the antiquated lodges on National Forest lakes do not provide the services to meet public demands. The Forest Service should promote modern tourist facilities by implementing the following measures: (1) do not renew operating permits for any site that fails to meet all health, safety, fire, and OSHA codes; (2) buy out all substandard facilities at salvage value; (3) discontinue the use of current permitting contracts; and (4) reinvent the entire public-resource/private-operation business model.

Response to Concern 950.07

Lodge facilities are periodically inspected to ensure compliance with health and safety requirements as required by Forest Service Manual (FSM) 2341.4. Submission and review of business plans are usually required for new proposals when considerable capital investment is involved. Most lodges located on public lands provide more rustic recreation experiences than those on private lands. Some users prefer more primitive accommodations at National Forest sites. More modern and luxurious experiences are usually available at resorts and lodges located on private lands. However, problems at some permitted facilities obviously do exist. It is felt that a more appropriate response is to address existing problems through the terms and conditions contained in the existing permits.

Concern Statement 950.08

The EIS should address heli-skiing, in particular, and guided outdoor activities in general in order to provide direction for land managers during permit renewals.

Response to Concern 950.08

Recreation management direction in the revised Forest Plans includes direction related to outfitter and guide operations, which would include heli-skiing operations. These include forest-wide goal REGO07; objective REOB26 (REOB28 in the Payette Plan); standard REST06; and guidelines REGU27 (REGU29 in the Payette Plan) through REGU31 (REGU33 in the Payette Plan).

980 Disturbance Events

Concern Statement 980.01

The Forest Service should consider that restoring forests requires reintroducing disturbance where it has been absent and changing management practices to more closely resemble natural disturbances and conditions. Mimicking disturbance requires an understanding of the natural dynamics of ecosystems and the effects of disturbance. Restoration will require learning from, adapting to, and working with natural disturbance to sustain natural patterns and processes. The Ecogroup restoration projects should start small, with sufficient monitoring to determine if restoration goals are being achieved.

Response to Comment 980.01

The role of ecological disturbance processes has been incorporated into the revised Forest Plans. These are reflected in the desired conditions, goals, and objectives associated with vegetation management actions. The extent to which management actions may mimic will vary by management prescription category. We agree that restoration activities involve learning from and adapting to lessons learned through experience and new information.

Concern Statement 980.02

Regarding DEIS, page 3-118, first paragraph below Table V-31: The Forest Service should add "Land Slides and Glacial Activity" to the list of events that have historically dominated disturbance regimes along streams.

Response to Comment 980.02

Landslides may have effected stand development at a fine scale of analysis, and glacial activity may have had mid-scale effects but not in the recent past. Therefore, while these are recognized as disturbance events, they have not occurred over a large enough area, nor are they recent enough to be considered in the same manner as fires and insects.

Concern Statement 980.03

The Forest Service should give managers the flexibility to use "trap tree" programs to control bark beetles in a timely manner. This effort would also have a positive effect on private lands adjacent to Forest Service lands.

Response to Comment 980.03

Specific decisions concerning how to prevent or suppress bark beetle infestation is beyond the scope of decisions made in the Forest Plan and thus was not considered during preparation of the Final EIS or proposed Plans. The Forest Plan does not constrain the flexibility in selecting methods used for controlling bark beetle infestations. These methods are based on site-specific conditions. The use of "trap trees" may be used when it is deemed to be an effective method.

Concern Statement 980.04

The DEIS does not provide an accurate estimate of the potential long-term risks associated with insect outbreaks and uncharacteristic wildfire, and it lacks any specifics on how increased long-term risks would impact neighboring stakeholders affected by Forest Service management philosophies contained in the Forest Plans. The Forest Service should provide an explanation of the strategies it would employ to reduce fire risks to neighboring stakeholders.

Response to Comment 980.04

Long-term wildfire and insect hazard effects were evaluated for each alternative and are documented in the Final EIS in the Vegetation Hazard section of Chapter 3. The effects analyzed include direct, indirect and cumulative effects. Cumulative effects consider the potential impacts to forested vegetation neighboring National Forest System lands.

990 Outside the Scope of Forest Plan

Concern Statement 990.01

- *Regarding the Sun Valley Company's permit application to increase its snowmaking capacity: The Forest Service should explain what water source would be used. If from the aquifer, this could contribute to the further depletion of the water supply.*
- *The Idaho Department of Fish and Game should close all fishing from the confluence of North Fork and South Gold Fork River on main Gold Fork River to Kennally Creek and angler education should be provided to citizens to help with bull trout and other species identification.*
- *The current Idaho Department of Fish and Game big game closures during the hunting season should still be enforced.*
- *The overstocking of game can be equally as detrimental as livestock grazing. The Idaho Department of Fish and Game should be considerate of landowners (public and private) and work with them to establish quotas for hunting as land managers provide the forage for game herds.*
- *The LMPs should include a review of place names and change names (such as Squaw Creek and Squaw Butte) that are inappropriate and insulting to Native American women. Recommended changes should be presented to the Idaho Historical Society board, which is the Idaho Geographic Place Names board.*
- *The Forest Service should comply with the following standard: "All recreation, public information, and enforcement staff are required to be working in the fields on weekends and holidays."*
- *The Sawtooth National Forest should do away with the recreation user fee.*
- *The Forest Service should establish a grant or contract program to mechanically harvest wood chips or hog fuel from the areas to be pre-commercially thinned and burned. This would establish a new economy for rural areas, reduce fire hazards, reduce phenolic acid in streams, and burn cleanly in EPA-approved furnaces.*
- *Beaver re-introductions should be limited to native beaver streams (III-83).*

Response to Concern 990.01

Thank you for your comment. This is outside the scope of Forest Plans.

Concern Statement 990.02

The LMPs should set forth standards and guidelines for the acquisition of lands that reflect that federally administered lands will be maintained at or less than current levels within the State. The Forest Service should achieve this goal by limiting exchanges of lands or interest in lands to within the State where the acquired property is located. With direct purchase of lands or interest in lands, the LMP directive must be that the Forest will sell excess property located within the State where any acquired private property located within the State is located, of no less than equal value of the lands or interests in lands acquired.

Regarding Payette Draft LMP, page III-103, "Lands and Special Uses," first objective: The Forest Service should not be allowed to acquire land that is currently owned by a government entity and open to public use.

Response to Concern 990.02

Land exchange and acquisition regulations and policies are set at the national level and are beyond the scope of this Forest Planning process.

Concern Statement 990.03

The LMPs must clearly state that nothing in the Plans should be construed as setting policy for the need to acquire any private property right by existing authority or to expand the authority of the Secretary of Agriculture, acting through the Forest Service to acquire lands or interests in lands by eminent domain. The Forest Service should create a policy and standard that specifies that Supervisors, District Rangers, and Line Officers must ensure appropriate protection of private property rights consistent with the provisions of the Constitution of the United States and State of Idaho.

The LMP should consider all inholdings, land, interest in property, scenic easements, and mineral interests, including both patented and unpatented mining claims, and vested water rights, within in the boundary of the National Forest, and any Wilderness Preservation System, Wild and Scenic River System and/or the Wild and Scenic River Corridor, Desert Protection System, National Park, or National Recreation Area and set a goal to protect all private property rights within the boundary of the Forest.

Response to Concern 990.03

Protection of private property rights is beyond the scope of decisions made in forest plans. Forest Plans do not consider specific inholdings and property since they are programmatic documents.

See also the response to Concern Statement 940.04.

Concern Statement 990.04

Commenters stated that the Forest Service should adopt a nationwide policy requiring (1) all motor vehicles operating on federal lands to have a current registration and licensing; (2) the operator to hold a valid driver's license; and (3) evidence of liability insurance.

Response to Concern 990.04

The Forest Service can determine types of access for National Forest System roads, trails and lands. However, motor vehicle licensing and registration regulations are the responsibilities of State governments making the suggested comment beyond the scope of Forest Plan revision.

Concern Statement 990.05

The Forest Service should consider constructing a small number of helipads at strategic points on tops of ridges. If they are placed ahead of time, there won't be competition for resources when a fire occurs. "The building of a minimum of three ridge-top helipads on all sides of Yellow Pine" should be incorporated in the LMP. The Forest Service should construct an "Initial Attack Fire Center" building close to Yellow Pine that could be used by (and costs shared by) the McCall-Donnelly School District during the non-fire season.

The LMP should include a provision to refurbish and man the Meadow Creek Lookout.

Response to Concern 990.05

The suggestions provided are site-specific decisions that are outside the scope of the Forest Plan.

Concern Statement 990.06

The Forest Service should, at a minimum, address the potential to utilize wood biomass as an energy source for generating electricity and address how to make larger supplies of wood biomass available by setting appropriate standards and guidelines.

Response to Concern 990.06

Using wood biomass may be a feasible means for generating electricity, however, the Forest Plan does not make decisions about the specific ways in which wood fiber will be used. This particular issue is beyond the scope of forest plan revision and thus was not analyzed.

Concern Statement 990.07

The Forest Service should concentrate on more efficient and economic timber sales preparation, and sales should accomplish fuel reduction and thinnings. Congress should assist by minimizing the appeal process once a ten-year forest plan is adopted. Each sale should not require a book on effects that are common to most every state.

Response to Concern 990.07

The decision to develop more efficient and economic timber sales, sales which accomplish fuel reduction and thinning, and for Congress to assist by minimizing the appeal process is beyond the scope of the Forest Plan.

Concern Statement 990.08

The United States imports 40 percent of the nation's timber products from countries that do not have the technology or regulations in place to protect the environment during logging. Greater damage is being caused to the world's environment by the logging practices of other countries while the United States emphasizes preservation by curtailing logging operations. More, not less, U.S. timber should be made available for logging.

In another view it was stated that the United States should use Canadian timber while it is readily available and lower in cost. The feeling is to let Canada cut its trees and ruin its environmental health. Yet, two United States senators are trying to limit importation and increase the price of timber from Canada. This will increase the cost for Americans to build homes.

Response to Concern 990.08

The decision to harvest more or less of the timber in the United States, either to prevent environmental damage in other countries or to use more readily available and lower cost timber from Canada is beyond the scope of the Forest Plan. Thus, the concerns expressed in these comments were not analyzed in this Environmental Impact Statement.

Concern Statement 990.09

The Forest Service should support removal of the dam on the Blackfoot. The dam ruins fishing, it is a flood hazard, and the sediments should be dredged out.

Response to Concern 990.09

We are unaware of a “Blackfoot” river or stream within the Ecogroup. The Blackfoot River is located in southeastern Idaho north of the town of Soda Springs and quite some distance from any of the Ecogroup Forests. We believe the comment was directed towards the “Black Canyon” dam, which is located off of National Forest System lands between Emmett and Horseshoe Bend. In that the Forest Service does not have jurisdiction over this structure, the comment is beyond the scope of Forest Plan revision.

Concern Statement 990.10

The financial analysis should include the costs of additional importation and burning of an additional 1.015 billion gallons of oil to manufacture and transport substitute building materials due the reduction of this nation's forest wood going to market. This oil will cost \$480.8 billion per year; these numbers should be included in the financial analysis.

Response to Concern 990.10

This inclusion of analysis is beyond the scope of the revision effort and will not be included for the FEIS.

Concern Statement 990.11

The reintroduction of wildlife such as gray wolf, grizzly bear, and bighorn sheep should not be allowed to impact current multiple uses, or be allowed to influence forest LMP revisions, as they are considered experimental/non-essential and should be treated as such.

Response to Concern 990.11

The Forest Service has no jurisdiction over the transplanting of wildlife or fish. It is within the jurisdiction of USDI Fish & Wildlife Service for listed species and State wildlife agencies for non-listed species. Fish and wildlife are property of the State if not listed under ESA.

Concern Statement 990.12

There should be an explanation of why the State of Idaho sells permits to catch Salmon and Steelhead in the same rivers the Forest Service is trying to protect.

Response to Concern 990.12

This comment is outside of the scope of this assessment.

Concern Statement 990.13

The Forest Service should not editorialize in their statements concerning the affects of dams on anadromous fish populations. There is no proof that the dams are the main cause of the decline in anadromous fish populations. Over-fishing and ocean habitat conditions play a much larger role in the decline of these populations.

Response to Concern 990.13

This comment is outside of the scope of this assessment.

Concern Statement 990.14

The Forest Service should request funds to adequately support its recreation and trails programs, to provide field-level staff, and fund projects.

Response to Concern 990.14

The budgetary request process and how the U.S. Congress caps the Forest Service budget amounts are outside the scope of the Forest Plan Revision Process.

Concern Statement 990.15

It is vitally important that the budget and management inequities in the range program be addressed within the EIS and LMPs through adjustments that rectify the current differences. The current funding deficit in the range management program has serious implications for a broad spectrum of fish and wildlife.

Response to Concern 990.15

The budgetary process and the apparent inequities seen between resource programs and how the U.S. Congress allocates the appropriated amounts to each resource program are outside the scope of the Forest Plan Revision Process.