United States
Department of
Agriculture

**Forest
Service**

Caribou-Targhee
National
Forest

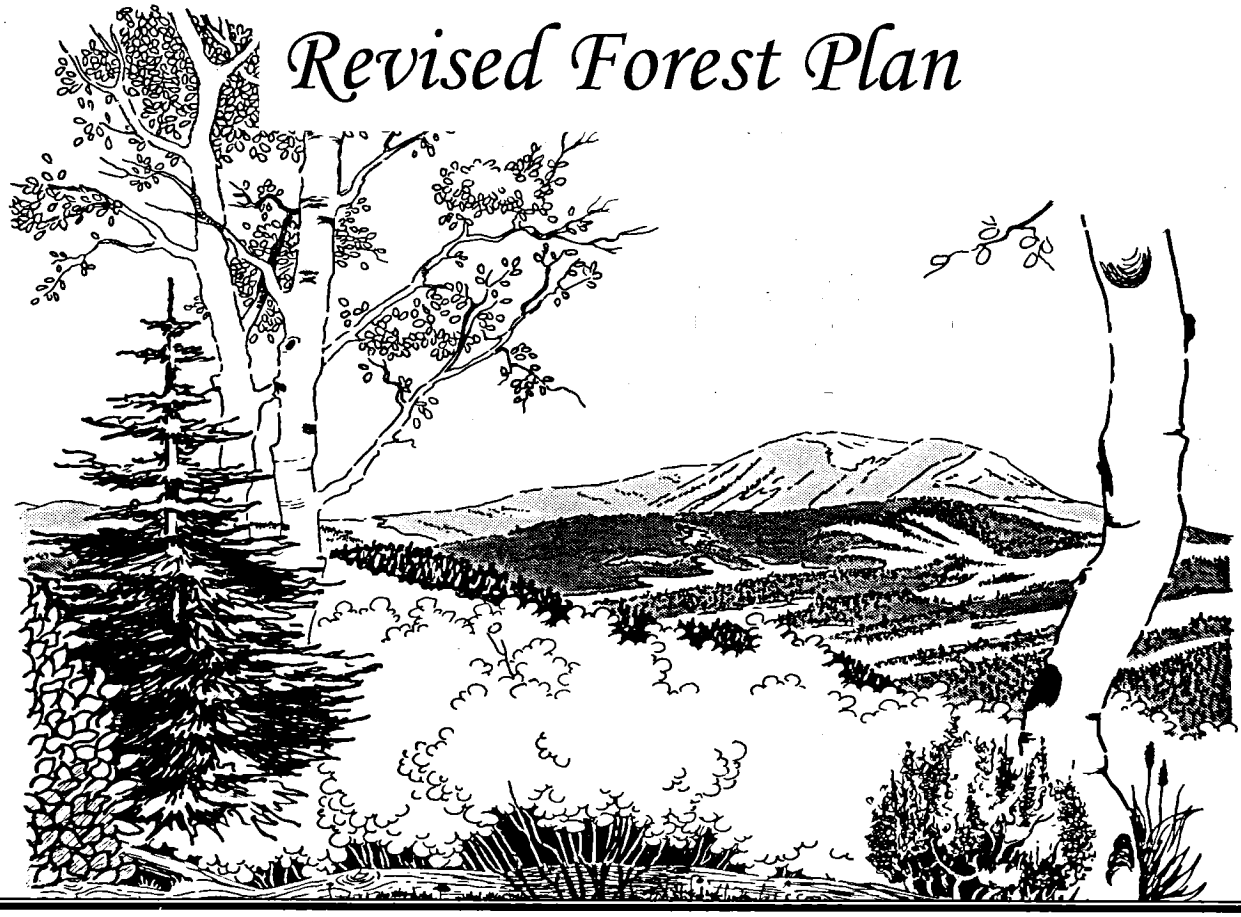
February, 2003

Final Environmental Impact Statement

For the

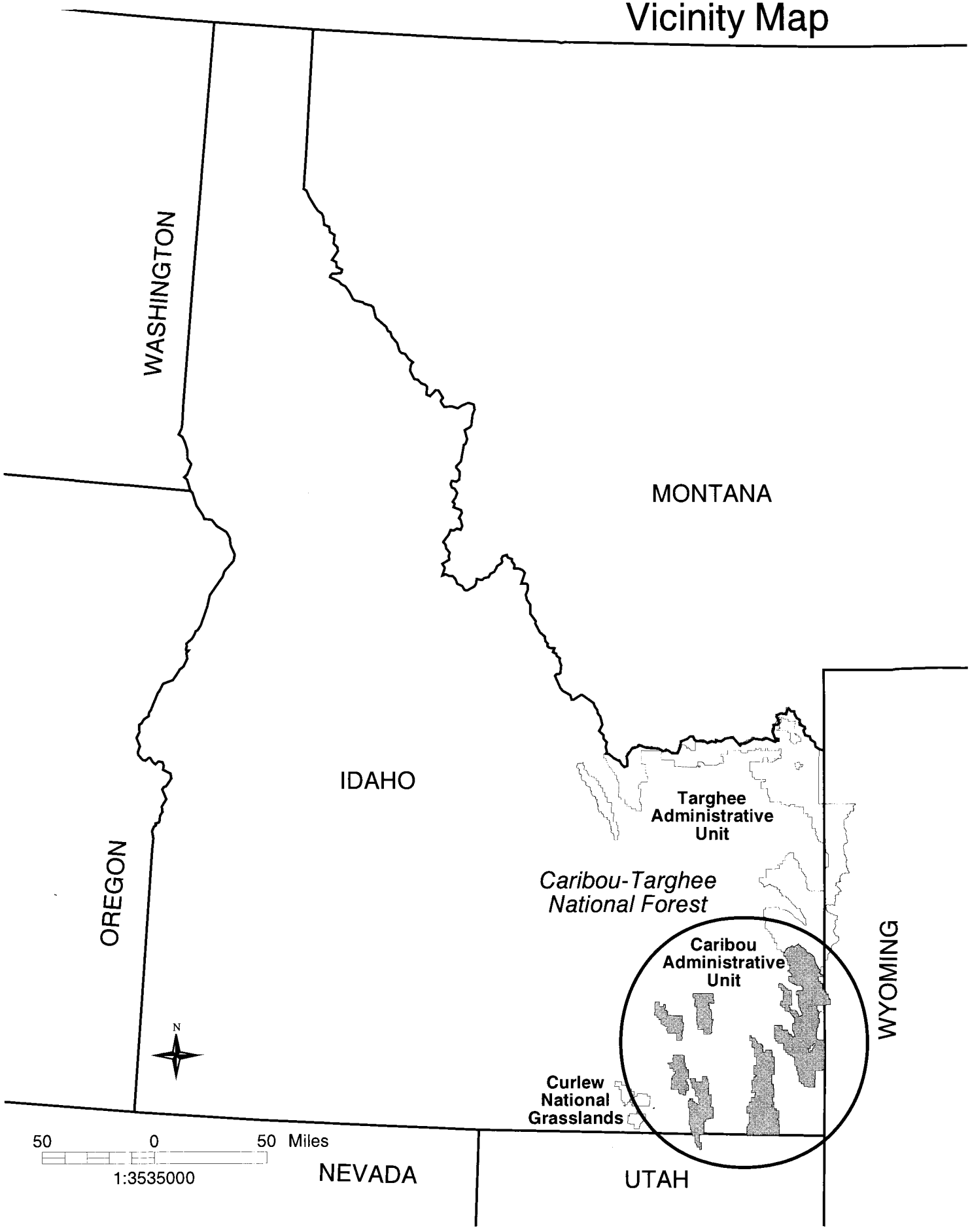
Caribou National Forest

Revised Forest Plan



Volume III: Appendix A

Public Involvement


Vicinity Map
WASHINGTON
MONTANA
IDAHO
OREGON
WYOMING
NEVADA
UTAH
Targhee
Administrative
Unit
Caribou-Targhee
National Forest
Caribou
Administrative
Unit
Curlew
National
Grasslands
N
50 0 50 Miles
1:3535000

Caribou-Targhee NF

Caribou-Targhee NF
1405 Hollipark Dr
Idaho Falls, ID 83401
(208) 557-5760

Final Environmental Impact Statement

Caribou Revised Forest Plan
Volume III

Contains

Appendix A—Public Involvement

Caribou-Targhee NF

Caribou-Targhee NF
1405 Hollipark Dr.
Idaho Falls, ID 83401
(208) 557-5760

Final Environmental Impact Statement

Appendix A—Public Involvement

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Appendix
A

Public Involvement

Throughout the planning process, the interdisciplinary team (IDT) gathered public input on issues, the proposed action and alternatives to the proposed action. The scoping process included public meetings, briefings with interested stakeholders, letters and updates, articles in the quarterly NEPA Schedule of Proposed Actions, and the development of a web homepage. These activities were used to identify the issues, alternatives and concerns to be considered in the development of a Forest Land and Resource Management Plan and to keep the public informed and involved throughout the planning process.

Public Involvement

Initial Analysis of the Management Situation (AMS) Report

In April 1999, a report called ***Initial Analysis of the Management Situation (AMS) for the Caribou National Forest*** (AMS) was released for public review. This report included information on the current resource conditions and uses of the Forest, a description of a range of Desired Conditions, and a synopsis of what management direction in the 1985 Caribou National Forest and Curlew National Grassland Land and Resource Management Plan needed to change to meet the range of Desired Conditions. Public comment was invited on the findings contained in the AMS.

A Public Involvement Strategy was developed in 1998 and supplemented through Public Involvement Plans in each phase of the public involvement process. The objective of the PI P for the AMS was to generate comments from interested groups and individuals about the assessment of the current health of Forest resources, the preliminary indication of management changes that may be needed to improve or maintain the health of these resources, and the proposed range of desired conditions, including new or alternative desired conditions.

The AMS was mailed to the general public (See Project File for mailing list) and posted to the web homepage in April 1999. Fifty-seven letters were received. A total of 463 individual comments were identified from these letters.

The following recaps the number of comments received in each category:

Cultural Resources	1
Economics	15
Ecosystem Management	35
Fire Management	8
Livestock Grazing	38
Minerals Management	4
Old Growth	15
Planning/Public Involvement	24
Recreation	72
Riparian/Watershed	16
Roads	15
Timber Program	13
Vegetation	32
Water	1
Wilderness	99
Wildlife	65
Wild & Scenic Rivers	3
TOTAL COMMENTS	**463**

The IDT reviewed these letters and completed the response to them on August 27, 1999, this was posted on the Forest's web page.

Notice of Intent (NOI) to Prepare an Environmental Impact Statement

On August 9, 1999 a Notice of Intent to Prepare an Environmental Impact Statement that included the Proposed Action appeared in the ***Federal Register***. The ***Federal Register*** notice initiated the formal scoping process. In addition, on August 16, 1999, a scoping letter and a copy of the content analysis from AMS comments was mailed to people, who had commented on the AMS. A scoping statement was mailed to other people on the "Forest Plan Mailing List" on August 16, 1999. The comment period originally was to close on October 2, 1999. An extension of the comment period to October 17, 1999 was printed in the Federal Register on October 5, 1999

Ranger Districts on the Forest also received a copy of the response to comments on the AMS and the Scoping Statement on August 13, 1999.

On September 8, 1999, a Public Involvement Plan was developed for this phase of public involvement to share results of comments from the NOI Scoping effort, preliminary issues, and drafts of the No Action and Proposed Action alternatives. (See Project file)

Stakeholder Briefings were held in September, 1999 and included:

Bear Lake Regional Commission	9/29/99
Franklin County Commission	9/27/99
Bannock County Commission	10/6/99
Bear River Basin Advisory Group	10/13/99
Congressional Field Office Staffs	9/29/99
Bureau of Land Management	11/30/00

The IDT received 289 comment letters in response to the Notice of Intent and completed content analysis and response to comments in January 2000. Approximately 625 comments were reviewed in the following categories:

Air Quality	2
Economic and Social Factors	42
Ecosystem Management	53
Livestock Grazing	69
Minerals Management	22
Planning/Public Involvement	101
Recreation	165
Riparian/Watershed	29
Timber	6
Wildlife	22
Wilderness	83
Miscellaneous	30
TOTAL COMMENTS	624

As a result of comments received on the AMS and through the NOI public scoping phase, the team generated preliminary issues to be used in the development of action alternatives.

December, 1999 Public Open Houses

In November 1999 the Forest hosted Open Houses to share a Draft "No Action" and "Proposed Action" with the public. In addition to the identification of preliminary issues, the Forest prepared a "Build Your Own Alternative" form to be used to solicit input into action alternatives (See project file). News releases were sent out to local media outlets, and a letter of invitation and briefing package were mailed to people on the Forest Plan mailing list on November 19, 1999. The objectives of the open houses were to share preliminary issues and validate them with the public prior to developing action alternatives and to provide a fun, creative way for people to submit their ideas on alternatives.

Open houses were held in:

Malad, Idaho	November 30, 1999	5:00 p.m. – 8:00 p.m.
Preston, Idaho	December 1, 1999	5:00 p.m. – 8:00 p.m.
Pocatello, Idaho	December 4, 1999	12:00 p.m. – 4:00 p.m.
Montpelier, Idaho	December 7, 1999	5:00 p.m. – 8:00 p.m.
Soda Springs, Idaho	December 8, 1997	5:00 p.m. – 8:00 p.m.

Public Open Houses were attended by **289 people**.

Tribal Coordination on the AMS, Notice of Intent, Preliminary Issues, and Public Comment

Forest Service representatives met with the Shoshone-Bannock Tribe on 11/29/99 to review the comments on the AMS, to receive input on the Scoping Statement and to share Preliminary Issues generated from the Scoping Statement.

On 11/20/00 Forest Representatives held an Open House at the Fort Hall Business Center. The purpose of the meeting was to present six preliminary draft alternatives for future management of the Caribou National Forest.

On 11/30/00 Forest representatives met with the Shoshone-Bannock Land Use Commission and selected members to provide a Forest Plan Revision Briefing.

The ID Team for the Forest Plan Revision includes employees from the Tribe. Anders Mikkelsen is a fish and wildlife biologist and David Moser is a fisheries biologist.

Build Your Own Alternative Exercise

The Forest Service developed an eight-page matrix for the public to use in selecting different components for an array of alternatives. Between December 5, 1999 and January 31, 2000, the **Forest received 316 completed exercises**.

In February, 2000, the Forest Service contracted with Dr. Tesa Stegner, Idaho State University, to do a statistical analysis of the completed exercise forms. One objective of the statistical analysis was to provide a picture of how the respondents felt about a wide range of issues being addressed through the Forest planning process. A copy of the statistical analysis is in the project file.

During February, 2000, the ID team developed draft, conceptual alternatives based on comments received on the AMS, the Notice of Intent, and the Build Your Own Alternative Exercise.

In March 2000 the Forest Leadership Team decided to focus on completing the Draft Environmental Impact Statement (DEIS) and the Draft Management Plan for the Curlew National Grassland. Forest Plan Revision activities were suspended during this six-month time period.

In September 2000, after the DEIS and Draft Management Plan were released for public comment, the Forest ID Team began to formulate more detailed alternatives and management prescriptions for the Revised Caribou National Forest Plan.

November 2000 Open Houses

In October 2000 a letter of invitation to upcoming Open Houses and a briefing package, describing preliminary draft alternatives, were mailed to the Forest Plan mailing list. In addition news releases were sent to local media outlets announcing the Open Houses and posted on the Forest's web page. The objectives of the Open Houses included sharing preliminary draft components and maps of action alternatives and soliciting public validation that the range of alternatives presented was adequate. Open Houses were held at:

Pocatello, Idaho	November 6, 2000	5:00 p.m. – 8:00 p.m.
Preston, Idaho	November 8, 2000	5:00 p.m. – 8:00 p.m.
Montpelier, Idaho	November 9, 2000	5:00 p.m. – 8:00 p.m.
Soda Springs, Idaho	November 14, 2000	5:00 p.m. – 8:00 p.m.
Malad, Idaho	November 15, 2000	5:00 p.m. – 8:00 p.m.
Ft. Hall, Idaho	November 21, 2000	5:00 p.m. – 8:00 p.m.

Public Open Houses were attended by **197 people**.

In addition, comments were accepted during the Open Houses and mail-in comments were accepted through January 31, 2001. The Forest received 453 comment forms and letters from the public. More than 300 were form letters from members of the Greater Yellowstone Coalition. The ID Team reviewed the comments and prepared a Content Analysis in February, 2001.

As a result of this input, the Forest adjusted various components of alternatives. In addition the Forest dropped the original Alternative 6 presented in the November briefing package and substituted an alternative submitted by Greater Yellowstone Coalition and other associated groups. Final alternatives for the Draft EIS were developed in February 2001.

Release of the Draft EIS/Draft Revised Forest Plan

The DEIS and Draft Revised Forest Plan were released to the public on April 27, 2001. The initial comment period was scheduled to close on August 31, 2001. Several agencies and interested stakeholders asked for an extension of the comment period. The Regional

Forester agreed to extend the comment period an additional 61 days until November 1, 2001.

The Forest prepared a video highlighting major provisions of the Draft EIS and Draft Revised Forest Plan and meeting display boards for use in public meetings during the summer of 2001. Public meetings were held at the following locations from 7:00 to 9:30 p.m.:

Pocatello, Idaho	August 8, 2001	West Coast Hotel
Preston, Idaho	August 2, 2001	Franklin County Fairgrounds
Montpelier, Idaho	August 1, 2001	Bear Lake County Fairgrounds
Soda Springs, Idaho	July 31, 2001	Tigert Middle School
Malad, Idaho	August 7, 2001	Senior Citizens Building
Ft. Hall, Idaho	August 16, 2001	Ft. Hall Business Center
Afton, Wyoming	August 14, 2001	Town Hall
Idaho Falls, Idaho	August 15, 2001	ITEC

Approximately 120 people attended these meetings.

Shoshone-Bannock Tribal Coordination and Briefing Meetings

Tribal Council	November	
Shoshone-Bannock Tribes	May 2, 2001	Land Use Commission Office
Ft. Hall, ID	January 23, 2003	Land Use Commission Office

Other Interested Party Briefings

In addition, separate briefing meetings were held with various agencies, Congressional staff, and interested non-governmental organizations. They included the following:

American Wildlands	December 11, 2002	Idaho Falls, ID
Blue Ribbon Coalition	May 2, 2001	BRC Office (Chubbuck, ID)
	November 26, 2002	Pocatello, ID
Greater Yellowstone Coalition	May 1, 2001	Idaho Falls, ID
	December 11, 2002	Idaho Falls, ID
Idaho Congressional staffs	April 30, 2001	Idaho Falls, ID
	December 9, 2002	Pocatello, ID
Idaho/Wyoming Congressionals	January 9, 2003	Washington, DC
Idaho Conservation League	December 11, 2002	Idaho Falls, ID
Idaho Fish and Game	November 26, 2002	Pocatello, Idaho
MACC	February 6, 2002	Salt Lake City, UT
County Commissions	On-going	Idaho Falls, ID and counties

Internal Briefings and Review

Internal reviews of the Draft EIS and Draft Revised Forest Plan were also conducted and included the following:

Regional Office Review	August 2002
Washington Office Review	January 8, 2003
USDA Review	January 8, 2003

Public Comment Recap on Draft DEIS and Draft Revised Forest Plan

The Forest received approximately 3,200 letters, postcards, e-mails, and phone calls. These comments were analyzed from January 2002 to March 2002. The Forest ID Team developed Alternative 7R based on comments, including a roadless area analysis for future management options in roadless areas.

Comment Category	Number of Comments	Percent of Total
Air Quality	7	<1%
Alternatives	60	3%
Alternative 1	3	<1%
Alternative 3	50	2%
Alternative 6	**196**	**8%**
Alternative 7	52	2%
Comment Noted	18	1%
DEIS - Adequacy	67	3%
Economics	59	2%
Ecosystem Management	14	1%
Energy	1	<1%
Fire	8	<1%
Fire Management	5	<1%
Fisheries	15	1%
Forest Plan	53	2%
Heritage Resources	1	<1%

Comment Category	Number of Comments	Percent of Total
Hydropower	2	<1%
Lands	3	<1%
Law Enforcement	1	<1%
Livestock Grazing	**294**	**12%**
Microbiotic Crust	3	<1%
Mining	**101**	**4%**
Noxious Weeds	15	1%
Oil and Gas Leasing	2	<1%
Outside Scope	2	<1%
Planning Process	5	<1%
Recreation	**468**	**20%**
Rights of Way	2	<1%
Riparian Areas	16	1%
Research Natural Areas	1	<1%
Road Density	26	1%
Roadless Areas	**335**	**14%**
Roads	31	1%
Roads Analysis	4	<1%
Management Prescriptions	4	<1%
Soils	2	<1%
Timber Production	48	2%
Vegetation	36	2%
Water Quality	17	1%
Watershed	14	1%
Wild & Scenic Rivers	3	<1%
Wilderness	**100**	**4%**
Wildlife	**218**	**9%**
TOTAL	**2,362**	**98%**

The following six topic areas surfaced during the comment period:

1. Providing recreation opportunities and access of all types is important to the public.

2. The local and national public is very interested in Roadless Area Management and wilderness recommendation on the 749,000 acres of Inventories Roadless Areas on the Caribou National Forest.

3. The public is concerned with livestock grazing on the Forest, both in terms of the effects on the resources and the local custom and culture.

4. The public is concerned with wildlife and fisheries management on the Forest.

5. The public is concerned with vegetation management on the Forest.

6. Many people are interested in the minerals program. The Forest has a unique issue of Selenium (Se) and other heavy metals leaching out of mine dumps in the phosphate patch.

Final EIS/Plan

RO Review August, 2002
WO Review January, 2003

Table 1. Summary Table of Public Involvement

Public Involvement Phase	Events	Total Letters/People	Total Comments
AMS	Opportunity to Comment	57 letters	463
Notice of Intent Scoping	Formal Scoping	289 letters	624
Preliminary Issues 1999 November Open Houses (5)	Opportunity to Comment	289 people attended	
Alternatives Build Your Own Alternative Exercise	Opportunity to comment	316 Returned	316
Alternatives 2000 November Open Houses (6)	Opportunity to Comment	197 people attended	
Alternatives Comment form on Alternatives/letters	Opportunity to comment	453 letters	295
Draft EIS Comments on Draft EIS and Preferred Alternative Selection	Opportunity to comment	3,200 letters	~2,400

Consultation with Other Agencies

The agencies listed below were consulted during the preparation and analysis of this Draft Environmental Impact Statement:

Federal Agencies

U.S. EPA, Region 10
U.S. Fish and Wildlife Service
USDA-Forest Service, Forest Health, Boise Field Office
USDI-Bureau of Land Management

Congressional Offices (Field Offices)

U.S. Senator Larry Craig
U.S. Senator Mike Crapo
U.S. Congressman Mike Simpson

State Agencies

Idaho Department of Parks and Recreation
Idaho Department of Environmental Quality

Idaho Department of Fish and Game
Idaho Department of Lands
Idaho Historical Society
Wyoming Federal Land Policy Office
Wyoming Game and Fish
University of Wyoming, William Laycock

CITY/COUNTY

Bear Lake Regional Commission
Bear Lake County Commission
Franklin County Soil and Water Conservation District
Oneida County Commission
City of Pocatello

List of Recipients

The following individuals, organizations, and agencies received a copy of the Draft EIS and/or Final EIS and Revised Forest Plan. This list was developed from those who responded to scoping and other interested parties, and includes agencies that are required to be contacted during the development of Environmental Impact Statements. Additional copies of the EIS are available from the Caribou NF Supervisor's Office in Idaho Falls, Idaho.

INDIVIDUALS

Available upon request

MEDIA OUTLETS

Idaho State Journal, Pocatello ID
Idaho Enterprise, Malad ID
Caribou County Sun, Soda Springs ID
Montpelier News Examiner, Montpelier ID
Post Register, Idaho Falls ID

ORGANIZATIONS

Eastern Idaho Sierra Club
Northern Rockies Sierra Club
Biodiversity Legal Foundation
High Marker Snowmobile Association
Region V, Wildlife Council
Alliance for the Wild Rockies
Greater Yellowstone Coalition
The Wilderness Society
American Wildlands
Land and Water Fund of the Rockies
Idaho Conservation League
American Lands
Predator Project

Blue Ribbon Coalition
SOAR
The Ecology Center
Idaho Rivers United
Idaho Snowmobile Association
Idaho Watershed Project
Utah Snowmobile Association
Willow Creek Ecology
Forest Conservation Council
Friends of the Earth
Monastery of St. Gertrude

INDUSTRY

Boise Cascade Corp.
Louisiana Pacific Corp.
High Country Sales and Service
Caribou Cattlemen's Association
Paris-Liberty Cattlemen's Association
Bear Lake Cattlemen's Association
Bloomington Cattlemen's Association
Naylor Insurance Company
Pebble Creek Ski Area, Ltd.
J.R. Simplot
Solutia, Inc.
Bear Lake Motor Company
Barker's Whitepine Gallery
Idaho Cattle Association
Bear Lake Farm Bureau
Idaho Farm Bureau

AGENCIES, AS REQUIRED BY LAW

Advisory Council on Historic Preservation
USDA APHIS PPD/EAD
Rural Utilities Service
Natural Resources Conservation Service
USDA, National Agricultural Laboratory
BLM Idaho State Office
U.S. Department of Energy
National Park Service, Pacific West Region
Northwest Power Planning Council
U.S. Department of Transportation
Federal Aviation Administration, Northwest Mountain Region
Federal Highway Administration

Response to Public Comments

Notice: If requested, a copy of all comments provided in response to this Environmental Impact Statement will be made available to the public, including names, addresses and any other personal information provided with the comments.

Organization of this Section

This section is organized into three sections:

- The first section is the register of commentors and identifies the comment letter number associated with their letter.

- The second section is the Summary of Responses to Comments. This summarizes the major topics from comments and the Forest response to them. Letters containing identical or similar comments are identified under each summary statement. **Counting the number of times a particular comment (or type of comment) was made represents the relative popularity of an observation or an opinion – but not its substance in regard to the analysis.** A high percentage of the total body of comment letters received on the Draft EIS and Draft Forest Plan consisted of form letters (five or more identical letters signed by different individuals). Many form letter types are generated from a basic form provided by interest groups, both for or against a certain desired outcome. The content analysis team looked for substantive comments, i.e. comments relating to issues about the proposed or preferred action. Personal anecdotal information does not generally fall into this category, although some anecdotal information was captured from the comments.

  In some cases all the comments from individual letters have been captured in this section. As a result many letters were fully responded to in this section. Due to the large size of the full Response to Comments, publication of all letters and the Forest's response was not feasible or economical. According to the Council of Environmental Quality's Regulations for Implementing the National Environmental Policy Act, the responsible official can determine that a summary of responses is appropriate, especially when the response to all comments is "exceptionally voluminous". Since the database contains more than 2,450 comments and responses, the Forest determined a summary of substantive comments is appropriate to circulate with the Final EIS. (FSH 1909.15, 24.1) Many comments have also been responded to in the FEIS itself. Analysis and documentation has been augmented, additional indicators are displayed, and Alternative 7R was developed directly in response to public comments.

  The Planning Record, however, includes the entire database with complete responses to each substantive comment. **Commentors wishing to receive a complete printout of their comments and the Forest's response can request one from the Forest's Planning Department in Idaho Falls at (208) 557-5821 or (208) 557-5808 or individuals can access the entire database from the Forest's web page at http://www.fs.fed.us/r4/caribou-targhee.**

- The third section contains letters received from Federal, State and local agencies and elected officials. This section includes a photocopy of the actual letter received followed by the Forest ID Team's responses. (FSH 1909.15, 24.1)

Process Used to Analyze Public Comments

The content analysis and response to public comments was conducted using a Microsoft Access ® database. Each individual comment received an identifying comment number associated with the comment letter number. Unless the comment letter identified the individual, agency or non-governmental group sending the letter, the ID Team did not have access to the letters' authors. This was done to improve objectivity in responding to public comments.

Each letter was reviewed by a small team and comments were categorized under major program or resource areas. Sub categories and Secondary categories were used to further define the comment. For example, a comment suggesting protection of biological corridors between Utah and the Greater Yellowstone Ecosystem for wide-ranging species, such as the wolf or lynx, was classified as "Wildlife," then "Biological Corridors," and then wolf or lynx, etc. Each major category was assigned to the appropriate ID Team member, who in turn prepared a draft response for each comment in the category. Some comments required coordination between specialists or program areas. The Forest Supervisor reviewed each comment and response and the planning staff conducted a consistency analysis between the comment responses and the Final EIS and Revised Forest Plan.

After all of the comments had been responded to, the Content Analysis team consolidated comments and responses for publication. The Summary of Responses includes the major substantive comments by issue, as required by FSH 1909.15, 24.1. As explained previously, the entire Response to Comments was not printed due to its voluminous size. Commenters can access the database on the Forest's website or can request a copy of the response to their comments by contacting the Forest Planning Department at (208) 557-5821 or (208) 557-5808.

Roster of Public Comment Letters in Numerical Order

Letter ID	Last Name	First Name
1	Form	Letter
2	Form	Letter
3	Form	Letter
4	Form	Letter
5	Form	Letter
6	Form	Letter
7	Form	Letter
8	Form	Letter
9	Form	Letter
10	Number Not Assigned	
11	Number Not Assigned	
12	Form	Letter
13	Form	Letter
14	Form	Letter
15	Number Not Assigned	
16	Number Not Assigned	
17	Talbot	C.
18	Molire	R.
19	Walton	K.
20	Nicoll	M.
21	Bateman	M.
22	McAlexander	L.
23	Hodel	C.
24	Corrinne	J.
25	Lynch	L.
26	Bradish	E.
27	Swenson	B.
28	Smith	D.
29	Johnson	K.
30	Scott	D.
31	Arnold	T.
32	Winterfield	D.
33	Winterfield	C.
34	Hill	G.
35	Foue	W.
36	Jahsman	P.
37	Martin	A.
38	Hardy	V.
39	McIivoy	K.
40	Griffith	A.
41	Willmore	J.
42	Wrona	L.
43	Turner	D.
44	Taylor	T.
45	Safford	L.
46	Hogan	R.
47	Williams	N.
48	Libby	S.
49	Briggs	B.
50	Phillips	T.
51	Ursenbeck	C.
52	Talley	A.
53	Phinney	V.
54	Akers	J.
55	Simkins	J.
56	Turner	C.
57	Baird	S.
58	Meinche	D.
59	Scott	D.
60	O'Neil	F.
61	McAleese	D.
62	Christensen	R.
63	Stephens	R.
64	Dement	J.
65	Larson	N.
66	Joyce	P.
67	Larson	C.
68	Piva	L.
69	Hoffman	A.
70	Green	O.
71	Hoffman	A.
72	Howell-Angle	J.
72	Taylor	C.
73	Park	M.
74	Schmidt	E.
75	Norby	D.
76	Phinney	N.
77	Minner	L.
78	Marciuke	R.J.
79	Pink	C.
80	Bray	C.
81	Wilde	C.
82	Johnson	J.
83	Orwizk	O.
84	Manning	M.
85	Baillie	R.W.
86	Cobbley	R.
87	Bray	J.
88	Smith	R.
89	Boyd	M.
90	Kotehes	C.

Letter ID	Last Name	First Name
91	Smite	R.
92	Simpson	T.
93	McAleese	M.
94	Peterson	D.
95	Nielson	J.
96	Gill	V.
97	Gewarges	M.
98	Landrigas	M.
99	Zirker	K.
100	Wyatt	S.
101	Van Slooten	P.
102	Martin	A.
103	England	D.
104	Sauder	J.
105	Baird	C.
106	Lynch	F.
107	Olson	J.
108	Rudmen	L.
109	Bray	K.
110	Piva	C.
111	Gill	S.
112	Merritt	B.
113	Coleman	J.
114	Adrer	J.
115	Safford	T.
116	Williams	C.
117	Roberts	E.
118	Nelson	E.
119	Scott	L.
120	Peno	D.
121	Olson	D.
122	Charles	A.
123	Downey	T.
124	Jackson	J.
125	Kranning	T.
126	Roberts	H.
127	Green	J.
128	Norby	A.
129	Simkins	J.
130	Rasmussen	R.
131	Merriain	J.
132	Shive	J.
133	Frailand	E.
134	Rasmussen	K.
135	Ulland	K.
136	Branchawd	H.
137	Filliater	T.

Letter ID	Last Name	First Name
138	Klingler	K.
139	Stephens	M.
140	Barker	T.
141	Eaton	B.
142	Krause	J.
143	Cinquemani	D.K.
144	Champlin	C.
145	Van Den Noort	J.
146	Krayer	B.
147	Jensen	J.
148	Hillman	R.
148	Secrist	G.
149	Bamford	S.
150	Rowe	D.
151	Mauchley	K.
152	Kochert	P.
153	Peterson	W.
154	Pyrex	D.S.
156	Donaldson	O.
157	Redden	G.D.
158	Fischel	D.
159	Criddle	C.
159	Hueftle	K.
160	Number Not Assigned	
161	Robinson	E.
161	Robinson	C.
162	Joseph	T.
163	McAleese	W.
164	O'Hearn	R.
165	Libengood	A.
166	Meyer	R.
167	Hull	D.
168	Heywood	M.
169	Number Not Assigned	
170	Catton	J.
171	Stade	K.
172	Burnett	A.
173	Litus	G.
174	Kennedy	C.
174	Page	D.
175	Nichol	L.
176	Pitman	D.
177	Johnson	C.
177	Johnson	L.
178	Isgro	C.
179	Parker	J.

Letter ID	Last Name	First Name
180	Bosworth	K.
181	Howze	S.
182	Vice	D.
183	Tsang	S.
184	Varga	K.
185	Rice	J.
186	Swanson	D.
187	Virag	J.
188	Krah	B.
188	Krah	R.
188	Krah	T.
188	Krah	Y.
189	Hansen	L.
189	Lish	D.
190	Patla	D.
191	Anderson	M.
192	Denure	C.
192	Woods	L.
193	Bedke	S.
194	Stauber	D.
194	Stauber	S.
195	Curtis	R.
196	Shrader,	E.
197	Number Not Assigned	
198	Daly	L.
200	Collignon	R.
201	Pantuso	C.
203	Eikaas	E.
204	Unfried	T.
205	Frank	S.
206	Gaillard	D.
206	Regnerus	S.
207	Cowan	D.
208	Gabriel	E.
209	Callahan	C.
210	Cartier	C.
211	Schechter	S.
212	Monarch	J.
213	Gall	J.
214	Wuerthner	G.
215	Silverstein	J.
216	Number Not Assigned	
217	Luetkemeyer	J.
218	Cook	A.
219	Patla	S.
220	Glidden	J.
221	Thomas	M.

Letter ID	Last Name	First Name
222	Feathers	J.
223	Angel	T.
224	Churchill	G.
224	Parker	L.
225	Brog	F.
226	Washam	L.
227	Teuscher	T.
228	Boehme	S.
229	Keetch	G.
230	Keetch	G.
231	Wilsnack	A.
232	Roberts	M.
234	Harrison	A.
235	Raleigh	D.
236	Tourangeau	P.
237	Coble	M.
238	Phelps	J.
239	Libengood	A.
240	Olson	D.
241	Mladenka	G.
242	Maxwell	S.
243	Ward	R.
244	Jensen	R.
245	Gorsuch	J.
246	Cook	A.
247	Herrick	J.
249	Gardner	M. K.
250	Langford	D.
251	Neuner	G.
252	Carpenter	R.
253	Zadis	P.
254	Weeks	L.
255	Williams	R.
256	Chewning	R.
257	Marx	G.C.
258	Schemm	G.
259	Moore	E.
260	Brown	N.
261	Maloney	K.
262	Fagerness	D.
263	Jenkins	M.
264	White	L.
265	Morrow	J.
266	Nebelsick	R.
267	Hayse	B.
268	Geer	W.
269	Young	L.

Letter ID	Last Name	First Name
270	Wyberg	B.
271	Rix	D.
272	West	K.
273	Graebner	P.
274	McKnight	C.
275	Moore	R.
276	Caples	T.
277	Yamate	M.
278	Warner-Steinberg	S.
279	Weston	J.
280	Duke	B.
281	Langford	E.
282	Gardner	B.
283	Dinger	M.
284	Elieson	R.
285	Mauchley	K.
286	Brown	B.
287	Thompson	K.
288	Riede	P.
289	Hamilton	J.
290	Rowley	M.
291	Falvey	S.
292	Jayne	J.
293	Luthi	R.
294	Drewien	R.
295	Gross	H.
295	Liguori	S.
296	Michaelson	C.
298	Robison	J.
299	Borg	J.
299	Sidell	R.
300	Gledhill	D.
301	Foster	L.
302	Rees	R.
303	Steitz	J.
304	Collins	J.
305	Maag	G.
306	Winters	L.
307	Barber	B.
308	Sleeger	P.
309	Swanson	J. R.
310	Huber	P.
311	Stone	J.
312	Durbano	D.
313	Zadis	P.
314	Christ	M.

Letter ID	Last Name	First Name
315	Miller	D.
316	Hansen	S.
317	Holbrook	J.
318	Harrison	A.
319	Keetch	G.
320	Wiebe	K.
321	French	N.
322	Smith	R.
323	Lenz	D.
324	Foss	D.
325	Mirsky	R.
326	Jordan	R.
327	Smith	R.
328	Shea	R.
329	Morrow	L.
331	Rugotzke	B.
332	Sparowe	R.
333	Westerberg	C.
334	Foster	L.
335	Maxwell	J.
336	MacButch	S.
337	Chu	T.
338	Kolar	J.
339	Legs	G.
340	Olmstead	B.
341	Franz	R.
342	Senn	D.
343	Panting	M.
344	Leach	C.
345	Mitchel	S.
346	Rabe	F.
347	Marcavtonio	J.
348	Leach	M.
349	Crihfield	K.
350	Garvin	M.
351	Reeves	R.
352	Lucia	T.
353	Blum	S.
354	Blalack	R.
355	Mills	R.
356	Jensen	E.
357	Livingston, Sr.	C.
358	Stauber	C.
359	Baird	D.
360	Elliott	M.
361	Woodke	L.

Letter ID	Last Name	First Name
362	St. James	C.
363	Hansen	D.
364	Vinagre	S.
365	McKay	J.
366	Ellers	D.
367	Emery	J.
368	Cooke	D.
369	Bird	J.
370	Teuscher	J.
371	Thompson	J.
372	Winegar	B.
373	Walker	M.
374	Sutter	R.
375	Morgan	D.
376	Wake	J.
377	County Commissioner Meeting	
378	Smoot	J.
379	Daube, Jr.	P.
381	Ryan, M.D.	K.
382	Van Camp	R. J.
383	Sugden	M.
384	Scott	T.
385	Lucid	M.
386	Ransom	T.
387	Lout, M.D.	R.
388	Atz	J.
389	DeForrest	N.
390	Cold Mountain, Cold River	
391	Skipton	B.
392	Varilone	T.
393	Olson	D.
394	Chappell	J.
395	Shea	R.
396	Wichers	B.
397	Mladenka	T.
398	Maughan	J.
399	Jahsman	P.
399	Madsen	N.
400	Tigert	L.
401	Luthi	R.
402	Wagenknecht	R.
403	Smith	S.
404	Pond	R.
405	Youngbear	S.
406	Rasmussen	R.

Letter ID	Last Name	First Name
407	Heiple	C.
408	Bergeson	J.
409	Miller	E.
410	Davis	R.
411	Dewolfe	R.
412	Dreblow	S.
413	Merrill	C..
414	Brathwobe	M.
415	Rust	J.
416	Flory	J.
417	Fujii	E.
418	Byers	C.
419	Smith	J.
420	Yeager	B.
421	Dawson	E.
422	Kolakosky	L.
423	Bosse	S.
424	Klarich	D.
425	Swyers	J.
426	Morphew	B.
427	Setter	M.J.
428	Rouse	S.
429	Mabbott	C.
430	Eddie	W.
431	Walker	J.
432	Woodward	C.
433	Wallace	G.
434	Ednie	G.
435	Adams	D.
436	Latterell	K.L.
437	French	W.
438	Maceachern	E.
439	Stevenson	F.
440	Fontana	J.
441	Chelstrom	T.
442	Wells	J.
443	Glaccum	E.
444	Matteson	M.
445	Marzinelli	M.
446	Hansen	C.
447	Stoke	J.
448	Fortin	L.A.
449	Clark	J.
450	Meshrow	G.
451	Jefimoff	J.
452	Tokle	B.
453	Miller	B.

Letter ID	Last Name	First Name
454	Lane	M.
455	Young	K.
456	Attig	Z.
457	Reeves	D.
458	Flournoy	T.
459	Fisher	J.
460	Pickett	S.
461	Reichert	J.
462	Mantione	J.
463	Anonymous	
464	Archer	K.
465	Whitehead	C.
466	Martin, Ph.D.	D. L.
467	Light	J.
468	Nilssen	L.
469	Swanson	J. R.
470	Kueltzo	C.
471	Straub	E.
472	Hrabovsky	A.
473	Simms	L.
474	Mually	L.
475	Vale	W.M.
476	Tennyson	E.
477	Trost	C.
478	Hodd	C.
479	Gaskill	S.
480	Serlin	S.
481	Anderson	N.
482	Marcolina	T.
483	Szymanski	D.
484	Kammerer	E.
485	Overgaard	S.
486	Wilson	M.
487	Blank	D.L.
488	Rana	P.
489	Beauchamp	S.
490	Holte	K.
491	Bosworth	K.
492	Zimmerman	W.
493	Niedenzu	B.
494	Batey	K.
495	Regelin	L.
496	Jeppson	P.
497	Hensel	D.
498	Rachhs	S.
499	Ford	L.
500	Akers	D.

Letter ID	Last Name	First Name
501	Lawless	C.
502	Ward	J.
503	Horstman	A.
504	Samendeld	H.
505	Stimac	V.
506	Vreeland	T.
507	Brown	J.
508	Garcia	M.
509	Walling	C.
510	Ball	G.
511	Schaefer	K.
512	Vivian	G.
513	Gregory	C.
514	Firestone	H.B.
515	Aldrich	D.
516	Kipping	D.
517	Campbell	L.
518	Kesich	J.
519	Humel	K.
520	Erickson	R.
521	Sullivan	D.
522	Rusnak, Jr.	R. A.
523	Black	L.
524	Ramel	C.
525	Sablin	N.
526	Nociti	S.
527	Tyler	F.
528	Stamper	R.
529	Cook	D.
530	Paskey	W.
531	Roberts	S.
532	Gadski	M. E.
533	Beer,	R.
534	Swarring	J.
535	Roberts	M.K.
536	Chernak	C.
537	Brown, III	J.E.
538	Warner	B.
539	Richardson	G.
540	Gustafson	C.
541	Szewczyk	L.
542	Holmgren	R.
543	Donohoe	J.
544	suzuki	M.
545	Martens	P.
546	Cannon-Geary	I.

Letter ID	Last Name	First Name
547	Kennedy	D.
548	Speer	G.
549	Harper	E.
550	Owen	S.
551	DuVivier	J.
551	Handelsman	R.
552	DuVivier	J.
553	Schutt	P.
554	Burris	B.
555	Crouse	W.
556	Clements	B.
557	Aengst	J.
558	Becker	D.
559	Sorensen	J.
560	Laufer	M.
561	Lichtesien	M.
562	Carter	J.

Letter ID	Last Name	First Name
563	Parrish	S.
564	Thea	K.
565	Schmidt	J.
566	Duehren	D.
567	Capital Trail Vehicle Asc	
568	Gehrke	C.
569	Levit	S.
570	Eddie	S.
571	Holmberg	P.
572	Bird	B.
573	Lee	J.
574	Varilone	T.
575	McCarthy	J.
576	Monarch	J.
577	Hoyt	M.

Summary Responses on Public Comments

Alternatives

ALTERNATIVE 3

Summary Statement: Alternative 3 is our preference for the Revised Forest Plan

Letters containing similar comments: Form letter 1, Form letter 2, Form letter 3, Form letter 4, Form letter 13, 151, 174,188, 189, 218, 224, 227, 228, 229, 243, 244, 245, 249, 250, 281, 285, 290, 296, 302, 304, 306, 307, 317, 333, 351, 360, 363, 372, 378, 386, 394, 399, 563, 567, 576,

Forest Summary Response:

Each of the alternatives represents a course of action for future management of the Forest that addresses the public's issues and concerns to varying degrees. Environmental effects of each alternative were analyzed in the EIS and displayed. Some alternatives, like Alternative 3, are more responsive to vegetation conditions and commodity uses, while others are more responsive to watershed condition, recreation use, or wildlife concerns.

Alternative 7R, the Selected Alternative in the Record of Decision, includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R). This alternative was developed in response to comments and includes components of other alternatives, including Alternative 3. For example, Alternative 3 and Alternative 7R have similar livestock utilization standards, similar mining standards and guidelines, and both alternatives allow timber harvesting in Inventoried Roadless Areas to varying degrees.

In regards to the Roadless Area Conservation Rule, the Deciding Officer will determine how to address this issue in the Record of Decision. Regardless of the outcomes of the lawsuit and rulemaking process, the Forest will continue to comply with current policy. The Deciding Officer can choose any of the alternatives or a combination of them. The Record of Decision associated with this EIS identifies the Selected Alternative the Deciding Officer will implement and discloses the rationale for the selection.

Counting the number of times a particular comment (or type of comment) was made represents the relative popularity of an observation or an opinion – but not its substance about the analysis. A high percentage of the total body of comment letters received on the Draft EIS and Draft Forest Plan consisted of form letters, both for and against a certain desired outcome.

ALTERNATIVE 6

Summary Statement: Alternative 6 is our preference for the Revised Forest Plan

Letters containing similar comments: Form letter 6, Form Letter 9, 19, 21, 34, 39, 42, 45, 50, 51, 52, 54, 55, 57, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 71, 73, 77, 80, 81, 82, 85, 87, 88, 89, 91, 93, 95, 98, 101, 102, 104, 105, 111, 114, 115, 116, 123, 125, 127, 129, 130, 131, 132, 134, 135, 136, 137, 139, 141, 142, 143, 145, 152, 153, 156, 157, 158, 163, 164, 166, 170, 171, 172, 173, 175, 177, 180, 181, 182, 183, 184, 185, 190, 194, 195, 196, 198, 203, 205, 206, 209, 210, 213, 217, 219, 220, 221, 222, 223, 226, 231, 232, 235, 236, 238, 240, 241, 242, 247, 251, 252, 254, 256, 257, 262, 263, 264, 265, 266, 267, 269, 270, 271, 272, 273, 274, 275, 276, 279, 280, 284, 292, 295, 298, 300, 313, 320, 321, 322, 323, 325, 326, 326, 327, 331, 335, 336, 337, 338, 339, 341, 342, 344, 346, 347, 348, 352, 353, 354, 355, 356, 357, 358, 359, 361, 362, 364, 365, 366, 368, 369, 373, 374, 375, 376, 379, 380, 381, 383, 384, 385, 388, 397, 398, 400, 407, 414, 421, 440, 442, 447, 465, 479, 482, 483, 494, 505, 506, 508, 511, 518, 537, 547, 562, 564, 565, 568, 569, 570, 575, 577

Forest Summary Response:

Each of the alternatives represents a course of action for future management of the Forest that addresses the public's issues and concerns to varying degrees. Environmental effects of each alternative were analyzed in the EIS and displayed. Some alternatives, like Alternative 6, are more responsive to roadless area protection and wilderness, while other alternatives are more responsive to commodity production, vegetation conditions, watershed condition, recreation use, or wildlife concerns.

Alternative 7R, the Selected Alternative in the Record of Decision, includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R). This alternative was developed in response to comments and includes components of other alternatives. For example, Alternative 6 and Alternative 7R have similar livestock utilization standards and similar vegetation treatment levels. Alternative 7R refines those treatments by focusing them in key areas such as wildland urban interface and areas where aspen is being succeeded by conifers. Both alternatives would allow and utilize wildland fire, to varying degrees.

The Deciding Officer can choose any of the alternatives or a combination of them.
The Record of Decision associated with this EIS identifies the Selected Alternative the Deciding Officer will implement and discloses the rationale for the selection.

The Deciding Officer will address the Roadless Area Conservation Rule in the Record of Decision. Regardless of the outcomes of the lawsuit and rulemaking process, the Forest will continue to comply with current policy.

Counting the number of times a particular comment (or type of comment) was made represents the relative popularity of an observation or an opinion – but not its substance in regard to the analysis. A high percentage of the total body of comment letters received on the Draft EIS and Draft Forest Plan consisted of form letters, both for or against a certain desired outcome.

ALTERNATIVE 6

Summary Statement: Alternative 6 is too restrictive

Letters containing similar comments: 189, 363, 399

Forest Summary Response:

Forest Service planning regulations require that the "interdisciplinary team shall formulate a broad range of reasonable alternatives...distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable the full range of major commodity and environmental resource uses and values that could be produced from the forest. Alternatives shall reflect a range of resource outputs and expenditure levels." In the Caribou Forest Plan Revision, Alternative 6 represents the minimum resource potential and Alternative 3 represents the maximum resource potential "consistent with the resource integration and management requirements of Secs. 219.13 through 219.27." (36 CFR 219.12(f))

Alternative 7R, the Selected Alternative in the Record of Decision, falls within this spectrum and includes factors in common with both ends. The selected alternative allows commodity resource production within the capabilities of the land. Priority is given to restoration and protection of wildlife and fisheries resources when designing treatments. It includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R).

The Deciding Officer can choose any of the alternatives or a combination of them. The Record of Decision associated with this EIS identifies the Selected Alternative the Deciding Officer will implement and discloses the rationale for the selection.

ALTERNATIVE 6

Summary Statement: Combine the Wilderness recommendation in Alternative 6 into Alternative 7.

Letters containing similar comments: 277, 283, 315, 350, 403

Forest Summary Response:

The NEPA requires agencies to analyze a range of alternatives to address significant issues identified from public comments. In addition, Forest Service planning regulations require that the "interdisciplinary team shall formulate a broad range of reasonable alternatives...distributed between the minimum resource potential and the maximum resource potential" (36 CFR 219.12(f)). The FEIS presents a range of alternatives that includes an alternative with no wilderness recommendation to an alternative that recommends more than 300,000 acres for wilderness. In developing Alternative 7R, the Selected Alternative in the Record of Decision, Forest managers reviewed characteristics of the Inventoried Roadless Areas (IRAs) for inclusion in the National Wilderness Preservation System. The wilderness recommendation in Alternative 7 from the Draft EIS was retained in Alternative 7R with minor adjustments to boundaries to facilitate management and exclude existing motorized routes.

ALTERNATIVE 7

Summary Statement: Alternative 7 does not go far enough in protecting all of the resources.

Letters containing similar comments: Form letter **7,** 17, 24, 61, 84, 98, 130, 141, 186, 239, 286, 294, 362, 396, 402, 410, 424, 455, 494, 497, 504, 508, 516, 520, 532, 539, 546, 568, 569, 570, 575, 577

Forest Summary Response:

All alternatives meet basic stewardship responsibilities and legal requirements governing management of National Forest System lands (36 CFR Secs. 219.13 through 219.27). Between issuance of the DEIS and the FEIS, the Forest formulated a new alternative, Alternative 7R, in response to public comments. Alternative 7R is very similar to Alternative 7 but was modified in several key ways. Alternative 7R allows commodity resource production within the capabilities of the land and forest management resources. The DFC's are essentially the same as in Alternative 7 but the Plan emphasizes activities in key areas in order to "make a difference" in specific community types. Vegetation treatment emphasis is on aspen restoration, big game winter range improvement, and fuel reduction in the wildland urban interface. To address public comments regarding wildlife corridor protection and riparian resources, the Plan includes more direction. Through application of management emphasis items, priority is given to restoration and protection of wildlife and fisheries resources in critical Ecological Subsections (Plan, Chapter 4, Ecological Subsections). Alternative 7R also includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R). Alternative 7R was chosen by the Deciding Officer and the rationale for his decision is displayed in the Record of Decision.

ALTERNATIVE 7

Summary Statement: Alternative 7 treats too many, or too few, sagebrush acres.

Letters containing similar comments: 159, 176, 230, 577 (too many acres)
230, 319 (too few acres)

Forest Summary Response:

In all alternatives the treatment levels were based on a desired future condition (DFC). The DFC for Alternative 7 is to achieve a range between 30 and 50 percent of the sagebrush/mountain shrub vegetation types in the greater than fifteen percent canopy cover density class. The DFC for Alternative 7R is the same as Alternative 7, but the estimate of probable treatments has been reduced to 40,000 acres over the next ten years. This reduction reflects our ability, given current staffing and budget. The 10-year outcome is expected to be greater than 56 percent of acres in these vegetation types in the greater than fifteen percent canopy cover density class. The long-term outcome would trend most of these acres toward denser canopy cover condition and away from the DFC. (FEIS, Chapter 4, Issue 3: Ecosystem Management, Non-forested Vegetation)

In Alternative 7R, however, treatments could be increased to move vegetation resources toward the DFC, if funding and staffing became available. In addition, once fire management plans are completed wildland fire may be used to move both non-forested and forested vegetation towards the DFCs (Plan, Chapter 3, Ecological Processes and Patterns, Fire, Objective #1). Alternative 7R reduces the acres of probable sagebrush treatments and focuses the treatments in wildland urban interface zones and in areas having a high

departure from the historic range of variation (HRV) (Plan, Chapter 3, Biological Elements, Vegetation, Guideline 9). Direction is included for maintaining historic patch sizes of vegetation and inclusion of requirements for sagebrush obligate wildlife species such as the sage grouse and pygmy rabbit (Plan, Chapter 3, Biological Elements, Wildlife).

No prescribed fire treatments have been identified in the Revised Forest Plan for bigtooth maple, juniper, mountain mahogany and tall forbs, but any treatments in these vegetation types would be subject to a separate NEPA process at the site-specific level. Alternative 7R includes a guideline to prioritize projects in these types based on site-specific needs. Restoration of the maple ecosystem will be emphasized in the Cache Valley Front Ecological Subsection.

Draft Environmental Impact Statement

Cumulative Effects

Summary Statement: The cumulative effects section of the DEIS is inadequate in regard to Forest Plan implementation.

Letters containing similar comments: 564, 568, 569, 572, 573, 575, 577

Forest Summary Response:

Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such actions." (40 CFR 1508.7). Cumulative effects must be evaluated along with direct and indirect effects of each alternative. Generally, cumulative effects are considered on a larger scale than the direct and indirect effects. They describe a larger picture across a longer time frame. When analyzing cumulative effects, different temporal and spatial scales are used than for direct and indirect effects. These scales of analysis extend only to where effects can actually be measured (EPA 1997).

In the case of Forest planning, the effects analysis "should consider trends and sustainability in the long term while direct impacts are considered less" (EPA letter, April 6, 2001). In the Forest Plan EIS many of the direct and indirect effects are, in fact, cumulative effects due to the large scale (over 1 million acres) and long time frame, most generally considered as the ten-year planning period. For instance, watershed and riparian effects include impacts and activities on private, state, and BLM lands expected to occur over the ten-year plan period.

Cumulative effects analysis involves assumptions and uncertainties while providing the opportunity to evaluate future Forest management options in the context of other developments in the planning analysis area. A study of activities on adjacent federal, state, and private land was conducted in 2000 and 2001 (See Project File, Caribou Adjacency Analysis). This study included discussions with local, state, and federal government agencies and other interested stakeholders and was used to identify important future actions and to help determine the scope of the cumulative effects analysis. Activities that could be additive or stressors that could be interactive with proposed alternatives in the EIS were identified. In addition, information from "An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins" was reviewed as part of this process. Although this latter report did not include portions of the Forest, it was useful as a resource for regional issues and concerns.

The FEIS includes discussions on the effects and outcomes on resource programs decades into the future. Where direct and indirect effects analysis does not adequately disclose cumulative effects, the FEIS contains an augmented discussion under the subheading "Cumulative Effects" in Chapter 4. Cumulative effects are discussed only for those resources impacted by the alternatives.

NEED FOR CHANGE

Summary Statement: Future management/protection of roadless areas should be a Need for Change.

Letters containing similar comments: 564, 575, 577

Forest Summary Response:

The range of alternatives in the FEIS responds to these changes and public values for goods, services, and products from the Forest. While they may not have been specifically identified in the Need for Change information from the Initial Analysis of the Management Situation, subsequent public scoping and outreach efforts identified these concerns, and they were considered in the development of the alternatives. Further, roadless area management is one of the significant issues which the alternatives addressed.

Alternative 6 fully protects all Roadless Areas and recommends more than 300,000 acres for wilderness. This alternative and its effects were analyzed in the EIS.

Alternative 7R, the Selected Alternative in the Record of Decision, includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R).

Issue 1 – Recreation, Access, and Scenery Management

Summary Statement: Prohibit all motorized use in the Forest.

Letters containing similar comments: 43, 57, 65, 78, 97, 114, 133, 247, 484, 519, 521, 526, 523, 557

Forest Summary Response:

See "Alternatives Considered but Eliminated from Detailed Study" in Chapter 2 of the EIS. Forest Managers considered this alternative. Some alternatives eliminate all off-road use and snowmobile use in some areas. Other areas of the Forest are open to all uses all of the time or without travel restrictions. This alternative does not meet the Purpose and Need described in Chapter 1 of the EIS. The alternatives analyzed in the EIS provide a variety of combinations for motorized and non-motorized use consistent with the agency's multiple use mission.

Public comments are diverse on the subject of open motorized roads and trails on the Caribou National Forest. To respond to public comment and resource issues the alternatives in the FEIS offer various ways to manage motorized use. Please see the Recreation Opportunity maps of existing semi-primitive non-motorized areas and proposed semi-primitive non-motorized areas for Alternative 7R. For more discussion and comparison on proposed management of motorized use by alternative, see the Recreation and Access section of the FEIS.

Based on the effects of alternatives, the Deciding Officer can choose any alternative or a combination of alternatives.

In Alternative 7R, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. See following comment responses for more information on how the Revised Forest Plan deals with access management.

The Revised Forest Plan includes an objective to initiate travel management planning within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. We encourage you to get involved in this process.

Summary Statements:

(1) Restrict/limit motorized use to designated routes forest-wide and apply stricter standards.

Letters containing similar comments: Form letter 6, Form letter 9, Form letter 14, 29, 36, 41, 45, 53, 55, 56, 63, 66, 68, 69, 70, 71, 74, 75, 78, 84, 86, 88, 90, 92, 94, 95, 96, 102, 104, 106, 108, 110, 111, 116, 122, 123, 124, 126, 135, 136, 137, 139, 140, 142, 143, 144, 149, 150, 152, 156, 176, 190, 194, 206, 214, 214, 219, 235, 238, 241, 242, 247, 264, 265, 268, 279, 284, 287, 291, 292, 295, 298, 311, 315, 324, 325, 327, 328, 331, 332, 335, 338, 348, 357, 358, 359, 366, 369, 373, 381, 384, 399, 402, 406, 412, 417, 425, 432, 433, 443, 450, 451, 457, 458, 468, 480, 484, 486, 487, 488, 489, 491, 498, 499, 514, 518, 519, 523, 541, 543, 553, 562, 564, 565, 568, 569, 570, 575, 577

(2) Provide more non-motorized recreation opportunities on the Forest.

Letters containing similar comments: 121, 153, 206, 206, 240, 247, 292, 328, 331, 393, 452, 502, 564, 568, 569

(3) Retain the existing access to the Forest.

Letters containing similar comments: 72, 117, 165, 179 199, 200, 225, 228, 250, 282, 360, 363

(4) Provide more overall access to the Forest.

Letters containing similar comments: Form letter 3, Form letter 4, 99, 192, 227, 239, 243, 244, 281, 291, 363, 371, 378, 567, 576

Forest Summary Response:

In Alternative 7R, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest.

In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation

experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections.

In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing.

For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

Summary Statement: Better enforce travel plan regulations.

Letters containing similar comments: Form letter 8, 122, 150, 200, 213, 242, 263, 264, 283, 320, 324, 332, 335, 403, 449, 564, 565, 577

Forest Summary Response:

Travel enforcement and funding are not primary issues of a programmatic plan. The Forest does intend to enforce the direction in the Revised Forest Plan, including access management. Enforcement, information and education are all tools that forest managers will use to insure compliance with the Revised Forest Plan. Many people will comply with restrictions if they understand the resource benefits.

If an alternative is chosen that restricts motorized use to designated routes in areas currently managed as open to cross-country motorized use, designated routes will be defined. Most pioneered routes are not depicted on the current forest travel plan. On the Westside Ranger District the current travel plan will be used. On the Montpelier and Soda Springs Ranger Districts, the travel plan maps will be updated to show designated motorized routes in areas that were previously open to cross-country motorized travel.

After the Record of Decision is signed, site-specific travel planning will be initiated for these areas. This will identify designated travel routes and types of uses allowed on these routes. Enforcement efforts will include public education, media outreach, and cooperative patrols with Idaho Fish and Game.

Summary Statement: Retain adequate access to Wenchell Dugway

Letters containing similar comments: Form letter 2, Form letter 3, 165, 188, 199, 218, 224, 239, 292, 302, 304, 307, 340, 377, 574

Forest Summary Response:

In the Draft EIS, a portion of the Wenchell Dugway was included in the Caribou City Recommended Wilderness Area (Prescription 1.3) for Alternative 7. In Alternative 7R, the boundary line has been corrected. The Wenchell Dugway is located in the Caribou Mountain Special Emphasis Area (Prescription 2.1.4) and actually marks the eastern boundary of the prescription area. This prescription allows motorized use and emphasizes scenery and heritage based recreation opportunities in a motorized setting (Plan, Chapter 4, Prescriptions 2.1.4).

The Forest Plan establishes road densities by prescription area; it does not determine whether specific roads or trails will be open to motorized access. That decision will be made during the site-specific travel management plan revision. The Forest Plan includes a goal to work cooperatively with local governments "towards resolution of R.S. 2477 assertions" (Plan, Chapter 3, Transportation, Goal 4). The ultimate resolution of R.S. 2477 assertions will be determined through a separate process based on on-going court case determinations.

SNOW SEASON ACCESS

Summary Statement: Winter (Snow Season) Recreation Access should be changed.

(1) Prohibit snowmobiles on the Forest.

Letters containing similar comments: 411, 436, 529

(2) Limit and restrict snowmobiles in the Forest, primarily in roadless and wilderness areas.

Letters containing similar comments: 107, 162, 163, 206, 212, 238, 286, 291, 292, 310, 315, 478, 564, 565, 568, 569, 570, 575, 577

(3) Maintain or provide more access for snowmobiles.

Letters containing similar comments: Form letter 1, 174, 225

Forest Summary Response:

In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this back-country winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year-long. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter.

Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized

winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including developed alpine skiing.

Between the Draft EIS and Final EIS, the Forest conducted a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R).

For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management. For more on recreation uses and IRAs, see the FEIS, Chapters 3 and 4, Issue 8: Roadless Area Management and Recommended Wilderness and Appendices C and R.

Summary Statements regarding access on the backside of Pebble Creek

(1) Maintain the backside of Pebble Creek as motorized in the winter.

Letters containing similar comments: Form letter 2, 163, 165, 189, 192, 218, 239, 249, 304, 307, 340, 360, 363, 378, 399

(2) Close the backside of Pebble Creek to motorized users in the winter.

Letters containing similar responses: 121, 153, 158,162, 240, 336, 381, 393, 565

Forest Summary Response:

Alternatives 7 and 7R propose managing the east slope of Mt. Bonneville (elsewhere referred to as the backside of Pebble Creek) for non-motorized recreation in winter. This is in response to public comments that would like to see more areas for non-motorized winter recreation. The east slope of Mt. Bonneville is the only area on the forest where a skier can access back-country, ungroomed, high elevation snow without having to climb several hours to reach it. This is a unique opportunity and managing the area to retain this opportunity has been included in Alternative 7R.

The FEIS discusses the unique back-country ski experience offered by the east slopes of Bonneville Peak (FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management). Closing this area to snowmobile use would displace that activity to other parts of the forest, over 90 percent of which is open to motorized winter use.

MOTORIZED ACCESS

Summary Statement: Prohibit any new motorized roads and trails in the Forest.

Letters containing similar comments: Form letter 1, 38, 144, 146, 153, 162, 176, 206, 214, 239, 292, 295, 299, 311, 367, 383, 427, 433, 441, 443, 446, 482, 503, 514, 559, 562, 564, 568, 569, 570, 577

Forest Summary Response:

Under the Revised Plan, new motorized roads or trails could be allowed if road densities are below the standard in a particular management prescription area. Decisions to build new roads or trails require a

separate, site-specific environmental analysis with public involvement. *See also* summary response to comments on roads.

In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a mix of motorized and non-motorized recreation experiences for both summer and winter.

Several areas currently non-motorized have been designated as such to preserve this experience. In Alternative 7R, these Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be management emphases in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections.

In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year-round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter.

Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing.

For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

Summary Statement: Insure access decisions are not in conflict with the Americans with Disabilities Act.

Letters containing similar comments: 281, 567, 571

Forest Summary Response:

Handicapped, elderly or physically challenged people can recreate in a variety of ways, just as all of us have specific things we can do and specific things we cannot do. This group of peoples' preferred outdoor recreation activities are not limited to motorized recreation. Many people of all abilities enjoy motorized road and trail use, and restricting some forest areas to OHV use by Forest Plan prescription and/or Forest Travel Plan does not violate the intent or spirit of the Americans with Disabilities Act. Federal laws, regulations, and

policies that apply to Federal agencies, including Section 504 of the Rehabilitation Act of 1973, as amended, do not require areas restricting or prohibiting OHV/ATV use for all people to make exceptions to such use because a person has a disability.

An exception is the use of a wheelchair, including battery-operated chairs that meet the legal definition, which may be used wherever foot travel is permitted.

The Forest is working towards improving the accessibility of facilities, developed areas, and programs for all types of visitors. The agency uses the design guide, "Universal Access to Outdoor Recreation" to help provide different levels of access depending on the development level of a recreation area or activity. The agency is also working toward improving and updating these guidelines.

(See Forest Service WO letter of Feb.21, 2002 under 2350/1700/7710 file code, giving OGC's opinion on this issue)

Issue 2 – Social and Economic Environment

Summary Statement:

The Forest did not adequately analyze the non-commodity resources' costs and benefits in the economic analysis. The net public benefits were not disclosed as required by NFMA, the Multiple Use Sustained Yield Act (MUSY), and other regulations.

Letters containing similar comments: 8, 148, 149, 193, 200, 291, 292, 300, 372, 431, 562, 564, 567, 570, 572, 574, 577

Forest Summary Response:

MUSY calls for management of the National Forests 'with consideration being given to the relative values of the various resources.' There is no requirement for such values to be monetarily expressed.

RPA, NFMA and implementing regulations outline the economic analysis and criterion requirement for forest planning. Many commenters misunderstand the 'net public benefits' analytical framework prescribed by 36 CFR 219. 'Net public benefits' is not a benefit-cost analysis given a comprehensive economic efficiency framework – one that incorporates a monetary expression of all known market and non-market benefits and costs. Such an analysis is generally used when economic efficiency is the sole or primary criterion upon which a decision is made. The Forest Service does not endorse or expect this use of economic efficiency analysis in projects, programs, or other analyses. The agency recognizes that many of the values associated with natural resource management are best handled apart from, but in conjunction with, a more limited benefit-cost framework. This concept is expressed in NFMA regulations [36 CFR 219] and is referred as 'cost-efficiency.' When discussing the evaluation of Forest Plan alternatives, the regulations state that the evaluation 'shall compare present net value, social and economic impacts, outputs of goods and services, and overall protection and enhancement of environmental resources' [36 CFR 219.12(h)]. It is this process that results in a Forest Plan that 'maximizes long term net public benefits in a environmentally sound manner' [36 CFR 219.1].

The NFMA regulations define net public benefits as:
'An expression used to signify the overall long-term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or

not. Net public benefits are measured by both quantitative and qualitative criteria rather than a single measure or index [36 CFR 219.3].'

Such an approach is reasonable given the vast array of environmental, social, and economic considerations in establishing or revising a Forest Plan. It is also consistent with the definition of multiple use as given in the MUSY Act.

The FS Manual and Handbook system agrees with this approach. FSH 1909.17, section 10 calls for economic efficiency analysis for all projects. Section 11 clarifies the analysis required. A pure economic efficiency analysis includes all benefits and costs in monetary, and therefore, maximizing present net value yields the same results as maximizing net public benefits. However, in most planning conditions all benefits and costs cannot be monetarily valued. Under this circumstance, maximizing present net value is not the same as maximizing net public benefits, and the handbook recommends the use of 'cost-efficiency' to satisfy these requirements. FSM 2430 and FSH2409.18 also focus on the concept of 'cost-efficiency' rather than pure economic efficiency.

The implementing regulations of NEPA expressly avoid a cost-benefit analysis as being a necessary basis for decisions: 'For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations.' (40 CFR 1502.23) A cost-benefit analysis, however, may be conducted if desired or required by other laws, regulations, or directives. Economic impacts, however, are a concern of NEPA, but only where such issues have been identified during scoping.

The social and economic section of the FEIS contains information about four resource industries; wood products, mining, range, and recreation/tourism. Recreation and tourism are also discussed extensively in the Recreation section of the FEIS. Several alternatives were developed to emphasize and manage resources for recreational use and values; these alternatives have been analyzed along with other alternatives in the FEIS. The effects of the alternatives on "non-commodity resources" such as wildlife, water quality, soils, are displayed in the FEIS under those sections.

Summary Statement:

(1) The livestock grazing program costs much more than the return in grazing fees. The Forest Service subsidizes logging. The analysis does not reflect the cost of the damage done to resources by grazing, logging, and mining.

(2) Livestock grazing, mining and timber harvest are important factors in the local economy. The economics section should recognize this better.

Letters containing similar comments: 4, 300, 367, 416, 461, 476, 525, 528, 564, 577

Forest Summary Response:

The social and economic section of the FEIS contains information about all four resource industries; wood products, mining, range, and recreation/tourism. This section has been updated between the Draft EIS and Final EIS. The revenue versus costs of management of the Forest is displayed in the Financial Present Net Value. All alternatives have a negative financial PNV which varies only by 4 percent between the alternatives (FEIS, Chapter 4, Issue2). This means that the actual cost of managing National Forest System lands exceeds

the return to the federal treasury for all alternatives. Many local industries, such as small timber operators, livestock grazers, and recreational-based businesses, depend on the Forest for a part or all of their livelihood.

Grazing on National Forest system lands is authorized by Congress and is a legitimate use of the Caribou National Forest. Some of the acts that authorize grazing are: Organic Administration Act of June 4, 1897; Multiple Use-Sustained Yield Act of June '12, 1960; Forest and Rangeland Renewable Resources Planning Act of August 17, 1974; and the Public Rangelands Improvement Act of October 25, 1978 (See also FEIS, Chapter 3, Issue 4: Livestock Grazing). Grazing fees are established by Congress, as well as, the funds appropriated to administer grazing on National Forest System Lands. See also Summary Responses for Issue 4—Livestock Grazing. The social and economic section displays the contribution of grazing operations to the analysis area in term of job, labor income and community activity.

Each timber sale is unique in its economics. Sales are usually prepared and administered by Forest Service employees using funds appropriated by Congress for this purpose. Some sales require extensive and costly environmental analysis as part of their preparation. Specific trees in a sale are designated for cutting and measured. Sales are individually appraised and their value determined using standard procedures, then the timber industry loggers bid on the logs from the sale, harvest the trees and pay the Forest Service for the logs. Some sales require road construction or helicopters to access the trees, and long hauling distances to mills. Timber sale purchasers are given allowances for these costs against the purchase price of the timber, thereby reducing the amount they pay the Forest Service for the timber. Other sales have expensive mitigation or other requirements that reduce the cost of the timber to purchasers. Given these costs, some sales cost more than they return to the government in strict dollar value. However, sales often provide other benefits in terms of resource protection and management and jobs to the local economy which are not easily measured.

The contribution of the mining industry to the local economy has been augmented and displayed in the FEIS, Chapters 3 and 4, Issue 2: Social and Economic Environment, using more up-to-date information.

Issue 3 – Ecosystem Management

Summary Statement:

Another failing, in terms of the various sections on ecosystem management found throughout the DEIS, is the unsubstantiated assumption that logging and/or thinning can be used to manage vegetation, reduce hazardous fuels, recycle nutrients, etc. Given the uncertainty of treatment methods and outcomes, treatments should be at a small scale.

Letters containing similar comments: 149, 292, 570, 571, 573, 577

Forest Summary Response:
A large body of research supports the fact that logging and/or thinning, correctly applied, can be used to manage vegetation, alter stand structure, and reduce hazardous fuels (ICBEMP, Beschta Report, Fire Regimes on the Caribou National Forest, The Effects of Thinning and Similar Stand Treatments on Fire Behavior in Western Forests).

The FEIS analyzes an array of alternatives that allow for both human disturbances to occur, as well as alternatives that emphasize the role of allowing natural disturbances, such as fire and insects and disease, to operate without human intervention in shaping the landscape. While science can help us understand the consequences of taking one course of action over another, society ultimately weighs this information and

determines which course of action to take. The Forest Service, through its ecosystem and adaptive management philosophy must insure that human and natural-caused disturbances do not result in the loss of important ecosystem components while at the same time providing for the sustained yield of goods, services, and products needed by Americans.

Alternative 7R provides for both human and natural disturbances to work together, where appropriate, to achieve landscapes that are resilient to catastrophic disturbances. Some areas of the Forest can benefit from human intervention, using such tools as timber harvest and controlled or prescribed fire, while other areas can be managed using natural disturbances, such as wildfire for resource benefit or allowing insects and disease to play an important part in shaping the landscape. Where private property or public safety is at stake, active human management should be used to reduce the risks. Alternative 7R and the Revised Forest Plan provide direction to this effect.

Recent surveys and polls indicate that most people believe human intervention is necessary and should be a primary management objective (Hammond, 1994). People also recognize that increasing use is taking its toll and that is has become a human problem to resolve, that people must partner with nature and that management should not be left to chance. They believe that a balance between uses is not an "either/or" situation, that a healthy balance can and should be maintained (Hammond, 1994).

We acknowledge that thinning can increase or decrease fire intensity and severity following treatments, and that thinning results in drier fuels. "Thinnings in general will lower crown bulk densities and redistribute fuel loads significantly, thus decreasing fire intensities if the surface fuels are treated (Agee 1993, Alexander 1988, Alexander and Yancik 1977)" [emphasis and citations in the original] (Graham et al. 1999, p.18).

Historic fire data for the Caribou National Forest from 1960 to 2000 indicate that 67 percent of the wildfires were caused by lightning, and 33 percent were human-caused. We acknowledge that roads have both positive and negative consequences in terms of their effect on wildfire. Roads provide access permitting effective control of wildfires, as well as an avenue for humans to ignite unwanted wildland fires. The positive impact of roads permitting more effective control of wildfires has also had the intended consequence of increasing woody biomass that has moderately increased the risk of uncharacteristic wildland fire.

Silvicultural activities involving tree harvesting will leave coarse woody debris (Plan, Ch. 3, Soils; Plan, Ch. 3, Wildlife), and live and dead snags at specified biological potentials for woodpeckers (Plan, Ch.3, Wildlife, Snag/Cavity Nesting Habitat). These serve as habitat and refugia for insect predators to provide natural checks and balances on insect pest populations. Furthermore, regeneration harvest, thinning, and salvage are anticipated to occur on only approximately 1 percent (11,100 acres) of the Forest in the next decade.

The Disturbance Section under Issue 3, Ecosystem Management, has been updated in the FEIS and clarified. Fire Condition Classes were also added to the discussion.

Summary Statement:

The Forest's description of ecosystem management is overly simplistic. Properly functioning condition should not have been used.

Letters containing similar comments: 292, 562, 568, 570, 573, 577

Forest Summary Response:

The Forest Service Manual (FSM) states authorities, objectives, policies and responsibilities for managing National Forest System lands. FSM 2060 gives the Regional Foresters the responsibility of "Ensuring that ecological information is used in forest planning and in project implementation on National Forest System lands." The Chief of the Forest Service has directed that Regional Foresters develop guidelines for using an ecological approach to manage the National Forests and Grasslands (Robertson 1992). The Forest Service has adopted an ecological approach as described in "An Ecological Basis for Ecosystem Management" (Kaufmann et al. 1994). The introductory section of Issue 3: Ecosystem Management in Chapter 3 of the FEIS has been augmented to better explain how the Caribou applied ecosystem management to the revision.

For each vegetation type discussed in the DEIS, structure, composition, patterns, succession along with disturbance was disclosed (Refer to Chapter 3, Issue 3: Ecosystem Management, Forested Vegetation Diversity and Non-forested Vegetation Diversity). Information used to describe these conditions included the most up-to-date scientific research. This was then evaluated at a broad scale that included lands outside the Forest boundaries (See Caribou National Forest and Surrounding Area Subregional Assessment Properly Functioning Condition 1997; Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin-ICBEMP 1996; CNF Adjacency Study-USDA-FS 2001).

The concept of Properly Functioning Conditions is used as a rapid assessment to determine if ecosystems are within the historic range of variability. It is also used to evaluate existing conditions of ecosystems to determine the risk to resiliency. A process paper is provided in the project file for complete background on the concept, use and application of PFC assessments (See FEIS, Chapter 3: Ecosystem Management; PFC Process Paper). Information from the Caribou PFC assessment was used to determine how far the Caribou ecosystems are from the historic range of variability (HRV). HRV was used to set a desired range of future conditions for vegetation and other resources (see HRV Process paper, Swanson 1994).

Issue 4 – Livestock Grazing

Summary Statements: Eliminate livestock grazing on the Forest.

Letters containing similar comments: 65, 70, 128, 192, 238, 265, 405, 415, 430, 436, 509, 553, 555, 559

Stop abusive grazing practices by applying stricter standards.

Letters containing similar comments: Form letter 6, Form letter 8, Form letter 9, Form letter 14, 21, 28, 30, 38, 41, 43, 45, 55, 56, 64, 66, 68, 75, 76, 83, 88, 89, 90, 92, 94, 95, 96, 97, 108, 110, 111, 114, 116, 124, 125, 126, 127, 132, 133, 136, 137, 139, 143, 152, 156, 164, 180, 190, 194, 219, 241, 242, 262, 264, 265, 268, 279, 292, 294, 295, 300, 325, 327, 331, 336, 348, 357, 358, 359, 369, 373, 384, 395, 402, 416, 428, 435, 444, 477, 482, 501, 528, 558, 562, 564, 568, 569, 570, 575, 577

Forest Summary Response:

Grazing on National Forest system lands is authorized by Congress and is a legitimate use of the Caribou National Forest. Some of the acts that authorize grazing are: Organic Administration Act of June 4, 1897; Multiple Use-Sustained Yield Act of June '12, 1960; Forest and Rangeland Renewable Resources Planning Act of August 17, 1974; and the Public Rangelands Improvement Act of October 25, 1978 (*See also* FEIS, Chapter 3, Issue 4: Livestock Grazing).

Alternative 7R, implements new livestock grazing utilization standards for uplands and riparian areas. These forest-wide utilization standards will be implemented immediately through inclusion in livestock grazing permits and/or Annual Operating Plans. In addition, the Forest has developed adaptive grazing guidance, the Caribou Riparian Grazing Guide, for determining livestock utilization levels at the site-specific level, based on site conditions. According to the analysis in the FEIS, these new livestock standards, guidelines, and adaptive process will improve livestock management on the Forest, resulting in improved rangeland and riparian conditions (FEIS, Chapters 3 and 4, Issue 4: Livestock Grazing and Issue 6: Riparian/Watershed and Aquatic Biota). The Revised Forest Plan also contains livestock monitoring that will help insure that resource conditions continue to improve over time (Plan, Chapter 5).

In addition to the grazing utilization standards, the Revised Forest Plan also includes direction relating to livestock grazing in other places. The livestock grazing suitability analysis, redone between the DEIS and FEIS, identified areas not suitable due to tradeoffs with other resource values. In Alternative 7R, corridors along the major travelways in Dispersed Camping Management Areas were deemed not suitable for livestock grazing (Plan, Chapter 4, Prescription 4.3). Other management prescription direction for special management areas restricts livestock grazing facilities and/or grazing itself. The big game winter range prescriptions (Plan, Chapter 4, Prescriptions 2.7.1 and 2.7.2) have more strict utilization standards to insure that grazing leaves adequate forage for wintering game. As a result of the suitability analysis in Alternative 7R, grazing will be phased out on an opportunity basis in St. Charles Creek and Elk Valley Marsh (Plan, Chapter 4, Prescription 2.5). Restoration of deteriorated rangelands is a management emphasis in the Webster Ridges, Preuss Ridges, Bear River, and Basin and Range Ecological Subsections (Plan, Chapter 4, Ecological Subsections).

Summary Statement: The Livestock Capability/Suitability analysis in the DEIS is inadequate.

Letters containing similar comments: 57, 148, 149, 193, 214, 235, 265, 291, 292, 305, 327, 331, 332, 348, 388, 395, 401, 562, 564, 572, 575, 577

Forest Summary Response:

The capability and suitability analysis was revised between the draft and final EIS, in response to public comments. The Forest analyzed acres that are capable and suitable for grazing and browsing as required in 36 CFR 219.20 (1982 Planning Regulations as published prior to 2001). This re-analysis determined that there are about 719,000 acres capable of supporting sheep and 469,000 acres capable of cattle. Suitable acres are less than capable acres and vary by alternative depending on the theme of the alternative. The results of the revised suitability analysis are described in Chapter 4, Issue 4, Livestock Grazing, Indicator LG1. The analysis process is described in the FEIS, Chapter 3 and Appendix B, Issue 4, Livestock Grazing (*See also* Livestock Grazing Specialist Reports and Interdisciplinary Team Notes).

This livestock analysis identified areas not suitable due to tradeoffs with other resource values using the Intermountain Region Protocol. Areas identified as not suitable in this analysis would not necessarily be closed to grazing. Although an area may not be suitable for livestock grazing, incidental grazing can still occur. The forage produced on unsuitable acres would not be considered when determining the grazing capacity of an allotment, however. In some prescriptions, areas were identified where grazing would be phased out on an "opportunity basis." Opportunity is defined as a suitable or favorable time to close an allotment or area to livestock grazing because of nonuse violations, term permit waivers, resource protection, or permit actions resulting in cancellation of the permit. For instance, in Alternative 7R corridors along the major travelways in Dispersed Camping Management Areas were deemed not suitable for livestock grazing (Plan, Chapter 4, Prescription 4.3). As a result of the suitability analysis, grazing will be phased out on an opportunity basis in St. Charles Creek and Elk Valley Marsh (Plan, Chapter 4, Prescription 2.5).

Summary Statement: The DEIS fails to show forage production estimates.

Letters containing similar comments: 265, 291, 562, 564, 565, 577

Forest Summary Response:

The FEIS has been augmented with this information, and a new indicator, LG 2 has been included. Chapter 4, Issue 4: Livestock Grazing presents tables indicating production by grazed community types, by suitable acres, and the resulting potential capacities in cattle and sheep animal months. According to this analysis, in Alternative 7R there is an estimated 171,671 cattle months and 1,340,000 sheep months of forage available on suitable range. The discussion also includes a table indicating potential herbaceous forage available for wildlife on suitable sheep range. In Alternative 7R there will be over 400 million pounds of forage remaining for wildlife to use on suitable sheep range. This analysis only calculated wildlife forage on sheep range since it also includes range suitable for cattle. The estimate is conservative for a variety of reasons, explained in detail in the FEIS (FEIS, Chapter 4, Issue 4: Livestock Grazing, Indicator LG 2).

Issue 5 – Mining

Summary Statement: Eliminate all mining on the Forest.

Letters containing similar comments: 19, 68, 70, 192, 279, 434, 436, 442, 533, 557, 559

Forest Summary Response:

The denial of mining on the Forest is outside the scope of the Forest Plan revision because it would be inconsistent with existing laws, regulations and valid existing rights. Under the 1872 Mining Laws, as amended, the staking and filing of mining claims is allowed on all Federal lands not formally withdrawn from mineral entry, subject to existing laws and regulations. Existing phosphate leases (there are many existing phosphate leases on the Forest) grant to the lessee the right to develop the phosphate resources present on the lease.

Summary Statement: Provide measurable standards for phosphate mining, including defined, prescriptive direction.

Letters containing similar comments: Form letter 6, Form letter 9, Form letter 14, 21, 30, 43, 45, 62, 65, 66, 69, 74, 76, 83, 89, 92, 95, 97, 108, 108, 110, 111, 114, 119, 123, 124, 126, 132, 136, 137, 143, 152, 156, 190, 194, 214, 219, 235, 238, 262, 264, 292, 325, 331, 357, 358, 384, 564, 568, 569, 570, 577

Forest Summary Response:

The Plan contains extensive direction for management of mining operations on the Forest. The first Desired Future Condition states that "mineral resources are available, consistent with other resources." Two of the forest-wide goals for the minerals program are to allow "mineral resource development using state of the art practices for surface resource protection and reclamation..." and to administer mining activities "to prevent the release of hazardous substances in excess of established state and/or federal standards."

Other direction includes designing actions to reclaim to pre-disturbance conditions and to eliminate or minimize exposure to hazardous substances. The Plan has about two pages of standards and guidelines

pertaining to administration and reclamation of Drastically Disturbed Lands (Plan, Chapter 3, Physical Elements, Minerals and Geology). In addition to forest-wide guidance, Prescription 8.2.2 (Phosphate Mine Areas) contains direction specific to phosphate mining.

The Forest Plan is a programmatic document and cannot display the site-specific impacts for each of the existing or future mining operations. An environmental analysis process is required for all new mining proposals and will disclose the anticipated effects of each proposal evaluated. This process will also review existing management practices, monitoring results, and other information to develop additional mitigation measures and conditions of approval to be used on a site-specific basis to ensure that hazardous substances are not released into the environment, and that impacts are mitigated/reduced to acceptable levels. During the site-specific environmental analyses done for each mining proposal, additional mitigation will likely be identified. These, in conjunction with Plan direction, will provide adequate mitigation measures to reduce or eliminate impacts to Forest resources. As time progresses and the results of monitoring are evaluated, necessary changes to Forest Plan standards will be made. All phosphate mining operations are bonded to ensure the disturbed lands are reclaimed to the pre-determined productive post-mining land uses.

Some of the "mitigation measures" or "standards" proposed by outside interests have not yet been tested, monitored and proven effective. One such untested proposal is to have complete pit backfill. However, as documented in the Final EIS for the Dry Valley Mine - South Extension Project (completed in 2000), the selenium concentrations in the surface and ground water leaving the mine site were projected to be greater with complete pit backfill than with other alternatives. To incorporate such measures (like complete pit backfill) as "standards" in the Forest Plan before they have been "proven to be effective" through implementation, monitoring and evaluation, would be irresponsible, and could even pose greater risks to the environment.

Water quality, riparian and wetland health, and aquatic habitat protection and restoration are priorities on the CNF. It is correct that water quality, riparian area health, etc., are intricately linked. For this reason, a separate prescription 2.8.3 prescription (see Forest Plan) has been allocated to riparian areas throughout the Forest. This prescription contains specific Goals, Objectives, Standards and Guidelines to direct Forest managers in the management and protection of riparian areas.

Summary Statement: Reclaim mined lands.

Letters containing similar comments: 24, 123, 324, 357, 570

Forest Summary Response:

The reclamation of areas disturbed by mining operations is required when approval of an operation is granted. Reclamation bonds are held to ensure that the required reclamation is completed. The Plan contains extensive direction regarding reclamation of drastically disturbed lands, including bonding, top soil management, vegetation selection, grades, etc (Plan, Chapter 3, Physical Elements, Minerals and Geology). In addition, the 8.2.2 Phosphate Mine Areas prescription includes direction specific to reclamation of phosphate mines. All of this direction emphasizes the use of "the most current science and research" and continued cooperation with the interagency efforts of the Selenium Area-wide Advisory Group (Plan, Chapter 4, Prescription 8.2.2).

Issue 6 – Riparian Areas and Aquatic Biota

Summary Statement: The Forest should protect all native fisheries on the Forest.

Letters containing similar comments: 24, 51, 98, 180, 238, 294, 310, 337, 344, 348, 423, 473, 485, 547, 564, 568, 569, 570, 577

Forest Summary Response:

Direction regarding the protection of native fish on the Forest can be found in the Revised Forest Plan in Chapter 4 under Prescription 2.8.3 and in Chapter 3 under forest-wide Standards and Guidelines for Riparian and Watershed Resources.

Based on the analysis in the FEIS and risk assessments presented in the Fish Populations Viability Evaluation in Appendix D, we have determined that the selected alternative, Alternative 7R, and the Revised Forest Plan will have a low risk to the long-term persistence of at-risk fish populations (FEIS, Chapter 4, Issue 6: Riparian/Watershed and Aquatic Biota and Appendix D, Fish Populations Viability Assessment).

All waterbodies on the Forest will be managed according to the direction in Management Prescription 2.8.3, Aquatic Influence Zones. The management emphasis in this prescription is to restore and maintain the health of these areas. One of the Desired Future Conditions in this prescription is that "native aquatic and riparian-dependent species population strongholds are increasing and well distributed within historic ranges…". The direction in this prescription was developed from various sources, including applicable information from INFISH and the Bonneville and Yellowstone Cutthroat Trout Conservation Strategies.

In addition to the direction in Prescription 2.8.3, management activities will emphasize restoration and protection of Bonneville and/or Yellowstone cutthroat trout strongholds in the Basin and Range, Bear River, Cache Valley Front, Caribou Range, Preuss Ridges and Webster Ridges ecological subsections (Plan, Chapter 4, Ecological Subsections).

Summary Statement:

The DEIS does not have an adequate discussion on riparian areas and water quality. The Forest must show how activities will meet the Clean Water Act. There should be more discussion on the effects of timber harvest, roads, livestock grazing and mining.

Letters containing similar comments: 167, 291, 310, 573, 454, 467, 472, 500, 564, 569, 573, 575, 577

Forest Summary Response:

Water quality, riparian and wetland health, and aquatic habitat protection and restoration are priorities on the CNF. It is correct that water quality, riparian area health, etc., are intricately linked. For this reason, a separate prescription 2.8.3 prescription (see Forest Plan) has been allocated to riparian areas throughout the Forest. This prescription contains specific Goals, Objectives, Standards and Guidelines to direct Forest managers in the management and protection of riparian areas. They are all designed to maintain the resource that is currently in "good" condition and improve "degraded" conditions. This includes water quality, aquatic habitat, stream channel maintenance and stability, and so forth. The direction specifically addresses ecological processes and patterns, physical elements (such as minerals), biological elements (such as wildlife), forest use

and occupation (such as roads and trails) and production of commodity resources (livestock grazing and timber harvesting).

NEPA and NFMA requirements must be met for all proposed land-disturbing activities within the Forest. The presence or absence of 303(d) streams, fisheries strongholds, etc., and the impacts of a management activity on those resources, is a factor to be considered in the NEPA process for individual proposed projects. If timber harvesting is proposed, then Best Management Practices for Silvicultural Activities per the Idaho Forest Practices Act must be applied, regardless of the allocated prescription for the land or the presence or absence of impaired waters or other "important" considerations. Similarly, mining, grazing, recreation, etc. must meet the intent of the Clean Water Act, Endangered Species Act, Clean Air Act, and other laws. Through these regulations and requirements, the Caribou National Forest will take every precaution to protect resources from adverse impacts associated with land management activities. Specific Best Management Practices will be considered for each project. It is not appropriate to attempt to list all possible practices in a broad-scale, programmatic document such as this, or attempt to analyze their effects for every specific situation. NEPA analysis for individual projects will determine which BMPs to use a on a site specific level, and assess individual and cumulative impacts to affected resources as a result of applying specific BMPs.

Mining

Changes were made in Chapters 3 and 4 of the EIS to address your comments. Many changes in the way mining and reclamation are being done have occurred in the last few years as a result of the selenium situation (See Chapter 3 of the EIS). Past mining and reclamation practices used in phosphate mining in southeast Idaho created undesirable effects. Changes have been and are being made to those practices. We do not have all the answers yet, but we are attempting to do what we can to prevent similar situations in the future. Clean Water Act and other State and Federal standards are required of the mine operators. Precisely how those standards are to be met is up to the mining industry, with overview by the Federal and State regulatory agencies.

The Revised Forest Plan contains extensive direction for management of mining operations on the Forest. The first Desired Future Condition states that "mineral resources are available, consistent with other resources." Two of the forest-wide goals for the minerals program are to allow "mineral resource development using state of the art practices for surface resource protection and reclamation..." and to administer mining activities "to prevent the release of hazardous substances in excess of established state and/or federal standards."

Other direction includes designing actions to reclaim to pre-disturbance conditions and to eliminate or minimize exposure to hazardous substances. The Plan has about two pages of standards and guidelines pertaining to administration and reclamation of Drastically Disturbed Lands (Plan, Chapter 3, Physical Elements, Minerals and Geology). In addition to forest-wide guidance, Prescription 8.2.2 (Phosphate Mine Areas) contains direction specific to phosphate mining.

Total Maximum Daily Loads (TMDLs)

The State of Idaho has identified streams listed as impaired under Section 303(d) of the Clean Water Act. TMDLS have been established for the Portneuf and Blackfoot River watersheds. Due dates for completing other assessments will occur after the Revised Plan is completed. The Forest Service and Bureau of Land Management Protocol for addressing 303(d) waters has been replaced in Forest Service Regions 1 and 4 by direction contained in the R1/R4 correspondence dated April 26, 2002. This process guidance represents and advisable course of action, but it is not considered process direction.

The Forest cooperates with State agencies to assist in verifying and validating impaired waters. The turbidity sampling referred to in the EIS was conducted randomly during summertime flow conditions.

The limited data neither validates nor refutes State BURP conclusions. It simply states that no water quality violations (i.e. turbidity) were noted at the point-in-time the samples were collected. These data will be added to the Forest's database and combined with data to be collected in the future. More comprehensive sampling will be completed in conjunction with TMDL implementation plans, to be developed in cooperation with DEQ. Through the monitoring protocol developed in these implementation plans, data will be collected and given to the State. The State will in turn add these data to their database to assist them in making future determinations to keep, add or remove a stream from the 303(d) list.

Roads, Grazing and Timber Effects—See Response to Comments for Issue 4 and Issue 7 and FEIS, Chapters 3 and 4, Issue 6: Riparian/Wetland Areas and Aquatic Biota.

Issue 7 – Timber Management

Summary Statement: The Forest should not allow any more timber harvests in the Forest.

Letters containing similar comments: 51, 149, 292, 303, 310, 436, 471, 534, 560

Forest Summary Response:

See "Alternatives Considered but Eliminated from Detailed Study" in Chapter 2 of the EIS. This alternative was considered but dropped from further analysis. To manage the entire forest a "no harvest" alternative fails to meet the Purpose and Need described in Chapter 1. Furthermore, the Forest Service mission is a multiple use mission, and Forest Plans provide guidance for these multiple uses.

Forest Service planning regulations require that the "interdisciplinary team shall formulate a broad range of reasonable alternatives...distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable the full range of major commodity and environmental resource uses and values that could be produced from the forest. Alternatives shall reflect a range of resource outputs and expenditure levels." The range of alternatives that were analyzed provide a variety of combinations of areas where timber harvest is or is not allowed, consistent with the multiple use mission. Alternatives analyzed in detail provide standards to permit timber harvest with appropriate environmental protection. Forests are ecosystems, constantly changing, affected by growth, disturbance, climate and many other interactions similar to other life forms. As part of the ecosystem, humans are involved in many of those interactions. Our management efforts are designed to move Forestlands toward DFCs, based on a historic range of variability, while trying to meet society's needs.

Alternative 7R predicts that commercial timber harvest will occur on less than 10 percent of acres determined to be suitable for timber harvest. Approximately 6,100 of the 84,000 acres of suitable timber would be harvested in a decade. This is less than two percent of the forested acres on the forest. While Alternative 7R includes a low level of harvest on suitable land, approximately the same number of acres of unsuitable land would be harvested to restore aspen communities.

Summary Statement: Limit timber harvest, primarily to selective cutting.

Letters containing similar comments: 62, 192, 377, 438, 493, 501, 559

Forest Summary Response:

Revised Forest Plan standards and guidelines in the Forested Vegetation and Timber sections address silvicultural and protection maintenance of logged areas. These include control of animal damage, density management or thinning to promote vigor and reduce impacts of insects and disease, fire protection and suppression. The Plan standard to complete silvicultural prescriptions for all forested vegetation treatments is designed to insure that the harvest method will achieve management goals. A "one size fits all" prohibition of clearcutting would not achieve management objectives in key vegetative communities such as aspen clones. These and other shade-intolerant, early seral species need an open canopy in order to regenerate. This is best accomplished through methods other than selective cutting. There are also many standards and guidelines in the soil and water protection and other sections that address these areas relative to timber harvest.

Alternative 7R, proposes to treat less than 10 percent of the total forested acres on the Caribou over the next ten years. This includes both commercial harvest and other forested vegetation treatments such as prescribed fire. Most (>75%) of those projects would occur for already roaded areas. Most planned harvesting in the Douglas-fir type involves thinning small sawlogs, opening up these stands for the large dominant trees to expand their roots and crowns. About 40 percent of the harvesting in the mixed conifer type, including lodgepole pine, will involve thinning new, young trees. A major thrust of any planned harvesting is to restore acres to vigorous, young quaking aspen, where feasible. Alternative 7R includes approximately 15,000 acres of prescribed fire or mechanical treatments focused in areas where aspen is succeeding to conifers (Plan, Chapter 3, Vegetation, Guideline 2). Based on historic patterns, the analysis also assumes that approximately 15,000 acres of escaped wildland fire will burn forested vegetation in the next decade.

Alternative 7R describes a Total Sale Program Quantity of 51 MMBF for the first decade of the Revised Forest Plan. This includes an Allowable Sale Quantity (ASQ) of 27 MMBF of conifer saw timber from capable, suitable lands, primarily to supply wood products. Approximately 25 percent of this volume is planned to come from inventoried roadless areas. This alternative also proposes harvest of an additional twelve MMBF of conifer saw timber for wood products (from lands with prescriptions emphasizing aspen restoration), approximately three MMBF of aspen harvest and 9 MMBF of firewood (primarily dead standing conifer within 300 feet of an open road). The ASQ is determined on the principal of non-declining flow for a 100-year period on about 84,000 acres of forestland. These lands are capable of sustaining timber harvest with a specific set of harvest prescriptions based on stand conditions.

Summary Statement: Prohibit clearcutting.

Letters containing similar comments: 49, 404, 409, 413, 419, 435, 463, 535

Forest Summary Response:

Insect infestation, disease, or fire, may lead to a decision to clear-cut a forest stand. Esthetic effects are dramatic and usually adverse in the short term if clear cuts are not carefully planned using principles of landscape design. On good sites, effects are usually short-term because rapidly growing trees soon become established. This is the case in nearly every clear-cut on the Caribou National Forest where lodgepole pine or quaking aspen are early seral species. The Forest plans to use a variety of silvicultural techniques, including clear cutting, only if it is the best method suited to the site, to restore forest structure and composition and provide wood products to the public.

The Plan standard to complete silvicultural prescriptions for all forested vegetation treatments is designed to insure that the harvest method will achieve management goals. A "one size fits all" prohibition of clearcutting would not achieve management objectives in key vegetative communities such as aspen clones. These and other shade-intolerant, early seral species need an open canopy in order to regenerate. This is best accomplished through clearcutting. The Plan contains guidance in other resource areas such as wildlife and fisheries to mitigate impacts from silvicultural practices.

Summary Statement: Protect remaining Old Growth.

Letters containing similar comments: 309, 418, 540, 568, 569, 577

Forest Summary Response:

Chapter 4 in the EIS in the Forested Vegetation Diversity section describes each forested vegetation cover type's movement towards the Desired Future Condition and displays percent of mature and old vegetation at ten years and 100 years after implementation of the Revised Forest Plan. After 100 years of the Plan's proposed treatments, and predicted natural disturbances, all conifer types still have about two thirds of their acreage in mature and old structural stages. The Forest has about 550,000 acres of forested vegetation. Planned treatments (timber harvest and prescribed fire) are projected to affect about 30,000 acres every ten years in these vegetation types (about 5 percent per decade). The Revised Forest Plan management direction and these treatment levels will help establish and protect many acres of old growth. Natural disturbances such as wildland fire and insects and diseases could, however, have a greater influence on the acres of old growth that survive the next century.

The Plan contains a standard that at least 15 percent of all forested acres in a 5^{th} code HUC are to meet or be actively managed to attain old growth characteristics (Plan, Chapter 3, Vegetation Standards #3).

Issue 8 – Roadless Area Management and Recommended Wilderness

ROADLESS AREA MANAGEMENT

Summary Statements:

(1) Fully protect the remaining roadless areas from logging, mining, roadbuilding and motorized use.

Letters containing similar comments: Form letter 6, Form letter 9, Form letter 14, 17, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, 30, 31, 32, 35, 36, 37, 38, 40, 41, 44, 45, 46, 47, 48, 50, 52, 53, 55, 56, 57, 59, 60, 62, 64, 65, 66, 68, 69, 70, 71, 73, 74, 75, 76, 78, 82, 83, 89, 90, 91, 92, 94, 95, 96, 97, 98, 100, 102, 103, 105, 108, 109, 110, 111, 112, 113, 115, 116, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 130, 131, 132, 133, 136, 137, 138, 140, 142, 143, 145, 149, 150, 152, 156, 161, 164, 168, 178, 181, 183, 190, 192, 194, 195, 196, 204, 206, 208, 211, 213, 214, 219, 222, 223, 226, 231, 235, 236, 237, 253, 255, 257, 259, 262, 264, 265, 266, 270, 272, 274, 276, 277, 278, 279, 288, 291, 292, 294, 295, 303, 309, 310, 313, 320, 325, 327, 331, 332, 336, 337, 338, 339, 341, 344, 347, 348, 355, 358, 359, 364, 367, 368, 369, 373, 374, 375, 376, 380, 381, 383, 387, 388, 397, 398, 402, 403, 426, 427, 456, 475, 481, 495, 498, 500, 510, 522, 529, 536, 543, 556, 562, 564, 565, 568, 569, 570, 575, 577

(2) Allow a full spectrum of uses and activities within the Forest's roadless areas.

Letters containing similar comments: Form letter 1, Form letter 3, Form letter 4, 146, 174, 189, 199, 227, 228, 229, 244, 250, 363, 370, 378, 389, 399, 567, 571, 574

Forest Summary Response:

Appendix R was formulated between the Draft EIS and Final EIS. This contains a full discussion of the process the ID Team used to re-evaluate roadless area management. It contains a complete review of each roadless area and the values (physical, biological, and social) of each. It describes the rationale for the application of management prescriptions inside the Inventoried Roadless Areas, as well. The ID Team used the process outlined in the Advanced Notice of Proposed Rulemaking for Roadless Area Management (Federal Register, August 2001). The Forest also considered USDA Secretary Veneman's five principles for evaluating Roadless areas.

Through this re-evaluation process forest managers determined that a variety of uses would be appropriate in parts of some of the Caribou's 34 Inventoried Roadless Areas. The following is a brief summary of how IRAs would be managed under Alternative 7R.

General Management

Protection of roadless area values can be evaluated by prescription and by alternative theme. Management area categories, or MACs, 1, 2, and 3 include recommended wilderness, special management areas and semi-primitive recreation emphasis areas. These prescriptions generally manage for low development and resource protection and enhancement. Acres managed under these prescription categories are more likely to retain their roadless areas values. In Alternative 7R, 68 percent of the total IRA acres would be managed in these MACs.

All of the alternatives provide direction for management of fish and wildlife habitat, whether it is located in an IRA or not. In the RFP, this direction is mainly in Chapter 3, Biological Elements, Wildlife and

Chapter 4, Prescription 2.8.3, Aquatic Influence Zones. The Plan also includes direction for wildlife in individual prescription areas. Management emphasis in several ecological subsections will be to preserve and protect cutthroat trout strongholds and maintain linkage habitat for wildlife (Plan, Chapter 4, Ecological Subsections).

Timber Harvest
Alternative 7R, the selected alternative, does not incorporate the Roadless Area Conservation Rule (RACR). Based upon the re-evaluation of roadless areas, Alternative 7R proposes to manage 63,000 acres within IRAs in a timber prescription allowing harvest. Road building would also be permissible if the area is within the route density limits. The timber modeling used for the Plan predicts that only 1,525 acres of IRAs would actually be harvested in the first decade of the Plan. This harvest is included in the Non-interchangable Component (NIC). Thus, if the Allowable Sale Quantity (ASQ) cannot be met in these areas, the Forest will not have to turn elsewhere to "make-up" the acres. Potential harvest in IRAs is concentrated in those areas that have past developments and historic or unimproved roads within them. See Appendices C and R.

Mining
Portions of some roadless areas have existing phosphate leases and areas of known phosphate reserves. Most of the leases and known phosphate reserves are in close proximity to existing mine operations. The lease areas will be mined in the future. Any new lease proposals on the Forest are subject to the NEPA process and public involvement. The effects of mining on IRAs are disclosed in the Roadless Area section, Chapter 4, Issue 8. Reclamation plans will incorporate new science and technology for reclaiming mined landscapes.

Livestock Grazing
Alternative 7R includes grazing standards for riparian areas and uplands designed to meet wildlife and fisheries objectives. The Forest determined that grazing would not affect the roadless area characteristics (Appendix R).

Motorized Access
The selected alternative restricts most motorized use to designated routes, and new motorized routes are limited by a prescribed motorized route density. Under this alternative, portions of some IRAs are managed as semi-primitive non-motorized during the snow-free season. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) were identified during the roadless re-evaluation process. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be management emphases in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections.

In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. The northwestern portion of Toponce, the backside of Pebble Creek Ski area, Bear Creek, and Mead Peak will all be managed as non-motorized year-round. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter.

See FEIS, Issue 8: Roadless Area Management and Recommended Wilderness for more information on alternatives and the effects of alternatives on roadless area values. Appendix C and R discuss each roadless

area's potential for wilderness, and its existing roadless area values respectively. The record of Decision associated with this final EIS identifies the selected alternative that will be implemented and discloses the rationale for the selection.

The Deciding Officer will address the Roadless Area Conservation Rule in the Record of Decision. Regardless of the outcomes of the lawsuit and rulemaking process, the Forest will continue to comply with current policy.

RECOMMENDED WILDERNESS

Summary Statements:

(1) The Forest should rescind the 1985 Forest Plan wilderness recommendation and should not recommend any other areas for wilderness.

Letters containing similar comments: Form letter 1, Form letter 4, 151, 174, 189, 225, 227, 228, 243, 244, 250, 293, 296, 345, 345, 360, 363, 372, 378, 386, 394, 399, 401, 563, 574

(2) The Forest should recommend the maximum amount of acres for wilderness.

Letters containing similar comments: 240, 242, 263, 265, 288, 291, 292, 294, 303, 309, 310, 469, 545, 564, 565, 568, 569, 570, 575, 577

(3) The Forest should fully protect existing recommended wildernesses.

Letters containing similar comments: 26, 79, 120, 127, 309, 533, 548, 568, 569, 570, 577

Forest Summary Response:

One of the requirements of the FS planning regulations is to evaluate and consider roadless areas for recommendation as potential wilderness areas (36 CFR 219.17). A portion of National Forest System lands across America provide an opportunity for inclusion in the Wilderness system. The question becomes where should these lands be designated and how many acres qualify for inclusion based on wilderness characteristics. The Forest Service only recommends particular areas for wilderness designation. Then, legislative action is required to include these recommended tracts into the wilderness system.

During the revision process the Forest reviewed the 1985 wilderness recommendation. Not all of the Roadless Areas on the Forest meet the capability and availability criteria for wilderness designation. Recommended wilderness varies by alternative, according to the theme of the alternative. The range of alternatives in the FEIS includes Alternative 3 which recommends no wilderness and rescinds the wilderness recommendation of the 1985 Caribou NF Land and Resource Management Plan to Alternative 6 which recommends more than 340,000 acres. We believe this range of alternatives is responsive to public comments received during the planning process. The Deciding Officer can choose any of the alternatives or a combination of them.

Alternative 7R recommends 42,500 acres in the Mt. Naomi and Caribou City Inventoried Roadless Areas for inclusion in the National Wilderness Preservation System. Until legislative action is completed, these will be managed to protect and maintain their wilderness character. Direction to accomplish this goal is displayed in the Plan, Chapter 4, Prescription 1.3, Recommended Wilderness. Some key direction is listed here:

These areas would not be available for development of mineral materials or mineral leasing. (Rx 1.3, Minerals/Geology, Standards 1 and 2).

No new road or motorized trail construction shall be allowed. (Roads, Standard 1).

Vegetation treatments are allowed if they do not lead to long-term adverse changes in wilderness character or if needed to maintain existing facilities. (Vegetation, Standard 1).

During the snow-free season, non-motorized travel only is allowed. During the snow season, motorized use is allowed. (Access, Standard 1).

Wildland fire use and prescribed fire should be used to restore or maintain native ecosystems. (Vegetation, Guideline 1).

This issue is discussed in detail in the FEIS, Chapters 3 and 4, Issue 8: Roadless Area Management and Recommended Wilderness and Appendices C and R.

Issue 9 – Wildlife Habitat Management

Summary Statement: Protect biological corridors that link to Utah and Greater Yellowstone Ecosystem.

Letters containing similar comments: 177, 206, 213, 237, 246, 258, 259, 260, 261, 263, 265, 277, 283, 291, 310, 311, 314, 315, 316, 320, 329, 337, 344, 348, 349, 350, 368, 382, 390, 403, 437, 466, 512, 517, 538, 544, 554, 561, 564, 568, 569, 570, 577

Forest Summary Response:

The Forest received numerous public comments regarding the importance of the Caribou as a wildlife corridor connecting the Greater Yellowstone Ecosystem to the north and the Southern Rocky Mountains. Of particular concern is the Bear River Range and the entire east half of the Forest. Several changes were made in the development of Alternative 7R and the Revised Forest Plan to address this concern. These are summarized below:

The Plan contains direction for maintenance of large blocks of security cover for wildlife in the Preuss Ridges and Caribou Range Ecological Subsections.

Management emphasis in the Caribou Range, Preuss Ridges, and Bear River Ecological Subsections is to maintain linkage habitat between the Caribou and the Targhee, Wasatch-Cache, and Bridger-Teton National Forests.

In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest.

In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In specific areas, route densities are lower than the current network to address wildlife and other concerns. One such area is the southern half of the Bear River Range; another is in the mountains east of Malad.

Several areas currently non-motorized have been designated as such to preserve this habitat security. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest but concentrated in the Caribou Range and Preuss Ridges Ecological Subsections.

The northwestern portion of Toponce, Bear Creek, and Meade Peak will all be managed as non-motorized year-round for recreation experience and wildlife security.

In big game winter range (Prescriptions 2.7.1 and 2.7.2) motorized snow season use is restricted to designated routes.

In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest are in prescriptions where winter access is non-motorized. Approximately 110,000 acres (10% of the Forest) is in a prescription where only non-motorized access is allowed during the summer.

A discussion of corridors is found in the Wildlife section of Appendix D. In addition, potential linkage habitat for lynx in discussed and mapped in the Biological Assessment. In analyzing effects of the alternatives on corridors, vegetation connectivity was also considered. Vegetation on the Forest is mapped based on cover type. The Subregional Properly Functioning Condition assessment for the Forest identified those vegetation types that were at low, moderate, or high departure from their historical range of variability (See Chapter 3, EIS, Ecosystem Management). DFCs and probable treatments for some of the alternatives are based on moving those vegetation types closer towards the HRV. The objectives are to treat those vegetation communities at higher departure, and move them closer to the HRV so they are more resilient to human and natural disturbances.

The analyses for individual wildlife species considered changes in vegetation from the alternatives, vegetation departure from HRV, as well as how sensitive the animal species is to human activities or disturbance and other factors. Risk assessments for each species are found in Chapter 4 and in the Wildlife section of Appendix D.

Summary Statement: Wildlife Viability Analysis is inadequate.

Letters containing similar comments: 291, 292, 572, 575, 577

Forest Summary Response:

Conclusion
Wildlife analysis for the Forest Plan Revision followed the direction contained in 36 CFR 219.19, and other direction applicable to wildlife found throughout 36 CFR 219. 36 CFR 219.12 must be considered in its entirety, along with other sections of 36 CFR 219. The wildlife analysis, including viability analysis, included all available population and habitat information that was applicable to the Caribou National Forest and the Forest Plan Revision. The EIS presents a summary of the wildlife analysis, whereas the full detailed wildlife analysis is presented in Appendix D.

Process
The wildlife TES and species-at-risk have wide distributions, and minimum viable populations have not been established. The Forest provides only a portion of the habitat used across these species ranges. Where population trend information was available, it was incorporated into the viability analysis in the Wildlife section of Appendix D.

An assessment of life history requirements and habitat used was done for each species. This was then used to predict changes in numbers or distribution across the planning area, based on habitat changes predicted for each alternative. Risk assessments were done for each TES species, using risk factors identified for that species and considering standards and guidelines in the Plan. Based on the risk assessments presented in the Fisheries Viability section of Appendix D, we have determined that the selected alternative, Alternative 7R, and the Revised Forest Plan will maintain habitat able to support viable populations of existing native and desired non-native species in the planning area. We have determined the Plan is sufficient to provide well-distributed habitat for reproductive individuals. Conservation measures were outlined for species-at-risk, and incorporated into the Plan. See Appendix D for more information on specific species.

The Plan was reviewed between the draft and final and changes were made to incorporate public and agency comments. Additional objectives have been added, as well as standards and guidelines. MIS have been identified for three habitats. For other habitats, no MIS could be found that met the selection criteria, and monitoring will focus on changes in vegetation structure.

Summary Statement: Winter Range (Rx 2.7.x) boundaries are too large.

Letters containing similar comments: 230, 319, 337

Forest Summary Response:

IDFG has selected trend areas, which are surveyed in the winter. These areas are established for mule deer and elk and are used to determine numbers, bull:cow, buck:doe and cow:calf ratios. The winter range on the Forest was mapped based on IDFG winter flight information. During these flights, they have found that bull elk consistently use the south aspect of Stump Peak (Boulder Creek). This mapping was refined several times, based on public and agency comments. See the Wildlife section in Appendix D for more information on mapping of winter ranges.

Summary Statement: A recreation capability and suitability analysis should have been conducted to insure protection for wildlife.

Letters containing similar comments: Form letter 8, 206, 214, 265, 291, 315, 564, 565, 568, 569, 570, 575, 577

Forest Summary Response:

Recreation planners recognize that the forest should provide a variety of setting and experiences for forest visitors, including motorized and non-motorized areas. The alternatives in the FEIS provide both experiences to varying degrees. In assigning management prescriptions and motorized route densities, vegetation structure, recreation and wildlife needs were analyzed together (Appendix R: Roadless Re-evaluation). The recreation analysis was done using the Recreation Opportunity Spectrum mapping as directed in the Forest Service planning regulations (36 CFR 219.21).

While responding to comments and re-evaluating roadless areas on the Forest, the ID Team looked at recreation uses in combination with other characteristics. Some of these other values included wildlife security habitat, native trout strongholds, watershed integrity, and departure from historic ranges of variation in vegetative communities. For instance, as discussed in the EIS, there are some wildlife species such as wolverine that may be affected by winter recreation use. Recreation use can affect watershed integrity and cutthroat trout populations. (Project File, Interdisciplinary Team Notes)

Capacity
Dispersed recreation uses are discussed in the Recreation and Access section of the FEIS. Recreation use by RVD, including categories of dispersed recreation, were gathered and reported annually, up to 1998. The ROS inventory also identifies acres currently available for different dispersed experiences. These reports and inventory were used along with public comments on dispersed recreation and travel management as it relates to dispersed recreation.

To determine recreation capacities for management areas, based on wildlife needs, we would need to determine what the wildlife tolerances are for various recreation activities. There is still much we do not know about the habitat needs and behavior of lynx and wolverine. Managing recreation use for capacity limits would be difficult. Without controlled entrances, like National Park management, how would we know when recreation use capacities are exceeded, and how would we enforce capacity limits?

Vegetation
In analyzing effects of the alternatives, vegetation connectivity was also considered. Vegetation on the Forest is mapped based on cover type. The Subregional Properly Functioning Condition assessment for the Forest identified those vegetation types that were at low, moderate, or high departure from their historical range of variability (See Chapter 3, EIS, Ecosystem Management). DFCs and probable treatments for some of the alternatives are based on moving those vegetation types closer towards the HRV. The objectives are to treat those vegetation communities at higher departure, and move them closer to the HRV so they are more resilient to human and natural disturbances.

The analyses for individual wildlife species considered changes in vegetation from the alternatives, vegetation departure from HRV, as well as how sensitive the animal species is to human activities or disturbance and other factors. Risk assessments for each species are found in Chapter 4 and in the Wildlife section of Appendix D.

Wildlife
The analyses for individual wildlife species considered changes in vegetation from the alternatives, vegetation departure from HRV, as well as how sensitive the animal species is to human activities or disturbance and other factors. Risk assessments for each species are found in Chapter 4 and in the Wildlife section of Appendix D.

Based on the results of the patch size analysis (see the Wildlife section of Appendix D), it would be very difficult to map roads, trails, habitat types, known sensitive species occurrences and come to any conclusion. Patch sizes are very small and many of the sensitive species are expected to be more widespread across the Forest than just where we have known occurrences.

Alternative 7R and the Revised Forest Plan
Listed below are some of the ways that recreation use and wildlife habitat needs are addressed and integrated in the Plan. This list is not all-inclusive.

- Alternative 7R includes four areas of year round non-motorized use, three of which were recommended, in part, because they would provide wildlife security habitat. These three areas are found around Toponce, Bear Creek and Meade Peak. The Toponce area will be managed as non-motorized also to respond to public comments regarding recreation and from the Shoshone-Bannock Tribe. The Tribe was concerned with snowmachine access onto the Reservation from that area. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter.

- In addition, several other areas, currently non-motorized in the summer, will be preserved for primitive recreation experiences and wildlife security.

- Alternative 7 and 7R set Open Motorized Route Densities to maintain and improve wildlife habitat and to provide non-motorized experiences.

- The Plan has a guideline to restrict disturbance within one mile of known active wolverine den sites from March 1 to May 15.

- The Plan contains direction for maintenance of large blocks of security cover for wildlife in the Preuss Ridges and Caribou Range Ecological Subsections.

- One of the management emphases in the Caribou Range, Preuss Ridges, and Bear River Ecological Subsections is to maintain linkage habitat between the Caribou and the Targhee, Wasatch-Cache, and Bridger-Teton National Forests.

- Management emphasis in the Caribou Range Ecological Subsection is to retain the primitive and semi-primitive recreation opportunity and the backcountry hunting experience.

Summary Statement: Using road density standards to manage big game is not valid and not supported in science.

Letters containing similar comments: Form letter 1, Form letter 3, 200, 212, 214, 284, 294, 372, 392, 566, 574, 576

Forest Summary Response:

General

Throughout the revision process, access management has been one of the major public issues. The 1985 Plan had a "no net gain" policy regarding new roads. While this policy addresses total road mileage on the Forest, it does not address road limits at a smaller scale. For instance, one area could have an extremely high road density and another have none. This would be in compliance with the Plan but would not address local conditions. In order to address this, and to be consistent with the Targhee zone of the Caribou-Targhee, forest managers set motorized route density limits at the management prescription area level. In keeping with the "no net gain" policy of the past 15 years, route density limits were set at near current levels. In some areas, such as Deep Creek/Clarkston and the south half of the Bear River Range, density will be reduced to accommodate specific conditions. In Bailey Creek and the intermingled private land northwest of Pocatello, no route density limits are set because of the need to provide access to private lands.

In setting route density limits for Alternative 7R, many factors, not just big game management, were considered. Vegetation structure, recreation opportunity spectrum, watershed integrity, past activities, predicted treatments and wildlife needs were analyzed along with public comments (Appendix R: Roadless Re-evaluation). Many people commented that the Forest should provide a variety of recreation settings and experiences for visitors, including motorized and non-motorized areas. Many of these comments were very specific to geographic locations. These were considered in setting density limits.

For instance, in order to retain the primitive backcountry experience of the Stump Peak area on the Soda Springs Ranger District, motorized route densities were set to closely match the existing route network.

Prescription density limits range from 0.0 mi/mi^2 to 1.0 mi/mi^2 in this area. This low density will allow people to have a primitive, backcountry experience. It will also retain the important and valuable roadless area character (Appendix R). One of the management emphases in the Caribou Range Subsection is "Retention of primitive and semi-primitive recreation opportunities" and "wildlife security and backcountry hunting experiences." Conversely, in areas managed with Prescription 5.2, Forested Vegetation Management, open motorized route density limits are generally set as 2.0 mi/mi^2.

Wildlife

While responding to comments and re-evaluating roadless areas on the Forest, the ID Team also looked at a variety of wildlife values when setting route density limits. These included wildlife security habitat, native trout strongholds, and protection of potential corridors. While big game management is an important public concern, another part of the wildlife issue is species viability. This includes all threatened, endangered and sensitive species, management indicator species, and species-at-risk. The alternatives were developed to manage habitats to maintain all species. For instance, as discussed in the FEIS, there are some wildlife species such as wolverine that appear to be sensitive to human disturbance (Project File, Interdisciplinary Team Notes). This was considered in setting route density limits for areas within the Caribou Range and Bear River Range Ecological Subsections that were identified as potential wolverine habitat.

Open motorized route densities were only one of the tools used to assess components of wildlife habitat. In Chapter 4 of the FEIS and in the Wildlife Process Paper you will see that indicators such as acres of vegetation treated, percent of Forest open to cross-country travel, forage utilization levels, and rate of riparian recovery were also used. The criteria used to assess affects on individual species are listed in the risk assessments in the Viability section of Appendix D.

Disturbance and displacement are well-documented effects of use along roads and trails. This is discussed in the Road and Motorized Trail section of Appendix D. Additional discussion has been added for individual species that are sensitive to human disturbance. Information from studies on road densities done on elk were used to address the needs of other species. As discussed above, there are many species that avoid areas of human activity and lower route densities benefit these species. Because of this, hunting season restrictions focused on big game may not provide security during the summer season when other species need it.

Several areas currently non-motorized have been designated as such to preserve this habitat security and recreation experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest but concentrated in the Caribou Range and Preuss Ridges Ecological Subsections. The northwestern portion of Toponce, Bear Creek, and Meade Peak will all be managed as non-motorized year round.

Elk and other Big Game

Most of the research and studies done on open motorized route or road densities have been done on elk. Rationale for selection of specific levels of access (1.0 mi/mi^2 and 2.0 mi/mi^2) and the effects is discussed in the Wildlife section of Appendix D.

IDFG has selected trend areas, which are surveyed in the winter. These areas are established for mule deer and elk and are used to determine numbers, bull:cow, buck:doe and cow:calf ratios. The winter range on the Forest was mapped based on IDFG winter flight information. This mapping was refined several times, based on public and agency comments. During these flights, they have found that bull elk consistently use the south aspect of Stump Peak (Boulder Creek).

As discussed in the FEIS, elk numbers are meeting state population objectives. The reason that the Diamond Creek area was identified as a concern for elk was the desire to maintain this as a trophy elk hunting area. Mule deer are not meeting objectives in all areas, and three areas have been identified as of concern during the planning process.

Additional information on Road and route densities, big game populations and effects on wildlife are found in the FEIS, Chapters 3 and 4, Issue 9: Wildlife Habitat and Appendix D, Wildlife, Road and Motorized Trail section, and then in analyses for specific species affected by motorized recreation and in the Planning Record. *See also* Summary Response to Comments on motorized roads and trails being treated the same previously in this Appendix.

Summary Statements on Canada lynx

(1) Forest Plan should incorporate guidance from LCAS.

Letters containing similar comments: 206, 208, 218, 315, 402, 568, 569, 577

(2) Forest Plan should not include LCAS guidance.

Letters containing similar comments: 174, 212, 246, 292

(3) Forest Plan should include other management guidance for Canada lynx: logging in lynx habitat, road standards for habitat security (specific standards listed)

Letters containing similar comments: 206, 246, 575, 576

Forest Summary Response:

Based on a meeting between the USFS and US Fish and Wildlife Service, it was agreed that the Caribou National Forest did not provide suitable lynx habitat. As a result of this, no Lynx Analysis Unit's are mapped on the Caribou. The east side of the Forest, Montpelier and Soda Springs Ranger Districts) are identified as potential linkage habitat. The analysis for lynx considered risk factors and conservation measures for lynx connectivity, movement and dispersal, as outlined in the Lynx Conservation Assessment and Strategy. This analysis is found in the Biological Assessment and Chapter 4 of the EIS. The U.S. Fish and Wildlife Service has concurred with the Forest's determination that the Revised Forest Plan may affect but is not likely to adversely affect the Canada lynx (Concurrence Letter, September 25, 2002).

Only LCAS direction for lynx connectivity, movement and dispersal apply to the Caribou. This direction has been evaluated in the Biological Assessment and incorporated into the Plan where appropriate (Plan, Chapter 3, Biological Elements, Wildlife, Canada lynx). In addition, the Plan contains direction for maintenance of large blocks of security cover for wildlife in the Preuss Ridges and Caribou Range Ecological Subsections. One of the management emphases in the Caribou Range, Preuss Ridges, and Bear River Ecological Subsections is to maintain linkage habitat between the Caribou and the Targhee, Wasatch-Cache, and Bridger-Teton National Forests. This will contribute towards maintaining potential lynx linkage habitat. Snow compaction, snowmobiling, management of vegetation for lynx habitat and motorized route densities are not risk factors for connectivity, movement or dispersal, and are not considerations for the Caribou.

Summary Statement: Forest Plan should designate more or different management indicator species (MIS) to insure viability as specified in 36 CFR 219.

Letters containing similar comments: 562, 564, 572, 575, 576, 577

Forest Summary Response:

Rationale for selection of MIS is explained in the Wildlife section of Appendix D. The process used follows guidance from USFS R1/R4 Terrestrial Protocols. Monitoring for these species is outlined in Chapter 5 of the Revised Forest Plan. In addition to the monitoring, there is an objective that addresses habitat mapping for sage grouse, and standards and guidelines for all three MIS. A viability assessment for all three species is found in the Appendix D and Chapter 4, Issue 9: Wildlife Habitat.

The Plan does provide direction for improvement of habitats for MIS; the three MIS are associated with sagebrush, grassland/open shrub and mature forests. All of these habitats are affected by vegetation treatments whose goal is to move towards historic range of variation (HRV), which will benefit all of these species. No predators were selected as MIS because they do not meet several of the selection criteria. They are not directly affected by forest management, they are difficult to monitor, difficult to tie changes in population to habitat and there is no baseline data already in place.

Elk were not selected as a MIS. Even though elk were not selected as MIS, they are discussed because of the public's interest in this big game species. The heading for Big Game in Chapter 3 of the Draft EIS is misleading and suggests that this was under the MIS section. This has been corrected in the Final EIS.

Summary Statement: Forest must insure compliance with Endangered Species Act (ESA) and fully explain how the Caribou is used by TES species.

Letters containing similar comments: 565, 575, 577

Forest Summary Response:

The USFWS reviewed the Draft Plan and EIS, and their comments have been considered during preparation of the Final EIS, Plan and Biological Assessment. Policy is to consult on the Selected Alternative. The Biological Assessment for Alternative 7R was sent to the USFWS on June 27, 2002. The USFWS concurred with the Biological Assessment in their letter dated September 25, 2002.

The wildlife TES and species-at-risk have wide distributions, and minimum viable populations have not been established. The Caribou provides only a portion of the habitat used across their ranges. Where population trend information was available, it was incorporated into the viability analysis in the Wildlife section of Appendix D.

An assessment of life history requirements and habitat used was done for each species. This was then used to predict changes in numbers or distribution across the planning area, based on habitat changes predicted for each alternative. Risk assessments were done for each TES species, using risk factors identified for that species and considering standards and guidelines in the Plan. Conservation measures were outlined for species-at-risk, and incorporated into the Plan. See the Appendix D for more information on specific species.

The Plan was reviewed between the draft and final and changes were made to incorporate public and agency comments. Additional objectives have been added, as well as standards and guidelines. MIS have been identified for three habitats. For other habitats, no MIS could be found that met the selection criteria, and monitoring will focus on changes in vegetation structure.

Summary Statement: Forest Plan must consider management of corridors, logging, grazing for wolves and wolverines.

Letters containing similar comments: 206, 238, 568, 569, 577

Forest Summary Response:
The Plan contains direction for maintenance of large blocks of security cover for wildlife in the Preuss Ridges and Caribou Range Ecological Subsections. One of the management emphases in the Caribou Range, Preuss Ridges, and Bear River Ecological Subsections is to maintain linkage habitat between the Caribou and the Targhee, Wasatch-Cache, and Bridger-Teton National Forests. This will contribute towards maintaining potential wolf and wolverine habitat.

Wolves
Management of wolves depredating on livestock and the potential for incidental take from trapping has been outlined in the Final Rule for listing as experimental, non-essential populations. These considerations are outside of the scope of this proposal. The RFP contains standards for protection of wolf dens (Wildlife, Gray Wolf, Standard 1) and management of wolves preying on livestock (Wildlife, Gray Wolf, Standard 3 and Grazing Management, Livestock Grazing Permits, Standard 1). This guidance is directly from the 1994 Reintroduction FEIS (USDI-FWS, 1994a and 1994b). The USFWS has concurred with the Forest's determination that the Revised Forest Plan will not jeopardize the continued existence of the non-essential experimental population (Concurrence Letter, September 25, 2002).

Wolverine
The viability analysis for wolverines can be found in the Wildlife section of Appendix D. This analysis identifies the risk factors for wolverines and rates the risk for wolverine based on proposed management. This includes maintenance of big game populations and areas free from human disturbance (summer and winter). Vegetation treatments have not been identified as a risk factor for wolverine. As discussed in the EIS, wolverine may be affected by winter recreation use. The RFP includes a guideline to "restrict intrusive human disturbance within one mile around known active wolverine den sites from March 1 to May 15" (Plan, Chapter 3, Wildlife, Wolverine, Guideline 1). It also has an objective to identify potential den sites within 2 years of signing the ROD and survey them within 4 years (Plan, Chapter 3, Wildlife, Objective 1).

In Alternative 7R, several areas have been closed to winter motorized use in response to public comments. The northwestern portion of Toponce, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year-round. Other areas of non-motorized winter use are available, including the Mink Creek area just outside Pocatello and Trail Canyon outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter.

Other Resources

AIR QUALITY

Summary Statement: DEIS does not consider impacts to air quality from motorized recreation

Letters containing similar comments: 562, 577

Forest Summary Response:

Recreational motorized use is part of the existing condition discussed in Chapter 3 of the FEIS. No analysis was conducted for emissions of hydrocarbons, nitrogen oxides, or toxic compounds associated with motorized emissions produced on the forest because they do not violate and they are not expected to violate the clean air act for current and expected future levels. (FEIS, Chapter 4, Other Resources, Air Quality)

The Revised Forest Plan includes direction to insure that forest management activities do not violate state or federal air quality requirements.

ROADS

Summary Statement: In establishing road density, it is unfair to equate roads with motorized trails.

Letters containing similar comments: Form letter 1, Form letter 2, 165, 200, 218, 224, 239, 249, 290, 302, 304, 306, 307, 333, 340, 372, 383, 386

Forest Summary Response:

For many years, there has been debate on whether or not to equate a single-track trail as equal to a road in travel planning. The following provides a brief overview documenting the process and reasoning used by the Forest.

Early in the planning process for the Targhee National Forest Plan revision, Forest personnel held a series of elk workshops with State game management agencies to determine how to do the analysis for elk. At those workshops and in subsequent written responses, noted elk expert, Dr. Jack Lyon, Intermountain Forest and Range Experiment Station, stated that although there was no research on the effects of motorized trails specifically, it is intuitive that elk should respond the same to motorized use on trails as they would to motorized use on roads. Based on this, the Targhee forest managers determined that the analysis for elk habitat effectiveness and elk vulnerability would be based on motorized route density, including both roads and trails. This reasoning and determination was echoed in 1994 and 1998 when the Interagency Grizzly Bear Committee determined that roads and trails should be treated equally in motorized access analysis (FEIS, 1997 Revision Forest Plan, Targhee National Forest).

During the travel planning process for the Targhee NF, new work had been done on developing interagency guidance for managing elk. In the "Interagency Guidelines for Managing Elk Habitats and Populations on USFS Lands in Central Idaho," motorized trails were given 1/10 the effect of motorized roads. According to biologists working on the guidelines, there was no scientific basis for determining that trails should be one tenth the impact of roads (FEIS for Open Road and Open Motorized Trail Analysis, Appendix E). Despite

this, the Targhee re-analyzed elk habitat effectiveness and elk vulnerability using this same process and the overall figures changed only slightly. The reasons for this were disclosed in the analysis. This analysis process was affirmed by the Washington Office of the Forest Service is the Targhee Forest Plan Revision Appeal Decision (page 95).

During the Caribou NF revision process, the Forest managers decided to use the same indicators, habitat effectiveness and elk vulnerability, in their analysis. In reviewing the literature, it was determined that there still had not been any scientifically controlled research documenting the effects of motorized trail use on wildlife. Thus, the determination was made to use much the same process that had been used in the Targhee NF revision. In addition, there were some other compelling reasons to equate motorized trails with roads. These are:

- In many areas of the Forest, it is unclear where the road ends and motorized trail begins. Much of the trail system has developed over the years from unused two-track roads. On many roads, whether it is a road or trail depends on the user's ability. Some people would drive a jeep on the same stretch of track that other people would only use an ATV or motorcycle on. This is especially true in the areas currently open to cross-country travel.

- In addition, there have been many advances in technology in the all terrain vehicle (ATV) industry. Machines are larger, wider, and much more popular. As ATVs increase in size, the distinction between them and a four-wheeled drive "vehicle" becomes less clear. According to the Idaho Department of Parks and Recreation, ATV recreation is the fastest growing OHV recreation use in Idaho and the United States. Registration figures show that Southeast Idaho's ATV registrations grew from 1,899 in 1995 to 4,444 in 2000 - an increase of 134 percent within six years (Idaho Dept. Parks and Recreation, 2001). It is not uncommon to encounter large groups of recreationists on ATVs at one time. They are also a very common method of accessing game during the hunting seasons. Even ATV organizations are concerned that some measure of control be exercised over the use of these machines in order to retain a quality motorized experience (BRC, 2002).

- Open motorized route limits were used not only for elk habitat analysis but also to address other wildlife species, watershed conditions and recreation experiences. New information provided by several groups indicates that all trails and roads, not just motorized routes, have a detrimental effect on wildlife security (Noss, 2002). Again, however, we are aware of no scientifically controlled studies to support this claim.

- Finally, recreation experience was another reason for setting the motorized route density limits and equating motorized trails with roads. While many people may disagree, forest managers believe that motorized trails affect the recreation experience similar to roads. Because Alternative 7R largely retains the current motorized road and trail network, intuitively it makes sense that roads and trails could be treated equally. For instance, in order to retain the backcountry experience of the area south of Tincup Highway on the Soda Springs Ranger District, motorized route densities were set to closely match the existing route network. Many of those access routes are currently trails so in order to maintain the experience with trails separate from roads, the Forest would have had to set separate density limits for each type of route. This would unnecessarily complicate the analysis and the public's ability to see how the changes would affect them.

As discussed elsewhere in the response to comments, the actual network of motorized roads and trails will be determined during site-specific travel planning. The Forest encourages all commentors to stay involved during that process to insure the Forest has an adequate network of routes, motorized and Non-motorized.

The FEIS has been augmented to include more information on this subject. Particularly, in Appendix D: Wildlife Process Paper, this is discussed under the topic of "Big Game and Motorized Use."

Summary Statement: Reduce the number of roads by closing unneeded roads through permanent closures, decommissioning, or obliteration.

Letters containing similar comments: 46, 75, 268, 292, 310, 309, 348, 402, 441, 446, 482, 559, 568, 569, 570, 577

Forest Summary Response:

One of the Transportation goals in the Revised Forest Plan is that "roads and trails not needed for long-term objectives are decommissioned, stabilized, and restored to a more natural state." Road Standard 1 states that "roads analysis shall be used to inform road management decisions; including construction, reconstruction, or obliteration of roads." In general Alternative 7R's motorized road and trail network closely resembles the current network. In order to meet route density standards, however, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will also determine how roads and trails would be closed. As shown above, the Plan contains direction regarding general management and decommissioning of roads and trails (Plan, Chapter 3, Forest Use and Occupation, Transportation, Roads).

Under the Road Management Policy, the road management direction for the Forest Service is changing from development of the road system to one of maintaining the road system. The revised policy is defined in FSM 703 as "to determine and provide for the minimum forest transportation system that best serves current and anticipated management objectives and public uses of National Forest System Lands, as identified in the appropriate land and resource management plans." The Roads Analysis Process will be used to evaluate and make recommendation on the existing and future road system. Road management activities such as new construction, reconstruction or road closure and/or obliteration will only be done after a roads analysis has been performed identifying the need and only after site specific NEPA has assessed the impacts.

The decision to decommission a road, especially if it involves obliteration and possibly recontouring, can have effects on resources. As part of the Road Management Policy, the Forest is required to complete Roads Analysis prior to performing road management activities such as construction, reconstruction or decommissioning. Once the roads analysis identifies a road for decommissioning, site-specific NEPA would be completed to identify resource impacts and decide on the method of closure. The option to convert the road to a motorized trail would be a viable option, if through travel planning, the need for the trail is identified and the impacts of converting to a motorized trail does not negate the reasons for decommissioning the road.

A Forest wide Roads Analysis using the process described in FS-643 "Roads Analysis: Informing Decisions about Managing the National Forest Transportation System" has been completed. The process is designed to evaluate and inform decisions about the management of Forest Service roads. It is not intended to be used to evaluate the management of motorized or non-motorized trails or travel management. The Roads Analysis evaluated the key routes for accessing Forest Service lands. Other classified and unclassified roads within the forest boundary will be addressed in future watershed or project scale Roads Analysis. Travel management will be addressed during the NEPA process for revising the travel plan.

Federal, State, local government agencies and Elected Officials

Form Letter 145

STATE OF IDAHO

DIRK KEMPTHORNE
Governor
PATRICK A. TAKASUGI
Director

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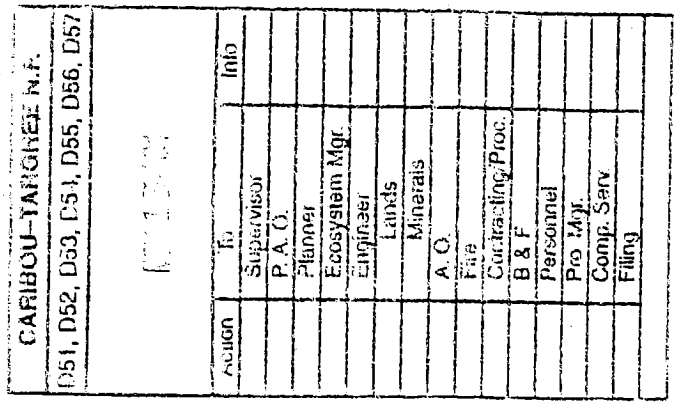


November 2, 2001

Jerry Reese
Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Dr
Idaho Falls, ID 83401-2100

Dear Jerry:

Thank you for the opportunity to comment on the Draft Caribou National Forest Plan. Below are our comments on Alternative 7, the Preferred Alternative. As with the Curlew National Grasslands Plan, the draft document identified a "Proposed Action" (Alternative 2), and a "Preferred Alternative" (Alternative 7). This is very confusing and we fail to see the point of this tactic. Many people are mislead into believing the "Proposed Action" will be the chosen alternative when Alternative 7, the "Preferred Alternative", is the one the agency will likely select. A good example is Table 4.14 "Forest Service Revenues and 25 Percent Payments to Counties (Decade 1)", DEIS Chapter 4-25, where Alternative 2 is highlighted in the table as "Proposed" and Alternative 7 is not emphasized at all. There should be at least a paragraph of discussion explaining the rational of this action, and clarifying which alternative will likely be selected.

Affected Environment

Issue 3: Ecosystem Management-Non-forested Vegetation Diversity

Sagebrush/Mountain Shrub Vegetation Group (DEIS Chapter 3-69):

Departures in Structure:

The statement is made that "when canopy cover on mountain big sagebrush sites approaches 30-40%, herbaceous production is restricted...". Al Winward is cited. This statement is incorrect. Winward purports, as do others (Tisdale et al., 1969), that sagebrush canopy coverage of 10-15% will begin to reduce herbaceous understory production significantly. When sagebrush canopy coverage reaches 30%, not only is production limited but recruitment and survival of herbaceous and shrub seedlings is all but eliminated. Allowing large expanses of sagebrush communities to reach canopy densities of 30-40% will result, as pointed out in the document, in "stagnant" stands that not only suppress herbaceous production but limit biologic diversity by effectively eliminating seedling recruitment. Once stands reach this seral stage they become an even age stand and are at risk of losing native components, allow non-native species to move into their place. Management guidelines must be established for upper limits of sagebrush canopies to maintain a healthy balance of the sagebrush ecotype at the landscape scale.

Issue 4: Livestock Grazing

Forage Production (DEIS Chapter 3-80):
Viewing Table 3.26 "Estimated Average Forage Production by Vegetation Type", it appears the average production figures are very high. Specific figures that raise questions are 1800 lb./ac. for average aspen stands and 200-700 lb./ac. for woodlands. These estimates are uncommonly high for these communities anywhere else in Idaho. Were these figures based on actual clip-and-weigh studies or estimates of production?

Rangeland Capability, Suitability, and Condition/Trend (DEIS Chapter 3-82):

We are very concerned with the manner in which the Forest Service is both defining and employing rangeland "capability" and "suitability" for livestock grazing. The definitions, as used, are absolutely confusing. "Suitable" range has been defined by the Society for Range Management for more than 50 years as "range accessible to livestock and which can be grazed on a sustained yield basis without damage to the resource". The US Forest Service took this definition and termed it "capable" and redefined "suitable" range as "areas within a capable land base where grazing is appropriate within the context of land management considerations such as...values of the area". This definition would be more appropriately termed "compatible" rather than suitable. Redefining long established range management terms seems to be an attempt by the Forest Service to separate itself from the range management community. Straying from long held and accepted guidelines promotes instability between agencies and other professionals with range management responsibilities.

Second, there is no attempt within the planning documents to define parameters by which to judge either capability or suitability. Capability, using the established guidelines for "suitable range", will be fairly straightforward and easy to apply objectively. There are, however, no definitive guidelines in the planning documents for suitability. Descriptions of criteria briefly mentioned within the planning document will by nature be purely a judgment call and thereby highly subjective. This is unacceptable. Influence by special interest groups or personal bias will be significant. Great pressure will be brought to bear on managers to remove livestock from areas with recreation or of personal interest with no requirement of substantiating evidence. This will not only be unfair to permittees, but will put misplaced pressure on line-officers to make decisions with few guidelines and in a very reactive manner.

There is no discussion of the use of range condition or trend within the Draft Plan or EIS. Determination of range condition and direction of trend is basic knowledge required to make informed management decisions. There is much discussion of implementation of short-term standards (stubble height and utilization) but no discussion of how these standards will be related back to meaningful long-term studies. Implementation of stubble heights and utilization are useful tools, but are meaningless unless analyzed in combination with studies that will indicate how these standards and the current management are affecting the condition of the rangelands.

Environmental Consequences

Issue 2: Social and Economic Environment (DEIS Chapter 4-15):

It appears the impact of new grazing standards for Alternative 7 have not been fully addressed. The estimated 5% reduction in sheep and 16% in cattle Head Months is a gross underestimation of impacts of increased stubble height and stream bank trampling. The raising of standards will not only directly reduce the available forage in riparian areas and big game wintering habitat, but indirect effects will be the loss of access to upland ranges. Grazing periods will be significantly reduced to reflect the earlier off-dates necessary to achieve required riparian stubble heights. This reduction will effectively be a much higher reduction in available AUMs than is depicted in the Draft Plan and will manifest in small communities like Preston and Soda Springs who rely heavily on extraction of natural resources. The reduced economic strength of ranches will trickle down to the community through reduced spending at retailers, and reduced payments from the Forest Service.

Issue 4: Livestock Grazing (DEIS Chapter 4-75):

Again, we believe the predicted reductions in head-months is under estimated. New standards that will be imposed will result in large portions of allotments being unused in order to meet riparian stubble height standards. The estimated 5% reduction for sheep and 16% for cattle in Alternative 7 does not appear to consider these types of influences.

We are also concerned in the lag time allowed for in developing the protocol for determining sight specific stubble height and stream bank disturbances. The Plan proposes to implement 6-inch stubble height standards across the board until the protocol is developed and each allotment is reviewed. The estimate for development of the protocol is one year from signing of the ROD, however, delays are inevitable with policy such as this. This, in addition to the

process of evaluating each allotment, will put permanent decisions off two or more seasons. This would certainly be an injustice to those operators who have practiced good stewardship in the past, as they may have to live with elevated standards while this process is worked out.

In regards to unilateral application of interim stubble height and utilization standards, regardless of how conservative, will not guarantee achievement of short, or long-term goals or objectives. Trend analysis must be employed for both riparian and uplands alike if effective management decisions are to be made. Riparian management specialists Wayne Elmore, Al Winward, Steve Leonard, and Wayne Burkhart all agree that direction of trend is more important than short-term standards. These recognized experts in range ecology all believe that the use of short-term monitoring techniques are inappropriate for making long-term determinations, such as carrying capacity or stocking levels. We strongly encourage development of the "protocol" rely heavily on trend analysis for establishment of standards. At-Risk streams with upward trends should be allowed a more liberal stubble height, and more conservative stubble heights on non-functional streams or those with a downward trend.

It must also be remembered that using stubble height as a grazing threshold has limited application. Duration and timing of grazing is more important to vegetation health and stream bank stability than residual stubble heights. Stubble height itself should not be used as a pass/fail standard, but as an indicator to begin looking for longer lasting impacts such as stream bank alteration.

Bank disturbance is also discussed in the Draft Plan but is not qualified. Ranges of acceptable bank disturbances are mentioned but it is not defined whether the disturbances are simply inherent instability of the system or if some disturbance is allowed for human activity such as recreation, grazing or other activities. This is a very important distinction as most streams have an inherent instability as high as 20-30% when in pristine condition. To impose a standard that does not allow for additional disturbance outside natural variability would be unfair to forest users.

The Draft Plan states utilization measurements will be taken at the end of the grazing period, and the Draft EIS indicate utilization measurements will be taken at the end of the grazing season. These statements may be contradictory as one definition may not be the same as the other. In any case, measuring utilization at either time will over estimate total utilization of current years growth, as the end of the grazing period or season may not coincide with the end of the growing season.

The Draft Plan recognizes the role of livestock in reducing risk of wildfire. Using excessive stubble height requirements will nullify benefits of livestock grazing removing vegetation to lessen fire hazard. Broad application of the proposed 6-inch stubble height will shorten the length of stay for livestock in most grazing units so that insufficient understory vegetation is removed to reduce risk of wildfire.

Cumulative Effects (DEIS Chapter 4-95):
The Draft EIS identifies the loss of viable ranch operations through reductions in grazing permits as a major contributor to urban development as ranches no longer viable are sold to developers. In the same document the statement is made that livestock/big game conflicts are increasing on winter range. There is a strong correlation between the two that we are not sure is recognized adequately, despite the obvious emphasis of the Draft Forest Plan being placed on managing for wildlife values. As traditional winter ranges on private lands are developed for summer homes, conflicts on remaining ranges will continue to increase. This should not be viewed, however, as a conflict between the long establish grazing which has occurred in those areas for over a century, but a conflict with urban sprawl that has just began to express itself in the last decade. Ranchers and their lands need to be recognized for their contribution to wildlife habitat, particularly winter ranges. Solutions must be developed to prevent as much conflict as possible and plan for the inevitable loss of a certain portion of big game habitat. In recent history it has been the trend for the livestock industry to take to brunt of this kind of change. If the livestock industry were responsible for the loss of habitat and resulting conflict, grazing management changes would be justified, but if the cause of conflicts are unrelated the livestock industry should not be held responsible.

A contributing factor to livestock/big game conflict is many of the Idaho Fish and Game wildlife management plans are out of date or not being implemented. Elk herds throughout Central and Southern Idaho exceed target populations

and are pioneering new ranges and Fish and Game is failing to address them. As a result, winter ranges are being depleted and conflicts between big game species increase. Very little discussion was made in the Draft EIS concerning the growing conflict between the expanding elk herds and their impact on traditional deer winter ranges. There has been growing concern the last few years over the obvious impact pioneering elk populations have had on deer winter range. The taller, heavier bodied elk are more successful at competing for forage by being able to access forage buried by deep snow and raising browse lines out of deer's reach. It is imperative these impacts be addressed or the conflicts will continue to increase.

We hope our comments are helpful, please contact us if you have any questions.

Sincerely,

Glen Secrist
Chief, Bureau of Vegetation Management
Idaho State Department of Agriculture

Letter Number 148 - Caribou RFP

CommentCategory	Livestock grazing
Comment	We are also concerned in the lag time allowed for developing the protocol for determining site-specific stubble height and stream bank disturbances. The Plan proposes to implement 6-inch stubble height standards across the board until the protocol is developed and each allotment is reviewed. The estimate for development of the protocol is one year from signing of the ROD, however, delays are inevitable with policies such as this.
Response	The protocol has been developed. It will be implemented after the Revised Forest Plan is approved. Until site specific Allotment Management Plans are written the forest-wide livestock utilization standards will be the default standards.

CommentCategory	Vegetation
Comment	There is no discussion of the range condition or trend within the Draft Plan or EIS. Determination of range condition and direction of trend is basic knowledge required to make informed management decisions. There is much discussion of implementation of short-term standards (stubble height and utilization) but no discussion of how these standards will be related back to meaningful long-term studies. Implementation of stubble heights and utilization are useful tools, but are meaningless unless analyzed in combination with studies that will indicate how these standards and the current management are affecting the condition of the rangelands.
Response	The Final EIS contains updated sections on range condition and trend in Chapters 3 and 4 in the Livestock Grazing Issue section.

CommentCategory	Vegetation
Comment	Management guidelines must be established for upper limits of sagebrush canopies to maintain a healthy balance of the sagebrush ecotype at the landscape scale.
Response	Goals, objectives, standards and guidelines have been developed for non-forested ecosystems including sagebrush ecosystems in the Revised Forest Plan. See Forest-wide standards and guidelines in the Revised Forest Plan, Chapter 3. The Plan establishes upper limits of 30 to 50 percent of a subwatershed to be in greater than 15 percent canopy cover density class as a desired future condition for non-forested vegetation in the Final Revised Forest Plan. These limits are within the historical range of variability that represents ecosystems that are resilient to disturbances. However, these upper limits have been adjusted lower for alternative 7R because of projected funding levels, reduce personnel to accomplish objectives and in order to responded to public comments. Approximately 40,000 acres of sagebrush/mountain shrub vegetation types will be treated during the next decade in this alternative.

CommentCategory	Livestock grazing
Comment	Second, there is no attempt within the planning documents to define parameters by which to judge either capability or suitability. Capability, using the established guidelines for "suitable range," will be fairly straightforward and easy to apply objectively. There are, however, no definitive guidelines in the planning documents for suitability. Descriptions of criteria briefly mentioned within the planning document will by nature be purely a judgment call and thereby highly subjective.
Response	The capability and suitability analysis was revised between the draft and final EIS, in response to public comments. The Forest analyzed acres that are capable and suitable for grazing and browsing as required in 36 CFR 219.20 (1982 Planning Regulations as published prior to 2001). This re-analysis determined that there are about 719,000 acres capable of supporting sheep and 469,000 acres capable of cattle. Suitable acres are less than capable acres and vary by alternative depending on the theme of the alternative. The results of the revised suitability analysis are described in Chapter 4, Issue 4, Livestock Grazing, Indicator LG1. The analysis process is described in the FEIS, Chapter 3 and Appendix B, Issue 4, Livestock Grazing (See also Livestock Grazing Specialist Reports and Interdisciplinary Team Notes). This livestock analysis identified areas not suitable due to tradeoffs with other resource values using the Intermountain Region Protocol. Areas identified as not suitable in this analysis would not necessarily be closed to grazing. Although an area may not be suitable for livestock grazing, incidental grazing can still occur. The forage produced on unsuitable acres would not be considered when determining the grazing capacity of an allotment, however. In some prescriptions, areas were identified where grazing would be phased out on an "opportunity basis ." For instance, in Alternative 7R corridors along the major travelways in Dispersed Camping Management Areas were deemed not suitable for livestock grazing (Plan, Chapter 4, Prescription 4.3). As a result of the suitability analysis, grazing will be phased out on an opportunity basis in St. Charles Creek and Elk Valley Marsh (Plan, Chapter 4, Prescription 2.5). Opportunity is defined as a suitable or favorable time to close an allotment or area to livestock grazing because of nonuse violations, term permit waivers, resource protection, or permit actions resulting in cancellation of the permit. If opportunities do not arise, then efforts will be made to relocate or accommodate animals to other areas within the planning period.
CommentCategory	Vegetation
Comment	The statement is made that "when canopy cover on mountain big sagebrush sites approaches 30-40 percent, herbaceous production is restricted...". Al Winward is cited. This statement is incorrect. Winward purports, as do others (Tisdale, et al, 1969), that sagebrush canopy coverage of 10-15 percent will begin to reduce herbaceous understory production significantly.
Response	Winward describes the effect of canopy cover density for several different sagebrush species in his paper "Management in the Sagebrush Steppe" (Winward 1991). When Wyoming big sagebrush approaches canopy cover density between 12-15 percent, understory production decreases as canopy cover increases. In Mountain and basin big sagebrush sites, canopy cover values of 30 to 40 percent have a much restricted herbaceous production and are essentially closed to recruitment of new herbaceous seedlings (Winward 1991). Mountain big and basin big sagebrush are in best condition when canopy cover is between 15 and 20 percent. Other literature may suggest a variation in these percentages such as Tisdale et al. 1969 but the point is made that with the increase in the canopy cover density, a reduction in the herbaceous understory occurs.

CommentCategory	Livestock grazing
Comment	Bank disturbance is also discussed in the Draft Plan but is not qualified. Ranges of acceptable bank disturbances are mentioned but it is not defined whether the disturbances are simply inherent instability of the system or if some disturbance is allowed for human activity such as recreation, grazing or other activities.
Response	The Caribou Riparian Grazing Guide relies on the physical condition of the riparian area. The method(s) used to achieve the desired condition is up to the manager and livestock permittee. Time-in-pasture is one available method. Specific monitoring parameters, such as stubble height, are NOT the desired condition, but, rather, properly functioning condition of the stream and riparian system. The Caribou Riparian Grazing Guide considers the sensitivities of the stream channels being grazed and the overall functioning condition of the stream and riparian area. Allowable utilization and/or disturbance standards vary according to actual on-the-ground conditions and situations. These standards are designed to maintain those areas considered to be in "good" condition and improve areas considered to be in less than desirable conditions. The grazing standards proposed in Alternative 7R are supported in literature as being capable of maintaining desired conditions and improving those areas that are in a deteriorated condition. Rates of improvement will vary depending on the existing condition of the riparian zone and applied standards. Grazing standards and guidelines in the Revised Forest Plan are also consider the presence or absence of other influences, such as 303(d) listed streams and cutthroat trout strongholds. For example, if a listed 303(d) stream is considered to be degraded because of livestock, then the grazing Guide specifies that allowable grazing impacts will be reduced. If a system is already non-functioning, then grazing may be temporarily suspended until water quality conditions improve and beneficial uses of the waterbody are supported, as determined by the State. Similar provisions apply to cutthroat trout strongholds.
CommentCategory	Economics
Comment	This reduction will effectively be a much higher reduction in available AUMs than is depicted in the Draft Plan and will manifest in small communities like Preston and Soda Springs who rely heavily on extraction of natural resources. The reduced economic strength of ranches will trickle down to the community through reduced spending at retailers and reduced payments from the Forest Service.
Response	The social and economic conditions in communities associated with grazing operations have been highlighted in the grazing and social-economic sections of the FEIS. Because actual changes in AUMs will not be made at the Forest Plan level, but in individual allotment plans, specific impacts to communities would be addressed at that level. All counties have selected full payment amounts under the secure payments legislation, so no changes to payments from the Forest Service would occur based on AUM changes.
CommentCategory	Livestock grazing
Comment	We are very concerned with the manner in which the Forest Service is both defining and employing rangeland "capability" and "suitability" for livestock grazing. The definitions, as used, are absolutely confusing. "Suitable" range has been defined by the Society for Range Management for more than 50 years as "range accessible to livestock and which can be grazed on a sustained yield basis without damage to the resource." The US Forest Service took this definition and termed it "capable" and redefined "suitable" range as "areas within a capable land base where grazing is appropriate within the context of land management considerations such as...values of the area." This definition would be more appropriately termed "compatible" rather than suitable.
Response	The definitions for capable and suitable land currently used are found in the 1982 planning regulations at 36 CFR 219.20. The definitions can be viewed in Appendix B of the FEIS in the Suitability Analysis. For Forest Planning purposes, these definitions were required in the analysis.
CommentCategory	Livestock grazing
Comment	The Draft Plan recognizes the role of livestock in reducing risk of wildfire. Using excessive stubble height requirements will nullify benefits of livestock grazing removing vegetation to lessen fire hazard. Broad application of the proposed 6-inch stubble height will shorten the length of stay for livestock in most grazing units so that insufficient understory vegetation is removed to reduce the risk of wildfire.
Response	Many of our vegetative communities are suffering from lack of fire (See Chapter 3 - Disturbance). However, efficient fire suppression activities has been the main culprit. With new information emerging on the benefits and need for periodic fire in western ecosystems, this too needs to be reintroduced into rangelands. In some cases, land managers may even be resting locations from grazing to promote fire restoration.

CommentCategory	Livestock grazing
Comment	A contributing factor to livestock/big game conflict is many of the Idaho Fish and Game wildlife management plans are out of date or not being implemented. Elk herds throughout Central and Southern Idaho exceed target populations and are pioneering new ranges, and Fish and Game is failing to address them. As a result, winter ranges are being depleted and conflicts between big game species increase. Very little discussion was made in the Draft EIS concerning the growing conflict between the expanding elk herds and their impact on traditional deer winter ranges. There has been growing concern the last few years over the obvious impact pioneering elk populations have had on deer winter range. The taller, heavier bodied elk are more successful at competing for forage by being able to access forage buried by deep snow and raising browse lines out of deer's reach.
Response	A discussion of increasing elk numbers and concerns of competition with mule deer for winter range has been added to Chapter 3 of the EIS. In addition, there is an objective in the Plan to "assess vegetation conditions on winter range in cooperation with IDFG and to implement actions where they are needed to improve low quality or declining winter range".
CommentCategory	Livestock grazing
Comment	We strongly encourage the development of the "protocol" rely heavily on trend analysis for establishment of standards. At-Risk streams with upward trend should be allowed a more liberal stubble height, and more conservative stubble heights on non-functional streams or those with a downward trend.
Response	The Caribou Riparian Grazing Guide does exactly as you propose. Standards are adjustable according to the functioning condition of the riparian area and the channel type. The more sensitive the channel type is to impacts and the poorer the overall riparian condition, the more stringent the standards, and vice versa. Trends are an integral part of the protocol. This is supported by the Goals for Aquatic Influence Zones (Prescription 2.8.3) in the Revised Forest Plan.
CommentCategory	Livestock grazing
Comment	In regards to unilateral application of interim stubble height and utilization standards, regardless of how conservative, will not guarantee achievement of short, or long-term goals or objectives. Trend analysis must be employed for both riparian and upland alike if effective management decisions are to be made.
Response	Yes, you are right and we agree with you. In Chapter 3 under "Condition and Trend" there is a discussion on the need to analyze the current situation against the "desired future conditions" of the site and then monitor to see if current management is trending in that direction. Adaptive management will also be used to adjust management as needed to ensure we are moving towards the "desired future conditions."
CommentCategory	Livestock grazing
Comment	Again, we believe the predicted reductions in head-months is under estimated. New standards that will be imposed will result in large portions of allotments being unused in order to meet riparian stubble height standards. The estimated 5 percent reduction for sheep and 16 percent for cattle in Alternative 7 does not appear to consider these types of influences.
Response	Livestock distribution will be key to meeting all the Revised Forest Plan standards. Livestock are influenced by topography, access to water and availability of feed, to name just a few. Actual reductions will need to be determined at the site specific level and will be dependent on local livestock management actions.

CommentCategory	Livestock grazing
Comment	It appears the impact of new grazing standards for Alternative 7 have not been fully addressed. The estimated 5 percent reduction in sheep and 16 percent in cattle Head Months is a gross underestimation of impacts of increased stubble height and stream bank trampling. The raising of standards will not only directly reduce the available forage in riparian areas and big game wintering habitat, but indirect effects will be the loss of access to upland ranges. Grazing periods will be significantly reduced to reflect the earlier off-dates necessary to achieve required riparian stubble heights.
Response	A calculation of forage production on suitable lands showed more than enough forage to support currently permitted livestock. However, as you alluded, livestock distribution is key to meeting resource objectives. The site specific needs will be determined at the allotment level through monitoring and AMP revision. The FEIS has been augmented with this information, and a new indicator, LG 2 has been included. Chapter 4, Issue 4: Livestock Grazing presents tables indicating production by grazed community types, by suitable acres, and the resulting potential capacities in cattle and sheep animal months. According to this analysis, in Alternative 7R there is an estimated 171,671 cattle months and 1,340,000 sheep months of forage available on suitable range. The discussion also includes a table indicating potential herbaceous forage available for wildlife on suitable sheep range. In Alternative 7R there will be over 400 million pounds of forage remaining for wildlife to use on suitable sheep range. This analysis only calculated wildlife forage on sheep range since it also includes range suitable for cattle. The estimate is conservative for a variety of reasons, explained in detail in the FEIS (FEIS, Chapter 4, Issue 4: Livestock Grazing, Indicator LG 2).
CommentCategory	DEIS
Comment	As with the Curlew National Grassland Plan, the draft document identified a "Proposed Action" (Alternative 2), and a "Preferred Alternative" (Alternative 7). This is very confusing and we fail to see the point of this tactic.
Response	These definitions are contained in the National Environmental Policy Act. The Proposed Action is the initial proposal put forth by the Forest Service at the beginning of the formal public scoping process. It is used to initiate dialogue and determine if alternative courses of action are available. Once the environmental consequences of all alternatives have been evaluated, the Deciding Officer identifies a "preferred alternative" from all of the alternatives analyzed. This alternative must be identified in the Draft environmental documents. The Record of Decision identifies the "selected alternative," that is, the alternative the Deciding Officer is choosing to implement on the ground. While we understand terminology can be confusing, we have made every effort to clearly identify the No Action, the Proposed Action, Action alternatives to the Proposed Action, the Preferred Alternative, and the Selected Alternative as outlined in the National Environmental Policy Act.
CommentCategory	Livestock grazing
Comment	The Draft EIS identifies the loss of viable ranch operations through reductions in grazing permits as a major contributor to urban development as ranches no longer viable are sold to developers. In the same document the statement is made that livestock/big game conflicts are increasing on winter range. As traditional winter ranges on private lands are developed for summer homes, conflicts on remaining ranges will continue to increase. This should not be viewed, however, as a conflict between the long established grazing which has occurred in those areas for over a century, but a conflict with urban sprawl that has just begun to express itself in the last decade. If the livestock industry were responsible for the loss of habitat and resulting conflict, grazing management changes would be justified, but if the cause of conflicts are unrelated the livestock industry should not be held responsible.
Response	The intent of the analysis was not to "blame" any one user of the loss of habitat but to look at what is affecting the habitat. There are several uses causing effects and conflicts but no all of them can be managed by the Forest Service. The activities occurring on private lands can have impacts to resources on adjacent public lands. Our intent was to analyze the impact and see where these could be reasonably mitigated by resource management.

CommentCategory	Livestock grazing
Comment	The Draft Plan states utilization measurements will be taken at the end of the grazing period, and the Draft EIS indicate utilization measurements will be taken at the end of the grazing season. These statements may be contradictory as one definition may not be the same as the other.
Response	Thank you for your comment. This has been corrected in the FEIS and Final Plan.

Letter 167

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 6, 2001

Jerry B. Reese
Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Attn: Caribou

Dear Mr. Reese:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Caribou National Forest Draft Revised Forest Plan (DRFP) and appreciate this opportunity to comment. We apologize for not responding in a more timely fashion and hope that does not disqualify our comments from consideration. We are confining our observations to those aspects of your proposal which have implications for water quality and the aquatic environment.

In the past few years, we have repeatedly requested that the Forest Service conduct a meaningful cumulative effects analysis for various programs and projects, usually associated with resource management. The National Environmental Policy Act, 42 U.S.C.§ 4321 et seq. (NEPA) requires federal agencies to conduct a cumulative impacts analysis in order to evaluate the combined impact of separate actions which the agency believes are significant, but which together significantly impact the environment. An analysis of sufficient scope to address the issues incorporated into your forest plan is not evident in the documentation provided for our review. More importantly, no accumulative benchmarks have been established which would indicate a condition of multiple impacts sufficient to degrade or inhibit improvement to aquatic resource beneficial uses. We encourage you to develop and incorporate accumulative impact "indicators", supported by measurable biological, physical, and chemical parameters, on which to base your management decisions.

Recent field reviews of several grazing allotments in which we have participated indicated the persistence of problems related to livestock grazing, particularly cattle. Streambanks and channels and overall riparian conditions remain impacted and upward trends are difficult to decipher. Heavy reliance on riparian/greenline stubble height may not always convey the information necessary to guide allotment management. Also, timely monitoring by qualified personnel is required in all cases for adequate protective response. We suggest that you increase your monitoring frequency on streams within the allotments and adopt specific channel and streambank measures and standards for your analysis.

Although you have adopted a buffer zone policy for timber harvest operations to better protect surface water resources, as well as a variable prescription for slash retainment to control erosion,

timely supervision to ensure that those standards are achieved is often lacking. If you are unable to provide the resources to effectively supervise and manage your individual timber harvests, then perhaps a reduction in the number of those activities would be appropriate.

Six of the seven Forest Plan alternatives adopt an adaptive management direction for mining issues. This is described in general terms, including the use of best available technology, site specific adaptation of BMPs, etc. While we find this approach acceptable, it is important that the Caribou-Targhee National Forest recognize the ultimate applicability of state and federal water quality standards. All of the alternatives should include those standards as a prescriptive element. This is extremely important in light of the recent selenium-related contamination problems associated with past and present phosphate mining on the forest.

Our beneficial use reconnaissance monitoring has documented riparian damage and sediment impacts from various roads and motorized trails throughout the forest. Examples include Eightmile, Meadow, Liberty, Mink, and Montpelier Creeks. Although it does represent a substantial reduction, your preferred alternative does not minimize cross-country summer motorized travel or road construction and does not afford the best solution for these problems.

Under "Key Indicators for Significant Issues" (page 30, DEIS Summary) your preferred alternative designated "Moderate persistency of species" for fish population viability (R1). Considering the current state of salmonid fisheries as a beneficial use on the forest, we find this unacceptable. It is important to note that the United States Fish and Wildlife Service's recent decision to not list the Bonneville Cutthroat Trout as endangered was based on ongoing and continued efforts to restore these fish to prominence within their natural range.

Overall, we applaud your actions to maintain and restore water quality and aquatic beneficial uses for ground and surface waters within forest boundaries. No fewer than 19 Water Quality Limited Streams are located on the forest in our region. As the primary land management agency for these watersheds, the responsibility for future conditions and beneficial use attainment falls largely to the forest service. Accordingly, we anticipate continued management and cooperation towards the environmental health of these resources.

If you have any questions or need clarification, don't hesitate to call (208-236-6160) or write to this office.

Sincerely,

David H. Hull

David H. Hull
Water Quality Science Officer

cc: Idaho Dept. of Fish & Game, Pocatello
U.S. Fish & Wildlife Service, Pocatello
Bureau of Land Management, Pocatello

Letter Number 167 - Caribou RFP

CommentCategory	Plan
Comment	An analysis of sufficient scope to address the issues incorporated into your forest plan is not evident in the documentation provided for our review. More importantly, no accumulative benchmarks have been established which would indicate a condition of multiple impacts sufficient to degrade or inhibit improvement to aquatic resource beneficial uses. We encourage you to develop and incorporate accumulative impact "indicators", supported by measurable biological, physical, and chemical parameters, on which to base your management decisions.
Response	Benchmarks used in the EIS to assess the effects of alternatives include the Inland West Water Initiative (IWWI), Properly Functioning Condition (PFC) assessments, and State water quality assessments (BURP). All of these are indicators of biological, physical and chemical parameters that are measurable and repeatable. (See EIS chapter 3 – Issue 6 – Riparian/Wetland Areas, Aquatic Habitat and Water Quality; and Chapter 4 – Issue 6).

CommentCategory	Recreation
Comment	Our beneficial use reconnaissance monitoring has documented riparian damage and sediment impacts from various roads and motorized trails throughout the forest. Examples include Eightmile, Meadow, Liberty, Mink, and Montpelier Creeks. Although it does represent a substantial reduction, your preferred alternative does not minimize cross-country summer motorized travel or road construction and does not afford the best solution for these problems.
Response	The 1985 Forest Plan has direction to maintain the existing amount of open roads; no net gain in open roads forest-wide. Alternatives 7 and 7R have prescribed open motorized route densities that will limit the amount of new motorized routes. These densities are generally close to the existing open motorized route density. In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management. The FEIS discusses recreation use in more detail than the draft document. The Recreation and Access section of the FEIS discusses recreation activities and other resource effects on recreation use. Individual resource sections, for example Soils, discusses recreation use's effects on soil. Individual resource areas also discuss the effects of open motorized routes. See the soils, wildlife and water sections of the FEIS.
CommentCategory	Mining
Comment	This is described in general terms, including the use of best available technology, site-specific adoption of BMPs, etc. While we find this approach acceptable, it is important that the Caribou-Targhee National Forest recognize the ultimate applicability of state and federal water quality standards. All of the alternatives should include those standards as a prescriptive element.
Response	The Forest Plan revision will not alter, change, or take away any existing laws or regulations; meeting State and/or Federal water quality standards will still be required of all mining operations.

CommentCategory	Fisheries
Comment	Under "Key Indicators for Significant Issues" (page 30, DEIS Summary) your preferred alternative designated "Moderate persistency of species" for fish population viability (R1). Considering the current state of salmonid fisheries as a beneficial use on the forest, we find this unacceptable. It is important to note that the United States Fish and Wildlife Service's recent decision to not list the Bonneville Cutthroat Trout as endangered was based on ongoing and continued efforts to restore these fish to prominence within their natural range.
Response	See FEIS Chapter 4 (Aquatics) and Appendix D - Fisheries section. This is a relative rating of the alternatives' probability of maintaining native fish population persistence over the long term. In other words, with the selection of the selected alternative, we would be moderately able to insure that native fish populations would persist across the Forest over the long term. The Revised Forest Plan contains management direction for native fisheries in Prescription 2.8.3 in Chapter 4 and in the forest-wide Standards and Guidelines for Riparian Areas and Aquatic Resources in Chapter 3.
CommentCategory	Water Quality
Comment	Overall, we applaud your actions to maintain and restore water quality and aquatic beneficial uses for ground and surface waters within forest boundaries.
Response	Thank you for your comment.
CommentCategory	Plan
Comment	Although you have adopted a buffer zone policy for timber harvest operations to better protect surface water resources, as well as a variable prescription for slash retainment to control erosion, timely supervision to ensure that those standards are achieved is often lacking. If you are unable to provide the resources to effectively supervise and manage your individual timber harvests, then perhaps a reduction in the number of those activities would be appropriate.
Response	Comment noted.

CommentCategory	Livestock grazing
Comment	Heavy reliance on riparian/greenline stubble height may not always convey the information necessary to guide allotment management. Also, timely monitoring by qualified personnel is required in all cases for adequate protective response. We suggest that you increase your monitoring frequency on streams within the allotments and adopt specific channel and streambank measures and standards for your analysis.
Response	All waterbodies on the Forest will be managed according to the direction in Management Prescription 2.8.3, Aquatic Influence Zones. The management emphasis in this prescription is to restore and maintain the health of these areas. One of the Desired Future Conditions in this prescription is that "native aquatic and riparian-dependent species population strongholds are increasing and well distributed within historic ranges...". The direction in this prescription was developed from various sources, including INFISH and the Bonneville and Yellowstone Cutthroat Trout Conservation Strategies. The Caribou Riparian Grazing Guide considers the sensitivities of the stream channels being grazed and the overall functioning condition of the stream and riparian area. Allowable utilization and/or disturbance standards vary according to actual on-the-ground conditions and situations. These standards are designed to maintain those areas considered to be in "good" condition and improve areas considered to be in less than desirable conditions. The grazing standards proposed in Alternative 7R are supported in literature as being capable of maintaining desired conditions and improving those areas that are in a deteriorated condition. Rates of improvement will vary depending on the existing condition of the riparian zone and applied standards. Grazing standards and guidelines in the Revised Forest Plan are also consider the presence or absence of other influences, such as 303(d) listed streams and cutthroat trout strongholds. For example, if a listed 303(d) stream is considered to be degraded because of livestock, then the grazing Guide specifies that allowable grazing impacts will be reduced. If a system is already non-functioning, then grazing may be temporarily suspended until water quality conditions improve and beneficial uses of the waterbody are supported, as determined by the State. Similar provisions apply to cutthroat trout strongholds.

Letter 176

IDAHO FISH & GAME
SOUTHEAST REGION
1345 Barton Road
Pocatello, Idaho 83204-1819

Dirk Kempthorne / Governor
Rod Sando / Director

November 5, 2001

Dear Jerry;

Department personnel have reviewed the Caribou Draft Revised Forest Plan and other associated documentS. We are very encouraged that the Forest Service apparently is taking a proactive role in evaluating current land use practice on the Caribou National Forest. We found the Draft Environmental Impart Study Summary quite useful in evaluating management directions/predicted outcomes provided in Alternatives 1 through 7. Our comments concern vegetation treatments, access/recreation management, timber sale program, roadless area management, livestock grazing management and riparian/water quality management as represented in Alternative 7 (Preferred Alternative). These comments are in addition to those provided in our previous letters of June 17 and October 20, 1999.

Vegetation Treatment (Table S. 16)

We continue to be uncertain of the need to treat **79,750** acres of sagebrush and mountain shrub over the decade (DEIS Summary, p.25). The literature and plant ecosystem researchers we have consulted are in general disagreement with your conclusions of the decadence of these communities in particular as they effect sage/sharptail grouse populations. We believe it advisable for the Forest to involve broader participation of Forest Service and BLM range/sagebrush experts in this area of Forest Service range manipulation planning and forecasting. More investigation is needed to establish the need for such a broad scale action and if the anticipated outcome will truly be reflected in improved vigor for the plant communities and improved habitats for the sagebrush obligate species.

Access Management (Table S. 17 - A6)

The approximate forty percent reductions in cross-country motorized access may help restrain the seeming proliferation in ORV use on public lands. Issues associated with big game habitat effectiveness and vulnerability along with reduction in water quality from increased sedimentation from roads/trails could benefit from this change in access management. Although the total acres is reduced the relative percentages of acres in semi-primitive **motor** (53%) as compared to semi-primitive **non-motor** (8%) remains unchanged. With the reductions in total acres open to motorized snow-free cross-county travel this should be an opportunity to reduce the emphasis on semi-primitive motorized access.

We remain concerned about gross trail improvements and new construction throughout the Westside District. Adding motorized ATV trails and enhancing their quality will continue to escalate non-snow period motorized effects. One effect is reduced mule deer fawning, rearing and hunting security. Our agency response is reduced hunting opportunity for long-term traditional hunter users on the forest.

Timber Sale Program (Table S. 17 - T6)

The estimated total miles of road construction and reconstruction would be significantly reduced in Alternative 7 from the current totals of 81miles to 18 miles (construction and reconstruction combined). As described in our previous correspondences roads oft times have demonstrable negative impacts on big game population and hunter satisfaction. Does this change represent a six-fold reduction in new roads only, if such, what becomes of existing roads? Are they to be decommissioned and reclaimed or merely regulated as closed. Our experience is that once a new road is established it is most difficult to effectively curtail its use by any means other than reclamation. Unfortunately, even then the determined individual will continue to use said road/trail creating an enforcement problem. We would strongly recommend that get care be

exercised in planning for ANY new roads on the forest due to the difficulties in effective regulation of their use. Four-wheel drive ATV trails are in effect roads relative to fish and wildlife resources and related users.

Roadless Area Management (Table S. 17 - SM & WNM)

Some 47,200 acres (the total acreage dedicated to wilderness designation) are made available for summer non-motorized (SNM) uses in Alternate 7 and zero acres are available for summer motorized (SM). But we are confused in this relationship during the winter wherein where the motorized recreationists has the entire 47,200 acres available but zero acres are open to the non-motorized recreations (WNM). If this is not a misprint but represents a true intent to encourage motorized recreation it seems in roadless areas we have great concerns as to how this type of recreation would negatively impact wintering animals.

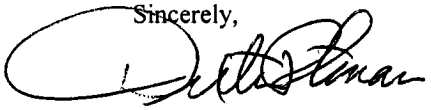
Livestock Grazing Management (Table S. 17 - LG 1)

We are aware of the programmatic nature of this document in particularly as it applies to livestock grazing, i.e., length and numbers on individual allotments. As such, we can only encourage the Caribou-Targee national Forest personnel to closely scrutinizing current grazing practices. Many areas of the Caribou appear to have suffered from have combination of little water and inappropriate grazing methods. If, as we fear this drought is to continue, extra protection **MUST** be provided locations that are being irreparable harmed. The slight shift in herd number from cattle to sheep is noted and appreciated do to the active herding of sheep flocks away from sensitive areas.

We believe the concept of *multiple use* should be applied so that every site is **not** assumed to be "suitable" for every "use". We hope that protection of fish and wildlife resources will receive increased attention relative to other forest "uses".

Thank-you for the opportunity to comment on this and past documents. We look forward to working closely with service personnel to implement the new Caribou Forest Plan at the district level.

Sincerely,



Dexter R. Pitman

Cc: Carl Anderson - IDFG
Tom Lucia - IDFG
Marc Potter - IDFG
Richard Scully - IDFG
Paul Wackenhut -IDFG
NRPB - IDFG
Dave Hull, IDEQ - Pocatello
Deb Mignogno, USFWS - Pocatello

Letter Number **176 - Caribou RFP**

CommentCategory	Livestock grazing
Comment	We are aware of the programmatic nature of this document in particularly as it applies to livestock grazing, I.e., length and numbers on individual allotments. As such, we can only encourage the Caribou-Targhee National Forest personnel to closely scrutinizing current grazing practices.
Response	Thank you for your comment.

CommentCategory	Vegetation
Comment	We continue to be uncertain of the need to treat 79,750 acres of sagebrush and mountain shrub over the decade (DEIS Summary, p. 25). The literature and plant ecosystem researchers we have consulted are in general disagreement with your conclusions of the decadence of these communities in particular as they effect sage/sharp-tail grouse populations. We believe it advisable for the Forest to involve broader participation of Forest Service and BLM range/sagebrush experts in this area of Forest Service range manipulation planning and forecasting. More investigation is needed to establish the need for such a broad scale action and if the anticipated outcome will truly be reflected in improved vigor for the plant communities and improved habitats for the sagebrush obligate species.
Response	We will continue to involve broader participation of rangeland/sagebrush experts in planning and forecasting effects from treating sagebrush with fire during project level analysis. Based on information from the Forest PFC assessment, indicators show a need for treatments to achieve desired future conditions that are within the historical range of variability thereby resulting in a more resilient and diverse ecosystem. Broader scale analyses including the Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin (ICBEMP 1996) also show decline in the rangeland ecosystems. Treatments were proposed based on a desire future condition that are within the historical range of variability. The desired future condition for Alternative 7 was to achieve a range between 30 and 50 percent of the sagebrush/mountain shrub vegetation types in the greater than fifteen percent canopy cover density class. The 10-year outcome for the level of treatments in Alternative 7 is about 48 percent of these vegetation types in mature and old age condition classes or with greater than 15 percent canopy cover density. Over the long term, about 40 percent of the sagebrush/mountain shrub vegetation types would be in mature and old condition classes. This level of treatments would achieve the desire future condition for this alternative within 4.5 decades. Because future funding levels are expected to be consistent with past funding levels, and reduced personnel to accomplish treatment goals, in order to address public comments the amount of treatments in sagebrush/mountain shrub have been reduced for Alternative 7R. This alternative will treat only 40,000 acres over the next 10 years. The 10-year outcome is expected to be greater than 56 percent of acres in these vegetation types in mature and old age condition classes. The long term outcome would trend most of these acres toward greater than fifteen percent canopy cover density condition that may be outside the historical range of variability.

CommentCategory	Wildlife
Comment	We believe the concept of Multiple use should be applied so that every site is not assumed to be "suitable" for every "use." We hope that protection of fish and wildlife resources will receive increased attention relative to other forest "uses."
Response	Management direction for Prescription Areas is found in the Forest Plan. Not all areas are suitable for all uses. All of the 1 and 2 management prescriptions include restrictions on some kinds of activities. These 1 and 2 management prescriptions have been applied on about 35 percent of the Forest. In addition, management prescriptions in the 4 category, which have a recreation emphasis, restrict some kinds of activities, as do management prescriptions in the 8 category. Management direction for wildlife is generally common to all Prescription Areas, except for woodpecker biological potential, which varies by Prescription Area. See the Snag section in the Wildlife section of Appendix D for more information on this. Big game winter range direction is found in Prescription Area 2.7.1 and 2.7.2. The winter range prescriptions are applied on about 21 percent of the Forest.

CommentCategory	Recreation
Comment	The approximate forty percent reduction in cross-country motorized access may help restrain the seeming proliferation in ORV use on public lands. Issues associated with big game habitat effectiveness and vulnerability along with reduction in water quality from increased sedimentation from roads/trails could benefit from this change in access management. Although the total acres is reduced, the relative percentages of acres in semi-private motor (53 percent) as compared to semi-private non-motor (8 percent) remains unchanged. With the reductions in total acres open to motorized snow-free cross-country travel, this should be an opportunity to reduce the emphasis on semi-private motorized access.
Response	In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.
CommentCategory	Plan
Comment	We are very encouraged that the Forest Service apparently is taking a proactive role in evaluating current land use practice on the Caribou National Forest. We found the Draft Environmental Impact Study Summary quite useful in evaluating management directions/predicted outcomes provided in Alternatives 1 through 7.
Response	Thank you for your comment. Forest planning can be complex and confusing. The Planning Interdisciplinary Team understands the importance of presenting information in understandable terms. We are pleased that our documents were useful to you.

CommentCategory	Recreation
Comment	We remain concerned about gross trail improvements and new construction throughout the Westside District. Adding motorized ATV trails and enhancing their quality will continue to escalate non-snow period motorized effects. One effect is reduced mule deer fawning, rearing and hunting security. Our agency response is reduced hunting opportunity for long-term traditional hunter users on the forest.
Response	Under the Revised Plan, new motorized roads or trails could be allowed if road densities are below the standard in a particular management prescription area. Decisions to build new roads or trails require a separate, site-specific environmental analysis with public involvement. See also summary response to comments on roads. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a mix of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Nonmotorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be management emphases in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Mead Peak will all be managed as non-motorized year-round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	Roadless
Comment	Some 47,200 acres (the total acreage dedicated to wilderness designation) are made available for summer non-motorized (SNM) uses in Alternative 7 and zero acres are available for summer motorized (SM). But we are confused in this relationship during the winter wherein motorized recreationists have the entire 47,200 acres available but zero acres are open to the non-motorized recreationists (WNM). If this is not a misprint but represents a true intent to encourage motorized recreation, it seems in roadless areas, we have great concerns as to how this type of recreation would negatively impact wintering animals.
Response	The acre figures you are referring to are not misprints. In Alternative 7R, recommended wilderness would be managed as non-motorized in the summer and allow motorized use in the winter. In addition to recommended wilderness, several areas currently non-motorized have been designated as such to preserve this experience. Several areas have been closed to winter motorized use in response to public comments. The northwestern portion of Toponce, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year-round. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. These Non-motorized Recreation and Wildlife Security management prescription areas (Prescription 3.1(a,e)) were identified during the roadless re-evaluation process. Alternative 7R does not encourage motorized use in roadless areas but does allow it. The selected alternative restricts most motorized use to designated routes, and new motorized routes are limited by a prescribed motorized route density. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be management emphases in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). In this Alternative 7R, portions of some IRAs are managed as semi-primitive non-motorized during the snow-free season. See FEIS, Issue 8: Roadless Area Management and Recommended Wilderness for more information on alternatives and the effects of alternatives on roadless area values. Appendix C and R discuss each roadless area's potential for wilderness, and its existing roadless area values respectively. The record of Decision associated with this final EIS identifies the selected alternative that will be implemented and discloses the rationale for the selection. Big game winter range has been identified cooperatively with Idaho Fish and Game and other interested parties. In the Plan, these will be managed as Prescription 2.7.1, Critical Winter Range or Prescription 2.7.2, Winter Range. These prescriptions have direction specific to maintaining and improving the quality of winter range, including travel restrictions and lower livestock utilization levels. See Plan, Chapter 4, Prescriptions 2.7.1 and 2.7.2 for details.

CommentCategory	Recreation
Comment	Does this change represent a six-fold reduction in new roads only? If such, what becomes of existing roads? Are they to be decommissioned and reclaimed or merely regulated as closed. We would strongly recommend that care be exercised in planning for ANY new roads on the Forest due to the difficulties in effective regulation of their use. Four-wheel drive ATV trails are, in effect, roads relative to fish and wildlife resources and related users.
Response	Under the Revised Plan, new motorized roads or trails could be allowed if road densities are below the standard in a particular management prescription area. Decisions to build new roads or trails require a separate, site-specific environmental analysis with public involvement. See also summary response to comments on roads. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a mix of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Nonmotorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be management emphases in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Mead Peak will all be managed as non-motorized year-round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

Letter 200

IDAHO DEPARTMENT OF PARKS AND RECREATION

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November 15, 2001

Paul Oakes, Forest Planner
Caribou/Targhee National Forest
1405 Hollipark Dr.
Idaho Falls, ID 83401

RE: Caribou Draft Revised Forest Plan and EIS

Dear Mr. Oakes:

The Idaho Department of Parks and Recreation reviewed the Caribou Draft Revised Forest Plan and Environmental Impact Statement (EIS). We appreciate the incorporation of the Statewide Comprehensive Outdoor Recreation and Tourism Plan information into the revised plan and EIS.

General Comments

The Caribou National Forest is a major recreation destination for residents and visitors in southeast Idaho. Our department has provided federal agencies within southeast Idaho with $1.5 million in grant funding to construct and reconstruct recreation facilities.

Our department is a partner in many of the recreation management activities that the Caribou National Forest undertakes. We provide a substantial amount of grant funding for recreation facilities to the Forest. The Forest is an active participant with our Trail Ranger and Trail Cat Program. The department also provides snowmobile trail grooming on the Montpelier and Soda Springs Ranger Districts.

The Idaho Department of Parks and Recreation Trail Ranger Program has been maintaining trails on the Westside, Soda Springs, and Montpelier Ranger Districts since 1989. This year, our crews provided maintenance on 211 miles of trail on the Caribou National Forest. Some alternatives would hamper our ability to assist the Caribou National Forest with trail maintenance while other alternatives would have little or no effect.

Our Trail Cat Program has been a major partner is providing the Caribou National Forest with equipment and labor to reconstruct trails. Last year, our department provided 24 workdays and equipment for the reconstruction of trails to accommodate ATV use.

The Caribou National Forest has been an active participant and recipient of Off Road Motor Vehicle Fund, Recreational Trails Program and Recreation Vehicle Fund grants. Many of the trails on the Westside Ranger District would have not been reconstructed without IDPR grant funding.

The Tri-County Snowmobile Program operated by Bear Lake State Park has the 5th largest amount of designated registrations in Idaho. This program is a draw for snowmobilers in Southeast Idaho, Utah, and Wyoming. This draw creates an important economic impact for Montpelier, Preston, Paris and Soda Springs. The revised plan can have a positive or negative effect on this program depending on which alternative is selected in the final plan.

The draft combines roads and trails into an open motorized road and trail density. Our department is supportive of restrictions on recreation use for wildlife when scientific facts support the reasoning for the closure. At this time, there are no scientifically controlled studies on the effects of motorized use on trails. Not one forest plan revision in Idaho, except the Targhee National Forest, uses an open motorized road and trail density.

The draft plan and EIS did not justify why an open motorized road and trail density standard was needed. The revision should not use an open motorized road and trail density standard until adequate scientific evidence is presented that shows the effects of motorized trail density on elk and deer habitat effectiveness and elk and deer vulnerability. We are willing to partner with the National Forests and Idaho Department of Fish and Game to research the impacts of motorized trail density on elk and deer habitat effectiveness.

The draft plan recognizes that recreation use on the Caribou National Forest has increased. The plan should recognize the increase in ATV recreation on the Forest. ATV recreation is the fastest growing OHV recreation use in Idaho and the United States. Our registration figures show that Southeast Idaho's ATV registrations grew from 1,899 in 1995 to 4,444 in 2000 – an increase of 134% within six years.

The rapid growth of ATV recreation has lead to the proliferation of trails being converted to ATV use by ATV recreationists. A lack of management has created inadequate signing, law enforcement, and travel plan regulations which contributed to conversions. Any successful travel management strategy has to provide adequate opportunity for recreationists and proper management.

Recreationists desire a variety of trail opportunities. Each recreation activity has different impacts to the resource. Recreationists of each activity and within each activity prefer different opportunities. Forest planners need to look at and plan for each recreation trail activity (snowmobile, ATV use, hiking, cross-country skiing, off-highway motorcycling, mountain bike, equine, etc.).

The alternative maps in the EIS presented a large amount of information. The management prescriptions color scheme used many shades of brown. The many shades of brown make it difficult to distinguish what prescriptions will be applied to management areas. If the maps are difficult to read, the public will not understand the different alternatives.

Table 2.39 on page 2-76 of the EIS gives a summary of effects including miles of snow-free motorized roads and trails. This table indicates that 129 miles of road and trail will be closed under preferred alternative 7. How many miles of those will be roads and how many miles of those will be trails?

In 1978, our department surveyed all national forests in Idaho for trail opportunities. In 1978, the Caribou National Forest had 1,141 miles of trail, of which 911 miles were open to motorized use and 150 miles were non-motorized. In 1995, the Caribou National Forest had 1,047 miles of trail, of which 757 miles were open to at least off-highway motorcycle use seasonally and 290 miles were non-motorized. These figures show that motorized users have lost trail opportunities, while non-motorized users gained trail opportunities, usually at the expense of motorized recreation.

The revised forest plan needs to include a standard that states, "Insure that during travel plan revision process that there is no net loss of motorized or non-motorized trail opportunities. Try to expand trail opportunities to accommodate increasing recreational trail activities."

This standard will place sideboards on the travel plan revision to make sure that more trails are not closed to motorized use or non-motorized trail opportunities are lost forest-wide. It has been our experience that each travel revision results in more trails and areas being closed to motorized use than the previous travel plan. If forest planners want to close another trail to motorized use, then they should try to make another trail available or construct a new trail. Likewise, if a non-motorized trail is opened to motorized use, then another non-motorized trail should be constructed or another motorized trail should be closed.

This concludes our general comments for the draft revised forest plan. We hope that the revision team takes our suggestion of "no net loss of trail opportunity" as a standard in the final plan.

Specific Forest Plan Comments

The general forest vision on page 2-9 doesn't contain a single item relating to recreation. The vision leaves the impression that the Forest is only managing the resource and not the visitors. A successful management plan must include social management in addition to resource management.

The Recreation and Access Management Issue on RFP 2-11, covers the side that wants more non-motorized recreation opportunities, but not the side of the public who wants more motorized recreation opportunities. The Idaho Department of Parks and Recreation 2000 OHV User Survey found the greatest needed for motorcycle/atv users is to provide more backcountry trail opportunities (70.1%). They also indicated that development of new OHV only trails was greatly needed (52.5%).

The desired future conditions for Recreation on page 3-35 places a greater emphasis on meeting environmental concerns than for providing recreation opportunity. For example, providing a broad range of recreation opportunities is third in the list of desired future conditions. Reduction of recreation impacts to forest resources is important, but it should be balanced with providing recreation opportunities.

The desired future condition "Recreation opportunities are concentrated near urban and high-use areas" gives the impression that the Forest will only provide opportunities within those areas. Recreation opportunities should be provided throughout the Forest.

This page also has a typographical error on Goal #7. We assume that the forest wants to reduce the effects of "trails", not just "trail".

The recreation section needs to provide a standard that would not reduce motorized or non-motorized recreation trail opportunities. A standard such as this would prevent to loss of trail opportunities. With rapidly growing trail-based recreation activities, land management agencies need to look at providing more and better-maintained trail opportunities.

On Page RFP 3-36, objective 1 would complete an interdisciplinary review of 5% of system trails each year to determine reconstruction needs. Our program believes that 5% is inadequate. Our Trail Ranger Program maintains 211 miles of trail on the Caribou National Forest. As a part of this maintenance, we do place suggestions on reconstruction needs. If the Forest utilizes these reports, volunteer information, and staff information, much more than 5% of the system trails could be reviewed each year. Partnering with the IDPR Trail Ranger Program, we believe 25% of the trail system each year could be reviewed.

Guideline 8 on page RFP 3-36 is confusing to the average reader. The way this statement is written, the forest proposes to restrict snowmobile use to designated routes throughout the forest. We assume that the forest is referring to summer motorized access, and not snowmobile use.

In Chapter 4 of the RFP, we are pleased to see that access management for the individual management prescriptions is clearly defined. We are concerned that the motorized road and trail density standards will place too tight of sideboards on

the travel planning process. The forest needs to look at ways of providing more trail opportunities, not restricting or abandoning more trails because of a density standard.

The placement of road and trail density standards will have an impact to the travel management process. The draft plan and EIS is not specific on which trails and roads will be closed. It only states that about 120 miles of trail and road be will closed to motorized use. The final plan and EIS needs to define which areas, trails and roads will face motorized access restrictions or closure.

Specific Draft EIS Comments

The draft EIS doesn't fully disclose the range of public opinion on recreation and access management on page 1-20. . The Idaho Department of Parks and Recreation 2000 OHV User Survey found the greatest needed for motorcycle/atv users is to provide more backcountry trail opportunities (70.1%). They also indicated that development of new OHV only trails was greatly needed (52.5%). This information should be presented in Issue 1.

The Summary of Effects on page 2-76 does not indicate how many miles of trail would be available to motorized use under any of the alternatives. The EIS needs to state on how many miles of trails will be open or closed under each alternative. As it stands now, it is very difficult to determine how trails will be effected because they are tied in the with road system.

On page 2-80 compares the different alternatives with respect to Wildlife Habitat Management. One indicator that is used is hunting season vulnerability. This is a poor indicator of wildlife habitat. Hunting season vulnerability is driven by the rules and regulations established by the Idaho Department of Fish and Game (IDFG).

The IDFG controls management objectives for sex ratios and total population. They set the timing of hunts, season length, permit numbers, and weapon choice.

Page 3-15 analyzes the existing situation for access and recreation management. Indicator A.1 is misleading. While 420,215 acres of land may be open to summer cross-country travel, not all of those 420,215 acres of land are available. Areas with heavy timber, brush cover, and steep slopes restrict summer motorized cross-country travel. With the GIS information and tools available, the final EIS should be able to tell how many acres are actually available for summer cross-country travel.

The Recreation Current Conditions section has several items of concern to our program. Fewer than 20% of the Forest's trails receive maintenance and clearing. If trails are not being maintained, then the public can't use them. The EIS should state that only 240 miles of trail are available to the public, not the 960 miles of trail that are not being maintained. The Caribou National Forest should examine ways to more effectively utilize the Trail Ranger, Trail Cat and volunteer programs to get more miles of trail maintained each year.

We appreciate the opportunity to comment on the draft forest plan and EIS. The final plan should look at ways of providing more recreation opportunities, not restricting more opportunities. Any changes to travel management because of this plan, should involve consultation with our department as well as the Idaho Department of Fish and Game and other affected state resource management agencies.

Sincerely,

Rick Collignon
Director

Letter Number **200 - Caribou RFP**

CommentCategory	DEIS
Comment	The draft EIS doesn't fully disclose the range of public opinion on recreation and access management on page 1-20. The Idaho Department of Parks and Recreation 2000 OHV User Survey found the greatest needed for motorcycle/ATV users is to provide more backcountry trail opportunities (70.1 percent). They also indicated that development of new OHV only trails was greatly needed (52.5 percent). This information should be presented in Issue 1.
Response	The issues, as described in Chapter 1, were developed by the ID Team from comments related specifically to the Revision. The list of things people want is a summary of the issue and is not intended to encompass the entire picture. We recognize that trails, both motorized and non-motorized, are important to Forest users. In the Revision, trail opportunities both current and future were considered when assigning motorized road densities. Development of new OHV trails is outside the scope of the Plan and would be done during travel planning and/or other site specific analyses.
CommentCategory	Recreation
Comment	The placement of road and trail density standards will have an impact to the travel management process. The draft plan and EIS are not specific on which trails and roads will be closed. It only states that about 120 miles of trail and road be will closed to motorized use. The final Plan and EIS need to define which areas, trails, and roads will face motorized access restrictions or closure.
Response	Forest Plans are programmatic in nature, and as stated in the FEIS in the Recreation and Access section, travel planning is best done at a local, site-specific scale. Alternative 7R proposes to close about 40 miles of road or motorized trail. The FEIS discloses the prescribed road densities for each prescription area and the existing road density of the area. Deciding which routes would be closed to motorized use to meet the given density is part of the travel planning process. Travel planning is a NEPA analysis, involving the public and discussing all alternatives and their effects on recreation uses and forest resources at the local level.
CommentCategory	Recreation
Comment	Recreationists desire a variety of trail opportunities. Each recreation activity has different impacts to the resource. Recreationists of each activity and within each activity prefer different opportunities. Forest planners need to look at and plan for each recreation trail activity (snowmobile, ATV use, hiking, cross-country skiing, off highway motorcycling, mountain bike, equine, etc.).
Response	Recreationists do enjoy a variety of trail opportunities. Recreation, beyond access for motorized and non-motorized uses, has been discussed further in the FEIS. Many activities have not been specifically analyzed in the FEIS, since recreation management of these activities will not vary by alternative. Pease see the Recreation and Access section of the FEIS.
CommentCategory	Wildlife
Comment	On page 2-80 compares the different alternatives with respect to Wildlife Habitat Management. One indicator that is used is hunting season vulnerability. This is a poor indicator of wildlife habitat. Hunting season vulnerability is driven by the rules and regulations established by the Idaho Department of Fish and Game (IDFG). The IDFG controls management objectives for sex ratios and total population. They set the timing of hunts, season length, permit numbers, and weapon choice.
Response	Hunting season vulnerability is a result of access, cover, topography, hunter density, type of hunting season and weather. Effects on vulnerability of big game are addressed in Chapter 4 of the EIS and in the Wildlife Section of Appendix D. This was only one indicator used in the analysis, not the only indicator.

CommentCategory	Plan
Comment	The recreation section needs to provide a standard that would not reduce motorized or non-motorized recreation trail opportunities. A standard such as this would prevent to loss of trail opportunities. With rapidly growing trail-based recreation activities, land management agencies need o look at providing more and better-maintained trail opportunities.
Response	One of the desired future conditions for the transportation system is to "provide a variety of road and trail opportunities, including motorized and non-motorized experiences." This will be done in site-specific travel planning. Alternative 7R, the Selected Alternative in the Record of Decision, maintains about the existing level of motorized trails and identifies additional non-motorized areas.

CommentCategory	Recreation
Comment	The revised Forest Plan needs to include a standard that states, "insure that during travel plan revision process that there is no net loss of motorized or non-motorized trail opportunities. Try to expand trail opportunities to accommodate increasing recreational trail activities." This standard will place sideboards on the Travel Plan revision to make sure that more trails are not closed to motorized use or non-motorized trail opportunities are lost forest-wide. It has been our experience that each travel revision results in more trails and areas being closed to motorized use than the previous travel plan. If forest planners want to close another trail to motorized use, then they should try to make another trail available or construct a new trail. Likewise, if a non-motorized trail is opened to motorized use, then another non-motorized trail should be constructed or another motorized trail should be closed.
Response	Many standards and objectives in the Forest Plan will be determined by the alternative or combination of alternatives outlined in the Record of Decision. Some alternatives in the FEIS do not limit open motorized route densities and some alternatives do limit open motorized route densities. Trail opportunities, motorized and non-motorized, can be improved with better trail conditions, and more trail information and maps. A forest plan emphasizing these objectives will best utilize the existing trail system. In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	DEIS
Comment	The Recreation Current Conditions section has several items of concern to our program. Fewer than 20 percent of the Forest's trails receive maintenance and clearing. If trails are not being maintained, then the public can't use them. The EIS should state that only 240 miles of trail are available to the public, not the 960 miles of trail that are not being maintained. The Caribou National Forest should examine ways to more effectively utilize the Trail Ranger, Trail Cat and volunteer programs to get more miles of trail maintained each year.
Response	Trails that are not maintained to standard can and are still used by recreationists. The Forest is in the process of completing trail inventories and condition surveys. The analysis uses our best and current information, which is not complete enough to determine which trails are in such poor condition as to be unusable. As our inventory is closer to completion, the forest can improve trail management and the database will help set priorities for trail maintenance and reconstruction. The Forest uses the State of Idaho's trail maintenance and grant programs and volunteers to maintain trails. The State of Idaho's Park and Recreation Department is a strong ally in helping the forest provide quality outdoor recreation to state residents and visitors.
CommentCategory	Plan
Comment	The Recreation and Access Management Issue on RFP 2-11, covers the side that wants more non-motorized recreation opportunities, but not the side of the public who wants more motorized recreation opportunities. The Idaho Department of Parks and Recreation 2000 OHV User Survey found the greatest need for motorcycle/ATV users is to provide more backcountry trail opportunities (70.1 percent). They also indicated that development of new OHV only trails was greatly needed (52.5 percent).
Response	We disagree. We believe we adequately captured the issues and concerns regarding recreation and access management. While your OHV User survey reflects the need of motorcycle/ATV users, it does not reflect the demand for non-motorized areas of the Forest. We believe the selected alternative in the Record of Decision provides for adequate motorized and non-motorized use. In this alternative motorized use is placed on designated routes with fewer acres open to cross-country travel than that currently allowed. We believe this change continues to provide for motorized use and access while responding to other resource issues, such as big game winter range or the quality of recreation opportunities for a variety of users, both motorized and non-motorized.
CommentCategory	Plan
Comment	The desired future conditions "Recreation opportunities are concentrated near urban and high-use areas" gives the impression that the Forest will only provide opportunities within those areas. Recreation opportunities should be provided throughout the Forest.
Response	We omitted an important word at the beginning of this sentence. It should have read "developed" recreation opportunities are concentrated near urban and high-use areas. Developed recreation is the type of recreation that occurs where modifications (improvements) enhance recreation opportunities and accommodate intensive recreation activities in a defined area. These developed areas include campgrounds, day use areas, or specially designed interpretive areas. The last part of the sentence reads, "Appropriate dispersed recreation opportunities are offered across the spectrum of recreation settings." Dispersed recreation refers to the type of recreation use that requires few, if any, improvements and may occur over a wide area. This type of recreation involves activities related to roads and trails. Dispersed recreation can include hunting, fishing, berry picking, hiking, horseback riding, off-road vehicle use, picnicking, viewing scenery, snowmobiling, and many others. We believe the selected alternative in the Record of Decision provides for a full spectrum of recreation opportunities across the Forest in a variety of settings.

CommentCategory	Recreation
Comment	The rapid growth of ATV recreation has lead to the proliferation of trails being converted to ATV use by ATV recreationists. A lack of management has created inadequate signing, law enforcement, and travel plan regulations which contributed to conversions. Any successful travel management strategy has to provide adequate opportunity for recreationists and proper management.
Response	Travel enforcement and funding are not primary issues of a programmatic plan. The Forest does intend to enforce the direction in the Plan, including access management. Enforcement, information and education are all tools that forest managers will use to insure compliance with the Plan. Many people will comply with restrictions if they understand the resource benefits. If an alternative is chosen that restricts motorized use to designated routes in areas currently managed as open to cross-country motorized use, designated routes will be defined. Most pioneered routes are not depicted on the current forest travel plan. On the Westside Ranger District the current travel plan will be used. On the Montpelier and Soda Springs Ranger Districts, the travel plan maps will be updated to show designated motorized routes in areas that were previously open to cross-country motorized travel. After the Record of Decision is signed, site-specific travel planning will be initiated for these areas. This will identify designated travel routes and types of uses allowed on these routes. Enforcement efforts will include public education, media outreach, and cooperative patrols with Idaho Fish and Game. In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	Recreation
Comment	Table 2.39 on page 2-76 of the EIS gives a summary of effects including miles of snow-free motorized roads and trails. This table indicates that 129 miles of road and trail will be closed under preferred Alternative 7. How many miles of those will be roads and how many miles of those will be trails?
Response	Alternative 7R, the Selected Alternative in the Record of Decision, establishes road density limits by management prescription area. In order to meet those densities, approximately 40 miles of motorized routes would be closed. The determination of which routes would be closed will be done at the site-specific level during travel planning. Public involvement will be essential during that process. Overall, this plan essentially retains the motorized route opportunities currently available on the Forest.
CommentCategory	DEIS
Comment	The alternative maps in the EIS presented a large amount of information. The management prescriptions color scheme used many shades of brown. The many shades of brown make it difficult to distinguish what prescriptions will be applied to management areas. If the maps are difficult to read, the public will not understand the different alternatives.
Response	We believe we have corrected this in the Final EIS.
CommentCategory	Plan
Comment	Guideline 8 on page RFP 3-36 is confusing to the average reader. The way this statement is written, the forest proposes to restrict snowmobile use to designated routes throughout the forest. We assume that the forest is referring to summer motorized access, and not snowmobile use.
Response	Your assumption is correct. Summer motorized travel on 97 percent of the Forest will be on designated roads or trails with the selected alternative, Alternative 7R. Winter motorized access would only be restricted to designated routes in winter range prescription areas. The transportation and access section of the Revised Forest Plan have been rewritten to provide clarification.
CommentCategory	DEIS
Comment	Page 3-15 analyzes the existing situation for access and recreation management. Indicator A.1 is misleading. While 420,215 acres of land may be open to summer cross-country travel, not all of those 420,215 acres of land are available. Areas with heavy timber, brush cover, and steep slopes restrict summer motorized cross-country travel. With the GIS information and tools available, the final EIS should be able to tell how many acres are actually available for summer cross-country travel.
Response	The analysis notes that not all acres are available for cross-country motorized travel due to vegetation and terrain. Our existing GIS data could eliminate some acres available to cross-country motorized use by screening out extreamly steep slopes. However, our vegetation layer is not detailed enough to predict if a motorcycle could travel through a particular vegetation type. The plan revision process is programmatic in nature, and does not attempt to capture site-specific analysis concerning access. The analysis compares and contrasts altneratives with the existing condition and in relation to each other. For example, Alternative 2 allows cross-country motorized travel on 40 percent of forest acres and Alternative 6 does not allow cross-country motorized travel on any portion of the forest. Clearly, Alternative 2 provides more motorized recreation opportunity than Alternative 6. GIS analysis could refine the acre numbers, but the relationship between the two alternatives would be the same. We did not believe this level of detail was necessary to disclose the effects of the alternatives, most of which further reduced the acreage available for cross-country motorized use. Further, with rapidly improving machines and drivers, it would be very difficult to determine what types of areas are available.

CommentCategory	Plan
Comment	In Chapter 4 of the RFP, we are pleased to see that access management for the individual management prescriptions is clearly defined. We are concerned that the motorized road and trail density standards will place too tight of sideboards on the travel planning process. The Forest needs to look at ways of providing more trail opportunities, not restricting or abandoning more trails because of a density standard.
Response	The target road densities resemble closely the road and trail network on the ground now. In Alternative 7R, approximately 40 miles of motorized routes would need to be closed. There is opportunities Forest-wide to provide new, reconstructed, or re-routed trails within areas that are below the road density standards.
CommentCategory	Economics
Comment	The Tri-County Snowmobile Program operated by Bear Lake State Park has the 5th largest amount of designated registrations in Idaho. This program is a draw for snowmobilers in Southeast Idaho, Utah, and Wyoming. This draw creates and important economic impact for Montpelier, Preston, Paris and Soda Springs. The revised plan can have a positive or negative effect on this program depending on which alternative is selected in the final plan.
Response	The economic impacts of snowmobile spending from non-residents were considered in the FEIS analysis based on a recent snowmobile expenditure survey completed in Utah. The Social and Economic sections of Chapters 3 and 4 provide information on recreation.
CommentCategory	Plan
Comment	The desired future conditions for Recreation on page 3-35 places a greater emphasis on meeting environmental concerns than for providing recreation opportunity. For example, providing a broad range of recreation opportunities is third in the list of desired future conditions. Reduction of recreation impacts to forest resources is important, but it should be balanced with providing recreation opportunities.
Response	All activities, including recreation use, must be within the land's capability to sustain such uses. Environmental concerns, such as riparian health, soil erosion and vegetation degradation as a result of recreation use must be considered. The Desired Future Conditions you reference were not designed as a prioritized list; however, protection of important resource values are certainly emphasized in recreation development and use in the standards and guidelines. We believe the Selected Alternative, Alternative 7R, in the Record of Decision allows for the wide array of recreation uses the public expects and that those uses are compatible with other resource objectives, such as clean water, fish habitat improvement, reduction of erosion and so on.
CommentCategory	Plan
Comment	The general forest vision on page 2-9 doesn't contain a single item relating to recreation. The vision leaves the impression that the Forest is only managing the resources and not the visitors. A successful management plan must include social management in addition to resource management.
Response	While not an explicit statement is presented for recreation, recreation resources are embodied in at least two of the Desired Future Condition statements: "Landscapes reflect a sense of place. They display an interconnected balance of physical landscape components, including upland terrestrial habitats, riparian areas, wetlands, and clean water." The "sense of place" referenced in this statement refers to incorporating distinct community and stakeholder values in the design and implementation of the Forest Plan. It also means integrating the ecological, economic and social goals of stakeholders. Further, a second statement says, "Forest lands efficiently provide a mix of economic and cultural benefits to people that balances regional, national and international interests. Benefits are provided in type, amount, distribution and regularity generally regarded as fair, well-reasoned and conducive to predictable use. The mix of benefits is responsive to changing public values and are produced in accordance with federal statutes and regulations which most frequently address issues of efficiency, sustainability, supply of goods and services important to people and consideration of local economic conditions." More specific desired future conditions for recreation can be found in Chapter 3 of the Revised Forest Plan, Forest Use and Occupation, under the subheading "Recreation."

CommentCategory	DEIS
Comment	The Summary of Effect on page 2-76 does not indicate how many miles of trail would be available to motorized use under any of the alternatives. The EIS needs to state on how many miles of trails will be open or closed under each alternative. As it stands now, it is very difficult to determine how trails will be effected because they are tied in the with road system.
Response	That is correct. Currently, the Forest has about 950 miles of motorized trails and 350 miles of non-motorized trails. In Alternative 7R, we predict approximately 40 miles of motorized routes - roads or trails - would have to be closed to meet the prescription area road density limits. Which routes are closed; which are left open; and how they will be closed are outside the scope of the Plan. Those decisions will be made during site-specific travel planning. We encourage you to stay involved through that process.
CommentCategory	Recreation
Comment	The Idaho Department of Parks and Recreation Trail Ranger Program has been maintaining trails on the Westside, Soda Springs, and Montpelier Ranger Districts since 1989. This year, our crews provided maintenance on 211 miles of trail on the Caribou National Forest. Some alternatives would hamper our ability to assist the Caribou National Forest with trail maintenance while other alternatives would have little or no effect.
Response	In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	Road Density
Comment	The draft plan and EIS did not justify why an open motorized road and trail density standard was needed. The revision should not use an open motorized road and trail density standard until adequate scientific evidence is presented that shows the effects of motorized trail density on elk and deer habitat effectiveness and elk and deer vulnerability.
Response	Throughout the revision process, access management has been one of the major public issues. The 1985 Plan had a "no net gain" policy regarding new roads. While this policy addresses total road mileage on the Forest, it does not address road limits at a smaller scale. For instance, one area could have an extremely high road density and another have none. This would be in compliance with the Plan but would not address local conditions. In order to address this, and to be consistent with the Targhee zone of the Caribou-Targhee, forest managers set motorized route density limits at the management prescription area level. In keeping with the "no net gain" policy of the past 15 years, route density limits were set at near current levels. In some areas, such as Deep Creek/Clarkston and the south half of the Bear River Range, density will be reduced to accommodate specific conditions. In Bailey Creek and the intermingled private land northwest of Pocatello, no route density limits are set because of the need to provide access to private lands. In setting route density limits for Alternative 7R, many factors, not just big game management, were considered. Vegetation structure, recreation opportunity spectrum, watershed integrity, past activities, predicted treatments and wildlife needs were analyzed along with public comments (Appendix R: Roadless Re-evaluation). Many people commented that the Forest should provide a variety of recreation settings and experiences for visitors, including motorized and non-motorized areas. Many of these comments were very specific to geographic locations. These were considered in setting density limits. For instance, in order to retain the primitive backcountry experience of the Stump Peak area on the Soda Springs Ranger District, motorized route densities were set to closely match the existing route network. Prescription density limits range from 0.0 mi/mi2 to 1.0 mi/mi2 in this area. This low density will allow people to have a primitive, backcountry experience. It will also retain the important and valuable roadless area character (Appendix R). One of the management emphases in the Caribou Range Subsection is "Retention of primitive and semi-primitive recreation opportunities" and "wildlife security and backcountry hunting experiences." Conversely, in areas managed with Prescription 5.2, Forested Vegetation Management, open motorized route density limits are generally set as 2.0 mi/mi2. Wildlife While responding to comments and re-evaluating roadless areas on the Forest, the ID Team also looked at a variety of wildlife values when setting route density limits. These included wildlife security habitat, native trout strongholds, and protection of potential corridors. While big game management is an important public concern, another part of the wildlife issue is species viability. This includes all threatened, endangered and sensitive species, management indicator species, and species-at-risk. The alternatives were developed to manage habitats to maintain all species. For instance, as discussed in the FEIS, there are some wildlife species such as wolverine that appear to be sensitive to human disturbance (Project File, Interdisciplinary Team Notes). This was considered in setting route density limits for areas within the Caribou Range and Bear River Range Ecological Subsections that were identified as potential wolverine habitat. Open motorized route densities were only one of the tools used to assess components of wildlife habitat. In Chapter 4 of the FEIS and in the Wildlife Process Paper you will see that indicators such as acres of vegetation treated, percent of Forest open to cross-country travel, forage utilization levels, and rate of riparian recovery were also used. The criteria used to assess affects on individual species are listed in the risk assessments in the Viability section of Appendix D. Disturbance and displacement are well-documented effects of use along roads and trails. This is discussed in the Road and Motorized Trail section of Appendix D. Additional discussion has been added for individual species that are sensitive to human disturbance. Information from studies on road densities done on elk were used to address the needs of other species. As discussed above, there are many species that avoid areas of human activity and lower route densities benefit these species. Because of this, hunting season restrictions focused on big game may not provide security during the summer season when other species need it. Several areas currently non-motorized have been designated as such to preserve this habitat security and recreation experience. These Nonmotorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest but concentrated in the Caribou Range and Preuss Ridges Ecological Subsections. The northwestern portion of Toponce, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Elk and other Big Game Most of the research and studies done on open motorized route or road densities have been done on elk. Rationale for selection of specific levels of access (1.0 mi/mi2 and 2.0 mi/mi2) and the effects is discussed in the Wildlife section of Appendix D. IDFG has selected trend areas, which are surveyed in the winter. These areas are established for mule deer and elk and are used to determine numbers, bull:cow, buck:doe and cow:calf ratios. The

winter range on the Forest was mapped based on IDFG winter flight information. This mapping was refined several times, based on public and agency comments. During these flights, they have found that bull elk consistently use the south aspect of Stump Peak (Boulder Creek).

As discussed in the FEIS, elk numbers are meeting state population objectives. The reason that the Diamond Creek area was identified as a concern for elk was the desire to maintain this as a trophy elk hunting area. Mule deer are not meeting objectives in all areas, and three areas have been identified as of concern during the planning process.

Additional information on Road and route densities, big game populations and effects on wildlife are found in the FEIS, Chapters 3 and 4, Issue 9: Wildlife Habitat and Appendix D, Wildlife, Road and Motorized Trail section, and then in analyses for specific species affected by motorized recreation and in the Planning Record. See also Summary Response to Comments on motorized roads and trails being treated the same previously in this Appendix.

CommentCategory	Plan
Comment	This page also has a typographical error on Goal #7. We assume that the forest wants to reduce the effects of "trails", not just "trail".
Response	You are correct. This is a typographical error. We have made the correction in the Final Revised Forest Plan. Thank you.

CommentCategory	Road Density
Comment	The draft combines roads and trails into an open motorized road and trail density. Our department is supportive of restrictions on recreation use for wildlife when scientific facts support the reasoning for the closure. At this time, there are no scientifically controlled studies on the effects of motorized use on trails. Not one forest plan revision in Idaho, except the Targhee National Forest, uses an open motorized road and trail density.
Response	For many years, there has been debate on whether or not to equate a single-track trail as equal to a road in travel planning. The following provides a brief overview documenting the process and reasoning used by the Forest. Early in the planning process for the Targhee National Forest Plan revision, Forest personnel held a series of elk workshops with State game management agencies to determine how to do the analysis for elk. At those workshops and in subsequent written responses, noted elk expert, Dr. Jack Lyon, Intermountain Forest and Range Experiment Station, stated that although there was no research on the effects of motorized trails specifically, it is inituitive that elk should respond the same to motorized use on trails as they would to motorized use on roads. Based on this, the Targhee forest managers determined that the analysis for elk habitat effectiveness and elk vulnerability would be based on motorized route density, including both roads and trails. This reasoning and determination was echoed in 1994 and 1998 when the Interagency Grizzly Bear Committee determined that roads and trails should be treated equally in motorized access analysis (FEIS, 1997 Revision Forest Plan, Targhee National Forest). During the travel planning process for the Targhee, new work had been done on developing interagency guidance for managing elk. In the "Interagency Guidelines for Managing Elk Habitats and Populations on USFS Lands in Central Idaho," motorized trails were given 1/10 the effect of motorized roads. According to biologists working on the guidelines, there was no scientific basis for determining that trails should be one tenth the impact of roads (FEIS for Open Road and Open Motorized Trail Analysis, Appendix E). Despite this, the Targhee re-analyzed elk habitat effectiveness and elk vulnerability using this same process and the overall figures changed only slightly. The reasons for this were disclosed in the analysis. This analysis process was affirmed by the Washington Office of the Forest Service is the Targhee Forest Plan Revision Appeal Decision (page 95). During the Caribou revision process, the Forest managers decided to use the same indicators, habitat effectiveness and elk vulnerability, in their analysis. In reviewing the literature, it was determined that there still had not been any scientifically controlled research documenting the effects of motorized trail use on wildlife. Thus, the determination was made to use much the same process that had been used in the Targhee revision. In addition, there were some other compelling reasons to equate motorized trails with roads. These are: □In many areas of the Forest, it is unclear where the road ends and motorized trail begins. Much of the trail system has developed over the years from unused two-track roads. On many roads, whether it is a road or trail depends on the user's ability. Some people would drive a jeep on the same stretch of track that other people would only use an ATV or motorcycle on. This is especially true in the areas currently open to cross-country travel. □In addition, there have been many advances in technology in the all terrain vehicle (ATV) industry. Machines are larger, wider, and much more popular. As ATVs increase in size, the distinction between them and a four-wheeled drive "vehicle" becomes less clear. According to the Idaho Department of Parks and Recreation, ATV recreation is the fastest growing OHV recreation use in Idaho and the United States. Registration figures show that Southeast Idaho's ATV registrations grew from 1,899 in 1995 to 4,444 in 2000 - an increase of 134 percent within six years (Idaho Dept. Parks and Recreation, 2001). It is not uncommon to encounter large groups of recreationists on ATVs at one time. They are also a very common method of accessing game during the hunting seasons. Even ATV organizations are concerned that some measure of control be exercised over the use of these machines in order to retain a quality motorized experience (BRC, 2002). □Open motorized route limits were used not only for elk habitat analysis but also to address other wildlife species, watershed conditions and recreation experiences. New information provided by several groups indicates that all trails and roads, not just motorized routes, have a detrimental effect on wildlife security (Noss, 2002). Again, however, we are aware of no scientifically controlled studies to support this claim. □Finally, recreation experience was another reason for setting the motorized route density limits and equating motorized trails with roads. While many people may disagree, forest managers believe that motorized trails affect the recreation experience similar to roads. Because Alternative 7R largely retains the current motorized road and trail network, intuitively it makes sense that roads and trails could be treated equally. For instance, in order to retain the backcountry experience of the area south of Tincup Highway on the Soda Springs Ranger District, motorized route densities were set to closely match the existing route network. Many of those access routes are currently trails so in order to maintain the experience with trails separate from roads, the Forest would have had to set separate density limits for each type of route. This would unnecessarily complicate the analysis and

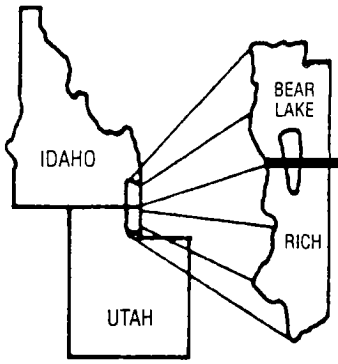
the public's ability to see how the changes would affect them.

As discussed elsewhere in the response to comments, the actual network of motorized roads and trails will be determined during site-specific travel planning. The Forest encourages all commentors to stay involved during that process to insure the Forest has an adequate network of routes, motorized and nonmotorized.

The FEIS has been augmented to include more information on this subject. Particularly, in Appendix D: Wildlife Process Paper, this is discussed under the topic of "Big Game and Motorized Use."

CommentCategory	Plan
Comment	On Page RFP 3-36, objective 1 would complete an interdisciplinary review of 5 percent of system trails each year to determine reconstruction needs. Our program believes that 5 percent is inadequate. Our Trail Ranger Program maintains 211 miles of trail on the Caribou National Forest. As a part of this maintenance, we do place suggestions on reconstruction needs. If the Forest utilizes these reports, volunteer information, and staff information, much more than 5 percent of the system trails could be reviewed each year. Partnering with the IDPR Trail Ranger Program, we believe 25 percent of the trail system each year could be reviewed.
Response	This objective has been deleted in the final Plan because it was a repeat of a national monitoring requirement. The objective in the draft Revised Forest Plan, as worded, required an interdisciplinary review. While the Trail Ranger review and suggestions are invaluable, it is not interdisciplinary. The review described in the objective would include specialists from many disciplines therefore less can be required given current budgets and staffing. Thank you for your comment and offer to assist the Forest Service. This objective was tied to a national initiative and was removed from the Plan. The Plan still includes monitoring of trails and we would be happy to have your cooperation in completing the monitoring.
CommentCategory	Economics
Comment	The plan should recognize the increase in ATV recreation on the Forest. ATV recreation is the fastest growing OHV recreation use in Idaho and the United States. Our registration figures show that Southeast Idaho's ATV registrations grew from 1,899 in 1995 to 4,444 in 2000 - an increase of 134 percent within six years.
Response	The FEIS recognizes that ATV and other motorized recreation is an important use of the Forest. That is one reason that access was one of the significant issues that drove the formulation of alternatives. The increase in ATV use has been recognized in the cumulative effects section (FEIS, Chapter 4, Cumulative Actions, and Issue 1, Recreation, Access and Scenery Management.).

Letter 234



Bear Lake Regional Commission

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25 YEARS 1973 - 1998

October 31, 2001

Mr Jerry Reese
Forest Supervisor
1405 Hollipark Dr
Idaho Falls, ID 83401

Dear Mr. Reese:

The staff of the Bear Lake Regional Commission has reviewed the Draft Revised Forest Plan, and EIS for the Caribou National Forest. We have also requested that individual members of the Regional Commission respond to the plan representing their jurisdictions.

The Bear Lake Regional Commission has long been a proponent of multiple use and are supportive of that concept. We are not in favor of locking the public lands up in wilderness areas, but feel public lands are for the benefit of all and their traditional uses have made the west what it is today.

I have not designated an alternate preference, but again strongly favor multiple use of public lands.

Sincerely,

Allen Harrison
Executive Director

Letter Number **234 - Caribou RFP**

CommentCategory	Alternatives
Comment	The Bear Lake Regional Commission has long been a proponent of multiple use and are supportive of that concept. We are not in favor of locking the public lands up in wilderness areas.
Response	Each of the alternatives represents a course of action for future management of the Forest that addresses the public's issues and concerns to varying degrees. Environmental effects of each alternative were analyzed in the EIS and displayed. Some alternatives, like Alternative 3, are more responsive to resource commodity production, while others are more responsive to watershed condition, vegetation condition, recreation use, or wildlife concerns. The Deciding Officer can choose any of the alternatives or a combination of them. Alternative 7R is conservative in recommending additional wilderness and changes the recommendation for the Worm Creek Roadless Area in the southern part of the Bear River Range. We believe this alternative provides for people's needs in a multiple use concept, while providing stewardship of the Forest's ecosystems. The Record of Decision associated with this EIS identifies the Selected Alternative the Deciding Officer will implement and discloses the rationale for the selection.

EULALIE TEICHERT LANGFORD
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Letter 281

COMMITTEES
AGRICULTURAL AFFAIRS
STATE AFFAIRS

House of Representatives
State of Idaho

September 21, 2001

Jack A. Blackwell, Regional Forester
c/o Ric Rine
Caribou National Forest
1405 Hollipark Drive
Idaho Falls, Idaho 83401

Re: Draft Environmental Impact Statement - Alternative 3 and 1.

Dear Mr. Blackwell,

Thank you for this opportunity for public comment regarding the future management of the Caribou National Forest. As an Idaho State Representative, I visit with a great many people in my legislative district–encompassing Bear Lake, Caribou, Franklin, Oneida, and south Bannock Counties. Grazing, mining, timber harvesting, firewood gathering, hunting, fishing, recreation, and public access are vital to the economy of this area. The management of our National Forest is of prime importance to all of my constituents. The vast majority of the people that I talk with want the Caribou National Forest to be managed so as to enhance the local economy and to allow local control of our Forest.

ALTERNATIVE 3: Having carefully studied the 7 alternatives offered by the Forest Service for the management of the Caribou National Forest, I find that in most cases Alternative 3 offers the best management plan to meet the needs of my constituents, and I urge you to incorporate the principles expressed in that alternative into the management of the Caribou National Forest.

GRAZING: In this category, I prefer the percentages allowed for grazing in Alternative 1–35% to 45% on upland browse and 50% to 60% on upland herbaceous as compared to the 25% to 35% and 35% to 55% recommended in Alternative 3. In other words, allow grazing to remove up to 60% of the available forage. This activity improves the forest and eliminates the possibility of a build-up of dry grasses which provide fuel for catastrophic forest fires. Livestock grazing helps the forest and the local economy.

MINING: The mining industry is essential to the local economy. By improving Best Management Practices through research and monitoring activities including reclamation and hazardous substance management, mining can occur without permanent damage to the Forest.

Mining companies doing business in the Caribou National Forest are spending millions of dollars to protect the environment.

TIMBER HARVEST: Alternative 3 finds 150,400 acres of the Caribou Forest suitable for timber harvest with an estimated yield of 67 million board feet of lumber during the first decade. Harvesting mature tress improves the health of the forest, provides jobs, and uses a valuable natural resource. Timber harvesting should be encouraged in the Caribou National Forest. Restrictive management practices that drive up the cost of the lumber to a point where it is not economically feasible to harvest the mature trees in the Forest should be abandoned.. We need the lumber. The local economy needs the jobs. Timber is a renewable crop and should be harvested.

FUEL WOOD HARVEST: Fuel wood is a valuable resource that many local residents rely on to heat their homes and cook their food. Removing the dead and diseased trees in the Forest makes the Forest healthier, removes wood that would add fuel to forest fires, and makes use of a resource that would otherwise be lost. Alternative 3 allows this harvest to take place for 2 reasons: (1) because it calls for harvesting 30 thousand cord per decade and (2) because the Roadless Area Conservation Rule does not apply in this alternative. I like that!

CONTROLLED BURNS: To protect the health of the forest, fire should be used but rarely. The public should be encouraged to remove all usable material from the forest prior to a controlled burn–mature tress for lumber, dead and diseased trees for fuel wood. In addition, the public should be educated to the value of using hardwood–chokecherry, scrub oak and maple for firewood. If the public is encouraged to clean the forest in this manner, valuable forest products will be harvested, the forest will be healthier and cleaner, and the need for controlled burns will be reduced..

HUNTING: Alternative 3 recognizes the need to "manage wildlife habitats to ensure viable and continuing populations on the Forest." That coupled with the fact the Roadless Conservation Rule does not apply allows more ready access to the game herds. Harvesting those herds is an important part of wise management both of the Forest and the wildlife. Many local residents rely on wild game for their winter food supply, and out-of-state hunters benefit the local economy.

FISHING: Under Alternative 3, the emphasis is on management. "Maintaining and restoring properly functioning condition to streams..." A well managed Forest is a healthy Forest in which streams and aquatic life can thrive.

RECREATION: The Caribou National Forest is a wonderful place for people to recreate during all seasons of the year–especially summer, fall, and winter. Clean, well-managed campgrounds, safe trails for hiking, cross-country skiing, and snowmobiling are needed as a growing population flocks to the Forests. The increasing popularity of all-terrain-vehicles creates a need for well marked trails where this activity can occur without destroying vegetation or causing erosion. Some seasonal road-closures are necessary to protect roads and fragile habitat during the spring run-off. This should be accomplished by the use of locked metal gates–not tank traps or other obstructions.

PUBLIC ACCESS: Alternative 3 allows more public access than do the other alternatives. That is good. The Forest belongs to everyone and everyone should have access to it. Proper management it needed, of course, to insure that the Forest is used but not abused.

ROADLESS AREAS: I especially like Alternative 3 because it contains fewer roadless areas than do the other Alternatives. Federal law requires that all public buildings provide access for the handicapped. Should not that law apply to our National Forests as well? Only the strong can enjoy the beauty of roadless and wilderness areas.

TANK TRAPS: Members of the National Search and Rescue Association donate their time and risk their lives in helping local sheriffs and law enforcement officers to locate and bring out the lost or injured from our National Forests. Many of these search and rescue missions are launched at night and under adverse weather conditions. The United States Forest Service should do all in its power to aid their heroic efforts. I have photographic proof that tank traps, berms, and barriers constructed of large boulders and downed trees block access to roads in the Caribou-Targhee Forest. These obstructions are a hindrance to both firefighters and search and rescue personnel. They make rescue and firefighting efforts more dangerous and less likely to succeed. I urge you to remove all such obstructions in the Caribou-Targhee National Forest–replacing them when absolutely necessary with locked steel gates.

WILDERNESS: Thank you for removing Mt. Naomi and Worm Creek from recommendation as wilderness area. The majority of my constituents want no areas designated as either roadless or wilderness. You are listening to the public, and I appreciate that. Local input is important. We want the management decisions regarding the Caribou Forest to be made locally rather than by some far-off bureaucrat.

ALTERNATIVE 3: This plan "proposes to manage the forest resources to produce goods and services to meet the needs of people." It is a good plan. I urge you to adopt it as the Forest management plan for the future.

Again, thank you for this opportunity to comment.

Sincerely,

Eulalie Teichert Langford

Eulalie Teichert Langford

Letter Number 281 - Caribou RFP

CommentCategory	Livestock grazing
Comment	In this category, I prefer the percentages allowed for grazing in alternative 35 percent to 45 percent on upland browse and 50 percent to 60 percent on upland herbaceous as compared to the 25 percent to 35 percent to 55 percent recommended in Alternative 3. In other words, allow grazing to remove up to 60 percent of the available forage. This activity improves the forest and eliminates the possibility of a build-up of dry grasses which provide fuel for catastrophic forest fires. Livestock grazing helps the forest and the local economy.
Response	The grazing standard for Alternative 7R is 45 percent for upland herbage. During the update of AMP's site specific utilization standards will be established based on site-specific conditions. Alternative 7R, the Selected Alternative in the Record of Decision, implements new livestock grazing utilization standards for uplands and riparian areas. These forest-wide utilization standards will be implemented immediately through Livestock Permittes' Annual Operating Plans. In addition, the Forest has developed an adaptive grazing protocol for determining livestock utilization levels at the site-specific level, based on site conditions. We believe these new livestock standards, guidelines, and adaptive protocol will improve livestock management on the Forest, which should result in improved rangeland and riparian conditions. The Revised Forest Plan also contains livestock monitoring that can help us improve resource conditions over time.
CommentCategory	Mining
Comment	The mining industry is essential to the local economy. By improving Best Management Practices through research and monitoring activities including reclamation and hazardous substance management, mining can occur without permanent damage to the forest. Mining companies doing business in the Caribou National Forest are spending millions of dollars to protect the environment.
Response	The social and economic section in the FEIS highlights the contribution of the mining industry to the analysis area economy.
CommentCategory	Roads
Comment	I have photographic proof that tank traps, berms, and barriers constructed of large boulders and downed trees block access to roads in the Caribou-Targhee Forest. These obstructions are a hindrance to both firefighters and search and rescue personnel. They make rescue and firefighting efforts more dangerous and less likely to succeed. I urge you to remove all such obstructions in the Caribou-Targhee National Forest - replacing them when absolutely necessary with locked steel gates.
Response	Under the recent Road Rule, Forest Service policy is is defined in FSM 7700 "to determine and provide for the minimum forest transportation system that best serves current and anticipated management objectives and public uses of National Forest System Lands, as identified in the appropriate land and resource mangement plans." Before a road is closed or decommisioned site-specific NEPA will be completed that will address the need to have the road closed or open and also the method of closure. Issues concerning existing road closures and methods of closure could also be addressed at this time if it were identified as an issue.
CommentCategory	Wildlife
Comment	Alternative 3 recognizes the need to "manage wildlife habitats to ensure viable and continuing populations on the Forest." That coupled with the fact the Roadless Conservation Rule does not apply allows more ready access to the game herds. Harvesting those herds is an important part of wise management both of the Forest and the wildlife. Many local residents rely on wild game for their winter food supply, and out-of-state hunters benefit the local economy.
Response	Economic impacts from visitor hunting activity were considered in the social and economic analysis in the FEIS. Wildlife habitat management that sustains hunting opportunities is provided for in Alternative 7R.

CommentCategory	Fisheries
Comment	Under Alternative 3, the emphasis is on management. "Maintaining and restoring properly functioning condition to streams..." A well managed Forest is a healthy Forest in which streams and aquatic life can thrive.
Response	We agree.

CommentCategory	Wilderness
Comment	Thank you for removing Mt. Naomi and Worm Creek from recommendation as wilderness areas. The majority of my constituents want no areas designated as either roadless or wilderness. You are listening to the public, and I appreciate that. Local input is important. We want the management decisions regarding the Caribou Forest to be made locally rather than by some far-off bureaucrat.
Response	The selected alternative in the Record of Decision recommends portions of Mt. Naomi for wilderness. Current summertime access will not change and snowmobiles will be allowed within the current closure area. Worm Creek has been dropped for recommendation in this alternative; however, a "Special Area" management prescription has been applied that will protect the areas existing unique characteristics and also allow existing recreation uses to continue. The Forest Service is required to evaluate potential areas on the Forest for recommendation into the National Wilderness Preservation System. Appendices C and R in the final EIS provide a discussion of the criteria, considerations, and findings of this evaluation.

CommentCategory	Timber Harvest
Comment	Fuel wood is a valuable resource that many local residents rely on to heat their homes and cook their food. Removing the dead and diseased trees in the Forest makes the Forest healthier, removes wood that would add fuel to forest fires, and makes use of a resource that would otherwise be lost. Alternative 3 allows this harvest to take place for 2 reasons: (1) because it calls for harvesting 30 thousand cord per decade and (2) because the Roadless Area Conservation Rule does not apply in this alternative. I like that!
Response	An annual personal use firewood program open to the public is a major objective of timber management on the Forest, as listed in the Revised Forest Plan, Chapter 3, Commodity Resources, Timber Management. Availability of wood may vary by year and Ranger District since the program is usually dependent on the amount of dead wood available and its accessibility. Some Districts offer green aspen under this program. Please check with the individual District if interested in firewood gathering.

CommentCategory	Recreation
Comment	The Caribou National Forest is a wonderful place for people to recreate during all seasons of the year - especially summer, fall, and winter. Clean, well-managed campgrounds, safe trails for hiking, cross-country skiing, and snowmobiling are needed as a growing population flocks to the Forest. The increasing popularity of all-terrain-vehicles creates a need for well marked trails where this activity can occur without destroying vegetation or causing erosion. Some seasonal road-closures are necessary to protect roads and fragile habitat during the spring run-off. This should be accomplished by the use of locked metal gates - not tank traps or other obstructions.
Response	The method of closure for roads and trails will be decided during site-specific travel planning, which will be initiated after the plan revision process.

CommentCategory	Recreation
Comment	Alternative 3 allows more public access than do the other alternatives. That is good. The Forest belongs to everyone and everyone should have access to it. Proper management is needed, of course, to insure that the Forest is used but not abused.
Response	In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	Recreation
Comment	I especially like Alternative 3 because it contains fewer roadless areas than do the other Alternatives. Federal law requires that all public buildings provide access for the handicapped. Should not that law apply to our National Forests as well? Only the strong can enjoy the beauty of roadless and wilderness areas.
Response	Handicapped, elderly or physically challenged people can recreate in a variety of ways, just as all of us have specific things we can do and specific things we cannot do. This group of peoples' preferred outdoor recreation activities are not limited to motorized recreation. Many people of all abilities enjoy motorized road and trail use, and restricting some forest areas to OHV use by Forest Plan prescription and/or Forest Travel Plan does not violate the intent or spirit of the Americans with Disabilities Act. Federal laws, regulations, and policies that apply to Federal agencies, including Section 504 of the Rehabilitation Act of 1973, as amended, do not require areas restricting or prohibiting OHV/ATV use for all people to make exceptions to such use because a person has a disability. An exception is the use of a wheelchair, including battery-operated chairs that meet the legal definition, which may be used wherever foot travel is permitted. The Forest is working towards improving the accessibility of facilities, developed areas, and programs for all types of visitors. The agency uses the design guide, "Universal Access to Outdoor Recreation" to help provide different levels of access depending on the development level of a recreation area or activity. The agency is also working toward improving and updating these guidelines. (See Forest Service WO letter of Feb.21, 2002 under 2350/1700/7710 file code, giving OGC's opinion on this issue). In Alternative 7R, the Selected Alternative, snow-free motorized use will be allowed only on designated routes on 97 percent of the Forest. Snow-free, cross-country use will be allowed on 3 percent of the Forest. This is a change from the current situation where cross country motorized travel is allowed on about 40 percent of the Forest. In Alternative 7R, motorized route density standards are applied by management prescription area. In general, the motorized road and trail network will closely resemble the current network. In order to meet route density standards, approximately 40 miles of roads and/or trails would have to be closed. The actual network would be determined during site-specific travel planning. The Revised Forest Plan includes an objective to initiate this within three years of signing the Record of Decision. This more site-specific process will involve additional public involvement in determining a balance of motorized and non-motorized recreation experiences for both summer and winter. Several areas currently non-motorized have been designated as such to preserve this experience. These Non-motorized Recreation and Wildlife Security management prescription areas (Rx 3.1(a,e)) are located throughout the Forest. In addition, retention of primitive and semi-primitive recreation opportunities and backcountry hunting experiences will be a management emphasis in the Caribou Range Ecological Subsection (Plan, Chapter 4, Ecological Subsections). Retention of roaded natural and semi-primitive recreation opportunities near the urban center of Pocatello will be a management emphasis in the Portneuf Uplands and Basin and Range Ecological Subsections. In the snow season, the majority of the Forest is open to snowmobile use in Alternative 7R. Several areas have been closed to winter motorized use in response to public comments. For instance, many people were concerned with snowmobile use along the yurt trail outside of Pocatello. To protect this backcountry winter recreation experience, the northwestern portion of Toponce will be closed to winter motorized travel. In addition, the backside of Pebble Creek Ski area, Bear Creek, and Meade Peak will all be managed as non-motorized year round. Other areas of non-motorized winter use are available, including the existing non-motorized use areas in Mink Creek just outside Pocatello and the Trail Canyon area outside of Soda Springs. In big game winter range (Prescriptions 2.7.1 and 2.7.2), motorized snow season use is restricted to designated routes. In Alternative 7R, approximately 60,000 acres or 6 percent of the Forest would be non-motorized in the winter. Because winter non-motorized recreation activities generally occupy a small land area, these "needs" are best met at the local level. Thus, the Plan contains an objective to consider additional areas for a non-motorized winter setting during the travel planning process. Management in the Portneuf Uplands Ecological Subsection will emphasize, among other things, non-motorized winter recreation opportunities, including alpine skiing. For more discussion and comparison on proposed management of motorized use by alternative, see the FEIS, Chapters 3 and 4, Issue 1: Recreation, Access, and Scenery Management.

CommentCategory	Timber Harvest
Comment	Alternative 3 finds 150,400 acres of the Caribou Forest suitable for timber harvest with an estimated yield of 67 million board feet of lumber during the first decade. Harvesting mature trees improves the health of the forest, provides jobs, and uses a valuable natural resource. Timber harvesting should be encouraged in the Caribou National Forest. Restrictive management practices that drive up the cost of the lumber to a point where it is not economically feasible to harvest the mature trees in the Forest should be abandoned. We need the lumber. The local economy needs the jobs. Timber is a renewable crop and should be harvested.
Response	Alternative 7R (Forest Service Preferred) describes a Total Sale Program Quantity of 51 MMBF for the first decade of the Revised Forest Plan. This includes an Allowable Sale Quantity (ASQ) of 27 MMBF of conifer saw timber from capable, suitable lands, primarily to supply wood products. Approximately 25% of this volume is planned to come from inventoried roadless areas. This alternative also proposes harvest of an additional 12 MMBF of conifer saw timber for wood products (from lands with prescriptions emphasizing aspen restoration), approximately 3 MMBF of aspen harvest and 9 MMBF of firewood (primarily dead standing conifer within 300 feet of an open road). The ASQ is determined on the principal of non-declining flow for a 100 yr. period on about 84,000 acres of forest land. These lands are capable of sustaining timber harvest with a specific set of harvest prescriptions based on stand conditions. We are also proposing felling of an additional 5,200 acres of mature aspen and applying prescribed fire on 10,600 acres of aspen and 4,800 acres of conifer for aspen restoration. We also intend to precommercially thin about 3,600 acres with Alternative 7R.
CommentCategory	Alternative 3
Comment	Having carefully studied Alternative 7 offered by the Forest Service for the management of the Caribou National Forest, I find that in most cases Alternative 3 offers the best management plan to meet the needs of my constituents, and I urge you to incorporate the principles expressed in that alternative into the management of the Caribou National Forest.
Response	Alternative 3 emphasizes commodity production, makes no wilderness recommendation and rescinds the 1985 Forest Plan wilderness recommendation, and allows active management in the Forest's roadless areas. Its effects were analyzed and disclosed in the EIS. Counting the number of times a particular comment (or type of comment) was made represents the relative popularity of an observation or an opinion – but not its substance in regard to the analysis. A high percentage of the total body of comment letters received on the Draft EIS and Draft Forest Plan consisted of form letters, both for or against a certain desired outcome. Each of the alternatives represents a course of action for future management of the Forest that addresses the public's issues and concerns to varying degrees. Environmental effects of each alternative were analyzed in the EIS and displayed. Some alternatives, like Alternative 3, are more responsive to vegetation conditions and commodity uses, while others are more responsive to watershed condition, recreation use, or wildlife concerns. Alternative 7R, the Selected Alternative in the Record of Decision, includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R). This alternative was developed in response to comments and includes components of other alternatives, including Alternative 3. For example, Alternative 3 and Alternative 7R have similar livestock utilization standards, similar mining standards and guidelines, and both alternatives allow timber harvesting in Inventoried Roadless Areas to varying degrees. In regards to the Roadless Area Conservation Rule, the Deciding Officer will determine how to address this issue in the Record of Decision. Regardless of the outcomes of the lawsuit and rulemaking process, the Forest will continue to comply with current policy. The Deciding Officer can choose any of the alternatives or a combination of them. The Record of Decision associated with this EIS identifies the Selected Alternative the Deciding Officer will implement and discloses the rationale for the selection.

Letter 289

JIM GERINGER
GOVERNOR

State of Wyoming
Office of Federal Land Policy
Art Reese, Director

August 31, 2001

Jerry Reese, Forest Supervisor
Caribou National Forest
250 South 4th Avenue
Pocatello, ID 83201

Dear Mr. Reese:

On behalf of the State of Wyoming, this office has reviewed the referenced document. We also provided the document to all affected state agencies for their review, in accordance with State Clearinghouse procedures. Enclosed you will find a letter from the Wyoming Game and Fish Department which resulted from their review. State agency comments are specific to their respective agency missions. While the State defers to their technical expertise in developing the State's position, the responsibility to ultimately articulate the official balanced, unified State policies and positions lies with the Governor or the Office of Federal Land Policy.

It appears you have largely addressed the comments submitted previously by the Game and Fish Department, we appreciate your doing so. This office reviewed the executive summary of the Environmental Impact Statement thus we know that it is an abbreviated document. We hope that you discussed oil and gas exploration and development in the full document per our comments submitted to you on October 15, 1999.

Please continue to provide this office with either two hard copies or electronic copy (submit to OFLP@state.wy.us) of continued information for review and distribution to interested agencies. Thank you for the opportunity to comment.

Sincerely,

Julie L. Hamilton
Assistant Program Administrator

Enclosure
cc: Lincoln County Commissioners
Wy. Game and Fish Department

Herschler Building, 1West ◆ 122 West 25th Street ◆ Cheyenne, Wyoming 82002-0060
Phone (307) 777-3736 ◆ Fax (307) 777-3524
OFLP@state.wy.us

Letter Number **289 - Caribou RFP**

CommentCategory	Oil and Gas Leasing
Comment	We hope that you discussed oil and gas exploration and development in the full document per our comments submitted to you on October 15, 1999.
Response	Oil/gas leasing is not analyzed in the Revised Forest Plan. Additional environmental analyses will be required prior to any oil/gas leasing.

Letter 308

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

IN REPLY REFER TO:

August 23, 2001

ER 01/416

Mr. Jerry B. Reese, Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Dr.
Idaho Falls, ID 83401

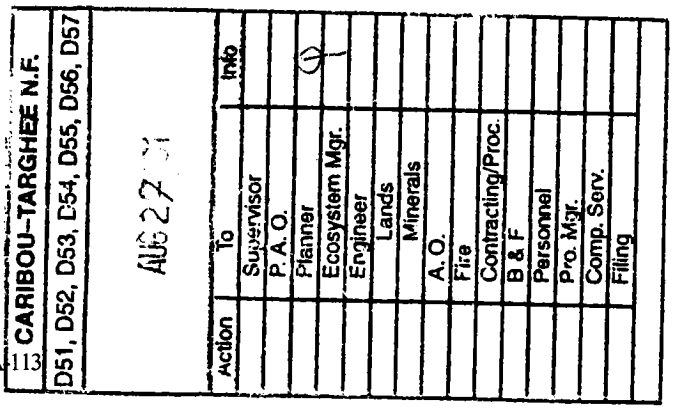
Dear Mr. Reese:

The Department of the Interior reviewed the Draft Environmental Impact Statement for the Caribou National Forest Draft Revised Plan, Caribou-Targhee National Forest. The Department does not have any comments to offer.

We appreciated the opportunity to comment.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer



Letter Number 308 - Caribou RFP

CommentCategory	Comment Noted
Comment	The Department of the Interior reviewed the Draft Environmental Impact Statement for the Caribou National Forest Draft Revised Plan, Caribou-Targhee National Forest. The Department does not have any comments to offer.
Response	Thank you.

Letter 396

WYOMING
GAME AND FISH DEPARTMENT

Jim Geringer, *Governor* | John Baughman, *Director*

"Conserving Wildlife —Serving People"

August 2, 2001

WER 2581
Caribou-Targhee National Forest
Draft Environmental Impact Statement and the
Draft Land and Resource Management Plan for the
Caribou National Forest
State Identifier Number: 2000-148

Art Reese, Director
Office of Federal Land Policy
Herschler Building, 1W
122 W. 25th Street
Cheyenne, WY 82002

Dear Mr. Reese:

These comments regarding the Draft Environmental Impact Statement and the Draft Land and Resource Management Plan for the Caribou National Forest have been approved by the Director and are specific to this agency's statutory mission within State government which is "Conserving Wildlife, Serving People". In that regard these comments are meant to, in association with all other agency comments, assist in defining the Official State Position. These comments defer to and are subordinate to the Official State Position.

The current Caribou National Forest Land and Resource Management Plan was implemented in 1985. This Executive Summary describes a series of seven alternatives that provide for future management.

The Forest completed the revision using primarily the 1982 Planning Regulations, while incorporating some of the approaches in the new (November 2000) regulations that are currently being reviewed.

We provided extensive written comments to the Draft Environmental Impact Statement in September 1999. Our review of the recently issued Executive Summary and the seven management alternatives described in this document indicate that the issues we identified in our September 1999 letter relative to maintenance of viable and ecologically sound wildlife

These comments are reflective of a specific agency mission only. These comments defer to and are subordinate to the Official State Position.

Headquarters: 5400 Bishop Boulevard, Cheyenne, WY 82006-0001
Fax: (307) 777-4610 Web Site: http://gf.state.wy.us

populations and habitat would best be addressed by Alternative 7 (the USFS Preferred Alternative).

Sincerely,

Bill Wichers

BILL WICHERS
DEPUTY DIRECTOR

BW:TC:as

These comments are reflective of a specific agency mission only. These comments defer to and are subordinate to the Official State Position.

Letter Number **396 - Caribou RFP**

CommentCategory	Alternative 7
Comment	Our review of the recently issued Executive Summary and the seven management alternatives described in this document indicate that the issues we identified in our September 1999 letter relative to maintenance of viable and ecologically sound wildlife populations and habitat would best be addressed by Alternative 7 (the USFS Preferred Alternative).
Response	All alternatives meet basic stewardship responsibilities and legal requirements governing management of National Forest System lands (36 CFR Secs. 219.13 through 219.27). Between issuance of the DEIS and the FEIS, the Forest formulated a new alternative, Alternative 7R, in response to public comments. Alternative 7R is very similar to Alternative 7 but was modified in several key ways. Alternative 7R allows commodity resource production within the capabilities of the land and forest management resources. The DFC's are essentially the same as in Alternative 7 but the Plan emphasizes activities in key areas in order to "make a difference" in specific community types. Vegetation treatment emphasis is on aspen restoration, big game winter range improvement, and fuel reduction in the wildland urban interface. To address public comments regarding wildlife corridor protection and riparian resources, the Plan includes more direction. Through application of management emphasis items, priority is given to restoration and protection of wildlife and fisheries resources in critical Ecological Subsections (Plan, Chapter 4, Ecological Subsections). Alternative 7R also includes a re-evaluation of the Forest's Inventoried Roadless Areas (IRAs) and provides comprehensive findings and decision rationale for the application of management prescriptions within the IRAs. (See Appendix R). Alternative 7R was chosen by the Deciding Officer and the rationale for his decision is displayed in the Record of Decision.

Letter 573

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECO-088

NOV 2 2001

Jerry B. Reese, Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Dear Mr. Reese:

We have reviewed the draft environmental impact statement (EIS) for the **Caribou National Forest Draft Revised Forest Plan**. We reviewed it in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309, independent of NEPA, specifically directs the Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements. For further explanation of our EIS review responsibility, please refer to *EPA's Section 309 Review: The Clean Air Act and NEPA* which was enclosed with our scoping comments of October 4, 1999.

Based on our review, we have rated the draft EIS, EC-2, Environmental Concerns, Insufficient Information. Enclosed is an explanation of the EPA rating system. This rating and a summary of the comments will be published in the Federal Register. The EIS is weak in a number of areas.

- This forest plan EIS needs to be more focused on cumulative effects than direct effects. The EIS needs to evaluate for each resource of concern its current condition, and for those resources outside the historical range of variability (HRV), describe past conditions and what has transpired to move the resource outside of HRV. The alternatives should be focused on describing how resources will be managed differently to achieve desired future conditions.

- It appears that the forest plan will not be successful in shifting the insect and fire hazards back to within historical range of variability. In addition, the EIS needs to provide explanations of the varying levels of success for each of the alternatives.

99-063-AFS
CEQ # 010127

- The Affected Environment sections discuss generically environmental impacts on a resource or by an activity and are not specific to the alternatives being considered for the Caribou National Forest. See particularly the section for Riparian/Wetland Areas, Aquatic Habitat, and Water Quality.

- The differences among the alternatives are described narratively with a theme such as wilderness, restoration, wilderness, recreation, etc. However, it is difficult to tell what specifically is occurring under each alternative that justifies the label.

- The EIS lacks information that would show how mining operations will prevent further amounts of selenium from entering the environment.

- Suction dredge and placer mining should be allowed under the General Mining Law of 1872 only if they meet tests of economic validity. Recreational forms of mining should not be an activity covered under the General Mining Law of 1872 and therefore subject to all environmental requirements as would be any other activity that degrades streams.

- No discussion of how the forest plan is consistent with the *Interim Air Quality Policy on Wildland and Prescribed Fires.*

- The Livestock Grazing chapter does not discuss the impacts grazing has had on the environment nor how the alternatives will impact the environment.

Attached are detailed comments that, if addressed, will help clarify the environmental issues and differences among the alternatives. We thank you for the opportunity to review and offer comments on this project. If you have questions, please contact me at (206) 553-6911 or Andy Smith at (206) 553-1750.

Sincerely,

Judith Leckrone Lee, Manager
Geographic Implementation Unit

Enclosures

Environmental Protection Agency (EPA) Detailed Comments on the Draft EIS for the Caribou National Forest Draft Revised Forest Plan

Cumulative Effects

Cumulative effects should be an overarching theme of any programmatic EIS. In fact, cumulative impacts should be the very heart of a Forest Plan because resources are examined at many different geographic, temporal, and cross-cutting scales. Forest plans are intended to manage the resources in a sustainable fashion over the next 10 to 15 years and to restore other resources that have degraded beyond some acceptable threshold. Forest Plans address water quality, endangered species, old growth, roadless areas, air quality, habitat, recreation, and others which are issues driven by cumulative impacts.

This EIS needs to be more clear on what is happening with resources in a cumulative fashion. For those resources that are degraded, the EIS should explain what has occurred on the landscape to cause the degradation and what will be done differently under each alternative to restore the resources. It appears that degradation and restoration are determined by proper functioning condition (PFC) and desired future condition (DFC). These concepts need to be defined and discussed in the EIS.

Cumulative impact discussion at a programmatic level is critical because cumulative impact concerns will also be an important consideration at the project-specific level. A good cumulative effects analysis done at a programmatic level would preclude having to repeat the analysis for each project that tiers off the Forest Plan EIS. Instead each project could update the cumulative effects analysis. In addition, cumulative impacts would be better monitored if a dynamic link is maintained between the Forest Plans and each EIS or EA. The update should serve to reassure the reviewers of site-specific NEPA documents that the resources are being used or managed in a sustainable fashion and within the context of a broader plan.

With project-specific EIS, the analysis for direct, indirect and cumulative impacts tend to be progressively more difficult. However, for programmatic EISs the reverse is true. Cumulative impact analyses are a natural fit for programmatic EISs which consider trends and sustainability in the long term.

The Council on Environmental Quality (CEQ) NEPA regulations state that EISs shall consider direct, indirect, and cumulative impacts. However, Federal agencies have found that doing an effects analysis for cumulative impacts has been the most challenging of the three impacts to be considered. Consequently, CEQ published in January 1997, *Considering Cumulative Effects Under the National Environmental Policy Act*, a guidance that provides a framework for analyzing cumulative effects.

Following the CEQ guidance, EPA issued guidance on how we are to provide comments on the assessment of cumulative impacts. The guidance, *Consideration of Cumulative Impacts in*

EPA Review of NEPA Documents, was enclosed with our scoping comments on October 4, 1999. It can also be found on EPA's Office of Federal Activities home page at: es.epa.gov/oeca/ofa/cumula.html. In short, the guidance states that in order to assess the adequacy of the cumulative impacts assessment, EPA reviewers should consider five key areas of information. They can be considered by asking if the cumulative effects analysis:

1. identifies resources that are being cumulatively impacted (If there are none, then it should state this.);
2. determines the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and will occur;
3. looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
4. describes a benchmark or baseline;
5. includes scientifically defensible threshold levels.

Ecosystem Management

It does not appear this forest plan will be successful in addressing fire and insect hazards under almost all of the alternatives even after 100 years of implementation according to Table 4.21. Only Alternative 4 shows some improvement in forested vegetation but worsening in non-forested vegetation. The EIS needs to characterize the environmental impacts with a qualitative discussion of what is happening on the landscape. This can be done by providing an explanation of the hazard level changes and context to what these changes mean. For almost all the alternatives, the hazard levels stay the same or get worse in the long term (100 years). Rather than just repeat in narrative form what is readily apparent in a table, the EIS should also explain why the alternatives have different results.

The discussion under the Disturbances section describes how forested and non-forested lands (resource of concern) are threatened by insects and wildfires and are now at low to moderate levels of departure from historical conditions. This condition has been brought about cumulatively over time and space by fire suppression (pp. 3-54 - 3-57). The EIS notes that historically 1.9 to 3.6 percent of the forest land would normally be affected by fire. However, effective fire suppression has resulted in an annual rate of 0.1 percent since 1970 (Please note the discrepancy on page 3-56).

The section can be improved in two ways. First, we suggest that the entire section be characterized as a cumulative effects analysis. It is labeled under Direct and Indirect Effects but it should more properly be considered cumulative effects. As stated earlier, most of the environmental impacts considered in a programmatic EIS more naturally can be discussed as cumulative effects rather than force-fitting them as direct or indirect impacts.

Second, some sections discuss both the forested and non-forested lands together. While this is fine, the logic would be clearer if the discussions were kept to separate paragraphs. Discussion with rationale applicable on forested lands should not end with conclusions drawn for both land types. The discussion on Insect Hazard and Wildfire Hazard on page 3-56 is one example. Page 3-55 discusses the percent of forested lands that was historically and naturally disturbed by wildfire. This is compelling argument for the need for more burns on forested lands. However, similar rationale is needed on the historical fire regime of the non-forested lands.

This discussion should be improved by describing a benchmark such as Historical Range of Variability (HRV). The EIS needs to begin by being clear on what is meant by low, medium, and high hazard levels. Are these levels of departure from HRV (see page 3-57) or levels of risk? That is, a low level of departure from HRV would be a departure nonetheless and still outside DFC. Or, a low hazard level may just be a low risk of wildfire. We presume the latter, but this needs to be made clear.

If the latter is the case, then the EIS needs to be clear about what hazard level is within HRV. The EIS should clarify that if the hazard level is low, does that mean that generally the severity of the fire is low across the landscape, the risk of fire is low, or both? The EIS should discuss what the hazard level was historically for both insect and wildfire. This would serve to tell the readers as to how close each alternative gets to success when examining Tables 4.19 and 4.21. The HRV values should be included in the tables as well as the baseline indicators from page 3-53.

Riparian/Wetland Areas, Aquatic Habitat, and Water Quality

The EIS is weak in describing the environmental consequences of each alternative. For example, in the discussion of Issue 6 (Riparian/Wetland Areas, Aquatic Habitat and Water Quality) under Environmental Consequences section, the EIS uses generic language to explain impacts that occur from activities such as timber harvesting, grazing, mining, and roads. Generic language more appropriately belongs in the Affected Environment section followed by language which specifically explains what is occurring on the landscape from the activity of concern. For example, if there is generic discussion on roads which describes how roads can affect water quality, then this should be followed by specific discussion of how applicable these road issues are to the Caribou and to what degree roads have been impacting the Caribou. This discussion should be placed in the Affected Environment and not the Environmental Consequences section.

The Environmental Consequences section does not show the environmental consequences of each alternative in the Riparian/Wetland Areas, Aquatic Habitat and Water Quality discussion. We leave it to the Forest Service to examine and ensure that the other sections clearly present the environmental consequences and avoid the use of generic language in the Environmental Consequences sections.

We thought that Tables 4.41 - 4.51, which compared the relative potential of each of the alternatives for the activities of concern, were useful. They should all be pulled together and perhaps included in the Comparison of Alternatives table. However, to improve this portion of the Environmental Consequences section, discussion should be added to give the reader a better understanding of the information the tables are presenting. The EIS should explain how each of the watershed disturbance activities would be managed differently under each of the alternatives to warrant the different relative ratings. For example, how is timber harvesting to be managed under Alternative 7 to warrant a potential watershed disturbance rating of 4 as compared to Alternative 4 which will have a rating of 3? Additionally, the discussion needs to characterize the significance of the ratings. In some cases, the differences among the ratings may be negligible while in others they may be significant.

According to Table 3.35 there are 19 streams listed as impaired under Section 303(d) of the Clean Water Act. This EIS needs to discuss what activities have occurred on and off Forest Service land to cause these streams to be degraded and what would be done under each of the alternatives to restore these streams. Table 3.35 should be expanded to included the pollutant for which each stream is listed. The discussion in the EIS on page 3-122 does generically acknowledge problems that have contributed to degradation of these streams. However, we believe specific discussion needs to be provided for each stream as to the causes of impairment.

We believe that the best approach is to discuss the *Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters*. This important policy provides a consistent approach for addressing Clean Water Act responsibilities on Forest Service (and BLM) administered lands. Application of the protocol provides assurance that federal management activities in watersheds with 303(d)-listed water bodies will proactively and collaboratively contribute to the restoration of water quality and support Idaho's development and implementation of TMDLs. The EIS should explain the purpose and intent of the *303(d) Protocol*, what it calls for land managers to do, and how the *303(d) Protocol* will be applied.

One purpose of the *303(d) Protocol* is to support the state of Idaho's development of TMDLs through early development of Water Quality Restoration Plans (WQRPs). It appears from the discussion on pages 3-121 -- 3-122 that TMDLs have not been prepared. The EIS should be explicit on this so the reader is clear where IDEQ is in the TMDL process. Even if a TMDL has been developed for a stream, a WQRP may still be in order. This is because the TMDL may have only allocated the pollutant loadings that need to be reduced to meet water quality standards to each of the sources but may not have specified how.

A WQRP includes six common elements, which should be explained in the EIS:

1. Condition assessment and problem description
2. Goals and objectives
3. Management actions to achieve objectives

4. Implementation schedule
5. Monitoring/evaluation plan
6. Public participation plan

Another objective of the *303(d) Protocol* is to validate the 303(d) stream listing. The EIS states on page 3-121 that turbidity data have been collected for the past few years and no violations of state criteria have been noted. However, the EIS does not say if any of these streams were those listed on Table 3.35. If they were, there needs to be some discussion on how this will be reconciled. The *303(d) Protocol* would call for this type of validation to be done for all 19 of the 303(d)-listed streams.

Vegetation

The discussion on vegetation is unclear on the need for action. Many of the National Forests in the Columbia River Basin have raised the concern that some forests are outside HRV. This is due to past practices such as selective harvesting of more valuable early seral and fire tolerant species such as Ponderosa Pine and White Pine; suppressing of natural wildfires allowing shade tolerant trees that are not fire resistant, such as Douglas-fir, to take over; constructing too many miles of roads in a watershed and in poor locations; harvesting trees too near to riparian areas; among other practices. The result of this has been degradation of water quality and habitat for fish and wildlife. Many Forests have acknowledged these issues and have taken steps to restore conditions.

It appears that the Caribou National Forest has a different history from the other national forests in the Columbia River basin. However, this history is not well told. The EIS is not clear on what resources are being significantly impacted, why, and how and to what degree degraded resources will be restored under each alternative. Has logging been taking place on the Caribou National Forest? Has it had any negative impacts? Has logging been occurring at a sustainable rate? Depending on the answers, the EIS would then explain what will be done differently if anything at all. A discussion of this fashion would essentially be a cumulative impact analysis which is what a forest plan should be.

Much of the controversy that surrounds a timber sale is not the sale itself but is driven by the cumulative impacts of all activities, federal and otherwise, that has happened and will happen in that forest and, indeed, across the region. A well written Forest Plan EIS which describes the "state of the forest" covering points such as those listed above, would help defuse the controversy on the site specific EISs.

"PFC assessment identified four vegetation cover types that are at a high departure from properly functioning condition: subalpine fir, aspen, juniper, and tall forbs." This statement on page 1-16 needs to be followed by an explanation of why this high departure has come about. Is this natural succession or has human activity (fire suppression) unduly influenced the natural

course of events? Is the goal of the Forest Service to keep the Caribou National Forest in a static state reflecting conditions found on the landscape from the early 1900s? If humans had not intervened in the area, what would the landscape look like 100 years hence?

Beginning on page 3-58 is further discussion on the various forest vegetation. What brought about the high departure is not too clear. In addition, the discussion seems to say that other trees such as Douglas-fir, Limber Pine, and Lodgepole Pine are at high departure as well. Approximately, 60 to 70% of the Douglas-fir are mature and old age classes. The EIS is not clear if this is preferable or not. However, the EIS was clear that due to lack of fire, there is a higher tree density and fuel buildup. These trees are likely not to be able to withstand the next fire. Thus, it would appear the Douglas-fir should be included among those trees that are at high departure from proper functioning conditions (PFC).

The same can be said about mixed conifer stands which apparently are now highly susceptible to stand-replacing fires. Thus, is this another vegetation cover that should be included among those trees that are at high departure from PFC?

There appears to be a discrepancy where one sentence on page 3-62 states that lodgepole pine has been intensively managed on the forest through harvest. We understand "intensively managed" to mean high amounts of logging. But on the following page the EIS states mixed conifers have gained considerable acres from the lodgepole pine through natural succession. If the first statement is true then it would seem that the acres of mixed conifer have not grown solely due to natural succession.

To correct the situation for conifers, the EIS proposes to introduce disturbance (prescribed fires and logging?) that would increase the amount of early- and mid-seral stages to improve biological diversity. The EIS should briefly describe how logging and prescribed fires will increase early- and mid-seral stages. Explain how much of each activity will be used, because each carries its own environmental advantages and disadvantages.

The differences among the alternatives are sometimes unclear. Some of this is due to different wording used to describe the themes and the ten resource conditions or issues discussed under each alternative. For example, the themes for Alternatives 2, 4, 6, and 7 each propose different goals but they seem to be saying the same thing:

- to manage forest resources to attain a range of DFCs (Alt-2)
- to restore ecosystem processes that function properly in the long term (Alt-4)
- to emphasize ecological enhancement and restoration on the forest (Alt-6)
- to attain the DFC (Alt-7)

Since they seem to mean the same thing, it is not clear if there is any difference among the goals.

In the discussion on the Timber Sale Program, Alternatives 6 and 7 both seem to say that if logging is the tool of choice to restore PFC, any commercial logs gathered in the process will simply be a "by-product" of the restoration efforts and not the primary purpose and need of the project. The difference then, between Alternatives 6 and 7, seem to be that more land (wilderness and inventoried roadless areas) will be deemed unavailable to active restoration efforts (i.e., logging) under Alternative 6.

In the remaining area, logging would be used only when no excessive damage would be done to other forest resources such as wildlife habitat, old growth forests, water quality, and recreation. But by stating this in Alternative 6 and not in Alternative 7, the reader is left wondering if there is a difference in how logging will be conducted under the two alternatives. Is excessive damage to be allowed under Alternative 7 since it is silent on this aspect? There may be no differences in how logging will be conducted, but because of different wording the reader is uncertain.

Another example is that Alternative 7 allows restoration efforts in unsuited lands but only to achieve ecological objectives. Is there a difference in meaning between achieving ecological objectives under Alternative 6 and restoring PFC under Alternative 7? Also, we presume unsuited lands are wilderness and roadless areas. If not, please clarify the meaning of unsuited lands.

We recommend a careful review of the descriptions for each alternative to ensure consistent wording where actions are the same. Where actions are different emphasize that difference with different wording and additional explanation. Or have a section which discusses the differences among the alternatives.

Since logging will be used where needed to restore PFC, we assume this tool can only be used where logging is economically viable. What will happen with those areas that cannot be logged economically? How will they be restored to properly functioning conditions? Once properly functioning conditions are restored, what will this mean in terms of further logging? Will further logging be needed? Will the amount of logging drop off? Under Alternative 6, what will happen to those lands unsuited for logging but are not in PFC if no logging is carried out? These questions can better be answered by explaining what is meant by PFC and describing the scenario of how the land will be managed once it is in PFC.

Is there a way for the forest plan to encourage the use of horse logging techniques? While we understand goals likely cannot be met solely through the use of horse logging, it can contribute to the overall goals while providing jobs for the local economy with minimal impact to the environment.

Noxious Weeds

According to the draft EIS (pp 3-204 -- 3-205), the expansion of noxious weeks is outpacing the existing containment and control efforts for some species of weeds, posing a potential risk for loss of biological diversity. To address this issue, the Caribou National Forest plans to revise the current direction for management of noxious weeds. We believe the Revised Caribou Land and Resource Management Plan should incorporate the use of integrated pest management methods to minimize the adverse effects of herbicides and insecticides to human health and the environment. We agree with the program outlined in the Caribou Draft Revised Forest Plan and ask that our suggestions and comments be addressed and incorporated into the final Forest Plan. The following comments are in regard to the Forest Plan.

Desired Future Condition

We are pleased that ecologically sound methods of controlling noxious weeds will be applied across the Caribou National Forest because forest practices have a wide impact to the health of the whole ecosystem and one of the overall goals of the state and federal environmental agencies is to sustain and advance the condition of native plant species.

Goals

We support the stated goal of using an integrated pest management strategy to control noxious weeds. We are also pleased that the known noxious weed species have been identified in Table 3.59 of the draft EIS. Identifying the known noxious weed species of concern is a critical element in the integrated pest management approach. Because the noxious weed species may change yearly, we encourage the Caribou National Forest to establish a program to continuously detect and monitor noxious weed infestation.

Standards

Prevention is one of the major components of an effective integrated pest management strategy. We are pleased to see that the Caribou National Forest identified prevention strategies, such as the use of certified weed-free hay and seeds and the use of borrow sources that are not infested with noxious weeds. We hope that an integrated pest management strategy will also be used on controlling the spread of noxious weeds on borrow sources. Moreover, we would like to see more discussion on other prevention strategies, such as promoting revegetation with native plant species.

In addition to an aggressive prevention program, a fully integrated pest management strategy to noxious weed control must include an education program that would provide the greatest long-term protection of vegetative community integrity. We recommend that the Caribou National Forest emphasize education and cooperation with recreation user groups and inform and/or educate other people that may be potentially affected by any herbicide or

insecticide application, including but not limited to workers, campers, hikers, fishers, and hunters.

Guidelines

We hope that the integrated pest management strategy for the Caribou National Forest will address the use of chemical, biological and cultural control methods, with the preference for the method that will least likely adversely affect human health and the environment. If insecticides or herbicides are applied, the applicators should minimize impacts on non-target species, such as avoiding the use aerial or broadcast methods. However, EPA realizes that there are terrain or weed conditions where aerial or broadcast spraying is the only feasible approach. Under these circumstances, EPA urges the Caribou National Forest to restrict the use of aerial and broadcast methods as much as possible to avoid deleterious effects on non-target plants and wildlife. In choosing a control method, the Caribou National Forest should consider both short-term and long-term effects.

Because pesticides are manufactured chemicals of varying toxicity, we believe that they are better not introduced to the wilderness environment. Furthermore, to uphold the intent of NEPA to, "avoid or minimize adverse effects of these actions upon the quality of the human environment"(40 CFR §1500.2(e)), we feel that herbicides and insecticides applications should be viewed as appropriate only when they are the least likely to adversely affect human health and the environment.

We are pleased to see that the Caribou National Forest will wash vehicles and equipments exposed to noxious weeds. Human activities associated with vehicles and roads are the largest sources of weed propagation. Practices such as incorporating weed prevention into travel management, road layout, design and alternative evaluation are consistent with NEPA's requirement to avoid or minimize any adverse effects (see 40 §CFR 1500.2(f)). We suggest that the Caribou National Forest establish a program to continuously identify the activities that are likely to cause noxious weed expansion and the locations of susceptible infestation areas.

Minerals and Geology

EPA has reviewed the minerals and geology sections in the Revised Forest Plan and accompanying EIS. EPA's comments are largely directed toward phosphate mining which dominates the mining scene in the Caribou National Forest. We also raise comments about less prominent placer and suction dredge operations.

General Comments for Phosphate Mining

Selenium impacts have been identified as a significant issue at active and inactive phosphate mines in southeast Idaho. To address these impacts, EPA has joined a number of

federal and state agencies to work cooperatively and develop a conceptual approach to mitigate releases using various legal authorities including the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, also known as Superfund). EPA participated in developing this conceptual approach and supports its implementation. The agencies are now in the early phase of applying this approach at individual mine sites to mitigate impacts. We expect a dozen or more large mine sites in southeast Idaho (including inactive portions of the Smoky Canyon Mine) will need to be cleaned up and will take many years to complete.

We believe that the Forest Service and others have helped to significantly improve mining practices employed at phosphate mines. Current mine practices at most mine sites have significantly reduced selenium mobility and exposure compared to previous mining methods by backfilling pits, segregating waste rock, and placing clean cover material over seleniferous waste rock. In addition, technical analysis and discussion of impacts has improved in recent EISs which have assessed the effects of expanding existing phosphate mines. For example, the hydrogeologic and geochemical analysis in the draft EIS for the proposed Smoky Canyon Mine expansion used appropriately conservative assumptions and empirical data where available.

Problems associated with phosphate mining in the area, however, still remain. Data collected at various mine sites over the past three years document releases of selenium at levels of concern to various media including ground water, surface water, and vegetation. EPA's interests with regard to phosphate mining operations are to minimize additional contaminant loading to the environment that would cause or contribute to environmental impacts, and to identify and encourage the use of mining practices and mitigation measures to control releases of contaminants or eliminate routes of exposure. This is essential to protecting public health, welfare, and the local environment and also ensuring the future viability of phosphate mining in southeast Idaho.

Specifically, we believe phosphate mine operations should 1) minimize selenium impacts to surface water and ground water; 2) bond or provide other financial assurance for reclaiming mine sites and to address unforeseen catastrophic environmental problems; and 3) develop comprehensive monitoring plans with stated monitoring objectives, methods, schedules, and trigger points tied to contingency plans. Mining practices that provide more protection to the environment continue to evolve. For that reason, it is understandable that most action alternatives call for an adaptive management approach to phosphate mining. We recommend, however, that the Forest Service consider developing a supplemental EIS to the Forest Plan that prescribes mining practices that protect the environment when such practices are sufficiently tried and tested.

However, until this conceptual approach is finalized, the EIS and Forest Plan should provide as much specific direction at this point because:

- Details of the approach are still being worked out. It is not clear, at this point, whether and the extent to which the approach would be applied to active mining operations (such

as active pits, dumps, tailings facilities).

- At this point there is no firm schedule or binding commitment on the part of mining companies or the Federal and State governments to address selenium releases according to the framework developed.
- Although the approach appears to enjoy broad support at this stage of negotiations, it has not been implemented at the site-specific level.

General Comments on Placer and Suction Dredge Operations

EPA has commented on a number of programmatic and project-level EISs for proposed placer and suction dredge operations in the last three years. EPA raised environmental objections to two proposed suction dredge operations in the Nez Perce National Forest because the proposed operations would further degrade streams whose water quality and fish habitat were already impaired and because operations were proposed in streams containing fish species listed under the Endangered Species Act. In addition, EPA was concerned that the two proposed suction dredges lacked NPDES (Non Point Discharge Elimination System) permits, the EISs lacked demonstrations that they would be economically viable mine operations, and the two operations were proposed on ceded lands of the Nez Perce Tribe which formally requested that no suction dredging occur on reservation or ceded lands to maintain their salmon rights. We raised similar concerns in scoping letters for other suction dredge proposals in the Nez Perce and Wallowa-Whitman Forests.

EPA believes that the Forest Service should categorize suction dredge and placer mining as activities that fall under the General Mining Law of 1872 and thus subject to tests of economic validity. Otherwise the activity should be considered recreational and subject to the same level of environmental scrutiny under NEPA, CWA, and ESA as any other activity impacting water quality.

The CWA and the ESA contain language directing federal agencies to protect and restore impaired water bodies, listed species, and, by extension, the habitats of listed species. In either case, we believe that it is unacceptable to approve plans of operations in degraded streams or those streams containing listed fish species unless projects contain a significant restoration component which mitigates for the negative impacts in the short term and improves water quality, fish, and fish habitat over the long term.

Specific Comments on the Minerals and Geology Section of the Forest Plan

We were pleased to read under the Desired Future Conditions that the Forest Service is attempting to develop mineral resources consistent with other resource uses. This has not been the case in the past. Historically, land managers gave more weight to mineral development, especially for locateable minerals, than to the protection and enhancement of other resource uses such as aquatic and wildlife resources. At times, direction granting the right to private

individuals to explore and develop minerals on Federal lands under the General Mining Law and the Mineral Leasing Act conflicted with the CWA and ESA which directs federal agencies to protect and restore clean water and endangered and threatened species. Mineral development also conflicted with the protection of the cultural and natural resources of tribes.

The EIS should more explicitly state how the Forest Service will resolve conflicts between mineral exploration and development and other resource use. We are extremely concerned about impacts to aquatic resources and rehabilitation due to our responsibilities under the CWA and CERCLA. The EIS should include important policies and court cases in this discussion that provide direction to the Forest Service in this matter. Finally, the EIS should add a discussion of the legal discretion that the Forest Service has in granting mining permits. The draft EIS delineates the jurisdictions of the Forest Service and the Bureau of Land Management in approving plans of operation. The EIS should also discuss how the Forest proposes to balance mineral development and exploration with the protection and restoration of environmental resources.

The goals in the forest plan appear to be less protective than the language in the desired future condition. We foresee a situation where fully implemented forest plan goals might not result in mineral resource development being consistent with protecting other resource uses. The protective elements of goals one and two should be bolstered. For example, goal one could read, "Provide for mineral resources development with *equal* consideration given to biological, physical, social, and economic resources." Goal two could read, "Regulate phosphate mining activities to prevent releases of toxic substances."

Objective one is likely out of compliance with the CWA and ESA. This objective should be rewritten as, "The Forest will annually coordinate with the Idaho Department of Environmental Quality, the U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service, and the Idaho Department of Water Resources to update and verify recreational placer dredging regulations and restrictions, identify the areas of operations and the level of activity for recreational placer dredgers, assess the cumulative effects of these operations, and ensure compliance with section 313 of the CWA and section 7 of the ESA as well as in compliance with any applicable stream channel alteration permit."

Standard one states that, "Pre-mining and post-mining water quality and aquatic habitat monitoring (both surface and groundwater) will occur on all mining sites as described in current protocols," but does not identify, state, or summarize those protocols and does not specify who pays for and conducts these monitoring efforts. The EIS should contain information that familiarizes the reader with the referenced monitoring protocols and states who will pay for and conduct monitoring efforts.

Standard two addresses surveys and mitigation measures at abandoned underground mines for cave-dependent species which EPA wholly supports. The Forest Plan should also require that surveyors concurrently assess environmental problems (such as Acid Rock Drainage

or ARD) found on abandoned mine lands and the Forest Service address these problems. It is imperative that the Forest Plan explicitly provide direction for the survey of abandoned mines and associated environmental problems and the correction of these problems.

Standard three proposes conducting field surveys when surface disturbing activities have a moderate to high potential of disturbing vertebrate fossils. Another possible option is to have the Forest Service train operators of heavy equipment to identify fossils or geologic deposits likely to contain fossils.

Concerning standard four, the EIS or Forest Plan should state whether conducting recreational suction dredging in accordance with the Idaho Department of Water Resources Application for a stream channel alteration permit and recreational suction dredge permit satisfactorily fulfills CWA and ESA responsibilities for the Forest Service. The EIS should discuss this and the Forest Plan should prohibit suction dredge mining in impaired waters and those streams containing listed species to protect and restore impaired waters and the condition of listed species. The EIS should also discuss whether recreational suction dredging should be considered an activity covered by the General Mining Law (and subject to economic tests of validity) or whether it should be considered a recreation activity.

A standard or guideline should require bonding or other financial assurance that is sufficient to cover the costs of reclaiming mine lands and addressing unforeseen catastrophic environmental problems during and after operation of the mine.

Specific Comments on the Reclamation of Mined/Drastically Disturbed Lands Section

EPA is pleased that the Forest Plan contains guidance for the reclamation of mined and drastically disturbed lands. Standards and guidelines prescribe monitoring of vegetation and water resources during the post-mining period. The Forest Plan should also prescribe mining of these resources during the pre-mining and mining periods to establish baseline information and rehabilitation goals and ensure that mining activities do not result in a violation of environmental standards.

Guideline five is a little awkward and should be rewritten as follows: "Implement appropriate sediment BMPs identified in BMP's for Mining in Idaho and existing selenium BMPs. Federal agencies and the phosphate mining industry shall continue to develop and monitor BMPs to reduce negative impacts from mining."

Guideline seven should be rewritten to state, "Surface water management will be designed and maintained to control water runoff and *prevent* erosion, sedimentation, and *contamination.*

The following sentence should be added to guideline eleven: "Barriers will be erected to prevent wildlife access to contaminated water and vegetation."

Draft Environmental Impact Statement

The EPA is pleased with current mining and reclamation practices associated with phosphate mining that require topsoil salvage, backfilling of pits, creating more natural appearing reclaimed landscapes, and the use of native plant species in reclamation. The EIS should also identify waste rock segregation and the placement of clean cover material over seleniferous material as standard practices that reduce selenium mobility and exposure. EPA agrees that issues associated with seleniferous contamination need to be addressed in the Forest Plan revision.

More specific detail should be included in the EIS to provide context for understanding future trends in the phosphate mining industry in southeast Idaho. The EIS largely limits its discussion of phosphate mining in the area to general terms. The affected environment chapter (chapter three) should name and describe existing mining operations including dates of inception, production levels, dates of expansion, and history of company consolidation and expansion. The EIS should also historically track the open-market price of phosphate and the cost of production. These two discussions could be presented briefly (because there are only a handful of companies that operate in the area). For example, page 3-90 discusses two phosphate processing facilities producing elemental phosphorus in the area but does not name them or identify where they are located.

Chapter three lacks information that quantifies the impacts of historic mining on aquatic resources, wildlife, vegetation, and soils. Similarly, chapter four lacks information that quantifies the impacts of future mining on resources and whether impacts will result in mine areas being designated as state or CERCLA clean-up areas. The reader should be directed to sections on other resources if this information can be found there.

Page 3-91 should identify the mine operations where selenium levels were detected above regulatory levels.

The discussion of past and existing gold mining on pages 3-93 and 3-94 should include survey results for abandoned and existing mines with a map of mine locations, characterization of resource impacts from past and existing mining, and plans for rehabilitation of abandoned mine lands with an indication of priority sites and the cost of rehabilitation. The EIS should also mention any significant environmental problems found at specific sites, such as ARD.

We recommend that the EIS on page 3-94 mention whether there are or are not geologic associations between perlite and asbestos because of public fears related to vermiculite mining in northwest Montana. Perlite and vermiculite are used for similar purposes and association between asbestos and perlite might be made by the reader.

The EIS should explain how impacts from recreational gold prospecting would occur if

McCoy Creek and its tributaries are to be closed to recreational mining. Page 3-93 of the draft EIS states that McCoy Creek and Tincup Creek and their tributaries are currently closed to the Idaho Department of Water Resources one-stop permit system. However, page 4-97 discusses possible "recreational" gold prospecting and states that the McCoy Creek drainage is likely to be the only stream system impacted by these impacted. We do not understand this inconsistency.

Page 4-102 states that some adits would not be closed in Inventoried Roadless Areas in Alternatives 4, 5, 6, and 7 if gaining access to the site required road construction or reconstruction. One possible alternative is using helicopters to carry in materials for closing adits or using light weight materials that can be packed into the area.

Starting on page 3-87, the Affected Environment section adequately discusses phosphate mining and the startling discoveries made in December of 1996 that selenium was poisoning horses. This discussion describes how several mines were designated Superfund sites and the remaining uncertainties about how to safely manage waste rock containing selenium. The EIS also states that the mechanisms that release, transport, and possibly concentrate selenium in the environment are not well known. Because of these uncertainties, a selenium task group has been formed to answer some of these questions and determine better ways to mine while avoiding the uptake and transport of selenium. This is all very good information to be providing in an EIS.

We were subsequently surprised to find that the Environmental Consequences section does not state the known risks of selenium contamination and does not describe how mining will be done differently to avoid selenium problems in the short term prior to completion of the study by the selenium task group. Page 4-111 states that, "The Forest contains one of the larger phosphate ore reserves in the world. As such, phosphate mining has and will continue to occur within this areas. Phosphate reserves have been identified and leases have been issued to allow mining to continue into the foreseeable future." The EIS continues on to state that each mining operation has a Plan of Operation which contain environmental constraints. The EIS should explain what environmental constraints will be required in Plans of Operation by the new forest plan to ensure mining activities protect ground water, surface water, wetlands, vegetation, and animals.

The recently completed draft EIS for the expansion of Smoky Canyon Mine characterizes the contamination of the Wells Formation Aquifer by selenium as an Irreversible and Irretrievable Commitment of Resources. We assume that similar impacts have occurred and are occurring at other mines. The discussion of Irreversible and Irretrievable Effects contains generic language and needs to thoroughly discuss the specific issue of selenium leaching into ground and surface water.

Air Quality and Fire Management

The EPA recognizes the valuable role fires play in the ecosystem and understands how

the past practice of fire suppression and not allowing fire to play its natural role has had unintended negative effects. Regardless of the benefits of fire, the EIS needs to disclose thoroughly the impacts on air quality and how public health will be protected from smoke. EPA supports the use of smoke management as a tool for maintaining clean air while allowing for prescribed fires. Since smoke management programs can vary, this EIS should describe the smoke management program the Caribou National Forest will be following.

At every opportunity, we remind Federal Land Managers about the *Interim Air Policy* and encourage them to discuss it in their NEPA documents (A summary description of the policy is enclosed). The *Interim Air Policy* best reflects national policy as to how Federal agencies, States, and Tribes will address the competing needs of clean air and fire in the ecosystem. The *Interim Air Policy* was prepared with the involvement of the Federal land management agencies including that of the Department of Agriculture. By describing this national policy, the Forest Service further demonstrates how its actions are consistent with national policy. We reminded the Caribou National Forest of the *Interim Air Policy* in our scoping letter of October 4, 1999 but there is no mention of it in the draft EIS. We recommend that *Interim Air Policy* be discussed in the final EIS.

Smoke management programs depend on favorable meteorological conditions to disperse smoke. However, despite best efforts to predict favorable conditions the weather can change causing smoke not to disperse as intended. Therefore, the EIS should acknowledge that there may be unintentional ground-level impacts from smoke and never presume to the public that there will be no air quality impacts. The public will naturally want to know what the Forest Service will do in the event smoke does not properly disperse.

We recommend that the EIS identify an action level or how one will be determined before the burn takes place. The reason for this is that in the event the smoke does not disperse properly some of the public may experience episodic levels of PM at concentrations higher than the National Ambient Air Quality Standards (NAAQS). The NAAQS for PM are designed to protect public health from long-term (annual and 24-hour) chronic exposures at relatively low concentrations and may not be protective of public health under more acute short-term conditions. Consequently, some smoke episodes which are less than 24 hours may not exceed the NAAQS due to the way air measurements are converted to a 24-hour standard but people may still be exposed to short-term but high concentrations of PM. But more importantly, 24-hour measurements are not timely enough to affect decisions such as issuing public health advisories or curtailing a burn. Thus, an action level would be a signal to issue public health advisories and/or to curtail the burning. The EIS should also discuss how communities will be informed of upcoming burns.

The EIS could discuss the amount of burning that will occur annually for the life of the Forest Plan in terms of acres and pollution loading. Information about recent historical activities provides perspective to what is being proposed in the Forest Plan. The reader should know whether the annual emission rate will go down as the fuel loading returns to historical norms and

how long this will take. This information will give the public a sense of where the Forest Service is heading with the burning, the impacts that will occur, and how the proposed amount of burning compares to what has gone on in the past. A map and table that show areas that need prescribed fires and the objective of the burn (e.g., to reduce fuel loading, reduce insect and disease) would help provide an overall picture.

Project-specific EISs should refer back to the Forest Plans EIS and refine the impact analysis as needed. This can be done by providing an update on progress made toward prescribed burn goals in the project-specific EISs. This would put the project-specific burns in context with the overall plan.

This EIS should discuss the Forest Service's *Cohesive Strategy for Protecting People and Sustaining Resources in Fire-Adapted Ecosystems*, the recent budget increase to carry out more prescribed fires in the rural/urban interface, and what this means for the Caribou National Forest.

There should be some discussion connecting the amount of smoke or smoke impacts in the Air Quality section with the success of reducing the Wildfire Hazard Index found in the Ecosystem Management section. This discussion could provide for the reader a sense of success in reducing the wildfire risks under each alternative which must be balanced against additional smoke in the air. We presume that with current conditions calling for an increased amount of prescribed fires that, depending on the alternative, the amount of prescribed burns (consequently smoke generated) will decrease as the Caribou National Forest brings wildfire hazard conditions back within HRV.

Explain why Pocatello and Chubbuck have been designated as a nonattainment areas for particulate matter. There are gradations of poor air quality that cannot be discerned from a nonattainment label. To better describe the affected environment, characterize 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. These two nonattainment areas along with the wilderness areas are what we would consider as sensitive receptors that the Caribou National Forest should avoid impacting with smoke when conducting prescribed burns.

Global Warming

Activities on the national forests have the potential to increase or decrease the amount of greenhouse gasses in the atmosphere and thus have a negative or positive effect on global warming. As part of your responsibility under NEPA to disclose environmental impacts, we suggest this issue be discussed.

Carbon dioxide is a greenhouse gas that is released through prescribed fires and wildfires. Clearly the alternatives in the EIS to address high fire risks will result in different amounts of carbon dioxide being released. Conversely, forestry management practices can beneficially affect

global warming through the process of carbon sequestration which uses carbon (and thus removes carbon dioxide from the atmosphere) in the growth of trees themselves. Global warming is a quintessential example of cumulative impacts and should be addressed in this context. The Forest Service has conducted extensive research in carbon sequestration and forestry management options which would increase carbon storage. This information is available at the following web site: http://www.fs.fed.us/ne/global/fsgcrp/index.html.

Grazing

It is well know that grazing is a significant source of environmental impacts. Indeed the EIS on page 3-80 briefly acknowledges these issues. Yet the EIS focuses solely on the effects of the forest plan on grazing and very little on the effects of grazing on the environment. The final EIS needs to describe in the Affected Environment section how grazing has impacted the landscape such as water quality, wildlife, and vegetation. Then in the Environmental Consequences section the EIS needs to discuss the impacts the alternatives will have on the environment. Please review our earlier comments on Cumulative Effects which is applicable to the effects analysis of grazing on the environment.

SUMMARY OF RATING DEFINITIONS
AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

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

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

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

Elements of a Smoke Management Program

A smoke management program may include a number of elements which are described below.

1) a process to authorize burns
2) a requirement that land managers consider alternatives to burning to minimize air pollutant emissions
3) a requirement that burn plans include smoke management components
   - actions to minimize fire emissions
   - evaluate smoke dispersion
   - actions that will be taken to notify populations and authorities prior to burns and to reduce the exposure of people at sensitive receptors if smoke intrusions occur
   - air quality monitoring, especially at sensitive sites
4) a public education and awareness program
5) a surveillance and enforcement program
6) periodic review of its program for effectiveness

In order to evaluate the air quality and visibility impacts, the NEPA document should (*Interim Air Policy* section V.A.2.b):

1) Include recent historic (e.g. 10 years) and projected (life of the plan) annual or seasonal emissions from wildland and prescribed fires.
2) Analyze cumulative impacts of fires on regional and subregional air quality, when possible.
3) Identify applicable regulation, plans or policies (e.g., burn plans, authorization to burn, conformity, etc.).
4) Identify sensitive receptors.
5) Include description of planned measures to reduce smoke impacts.
6) Identify the potential for smoke intrusions into sensitive areas, and model air quality and visibility impacts, when possible.
7) Describe ambient air monitoring plans, when appropriate.

Smoke management programs depend on favorable meteorological conditions to disperse smoke. However, despite best efforts to predict favorable conditions the weather can change causing smoke not to disperse as intended. Therefore, an EIS should acknowledge that there may be unintentional ground-level impacts from smoke and never presume to the public that there will be no air quality impacts. The public will naturally want to know what the Federal Land Manager will do in the event smoke does not properly disperse. The discussion of the contingency measure element of the smoke management program should address this concern.

Overview of the Interim Air Quality Policy on Wildland and Prescribed Fires

Background

On May 15, 1998, the EPA issued the *Interim Air Quality Policy on Wildland and Prescribed Fires* to address public health and welfare impacts caused by wildland and prescribed fires that are managed to achieve resource benefits. The *Interim Air Policy* was prepared in an effort to integrate the public policy goals of allowing fire to function in its natural role in maintaining healthy ecosystems and protecting public health and welfare by mitigating the impacts of air pollutant emissions on air quality and visibility. The policy was developed with the active involvement of stakeholders, including the US Department of Agriculture. The *Interim Air Policy* is Federal policy which reconciles the competing needs to conduct prescribed fires while at the same time to maintain clean air to protect public health. The *Interim Air Policy* is interim only in that it does not yet address agricultural burning nor visibility/regional haze. It is not interim with regard to how States, Tribes, and Federal land managers should address smoke from prescribed fires.

While the *Interim Air Policy* is directed at both Federal land managers and State/Tribal air quality managers, the expectations are different because each have a different role in protecting air quality. The *Interim Air Policy* calls on states to develop a smoke management program and for the Federal Land Managers to participate in the state and tribal smoke management programs. States that do not have a smoke management program in place run the risk of EPA designating an area as nonattainment under the Clean Air Act should there be a violation of the National Ambient Air Quality Standards (NAAQS) due to smoke from prescribed fires. While States with smoke management programs will instead be required to review the adequacy of their Smoke Management Program and make appropriate improvements to mitigate future air quality impacts.

While the burden of addressing a nonattainment area falls on the state, Federal Land Managers need to ensure protection of the NAAQS by participating in state smoke management programs. At the time, the development of the *Interim Air Policy* was partly driven by the concern that there will be exceedances of the NAAQS in light of plans by Federal Land Managers to carry out more prescribed fires. This is still a concern with the recent increased appropriations to reduce fire risks at urban/rural interface areas. Our obligations can be met by discussing the *Interim Air Policy* in our NEPA documents, disclosing how the Federal Land Manager is participating, and describing how prescribed burns will be in line with any smoke management program.

Letter Number **573 - Caribou RFP**

CommentCategory	ecosystem management
Comment	Ecosystem Management It does not appear this Forest Plan will be successful in addressing fire and insect hazards under almost all of the alternatives even after 100 years of implementation according to Table 4.21. Only Alternative 4 shows some improvement in forested vegetation but worsening in non-forested vegetation. The EIS needs to characterize the environmental impacts with a qualitative discussion of what is happening on the landscape. This can be done by providing an explanation of the hazard level changes and context to what these changes mean. For almost all the alternatives, the hazard levels stay the same or get worse in the long term (100 years). Rather than just repeat in narrative form what is readily apparent in a table, the EIS should also explain why the alternatives have different results.
Response	Alternative 7R was developed to address this somewhat. This alternative allows for an increase in probable treatments if environmental concerns, staffing and budget allow. It also provides priority areas, such as aspen stands, etc. where the treatments can make the most difference.
CommentCategory	Air Quality
Comment	There should be some discussion connecting the amount of smoke or smoke impacts in the Air Quality section with the success of reducing the Wildfire Hazard Index found in the Ecosystem Management section. This discussion could provide for the reader a sense of success in reducing the wildfire risks under each alternative which must be balanced against additional smoke in the air. We presume that with current conditions calling for an increased amount of prescribed fires that, depending on the alternative, the amount of prescribed burns (consequently smoke generated) will decrease as the Caribou National Forest brings wildfire hazard conditions back within HRV.
Response	Discussion regarding smoke generated from wildfire verses prescribed fire is addressed in Chapter 3 of the FEIS in the Air Quality section and in the cumulative effects section of Air Quality in Chapter 4. Smoke generated from wildfire events is expected to be greater than those generated from controlled prescribed fire treatments because conditions can be controlled to produce less smoke during burning.
CommentCategory	Noxious Weeds
Comment	We are pleased to see that the Caribou National Forest will wash vehicles and equipments exposed to noxious weeds
Response	This is only one of the several action items identified in the Caribou-Targhee National Forest Noxious Weed Strategy.
CommentCategory	Plan
Comment	Guideline five is a little awkward and should be rewritten as follows: "Implement appropriate sediment BMPs identified in BMP's for Mining in Idaho and existing selenium BMPs. Federal agencies and the phosphate mining industry shall continue to develop and monitor BMPs to reduce negative impacts from mining." Guideline seven should be rewritten to state, "Surface water management will be designed and maintained to control water runoff and prevent erosion, sedimentation, and contamination. The following sentence should be added to guideline eleven: "Barriers will be erected to prevent wildlife access to contaminated water and vegetation."
Response	Guideline five has been reworded. Thank you for your suggestion concerning Guideline seven. However, erosion and sedimentation cannot be completely prevented on any lands over the long term without such drastic measures as paving or completely enclosing the area, which is not the intent of the guideline. This guideline was changed to a standard in the final Forest Plan. Thank you for your suggestion concerning Guideline 11. As this is a "guideline," we believe the current wording is sufficient.

CommentCategory	Air Quality
Comment	Activities on the national forests have the potential to increase or decrease the amount of greenhouse gasses in the atmosphere and thus have a negative effect on global warming. As part of your responsibility under NEPA to disclose environmental impacts, we suggest this issue be discussed. Carbon dioxide is a greenhouse gas that is released through prescribed fires and wildfires. Clearly the alternatives in the EIS to address high fire risks will result in different amounts of carbon dioxide being released. Conversely, forestry management practices can beneficially affect global warming through the process of carbon sequestration which uses carbon (and thus removes carbon dioxide from the atmosphere) in the growth of trees themselves.
Response	Discussion and information regarding global climate change is included in the FEIS. The Global Climate Change Prevention Act directs the Secretary of Agriculture to establish a global climate change program by studying these effects on agriculture and forestry. This act does not require the Forest Service to assess the effects of increases in atmospheric carbon caused by National Forest timber sales nor does it require the agency to incorporate these effects into the decision-making process for the Forest Plan. Information related to how climate change effects forest ecosystems was consulted in preparing the FEIS (Bytnerowics et al. 1998; Wagner et al. 1998; Joyce et al. 2000).
CommentCategory	Riparian/Watershed
Comment	We thought that Tables 4.41 - 4.51, which compared the relative potential of each of the alternatives for the activities of concern, were useful. They should all be pulled together and perhaps included in the Comparison of Alternatives table. However, to improve this portion of the Environmental Consequences section, discussion should be added to give the reader a better understanding of the information the tables are presenting. The EIS should explain how each of the watershed disturbance activities would be managed differently under each of the alternatives to warrant the different relative ratings. For example, how is timber harvesting to be managed under Alternative 7 to warrant a potential watershed disturbance rating of 4 as compared to Alternative 4 which will have a rating of 3? Additionally, the discussion needs to characterize the significance of the ratings. In some cases, the differences among the ratings may be negligible while in others they may be significant.
Response	Thank you. The tables are presented to help the reader distinguish the relative difference between alternatives, as the alternatives relate to one another. The basic difference between rankings is not so much in differences in management practices between alternatives, but rather, the intensity, or number of acres potentially disturbed. For example, Alternative 1 proposes treating 9.1-16.1 thousand acres by timber harvesting per decade. Alternative 6, on the other hand, proposes to treat 2.1-5.1 thousand acres per decade. When evaluating the potential impacts for each alternative, it is assumed that the intensity or methods of harvesting will not substantially change between alternatives, only the potential acres treated. Therefore, Alternative 1 has a higher potential to disturb watersheds than Alternative 7, which is reflected in rankings.
CommentCategory	Plan
Comment	The goals in the forest plan appear to be less protective than the language in the desired future condition. We foresee a situation where fully implemented forest plan goals might not result in mineral resource development being consistent with protecting other resource uses. The protective elements of goals one and two should be bolstered. For example, goal one could read, "Provide for mineral resources development with equal consideration given to biological, physical, social, and economic resources." Goal two could read, "Regulate phosphate mining activities to prevent releases of toxic substances."
Response	Difficulties arise with your suggested wording for goal one. For example, if grazing were given "equal consideration" to mining, it would create an irresolvable conflict, because the same piece of land cannot be mined and grazed at the same time. It could be mined now and later returned to grazing, but not both at the same time. All resources have to work together to achieve a balanced, multiple use. The suggested wording for Goal two is adequately covered by the Standards and Guidelines included in the Forest Plan, and should alleviate any concerns about Goal two.

CommentCategory	Air Quality
Comment	Regardless of the benefits of fire, the EIS needs to disclose thoroughly the impacts on air quality and how public health will be protected from smoke. EPA supports the use of smoke management as a tool for maintaining clean air while allowing for prescribed fires. Since smoke management programs can vary, this EIS should describe the smoke management program the Caribou National Forest will be following. We reminded the Caribou National Forest of the Interim Air Policy in our scoping letter of October 4, 1999 but there is no mention of it in the draft EIS. We recommend that Interim Air Policy be discussed in the final EIS. the EIS should acknowledge that there may be unintentional ground-level impacts from smoke and never presume to the public that there will be no air quality impacts. Thus, an action level would be a signal to issue public health advisories and/or to curtail the burning. The EIS should also discuss how communities will be informed of upcoming burns. The EIS could discuss the amount of burning that will occur annually for the life of the Forest Plan in terms of acres and pollution loading. Information about recent historical activities provides perspective to what is being proposed in the Forest Plan.
Response	The FEIS discloses the impacts of air quality on public health in Chapter 4 under Air Quality. Additional information has been added to the FEIS. The smoke management program that the Caribou National Forest follows and will continue to follow is addressed in Chapter 3 of the FEIS. Forest management using fire will be consistent with the EPA's Interim Air Policy and information related to this Interim Policy has been added to the FEIS and Revised Forest Plan. The Forest Service does not issue health advisories, however, the Forest Service does notify public agencies when burning operations will take place (personal communications with Tiffany Floyd, DEQ 2002). Information regarding the amount of burning that will occur annually for the life of the Forest Plan in terms of acres and pollution loading is disclosed in the Air Quality sections of Chapters 3 and 4.
CommentCategory	ecosystem management
Comment	This discussion should be improved by describing a benchmark such as Historical Range of Variability (HRV). The EIS needs to begin by being clear on what is meant by low, medium, and high hazard levels. Are these levels of departure from HRV (see page 3-57) or levels of risk? That is, a low level of departure from HRV would be a departure nonetheless and still outside DFC. Or, a low hazard level may just be a low risk of wildfire. We presume the latter, but this needs to be made clear. If the latter is the case, then the EIS needs to be clear about what hazard level is within HRV. The EIS should clarify that if the hazard level is low, does that mean that generally the severity of the fire is low across the landscape, the risk of fire is low, or both? The EIS should discuss what the hazard level was historically for both insect and wildfire. This would serve to tell the readers as to how close each alternative gets to success when examining Tables 4.19 and 4.21. The HRV values should be included in the tables as well as the baseline indicators from page 3-53.
Response	This section has been augmented in the FEIS to better explain the hazard ratings and also include the National Fire Plan rating system to better show how the landscape will change.
CommentCategory	Water Quality
Comment	It appears from the discussion on pages 3-121 -- 3-122 that TMDLs have not been prepared. The EIS should be explicit on this so the reader is clear where DEQ is in the TMDL process. Even if a TMDL has been developed for a stream, a WQRP may still be in order. A WQRP includes six common elements, which should be explained in the EIS 1. Condition assessment and problem description□□ 2. Goals and objectives 3. Management actions to achieve objectives 4. Implementation schedule 5. Monitoring/evaluation plan 6. Public participation plan
Response	TMDLs have been established for the Portneuf and Blackfoot River watersheds within the Caribou National Forest. TMDLs have not been established for the Bear River basin in Idaho. A WQRP is part of the protocol identified in the FS/BLM Protocol for Addressing Clean Water Act Section 303(d) Listed Waters. This has been replaced by Forest Service Region 1/Region 4 guidance.

CommentCategory	Riparian Areas
Comment	The EIS is weak in describing the environmental consequences of each alternative. For example, if there is generic discussion on roads which describes how roads can affect water quality, then this should be followed by specific discussion of how applicable these road issues are to the Caribou and to what degree roads have been impacting the Caribou. This discussion should be placed in the Affected Environment and not the Environmental Consequences section. The Environmental Consequences section does not show the environmental consequences of each alternative in the Riparian/Wetland Areas, Aquatic Habitat and Water Quality discussion. We leave it to the Forest Service to examine and ensure that the other sections clearly present the environmental consequences and avoid the use of generic language in the Environmental Consequences sections.
Response	Chapter 3, Issue 6 – Riparian/Wetland Areas, Aquatic Habitat and Water Quality, discusses present watershed condition throughout the Forest. Described conditions include all activities occurring throughout the Forest, including roads. In Chapter 4, roads are also discussed in the environmental consequences section in the Riparian/Wetland, Aquatic Habitat and Water Quality section.
CommentCategory	Mining
Comment	Suction dredge and placer mining should be allowed under the General Mining Law of 1872 only if they meet tests of economic validity. Recreational forms of mining should not be an activity covered under the General Mining Law of 1872 and therefore subject to all environmental requirements as would be any other activity that degrades streams.
Response	The 1872 mining laws, as amended, allow for the prospecting and exploration for mineral deposits. Suction dredging and placer mining operations are subject to environmental analysis review and other applicable laws and regulations, and will be evaluated on a site-specific basis, the same as any other proposed surface-disturbing activity.

CommentCategory	Plan
Comment	Standard 2 addresses surveys and mitigation measures at abandoned underground mines for cave-dependent species which EPA wholly supports. The Forest Plan should also require that surveyors concurrently assess environmental problems (such as Acid Rock Drainage or ARD) found on abandoned mine lands and the Forest Service address these problems. It is imperative that the Forest Plan explicitly provide direction for the survey of abandoned mines and associated environmental problems and the correction of these problems. Standard 3 proposes conducting field surveys when surface disturbing activities have a moderate to high potential of disturbing vertebrate fossils. Another possible option is to have the Forest Service train operators of heavy equipment to identify fossils or geologic deposits likely to contain fossils. Concerning Standard 4, the EIS or Forest Plan should state whether conducting recreational suction dredging in accordance with the Idaho Department of Water Resources Application for a stream channel alteration permit and recreational suction dredge permit satisfactorily fulfills CWA and ESA responsibilities for the Forest Service. The EIS should discuss this and the Forest Plan should prohibit suction dredge mining in impaired waters and those streams containing listed species to protect and restore impaired waters and the condition of listed species. The EIS should also discuss whether recreational suction dredging should be considered an activity covered by the General Mining Law (and subject to economic tests of validity) or whether it should be considered a recreation activity. A standard or guideline should require bonding or other financial assurance that is sufficient to cover the costs of reclaiming mine lands and addressing unforeseen catastrophic environmental problems during and after operation of the mine
Response	Standard 2 has been modified to include water quality sampling. ARD has not been a factor on the Caribou NF because the alkaline character of the rocks present. Thank you for your suggestion concerning Standard #3. The 1872 mining laws, as amended, allow for the prospecting and exploration for mineral deposits. Suction dredging and placer mining operations are subject to environmental analysis review and other applicable laws and regulations, and will be evaluated on a site-specific basis, the same as any other proposed surface-disturbing activity. In addition, no streams containing known placer gold resources on the Forest are open to the Idaho Department of Water Resources one stop recreational suction dredge permit. There are no listed fish species in the streams known or suspected to contain placer gold on the Forest, so impacts to listed fish species from "recreational dredging" are not a concern. Currently, heavy restrictions are placed on any suction dredge operations on the Forest, based on environmental analyses already conducted. Reclamation bonds are required for all mining operations prior to surface disturbance. It is Forest Service policy to not have "contingency bonds" for unforeseen catastrophic events, because of the uncertainties involved with trying to justify and determine such bond amounts.
CommentCategory	Vegetation
Comment	The EIS should briefly describe how logging and prescribed fires will increase early- and mid-seral stages. Explain how much of each activity will be used, because each carries its own environmental advantages and disadvantages.
Response	The FEIS, Chapter 2, Alternatives, describes how logging and prescribed fires will increase early seral species and young, vigorous stands. Chapter 4, Forested Vegetation Diversity, Direct and Indirect Effects, explains the amount of each activity to be used to move the particular cover type towards the Desired Range of Future Conditions (DRFC).
CommentCategory	DEIS
Comment	We were pleased to read under the Desired Future Conditions that the Forest Service is attempting to develop mineral resources consistent with other resource uses.
Response	Thank you for your comment.

CommentCategory	Riparian Areas
Comment	The Affected Environment sections discuss generically environmental impacts on a resource or by an activity and are not specific to the alternatives being considered for the Caribou National Forest. See particularly the section for Riparian/Wetland Areas, Aquatic Habitat, and Water Quality.
Response	An EIS at the programmatic or Forest-wide level cannot be project-by-project site-specific. For this reason, generic impacts are analyzed. For example, we can estimate that X-amount of timber will be harvested over the next decade, but we do not know specifically where this will occur until the proposed timber- harvesting unit is laid out on the ground. Then specific effects can be determined in the site-specific NEPA document for that project.
CommentCategory	Vegetation
Comment	Vegetation The discussion on vegetation is unclear on the need for action. It appears that the Caribou National Forest has a different history from the other national forests in the Columbia River basin. However, this history is not well told. The EIS is not clear on what resources are being significantly impacted, why, and how and to what degree degraded resources will be restored under each alternative. Has logging been taking place on the Caribou National Forest? Has it had any negative impacts? Has logging been occurring at a sustainable rate? Depending on the answers, the EIS would then explain what will be done differently if anything at all. A discussion of this fashion would essentially be a cumulative impact analysis which is what a forest plan should be.
Response	Chapter 1 of the FEIS, Issue #3 describes the need for action in Vegetation Management. See Chapter 3, Issue #7, Timber Sale Program, for a description of logging history on the Caribou National Forest. The Forest, with approximately 295,000 acres of land capable of supporting timber management activities, has harvested wood products on about 30,000 acres since the 1960's.
CommentCategory	ecosystem management
Comment	Second, some sections discuss both the forested and non-forested lands together. While this is fine, the logic would be clearer if the discussions were kept to separate paragraphs. Discussion with rationale applicable on forested lands should not end with conclusions drawn for both land types. The discussion on Insect Hazard and Wildfire Hazard on page 3-56 is one example. Page 3-55 discusses the percent of forested lands that was historically and naturally disturbed by wildfire. This is a compelling argument for the need for more burns on forested lands. However, similar rationale is needed on the historical fire regime of the non-forested lands.
Response	The Disturbance Section under Issue 3, Ecosystem Management, has been updated in the FEIS and clarified. Fire Condition Classes were also added to the discussion. The discussion on insects applies only to forested lands. The historic wildfire acreage reported on page 3-55 of the DEIS applies to the entire National Forest (i.e., both forested and non-forested vegetation). Our fire reports only reveal the acreage burned, and do not distinguish between the amounts of forested and non-forested vegetation affected by wildfire.
CommentCategory	Air Quality
Comment	No discussion of how the forest plan is consistent with the Interim Air Quality Policy on Wildland and Prescribed Fires.
Response	Direction has been added to the Revised Forest Plan and discussion in the FEIS to include consistency with the EPA's Interim Air Quality Policy on Wildland and Prescribed Fires.

CommentCategory	Livestock grazing
Comment	The Livestock Grazing chapter does not discuss the impacts grazing has had on the environment nor how the alternatives will impact the environment.
Response	Chapter 3 – Issue 4, Livestock Grazing gives a brief overview of the grazing history on the Forest and the current vegetation conditions and trends. Chapter 4 – Issue 4, Livestock Grazing, discusses the effects of utilization standards and the livestock grazing program by alternative. The suitability analysis can be found in Appendix B.

CommentCategory	Noxious Weeds
Comment	We are pleased that ecologically sound methods of controlling noxious weeds will be applied across the Caribou National Forest because forest practices have a wide impact to the health of the whole ecosystem and one of the overall goals of the state and federal environmental agencies is to sustain and advance the condition of native plant species. We support the stated goal of using an integrated pest management strategy to control noxious weeds. We are also pleased that the known noxious weed species have been identified in Table 3.59 of the draft EIS. Identifying the known noxious weed species of concern is a critical element in the integrated pest management approach.
Response	Thank you for your comment. We also try to keep track of potential risks from new invaders. Public knowledge and assistance is critical to protecting our ecosystems.

CommentCategory	Vegetation
Comment	Beginning on page 3-58 is further discussion on the various forest vegetation. What brought about the high departure is not too clear. In addition, the discussion seems to say that other trees such as Douglas-fir, Limber Pine, and Lodgepole Pine are at high departure as well. Approximately, 60 to 70percent of the Douglas-fir are mature and old age classes. The EIS is not clear if this is preferable or not. However, the EIS was clear that due to lack of fire, there is a higher tree density and fuel buildup. These trees are likely not to be able to withstand the next fire. Thus, it would appear the Douglas-fir should be included among those trees that are at high departure from proper functioning conditions (PFC). The same can be said about mixed conifer stands which apparently are now highly susceptible to stand-replacing fires. Thus, is this another vegetation cover that should be included among those trees that are at high departure from PFC?
Response	Departures in structure, composition and patterns were brought about by natural succession in the absence of disturbance, as described in Chapter 3, Forested Vegetation, under Current Conditions, for each cover type. Desired future conditions, based on the historic range of variation (HRV) for the cover type, are described in Chapter 4, Forested Vegetation Diversity. For conifers, 30-40 percent mature and old is preferable and 20-40 percent mature and old is preferable for aspen. Although many stands of Douglas-fir have dense understories of smaller trees, older trees in the overstory are relatively more fire resistant compared to the true firs (subalpine fir) and Engelmann spruce, which are in high departure. There is also a slightly smaller percentage of mature and old Douglas-fir tree stands compared to the spruce-fir cover type. Douglas-fir is considered to be in moderate departure from HRV. The discussion on disturbances and departure from HRV as well as its relationship to Properly Functioning Condition has been augmented in Issue 3, Chapters 3 and 4 and in Appendix B. For more details, the commenter can request a copy of the Caribou Sub-regional PFC Assessment and/or the Initial Analysis of the Management Situation Report.

CommentCategory	DEIS
Comment	This EIS needs to be more clear on what is happening with resources in a cumulative fashion. For those resources that are degraded, the EIS should explain what has occurred on the landscape to cause the degradation and what will be done differently under each alternative to restore the resources. It appears that degradation and restoration are determined by proper functioning condition (PFC) and desired future condition (DFC). These concepts need to be defined and discussed in the EIS. In addition, cumulative impacts would be better monitored if a dynamic link is maintained between the Forest Plans and each EIS or EA. Cumulative impact analyses are a natural fit for programmatic EISs which consider trends and sustainability in the long term.
Response	Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such actions." (40CFR1508.7). Cumulative effects must be evaluated along with direct and indirect effects of each alternative. Generally, cumulative effects are considered on a larger scale than the direct and indirect effects. They describe a larger picture across a longer time frame. When analyzing cumulative effects, different temporal and spatial scales are used than for direct and indirect effects. These scales of analysis extend only to where effects can actually be measured (EPA 1997). In the case of Forest planning, the effects analysis "should consider trends and sustainability in the long term while direct impacts are considered less" (EPA letter, April 6, 2001). In the Forest Plan EIS many of the direct and indirect effects are, in fact, cumulative effects due to the large scale (over 1 million acres) and long time frame, most generally considered as the ten-year planning period. For instance, watershed and riparian effects include impacts and activities on private, state, and BLM lands expected to occur over the ten-year plan period. Cumulative effects analysis involves assumptions and uncertainties while providing the opportunity to evaluate future Forest management options in the context of other developments in the planning analysis area. A study of activities on adjacent federal, state, and private land was conducted in 2000 and 2001 (See Project File, Caribou Adjacency Analysis). This study included discussions with local, state, and federal government agencies and other interested stakeholders and was used to identify important future actions and to help determine the scope of the cumulative effects analysis. Activities that could be additive or stressors that could be interactive with proposed alternatives in the EIS were identified. In addition, information from "An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins" was reviewed as part of this process. Although this latter report did not include portions of the Caribou National Forest, it was useful as a resource for regional issues and concerns. The FEIS includes discussions on the effects and outcomes on resource programs decades into the future. Where direct and indirect effects analysis does not adequately disclose cumulative effects, the FEIS contains an augmented discussion under the subheading "Cumulative Effects" in Chapter 4. Cumulative effects are discussed only for those resources impacted by the alternatives.

CommentCategory	Mining
Comment	We were subsequently surprised to find that the Environmental Consequences section does not state the known risks of selenium contamination and does not describe how mining will be done differently to avoid selenium problems in the short term prior to completion of the study by the selenium task group. The EIS continues on to state that each mining operation has a Plan of Operation which contain environmental constraints. The EIS should explain what environmental constraints will be required in Plans of Operation by the new forest plan to ensure mining activities protect ground water, surface water, wetlands, vegetation, and animals. The recently completed draft EIS for the expansion of Smoky Canyon Mine characterizes the contamination of the Wells Formation Aquifer by selenium as an Irreversible and Irretrievable Commitment of Resources. We assume that similar impacts have occurred and are occurring at other mines. The discussion of Irreversible and Irretrievable Effects contains generic language and needs to thoroughly discuss the specific issue of selenium leaching into ground and surface water.
Response	Changes were made in Chapters 3 and 4 of the EIS to address your comments. Many changes in the way mining and reclamation are being done have occurred in the last few years as a result of the selenium situation (See Chapter 3 of the EIS). Past mining and reclamation practices used in phosphate mining in southeast Idaho created undesirable effects. Changes have been and are being made to those practices. We do not have all the answers yet, but we are attempting to do what we can to prevent similar situations in the future. Clean Water Act and other State and Federal standards are required of the mine operators. Precisely how those standards are to be met is up to the mining industry, with overview by the Federal and State regulatory agencies. The Plan contains extensive direction for management of mining operations on the Forest. The first Desired Future Condition states that "mineral resources are available, consistent with other resources." Two of the forest-wide goals for the minerals program are to allow "mineral resource development using state of the art practices for surface resource protection and reclamation..." and to administer mining activities "to prevent the release of hazardous substances in excess of established state and/or federal standards." Other direction includes designing actions to reclaim to pre-disturbance conditions and to eliminate or minimize exposure to hazardous substances. The Plan has about two pages of standards and guidelines pertaining to administration and reclamation of Drastically Disturbed Lands (Plan, Chapter 3, Physical Elements, Minerals and Geology). In addition to forest-wide guidance, Prescription 8.2.2 (Phosphate Mine Areas) contains direction specific to phosphate mining. During the site-specific environmental analyses done for each mining proposal, additional mitigation will likely be identified. These, in conjunction with Plan direction, will provide adequate mitigation measures to reduce or eliminate impacts to Forest resources. As time progresses and the results of monitoring are evaluated, necessary changes to Forest Plan standards will be made. All phosphate mining operations are bonded to ensure the disturbed lands are reclaimed to the pre-determined productive post-mining land uses. "Adaptive management" is intended to use the latest science, site-specific analyses, extensive monitoring and evaluation information, and Forest Plan direction to find and implement the most environmentally responsible mining and reclamation practices. As mining/reclamation practices are tested and proven to be effective at controlling dissolved solid concentrations in water at or leaving mine sites, future mine/reclamation plans will use those proven practices in their mine development. Site-specific environmental analyses will be required at all proposed (future) mining operations. Using the best site-specific information available, and the standards and guidelines in the Forest Plan, sound decisions will be made concerning mining operations. Some of the "mitigation measures" or "standards" proposed by outside interests have not yet been tested, monitored and proven effective. One such untested proposal is to have complete pit backfill. However, as documented in the Final EIS for the Dry Valley Mine - South Extension Project (completed in 2000), the selenium concentrations in the surface and ground water leaving the mine site were projected to be greater with complete pit backfill than with other alternatives. To incorporate such measures (like complete pit backfill) as "standards" in the Forest Plan before they have been "proven to be effective" through implementation, monitoring and evaluation, would be irresponsible, and could even pose greater risks to the environment. The Forest Plan is a programmatic document and cannot display the site-specific impacts for each of the existing or future mining operations. An environmental analysis process is required for all new mining proposals and will disclose the anticipated effects of each proposal evaluated. This process will also review existing management practices, monitoring results, and other information to develop additional mitigation measures and conditions of approval to be used on a site-specific basis to ensure that hazardous substances are not released into the environment, and that impacts are mitigated/reduced to acceptable levels.

CommentCategory	Vegetation
Comment	There appears to be a discrepancy where one sentence on page 3-62 states that lodgepole pine has been intensively managed on the forest through harvest. We understand "intensively managed" to mean high amounts of logging. But on the following page the EIS states mixed conifers have gained considerable acres from the lodgepole pine through natural succession. If the first statement is true then it would seem that the acres of mixed conifer have not grown solely due to natural succession.
Response	Lodgepole pine is largely an early seral species on the Caribou, most often being succeeded, as it ages, by subalpine fir or Douglas fir. This succession occurs gradually over time and transforms the once pure stand of lodgepole pine into a mixed conifer stand of lodgepole pine, Douglas fir and subalpine fir. The Forest has intensively managed, or logged, several thousand acres of lodgepole pine in the 1980's and 1990's, moving those acres backwards on the successional pathway, starting them over, and into lodgepole seedling and sapling stages.
CommentCategory	Forested Vegetation
Comment	Since logging will be used where needed to restore PFC, we assume this tool can only be used where logging is economically viable. What will happen with those areas that cannot be logged economically? How will they be restored to properly functioning conditions? Once properly functioning conditions are restored, what will this mean in terms of further logging? Will further logging be needed? Will the amount of logging drop off? Under Alternative 6, what will happen to those lands unsuited for logging but are not in PFC if no logging is carried out? These questions can better be answered by explaining what is meant by PFC and describing the scenario of how the land will be managed once it is in PFC.
Response	See Chapter 3 of the FEIS for a description of Proper Functioning Condition (PFC) and its management implications. See also Chapter 4, Forested Vegetation Diversity for a description of Desired Range of Future Conditions (DRFC) and Desired Outcomes. On unsuitable or economically unviable lands, wildfire for resource benefit, prescribed fire or mechanical felling are among the methods the Forest will use to advance vegetation towards DRFC. We do not expect to reach Properly Functioning Conditions during this next planning period, but should make progress toward our desired range, given budget and social support. We have included a more detailed explanation of how the PFC process was used. As shown in the alternative descriptions, mechanical methods or prescribed fire may be used to reach the DRFC in areas of habitat types where timber harvest is not practical preferable or allowable.
CommentCategory	Water Quality
Comment	Another objective of the 303(d) Protocol is to validate the 303(d) stream listing. The EIS states on page 3-121 that turbidity data have been collected for the past few years and no violations of state criteria have been noted. However, the EIS does not say if any of these streams were those listed on Table 3.35. If they were, there needs to be some discussion on how this will be reconciled. The 303(d) Protocol would call for this type of validation to be done for all 19 of the 303(d)-listed streams.
Response	You are correct that the Forest cooperates with State agencies to assist in verifying and validating impaired waters. The turbidity sampling referred to in the EIS was conducted randomly during summertime flow conditions. The limited data neither validates nor refutes State BURP conclusions. It simply states that no water quality violations (i.e. turbidity) were noted at the point-in-time the samples were collected. These data will be added to the Forest's database and combined with data to be collected in the future. More comprehensive sampling will be completed in conjunction with TMDL implementation plans, to be developed in cooperation with DEQ. Through the monitoring protocol developed in these implementation plans, data will be collected and given to the State. The State will in turn add these data to their database to assist them in making future determinations to keep, add or remove a stream from the 303(d) list.
CommentCategory	Noxious Weeds
Comment	We suggest that the Caribou National Forest establish a program to continuously identify the activities that are likely to cause noxious weed expansion and the locations of susceptible infestation areas.
Response	Risk of infestations is identified in project analysis and sites monitored.

CommentCategory	Noxious Weeds
Comment	We hope that the integrated pest management strategy for the Caribou National Forest will address the use of chemical, biological and cultural control methods, with the preference for the method that will least likely adversely affect human health and the environment. Under these circumstances, [we] urge the Caribou National Forest to restrict the use of aerial and broadcast methods as much as possible to avoid deleterious effects on non-target plants and wildlife. In choosing a control method, the Caribou National Forest should consider both short-term and long-term effects.
Response	The Caribou National Forest has an EA for noxious weeds that implements IPM strategy. In addition, the Caribou-Targhee National Forest developed a noxious weed strategy that prioritizes IPM as the preferred choice for treatment. The method used for treatment will be decided for each project and a separate site-specific analysis will be done at that time. Part of the project analysis processes to consider and document the short-term and long-term effects.
CommentCategory	Vegetation
Comment	"PFC assessment identified four vegetation cover types that are at a high departure from properly functioning condition: subalpine fir, aspen, juniper, and tall forbs." This statement on page 1-16 needs to be followed by an explanation of why this high departure has come about. Is this natural succession or has human activity (fire suppression) unduly influenced the natural course of events? Is the goal of the Forest Service to keep the Caribou National Forest in a static state reflecting conditions found on the landscape from the early 1900s? If humans had not intervened in the area, what would the landscape look like 100 years hence?
Response	The Forest PFC sub-regional assessment documents why these vegetation types have high magnitude of departure from historical ranges of variability (USDA-FS, 1997). Based on the criteria used to make this assessment, i.e., structure, composition, disturbance regime and patterns, these vegetation types have increased fire return intervals, structure is trending toward more dense canopy cover classes, composition is outside HRV indicators and patterns have expanded. Fire suppression is a factor contributing to these conditions. The goal of the Forest Service is to trend toward or achieve the desired future conditions for these vegetation types not to keep the forest in a static state. If humans had not intervened in the area, it is difficult to conjecture what conditions may have been like but it is felt that most vegetation types would be functioning within their historical ranges in structure, composition, disturbance regimes and patterns. Achieving the desired future condition should reduce the risk to these ecosystems and cause them to become more diverse and resilient to disturbances.
CommentCategory	Mining
Comment	Page 4-102 states that some adits would not be closed in Inventoried Roadless Areas in Alternatives 4, 5, 6, and 7 if gaining access to the site required road construction or reconstruction. One possible alternative is using helicopters to carry in materials for closing adits or using light weight materials that can be packed into the area.
Response	The above referenced page states that some adits in Inventoried Roadless Areas MAY not be closed. Thank you for the suggestions to help solve the problem.
CommentCategory	Noxious Weeds
Comment	Because the noxious weed species may change yearly, we encourage the Caribou National Forest to establish a program to continuously detect and monitor noxious weed infestation.
Response	Annual reports are a requirement for weed locations and acres treated. Although we try to keep up-to-date inventories of specific weed locations and size of infestation, observations by other forest users are always welcome. When infestations are eliminated, the site is monitored for several years because of the viability of the seeds or rootstalks of some of these plants. Annual monitoring is a critical part of the war against weeds. The Caribou-Targhee National Forest will be following the Forest Strategy developed in 2000 to control weeds and keep them from expanding further.

CommentCategory	Mining
Comment	Mining practices that provide more protection to the environment continue to evolve. For that reason, it is understandable that most action alternatives call for an adaptive management approach to phosphate mining. We recommend, however, that the Forest Service consider developing a supplemental EIS to the Forest Plan that prescribes mining practices that protect the environment when such practices are sufficiently tried and tested.
Response	A Forest-wide supplemental EIS as suggested above could provide generic, often non site-specific practices. Currently, each time a new mining proposal is received, an environmental analysis is completed that evaluates the site-specific conditions associated with that particular operation. The "tried and tested" practices to "protect the environment" will be considered in that analysis, and the determination of the Best Management Practices, appropriate conditions of approval and/or mitigation measures will be made on a site-specific basis. If the need for a supplemental EIS, as suggested above, becomes evident, certainly the Forest Service would consider the preparation of such a document.
CommentCategory	Noxious Weeds
Comment	We are pleased to see that the Caribou National Forest identified prevention strategies, such as the use of certified weed-free hay and seeds and the use of borrow sources that are not infested with noxious weeds.
Response	The Caribou-Targhee National Forest noxious weed strategy has several such action items to slow the spread of noxious weeds. Our greatest strength is in cooperation with neighboring land owners through Cooperative Weed Management Area (CWMA) membership.

CommentCategory	Mining
Comment	Chapter three lacks information that quantifies the impacts of historic mining on aquatic resources, wildlife, vegetation, and soils. Similarly, chapter four lacks information that quantifies the impacts of future mining on resources and whether impacts will result in mine areas being designated as state or CERCLA clean-up areas. The reader should be directed to sections on other resources if this information can be found there. Page 3-91 should identify the mine operations where selenium levels were detected above regulatory levels.
Response	The impacts of historic mining (non-phosphate) are generally negligible. The State of Idaho Department of Lands completed an inventory of abandoned mines in the Caribou Mountain area. All of the identified mines in that area with current openings are located on patented (private) mining claims on Caribou Mountain. Very few abandoned mines (non-phosphate) are present on the Forest, and inventory information present for them is somewhat limited. Because open mine shafts and adits could pose a potential safety risk to the inquisitive public, the disclosure of the locations of those features in the Forest Plan is not deemed advisable. The inventory information is available in Forest Service records. Other than the potential physical hazards associated with open adits or shafts, no known significant environmental problems exist at any of these abandoned mine sites. Most all of these abandoned mines on the Forest are nothing more than very small prospects with negligible impacts. The general calcarious nature of almost all rock units on the Forest essentially eliminates the potential for ARD. Only one of the known abandoned mines on the Forest is known to discharge water (very minor amount and then only seasonally); this adit and mine are in limestone, so acid drainage is not a problem. Because of the small nature of these prospects, on a regional basis, the priority for abandoned site reclamation on the Caribou NF is low. The larger abandoned (non-phosphate) mine workings are generally very old hydraulic or placer operations in the Caribou Mountain vicinity, where the area has essentially revegetated (reclaimed) itself. Workings in these areas are not bedrock in nature, dealing with the alluvial sediments on the surface, so again ARD is not a concern. We are not aware of any association between the perlite deposits on the Forest and asbestos. No issues of confusion with vermiculite and perlite and the possible link with asbestos have been identified. Closing a stream or drainage to the State of Idaho one-stop recreational suction dredging permit system does not mean that 'recreational' or other prospecting cannot occur, only that a different type of permit is required. The other permits give the Forest greater control over when, where, and how the prospecting can occur, thus helping us reduce the potential impacts associated with this activity. This has been clarified in the Final EIS. Some general impacts from mining on the Forest are predicted in the EIS, where they can be reasonably determined; they are discussed in the various resource sections of the EIS. A delineation of all the possible impacts of future mining on the Forest is beyond the scope of this Forest Plan revision. Each mining proposal is subject to the environmental analysis (NEPA) process, where anticipated impacts from the proposed activity are disclosed. Essentially all phosphate mining operations have a selenium concern in one form or another (runoff, discharge, or in the vegetation/soils). These concerns for selenium are being handled through the CERCLA process (for past and existing operations) or through Forest Plan revision Standards and Guidelines and site-specific NEPA for future proposals.

CommentCategory	DEIS
Comment	This forest plan EIS needs to be more focused on cumulative effects than direct effects. The EIS needs to evaluate for each resource of concern its current condition, and for those resources outside the historical range of variability (HRV), describe past conditions and what has transpired to move the resource outside of HRV. The alternatives should be focused on describing how resources will be managed differently to achieve desired future conditions.
Response	The cumulative effects sections for all issues has been augmented using the process recommended by the Council on Environmental Quality. With an action at this scale, many of the direct effects are, indeed, cumulative effects since they cover the entire forest and very long time frames (100 years). Effects of past actions and current conditions are discussed by Issue in Chapter 3. Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such actions." (40CFR1508.7). Cumulative effects must be evaluated along with direct and indirect effects of each alternative. Generally, cumulative effects are considered on a larger scale than the direct and indirect effects. They describe a larger picture across a longer time frame. When analyzing cumulative effects, different temporal and spatial scales are used than for direct and indirect effects. These scales of analysis extend only to where effects can actually be measured (EPA 1997). In the case of Forest planning, the effects analysis "should consider trends and sustainability in the long term while direct impacts are considered less" (EPA letter, April 6, 2001). In the Forest Plan EIS many of the direct and indirect effects are, in fact, cumulative effects due to the large scale (over 1 million acres) and long time frame, most generally considered as the ten-year planning period. For instance, watershed and riparian effects include impacts and activities on private, state, and BLM lands expected to occur over the ten-year plan period. Cumulative effects analysis involves assumptions and uncertainties while providing the opportunity to evaluate future Forest management options in the context of other developments in the planning analysis area. A study of activities on adjacent federal, state, and private land was conducted in 2000 and 2001 (See Project File, Caribou Adjacency Analysis). This study included discussions with local, state, and federal government agencies and other interested stakeholders and was used to identify important future actions and to help determine the scope of the cumulative effects analysis. Activities that could be additive or stressors that could be interactive with proposed alternatives in the EIS were identified. In addition, information from "An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins" was reviewed as part of this process. Although this latter report did not include portions of the Caribou National Forest, it was useful as a resource for regional issues and concerns. The FEIS includes discussions on the effects and outcomes on resource programs decades into the future. Where direct and indirect effects analysis does not adequately disclose cumulative effects, the FEIS contains an augmented discussion under the subheading "Cumulative Effects" in Chapter 4. Cumulative effects are discussed only for those resources impacted by the alternatives.
CommentCategory	Mining
Comment	EPA is pleased that the Forest Plan contains guidance for the reclamation of mined and drastically disturbed lands. Standards and guidelines prescribe monitoring of vegetation and water resources during the post-mining period. The Forest Plan should also prescribe mining of these resources during the pre-mining and mining periods to establish baseline information and rehabilitation goals and ensure that mining activities do not result in a violation of environmental standards.
Response	Monitoring to establish baseline information is required for all large mining operations, as is monitoring while mining is occurring, and after mining has ended.

CommentCategory	DEIS
Comment	Much of the controversy that surrounds a timber sale is not the sale itself but is driven by the cumulative impacts of all activities, federal and otherwise, that has happened and will happen in that forest and, indeed, across the region. A well written Forest Plan EIS which describes the "state of the forest" covering points such as those listed above, would help diffuse the controversy on the site-specific EISs.
Response	We believe the many documents associated with the Revision, including the AMS through the Final EIS, does provide the state-of-the-forest picture. Cumulative effects analyses have been augmented in the Final EIS to provide more disclosure and a better foundation for site-specific projects. Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such actions." (40CFR1508.7). Cumulative effects must be evaluated along with direct and indirect effects of each alternative. Generally, cumulative effects are considered on a larger scale than the direct and indirect effects. They describe a larger picture across a longer time frame. When analyzing cumulative effects, different temporal and spatial scales are used than for direct and indirect effects. These scales of analysis extend only to where effects can actually be measured (EPA 1997). In the case of Forest planning, the effects analysis "should consider trends and sustainability in the long term while direct impacts are considered less" (EPA letter, April 6, 2001). In the Forest Plan EIS many of the direct and indirect effects are, in fact, cumulative effects due to the large scale (over 1 million acres) and long time frame, most generally considered as the ten-year planning period. For instance, watershed and riparian effects include impacts and activities on private, state, and BLM lands expected to occur over the ten-year plan period. Cumulative effects analysis involves assumptions and uncertainties while providing the opportunity to evaluate future Forest management options in the context of other developments in the planning analysis area. A study of activities on adjacent federal, state, and private land was conducted in 2000 and 2001 (See Project File, Caribou Adjacency Analysis). This study included discussions with local, state, and federal government agencies and other interested stakeholders and was used to identify important future actions and to help determine the scope of the cumulative effects analysis. Activities that could be additive or stressors that could be interactive with proposed alternatives in the EIS were identified. In addition, information from "An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins" was reviewed as part of this process. Although this latter report did not include portions of the Caribou National Forest, it was useful as a resource for regional issues and concerns. The FEIS includes discussions on the effects and outcomes on resource programs decades into the future. Where direct and indirect effects analysis does not adequately disclose cumulative effects, the FEIS contains an augmented discussion under the subheading "Cumulative Effects" in Chapter 4. Cumulative effects are discussed only for those resources impacted by the alternatives.
CommentCategory	Alternatives
Comment	The differences among the alternatives are described narratively with a theme such as wilderness, restoration, wilderness, recreation, etc. However, it is difficult to tell what specifically is occurring under each alternative that justifies the label.
Response	The themes for each alternative are a very "broad brush" description of the direction. In Chapter 2, the Management Direction Components are compared in table format at the end of the chapter. This table displays the range of deisred future conditions for each alternative. Each alternative has a set of desired future conditions, but they are not the same for each alternatve. A review of this table should provide the commentor with more information about the differences between each of the alternatives in terms of management direction and how quickly each alternative is expected to achieve its range of desired future conditions.

CommentCategory	Plan
Comment	Objective one is likely out of compliance with the CWA and ESA. This objective should be rewritten as, "The Forest will annually coordinate with the Idaho Department of Environmental Quality, the U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service, and the Idaho Department of Water Resources to update and verify recreational placer dredging regulations and restrictions, identify the areas of operations and the level of activity for recreational placer dredgers, assess the cumulative effects of these operations, and ensure compliance with section 313 of the CWA and section 7 of the ESA as well as in compliance with any applicable stream channel alteration permit."
Response	Objective one addresses the coordination with the Idaho Department of Water Resources concerning which waters are open or closed to their "One-stop Permit" for recreational suction dredging. This coordination is not intended to cover the above concerns with the CWA and ESA. Currently all known gold bearing streams on the Forest are closed to the one-stop permitting system because of the lack of Forest Service control and lack of State enforcement for such permits. It is anticipated that these recommended closures will continue through the planning period.
CommentCategory	Timber
Comment	Is there a way for the Forest Plan to encourage the use of horse logging techniques? While we understand goals likely cannot be met solely through the use of horse logging, it can contribute to the overall goals while providing jobs for the local economy with minimal impact to the environment.
Response	Opportunities for this type of logging often arise on the Forest. Contacting the individual Ranger District timber personnel or District Ranger is the best method to promote the use of specific tools, such as horse logging. District Rangers are responsible for small log hauling projects, which would be best suited for horse logging, such as around campgrounds, or other special use areas. Contact our Ranger Districts and ask them to put you or other interested individuals on their project mailing list.

CommentCategory	Mining
Comment	The EIS lacks information that would show how mining operations will prevent further amounts of selenium from entering the environment.
Response	Selenium discharges for past and present mining operations are being handled under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authorities and are outside the scope of this Forest Plan Revision. Past mining and reclamation practices used in phosphate mining in southeast Idaho created undesirable effects. Changes have been and are being made to those practices. We do not have all the answers yet, but we are attempting to do what we can to prevent similar situations in the future. Clean Water Act and other State and Federal standards are required of the mine operators. Precisely how those standards are to be met is up to the mining industry, with overview by the Federal and State regulatory agencies. The Plan contains extensive direction for management of mining operations on the Forest. The first Desired Future Condition states that "mineral resources are available, consistent with other resources." Two of the forest-wide goals for the minerals program are to allow "mineral resource development using state of the art practices for surface resource protection and reclamation..." and to administer mining activities "to prevent the release of hazardous substances in excess of established state and/or federal standards." Other direction includes designing actions to reclaim to pre-disturbance conditions and to eliminate or minimize exposure to hazardous substances. The Plan has about two pages of standards and guidelines pertaining to administration and reclamation of Drastically Disturbed Lands (Plan, Chapter 3, Physical Elements, Minerals and Geology). In addition to forest-wide guidance, Prescription 8.2.2 (Phosphate Mine Areas) contains direction specific to phosphate mining. During the site-specific environmental analyses done for each mining proposal, additional mitigation will likely be identified. These, in conjunction with Plan direction, will provide adequate mitigation measures to reduce or eliminate impacts to Forest resources. As time progresses and the results of monitoring are evaluated, necessary changes to Forest Plan standards will be made. All phosphate mining operations are bonded to ensure the disturbed lands are reclaimed to the pre-determined productive post-mining land uses. "Adaptive management" is intended to use the latest science, site-specific analyses, extensive monitoring and evaluation information, and Forest Plan direction to find and implement the most environmentally responsible mining and reclamation practices. As mining/reclamation practices are tested and proven to be effective at controlling dissolved solid concentrations in water at or leaving mine sites, future mine/reclamation plans will use those proven practices in their mine development. Site-specific environmental analyses will be required at all proposed (future) mining operations. Using the best site-specific information available, and the standards and guidelines in the Forest Plan, sound decisions will be made concerning mining operations. Some of the "mitigation measures" or "standards" proposed by outside interests have not yet been tested, monitored and proven effective. One such untested proposal is to have complete pit backfill. However, as documented in the Final EIS for the Dry Valley Mine - South Extension Project (completed in 2000), the selenium concentrations in the surface and ground water leaving the mine site were projected to be greater with complete pit backfill than with other alternatives. To incorporate such measures (like complete pit backfill) as "standards" in the Forest Plan before they have been "proven to be effective" through implementation, monitoring and evaluation, would be irresponsible, and could even pose greater risks to the environment.
CommentCategory	DEIS
Comment	Based on our review, we have rated the draft EIS, EC-2, Environmental Concerns, Insufficient Information. Enclosed is an explanation of the EPA rating system. This rating and a summary of the comments will be published in the Federal Register. The EIS is weak in a number of areas.
Response	Thank you for your comments. Your individual comments are responded to both in the FEIS and in this Appendix.

CommentCategory	Alternatives
Comment	In the discussion on the Timber Sale Program, Alternatives 6 and 7 both seem to say that if logging is the tool of choice to restore PFC, any commercial logs gathered in the process will simply be a " by-product" of the restoration efforts and not the primary purpose and need of the project. The difference then, between Alternatives 6 and 7, seem to be that more land (wilderness and inventoried roadless areas) will be deemed unavailable to active restoration efforts (i.e., logging) under Alternative 6. In the remaining area, logging would be used only when no excessive damage would be done to other forest resources such as wildlife habitat, old growth forests, water quality, and recreation. But by stating this in Alternative 6 and not in Alternative 7, the reader is left wondering if there is a difference in how logging will be conducted under the two alternatives. Is excessive damage to be allowed under Alternative 7 since it is silent on this aspect? There may be no differences in how logging will be conducted, but because of different wording the reader is uncertain.
Response	The conduct of on-the-ground logging activities will be the same under all alternatives. Site-specific environmental analysis will be done for each proposed logging project area, and a project alternative including required mitigation, selected by the appropriate line officer. A contract, composed of over 100 standard and special provisions, tailored to the specific project alternative, will then be developed to accomplish the selected alternative on the ground, and auctioned to the logging industry. This contract will be administered for contractor and government compliance by Forest Service personnel. BP
CommentCategory	Livestock grazing
Comment	It is well known that grazing is a significant source of environmental impacts. Indeed the EIS on page 3-80 briefly acknowledges these issues. Yet the EIS focuses solely on the effects of the forest plan on grazing and very little on the effects of grazing on the environment. The final EIS needs to describe in the Affected Environment section how grazing has impacted the landscape such as water quality, wildlife, and vegetation. Then in the Environmental Consequences section the EIS needs to discuss the impacts the alternatives will have on the environment. Please review our earlier comments on Cumulative Effects which is applicable to the effects analysis of grazing on the environment.
Response	In Chapter 4 – Issue 4, Livestock Grazing, Section "Effects of Forage Utilization Standards in Livestock Grazing" the factors that can effect livestock grazing and their interrelationships are explained. Grazing effects are dependent on so many variable that they must be addressed at a site-specific level and past use considered. Effects common to all alternatives and effects that vary by alternative are also described in this section. The effects of livestock grazing on water quality and wildlife can be found in those sections of Chapter 4.
CommentCategory	Noxious Weeds
Comment	Moreover, we would like to see more discussion on other prevention strategies, such as promoting revegetation with native plant species. In addition to an aggressive prevention program, a fully integrated pest management strategy to noxious weed control must include an education program that would provide the greatest long-term protection of vegetative community integrity. We recommend that the Caribou National Forest emphasize education and cooperation with recreation user groups and inform and/or educate other people that may be potentially affected by any herbicide or insecticide application, including but not limited to workers, campers, hikers, fishers, and hunters.
Response	We agree that education is critical to getting control of the weed problem. The Caribou-Targhee National Forest Noxious Weed Strategy includes an action item for education. In addition, two CWMA's cover the Caribou Forest and education is a strong component of their activity.
CommentCategory	Fire Management
Comment	This EIS should discuss the Forest Service's Cohesive Strategy for Protecting People and Sustaining Resources in Fire-Adapted Ecosystems, the recent budget increase to carry out more prescribed fires in the rural/urban interface, and what this means for the Caribou National Forest.
Response	This discussion has been added to the FEIS in the Fire Management section in Chapter 3.

CommentCategory	Mining
Comment	The EIS should more explicitly state how the Forest Service will resolve conflicts between mineral exploration and development and other resource use. We are extremely concerned about impacts to aquatic resources and rehabilitation due to our responsibilities under the CWA and CERCLA. The EIS should include important policies and court cases in this discussion that provide direction to the Forest Service in this matter. Finally, the EIS should add a discussion of the legal discretion that the Forest Service has in granting mining permits. The draft EIS delineates the jurisdictions of the Forest Service and the Bureau of Land Management in approving plans of operation. The EIS should also discuss how the Forest proposes to balance mineral development and exploration with the protection and restoration of environmental resources.
Response	The resolution of conflicts between mining and other resources is a very site-specific situation, based upon site-specific proposals. CERCLA action is outside the scope and authority of the Revised Forest Plan (See Chapter 3, Issue 5, of the EIS); however, Forest Plan Standards and Guidelines will be reviewed and considered for inclusion in the requirements for site remediation. As discussed in the EIS, the Forest Service does not grant mining permits for phosphate operations; the Bureau of Land Management does. The Standards and Guidelines in the Revised Forest Plan provide direction on mineral development and reclamation. Additional mitigation measures and conditions of approval for any proposed mining operation are also developed during the site-specific environmental analysis (NEPA) process to help ensure adequate protection for other Forest resources. During the development of site-specific proposals, issues, concerns, and project alternatives are considered. This is the most appropriate scale for potential conflict resolution.
CommentCategory	Alternatives
Comment	We recommend a careful review of the descriptions for each alternative to ensure consistent wording where actions are the same. Where actions are different emphasize that difference with different wording and additional explanation. Or have a section which discusses the differences among the alternatives.
Response	The themes for each alternative are a very "broad brush" description of the direction. In Chapter 2, the Management Direction Components are compared in table format at the end of the chapter. This table displays the range of deisred future conditions for each alternative. Each alternative has a set of desired future conditions, but they are not the same for each alternatve. A review of this table should provide the commentor with more information about the differences between each of the alternatives in terms of management direction and how quickly each alternative is expected to achieve its range of desired future conditions.
CommentCategory	Air Quality
Comment	Explain why Pocatello and Chubbuck have been designated as a nonattainment areas for particulate matter. There are gradations of poor air quality that cannot be discerned from a nonattainment label. To better describe the affected environment, characterize 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. These two nonattainment areas along with the wilderness areas are what we would consider as sensitive receptors that the Caribou National Forest should avoid impacting with smoke when conducting prescribed burns.
Response	Discussion related to the Pocatello and Chubbuck, Idaho nonattainment areas and what is being done to correct the problem is presented in Chapter 3 of the FEIS in the Air Quality section. Frequency for exceeding National Ambient Air Quality Standards is three times in 1999 and since that time no exceedances have occurred (personal communications with Tiffany Floyd, DEQ). Additional information has been added to the FEIS concerning source of pollution for these nonattainment areas. Also these two nonattainment areas and wilderness areas within 200 kilometers will be identified as sensitive receptors in the FEIS and will be identified and analyzed for smoke impacts at the site-specific level when using prescribed fire treatments.

CommentCategory	Noxious Weeds
Comment	According to the draft EIS (pp 3-204 -- 3-205), the expansion of noxious weeks is out-pacing the existing containment and control efforts for some species of weeds, posing a potential risk for loss of biological diversity. To address this issue, the Caribou National Forest plans to revise the current direction for management of noxious weeds. We believe the Revised Caribou Land and Resource Management Plan should incorporate the use of integrated pest management methods to minimize the adverse effects of herbicides and insecticides to human health and the environment. We agree with the program outlined in the Caribou Draft Revised Forest Plan and ask that our suggestions and comments be addressed and incorporated into the final Forest Plan. The following comments are in regard to the Forest Plan.
Response	IPM has been part of the control efforts for many years. It was addressed in the old plan and reiterated in a 1996 EA for treatment of noxious weeds. Currently the Forest uses herbicides, biological control, and sheep grazing for the majority of our efforts. In the summer of 2002 the Highlands CWMA, of which the Forest is a member, sponsored a "Bag of Woad" day. Participants were paid for turning in bags of Dyer's Woad.
CommentCategory	Alternatives
Comment	Another example is that Alternative 7 allows restoration efforts in unsuited lands but only to achieve ecological objectives. Is there a difference in meaning between achieving ecological objectives under Alternative 6 and restoring PFC under Alternative 7? Also, we presume unsuited lands are wilderness and roadless areas. If not, please clarify the meaning of unsuited lands.
Response	Restoration efforts on all lands, regardless of alternative, are designed to meet or move towards Desired Future Conditions tied to historic range of variability. Concerning scheduled commercial timber production, unsuited lands fall into two categories: Category #1 - Lands not suited for scheduled commercial timber production because a) it is not forest land, b) technology is not available to ensure timber production form the land without irreversible resource damage, c) there exist restocking problems, d) the land has been withdrawn from timber production by an Act of Congress, Secretary of Agriculture or Chief of the Forest Service, and Category #2 - Lands identified as not appropriate for scheduled commercial timber production because a) the land is proposed for resource uses that preclude timber production, such as wilderness, b) Other management objectives limit timber production where management requirements in 36 CFR 219.27 cannot be met, c) the lands are not cost-efficient in meeting forest objectives. Salvage harvesting or harvest to protect other multiple-use values or activities that meet other objectives on such lands, is allowed if the Forest Plan establishes that such actions are appropriate.
CommentCategory	Mining
Comment	The EIS should also identify waste rock segregation and the placement of clean cover material over seleniferous material as standard practices that reduce selenium mobility and exposure. [We] agree that issues associated with seleniferous contamination need to be addressed in the Forest Plan revision. More specific detail should be included in the EIS to provide context for understanding future trends in the phosphate mining industry in southeast Idaho.
Response	Standards and Guidelines included in the Revised Forest Plan, coupled with Best Management Practices and the mitigation measures and conditions of approval identified in the site-specific environmental analyses completed for each proposed mining operation, will reduce or eliminate the potential exposure of selenium to the environment. Mine Plan approvals sice the discovery of the selenium problem incorporate such practices as placement of clean waste rock over seleniferous material and a number of other practices to minimize selenium contamination. Future trends in the phosphate mining industry in southeast Idaho are not possible to accurately predict and are outside the scope of the Revised Forest Plan. However, reclamation bonds are required prior to the beginning of mining to help ensure that the identified reclamation is completed, regardless of the financial standing of the mining company or when the mine is closed or mining terminated.

CommentCategory	Alternatives
Comment	The differences among the alternatives are sometimes unclear. Some of this is due to different wording used to describe the themes and the ten resource conditions or issues discussed under each alternative. For example, the themes for Alternatives 2, 4, 6, and 7 each propose different goals but they seem to be saying the same thing: To manage forest resources to attain a range of DFCs (Alt-2) to restore ecosystem processes that function properly in the long term (Alt-4) to emphasize ecological enhancement and restoration on the forest (Alt-6) to attain the DFC (Alt-7) Since they seem to mean the same thing, it is not clear if there is any difference among the goals.
Response	The themes for each alternative are a very "broad brush" description of the direction. In Chapter 2, the Management Direction Components are compared in table format at the end of the chapter. This table displays the range of deisred future conditions for each alternative. Each alternative has a set of desired future conditions, but they are not the same for each alternatve. A review of this table should provide the commentor with more information about the differences between each of the alternatives in terms of management direction and how quickly each alternative is expected to achieve its range of desired future conditions.
CommentCategory	Mining
Comment	The discussion of past and existing gold mining on pages 3-93 and 3-94 should include survey results for abandoned and existing mines with a map of mine locations, characterization of resource impacts from past and existing mining, and plans for rehabilitation of abandoned mine lands with an indication of priority sites and the cost of rehabilitation. The EIS should also mention any significant environmental problems found at specific sites, such as ARD. We recommend that the EIS on page 3-94 mention whether there are or are not geologic associations between perlite and asbestos because of public fears related to vermiculite mining in northwest Montana. Perlite and vermiculite are used for similar purposes and association between asbestos and perlite might be made by the reader. The EIS should explain how impacts from recreational gold prospecting would occur if McCoy Creek and its tributaries are to be closed to recreational mining. Page 3-93 of the draft EIS states that McCoy Creek and Tincup Creek and their tributaries are currently closed to the Idaho Department of Water Resources one-stop permit system. However, page 4-97 discusses possible "recreational" gold prospecting and states that the McCoy Creek drainage is likely to be the only stream system impacted by these impacted. We do not understand this inconsistency.
Response	The State of Idaho Department of Lands completed an inventory of abandoned mines in the Caribou Mountain area. All of the identified mines in that area with current openings are located on patented (private) mining claims on Caribou Mountain. Very few abandoned mines (non-phosphate) are present on the Forest, and inventory information present for them is somewhat limited. Because open mine shafts and adits could pose a potential safety risk to the inquisitive public, the disclosure of the locations of those features in the Forest Plan is not deemed advisable. The inventory information is available in Forest Service records. Other than the potential physical hazards associated with open adits or shafts, no known significant environmental problems exist at any of these abandoned mine sites. Most all of these abandoned mines on the Forest are nothing more than very small prospects with negligible impacts. The general calcarious nature of almost all rock units on the Forest essentially eliminates the potential for ARD. Only one of the known abandoned mines on the Forest is known to discharge water (very minor amount and then only seasonally); this adit and mine are in limestone, so acid drainage is not a problem. Because of the small nature of these prospects, on a regional basis, the priority for abandoned site reclamation on the Caribou NF is low. The larger abandoned (non-phosphate) mine workings are generally very old hydraulic or placer operations in the Caribou Mountain vicinity, where the area has essentially revegetated (reclaimed) itself. Workings in these areas are not bedrock in nature, dealing with the alluvial sediments on the surface, so again ARD is not a concern. We are not aware of any association between the perlite deposits on the Forest and asbestos. No issues of confusion with vermiculite and perlite and the possible link with asbestos have been identified. Closing a stream or drainage to the State of Idaho one-stop recreational suction dredging permit system does not mean that 'recreational' or other prospecting cannot occur, only that a different type of permit is required. The other permits give the Forest greater control over when, where, and how the prospecting can occur, thus helping us reduce the potential impacts associated with this activity. This has been clarified in the Final EIS.

CommentCategory	Water Quality
Comment	According to Table 3.35 there are 19 streams listed as impaired under Section 303(d) of the Clean Water Act. This EIS needs to discuss what activities have occurred on and off Forest Service land to cause these streams to be degraded and what would be done under each of the alternatives to restore these streams. Table 3.35 should be expanded to included the pollutant for which each stream is listed. The discussion in the EIS on page 3-122 does generically acknowledge problems that have contributed to degradation of these streams. However, we believe specific discussion needs to be provided for each stream as to the causes of impairment. We believe that the best approach is to discuss the Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters. The EIS should explain the purpose and intent of the 303(d) Protocol, what it calls for land managers to do, and how the 303(d) Protocol will be applied.
Response	The State of Idaho has identified streams listed as impaired under Section 303(d) of the Clean Water Act. They have identified the type of impairment (i.e. sediment, temperature, etc.), but they do not identify the source (e.g. roads, grazing, etc.). TMDLs have been established for the Portneuf and Blackfoot River watersheds. Once TMDLs have been established, Implementation Plans can be written to attempt to identify the source of pollutants and what actions will be taken to bring water quality back to supporting beneficial uses. Due dates for completing the Implementation Plans are after the Final Plan and supporting EIS are to be completed. TMDLs for the Bear River watershed have not been completed to date, and Implementation Plans for those waters will be completed some time in the future. The Forest Service/Bureau of Land Management Protocol for Addressing 303(d) waters has been replaced in Forest Service Regions 1 and 4 by direction contained in the R1/R4 correspondence dated April 26, 2002. This process guidance represents an advisable course of action, but is not considered process direction, which is equivalent to policy. Thus, the advice contained in the enclosure is strongly encouraged, but not mandatory (USFS 2002).
CommentCategory	Plan
Comment	Standard one states that, "Pre-mining and post-mining water quality and aquatic habitat monitoring (both surface and groundwater) will occur on all mining sites as described in current protocols," but does not identify, state, or summarize those protocols and does not specify who pays for and conducts these monitoring efforts. The EIS should contain information that familiarizes the reader with the referenced monitoring protocols and states who will pay for and conduct monitoring efforts.
Response	Standard one has been reworded (See Forest-wide Guidance, Chapter 3 in the Forest Plan) based on your comment.

☆ U.S. GOVERNMENT PRINTING OFFICE: 2003 — 573-084 / 42134 Region No. 8

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